

penrose academy

Annual Safety and Security Report 2020

13402 North Scottsdale Rd, Suite B160 Scottsdale, AZ 85254

P:480.222.9540 F: 480.222.9450

www.penrose.edu

SAFETY AND SECURITY REPORTING

The campus security authorities for Penrose Academy are Nikki Parcels, Sr. Director of Education and Student Services, and Jill Kohler, President and Founder of Penrose Academy.

The “Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act” is a federal law that requires institutions of higher education in the United States to disclose campus security information including crime statistics for the campus and surrounding areas. For more information contact either the Campus Security Advisor, Jill Kohler at (480)222.9540 or the Office of Civil Rights. Toll Free: (800)368.1019 [HHS.gov](https://www.hhs.gov).

To comply with these regulations, we are providing the information as follows:

- Crime and fire statistics report compiled from Phoenix Police Department for years 2016 – 2018.
- Disclosure of Penrose Academy's Security Policy
- Guidance on prompt crime reporting

This information is available:

- Electronically on Penrose Academy's website, www.penrose.edu.
- Electronically on Penrose Academy's App.
- In paper form, available upon request, in the Student Services office on campus

SECURITY POLICY

Penrose Academy prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. Students, parents and staff may access this report in full by contacting the Phoenix Police Department. A complete copy of this report is also available online at penrose.edu.

Campus crime, arrest and referral statistics include those reported to the Phoenix Police Department and the Penrose Academy designated campus officials.

Please note that Penrose Academy has one campus, located at 13402 N. Scottsdale Road, Suite B160, Scottsdale, AZ 85254, with no campus housing nor satellite locations, nor any public property that is immediately adjacent to, or accessible from, our campus.

Penrose Academy does not have a campus police staff, nor do the campus security officials have any arresting authority. Local law enforcement has the arresting authority on Penrose Academy's Campus. Upon written request, Penrose Academy will disclose to the alleged victim of any crime of violence or non-forcible sex offense, the results of any disciplinary hearing conducted by Penrose Academy against a student who is the alleged perpetrator of such crime or offense.

Each year, by October 1, Penrose Academy will compile an Annual Safety and Security Report that includes fire and crime statistics from the incident and crime reports given to the campus security authorities. The crime statistics will be sent to the U.S. Department of Education each year upon receipt of the letter requesting the crime reports. This information will be uploaded via <http://surveys.ope.ed.gov/security> by the Sr. Director of Education and Student Services. Crime statistics from the area surrounding Penrose Academy (Thunderbird Rd to Sweetwater Ave, 68th St. to Scottsdale Rd) will also be requested from the Phoenix Police Department and will be disclosed in the annual crime report.

Each year, a message will be sent to all enrolled students and staff via the Penrose App by October 1, giving the website address to access this updated report. New faculty and staff members and students will be informed of this report during their new hire orientation or student orientation and directed to the Penrose Academy App. and/or website to review this report.

TO REPORT A CRIME

The campus security authorities for Penrose Academy are Nicole Parcels, Sr. Director of Education and Student Services, and Jill Kohler, President of Penrose Academy. Contact the campus security authorities immediately of a crime by calling (480) 222.9540. If unavailable by phone, please email compliance@penrose.edu, nikki@penrose.edu or jill@penrose.edu (only in non-emergency situations). The campus security authorities do not have arresting authority. For emergencies, dial 9-1-1.

Every crime that is reported to the campus security authorities will be investigated. Please note that due to the public nature of police reports, Penrose Academy cannot ensure the complete confidentiality of any crime report. All incident report is reviewed by the President.

Student, faculty and administrative staff, guests and community members are encouraged to report all crimes and public safety related incidents to the above named campus security staff. New students and staff are informed of such procedures and crime prevention and safety tips during regular orientations.

STUDENT GUIDELINES

Through meaningful educational experiences, Penrose Academy educates, empowers and connects our students to their professional goals. To achieve that goal, it is our responsibility to maintain an environment that is safe, relevant, educational and consistent with our mission.

Penrose Academy has established policies to ensure the safety and well-being of this academy and to respond promptly and accurately to actions that are contrary to our purpose and mission. Penrose Academy complies with all local, state and federal laws that apply.

When student conduct or behavior adversely impacts Penrose Academy's community, the educational programs are jeopardized, and all are at risk. Behavior that is in violation of local, state or federal law will not be tolerated. In these cases, Penrose Academy does not provide protection from prosecution by law enforcement agencies. As stated in the Enrollment Agreement, students acknowledge and agree to be bound by the terms and conditions defined in the Student Catalog. A student failing to comply with the rules and regulations set forth in the Student Catalog may face termination prior to completion of their program. Should any of the guidelines not be adhered to, the student may not benefit from the program as intended. Proper student conduct is important for the culture of the school, as it is our desire to lead everyone toward success.

STUDENT CODE OF CONDUCT POLICY

Penrose Academy does not tolerate any student misconduct including but not limited to: arrogance, rudeness, insensitivity to others, refusal to participate in student learning, refusal to perform services, refusal to take a walk-in guest, refusal to retail products or any other negative, anti-social, unprofessional behavior as determined by school ownership. Bullying is defined by the state of Arizona as any written, verbal or physical act/electronic communication, including the use of social media that is intended to harm a student is considered student misconduct and will not be tolerated. An investigation and/or termination may result from excessively bad behavior.

No Theft	No Cheating	No Smoking
No Weapons	No Stealing	No Tobacco
No Bullying	No Drugs	No Nicotine
No Cyberbullying	No Alcohol	No Vaping

SAFETY, SANITATION AND INFECTION CONTROL

Penrose Academy follows an Emergency Preparedness Plan and Safety, Sanitation and Infection Control (SSIC) is a significant component of it. Our goal is to educate our community, especially our students about the diseases, infections and threats not only throughout their career in the professional beauty industry, but also on our 20,000 square foot campus.

Diseases including MRSA, Hepatitis B and C, HIV, AIDS, Tuberculosis and COVID-19 and many more and they threaten us all. To keep our community safe, we have developed and continually enhance our SSIC policies. These policies contribute to the safety and wellbeing of the Penrose community.

CLEANING & DISINFECTING PRACTICES

- Wear disposable gloves when cleaning and disinfecting (using CDC recommended disinfectants).
- Practice routine cleaning especially focusing on high touch surfaces including tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, ipads, mobile phones, etc.
- Provide hand sanitizer throughout the campus, especially at the front desk.
- Add 15 additional minutes to salon appointments.
- Enforce existing 15 minutes between spa appointments.
- Use appropriate personal protective gear (PPG) when cleaning.
- Additional steps should be added as we review and improve procedures and protocols.

BEHAVIORAL PRACTICES

- Avoid touching your eyes, nose, and mouth.
- Hand-wash with soapy, warm water for 20+ seconds often, especially after contact with hard surfaces and others.
- Wear clean clothes each day to campus.
- Cover coughs and sneezes with a tissue or inside of the elbow.
- No eating on salon floor or spa. Drinks must have lids.
- Stay home when sick.

TECHNOLOGY

- Launch Zenoti to allow for online booking.
- Continuously wipe down guest check in and out areas screens/ipads/devices.
- Attempt to achieve paperless environment.
- Attempt to eliminate pens at check out.

PERSONAL PROTECTIVE GEAR (PPG)

- Guests will be draped with capes.
- Gloves available upon request.
- Students can use disposable smocks if they choose; to be laundered after the guest.
- Students will continue to use neck strips.
- Change all PPG, such as gloves, gowns, drapes, linens and eye coverings between each guest.
- All used PPG items cleaned and disinfected or discarded in a closed container.
- Additional steps should be added as we review and improve procedures and protocols.

ADDITIONAL STEPS TO BE TAKEN ON CAMPUS:

- Training staff and faculty cleaning and other SSIC policies.
- Removal of all laminated documents
- If providing a pen, wipe it down after use.
- Discontinue use of printed receipts, email receipts only
- Discontinue use of "testers" and non-essential items: magazines, handouts, paper materials, etc.

SUBSTANCE ABUSE PREVENTION POLICY

Penrose Academy is committed to maintaining a Company free of substance abuse. No employee that performs work for Penrose Academy or student who is enrolled at Penrose Academy is allowed to consume, possess, sell, purchase, or be under the influence of alcohol or illegal drugs, as defined by federal law, on any property owned by or leased on behalf of Penrose Academy, or in any vehicle owned or leased on behalf of the Company or while on Company business.

The use of over-the-counter drugs and legally prescribed drugs is permitted as long as they are used in the manner for which they were prescribed and provided that such use does not hinder an employee's ability to safely perform his or her job or hinder a student's ability to safely perform his or her training. Employees should inform their department head if they believe their medication will impair their job performance, safety or the safety of others, or if they believe they need a reasonable accommodation when using such medication. Students should inform Student Services if they believe their medication will impair their training performance, safety or the safety of others, or if they believe they need a reasonable accommodation when using such medication.

Penrose Academy will not tolerate employees who report for work while impaired by the use of alcohol or drugs. All employees should report evidence of alcohol or drug abuse to their department head or the President / Founder immediately. In cases in which the use of alcohol or drugs creates an imminent threat to the safety of

persons or property, employees are required to report the violation. Failure to do so may result in disciplinary action, up to and including termination of employment.

Penrose Academy will not tolerate students who report to school while impaired by the use of alcohol or drugs. All students should report evidence of alcohol or drug abuse to the Student Services department immediately. In cases in which the use of alcohol or drugs creates an imminent threat to the safety of persons or property, students are required to report the violation. Failure to do so may result in disciplinary action, up to and including termination of enrollment.

As a part of our effort to maintain a campus free of substance abuse, Penrose Academy employees and students may be asked to submit to a medical examination and/or clinical testing for the presence of alcohol and/or drugs. Within the limits of federal, state, and local laws, Penrose Academy reserves the right to examine and test for drugs and alcohol at our discretion.

As a condition of employment and enrollment with Penrose Academy, employees and students must comply with this Drug & Alcohol Use Policy. Be advised that no part of the Drug & Alcohol Use Policy shall be construed to alter or amend the at-will employment relationship between Penrose Academy and its employees.

Employees and Students found in violation of this policy may be subject to disciplinary action, up to and including termination of employment.

Drug abuse can have a pervasive effect on an entire community. Understanding drug use risk factors and spreading the word through prevention programs is the best defense against drug abuse.

Drug abuse prevention has become an important first step in informing our staff, faculty and students about the dangers of addiction, prevention techniques and where to find recovery help if necessary.

The use of drugs and alcohol can cause numerous health problems and can lead to death. The effects to a person's health include respiratory failure, heart attack, overdose, acute intoxication and transmittable diseases such as Hepatitis C and AIDS. Thousands of deaths are caused each year by drug overdoses, allergic reactions to drugs, toxic combinations of drugs and alcohol poisoning.

Some drugs legally purchased at a pharmacy, whether they're prescribed by a doctor or bought over-the-counter (OTC), can be just as dangerous and impair your judgement. Look for warning labels or ask your pharmacist if you are in doubt about a drug's capacity for impairment.

Penrose Academy has a zero-tolerance policy for drugs and alcohol use. For the safety of Penrose Academy, students, staff, faculty and its guest's, the manufacture, distribution, dispense of, possession, use, sale, purchase, offer to buy/sell or use of alcohol, illegal drugs or related paraphernalia and the illegal use of drugs (including the misuse of prescription drugs) at Penrose Academy, on campus or while engaged in the course curriculum, is strictly prohibited.

Students, staff or faculty under the influence of nonprescription or prescription drugs (those that impair judgment, alertness, concentration or motor skills), alcohol, or any unknown substance (including before school, during school, on a field trip or at a Penrose Academy event) will be asked to leave the premises immediately. An investigation and termination proceedings may follow and may be subject to criminal prosecution. Penrose Academy further reserves the right to take any and all appropriate and lawful action necessary to enforce this substance abuse policy including, but not limited to, the inspection of school issued lockers, desks or other suspected areas of concealment, as well as personal property when the school has reasonable suspicion to believe the student, staff or faculty member has violated this policy. The use of a drug detection dog may also be used for searches.

Penrose Academy also prohibits such conduct during non-curriculum time to the extent that, in the judgment of Penrose Academy, it impairs a student's ability to progress through the curriculum, threatens the reputation and/or integrity of the school or violates the law.

Penrose Academy will refer violators to the authorities for prosecution consistent with local, state and federal law in accordance the Arizona Revised Statutes Title 13 Criminal Code, Chapter 34 Drug Offenses, Sections 3401 – 3421 which can be found online at www.azleg.state.az.us.

You may request a copy of Penrose Academy's Substance Abuse Policy and Prevention Plan from the Student Services office at any time for resources on prevention of substance abuse, this policy is also provided digitally for every student and posted on our student app.

The penalties for drug possession can vary and are dependent on the kind and quantity of drugs or substances in possession, previous criminal history, and whether your charges are simple possession, which is for personal use, or possession with the intent to sell.

Students and staff members who use prescription drugs should follow the prescribing physician's directions for use and all prescriptions are to be kept with the prescription bottle with name of person medication prescribed for. If use of a prescription drug may impair your performance or affect safety while performing course related services, you should notify your educator or immediate supervisor, so Penrose Academy can take appropriate action protect your safety and that of fellow students, coworkers and guests. Any student or staff member found in violation of this policy is subject to suspension or expulsion from the program.

Below are some examples of different charges that might be faced along with the penalties that could be faced.

- **Dangerous Drug** – Being charged with having a dangerous drug is a Class 4 felony. With no prior felony convictions and if the drug in possession was not meth or any kind of amphetamine, there is the possibility of being reduced to a Class 1 misdemeanor, along with a fine of at least \$2,000 or three times the value of the drugs in possession, whichever is the greater amount. Having no prior convictions, jailtime ranges from none to one-year, which could increase to up to 3.75 years having prior convictions.
- **Narcotics** – Possession of narcotics is a Class 4 felony. Having no prior convictions, charges might be reduced to a Class 1 misdemeanor, along with a fine of no less than \$2,000 or three times the value of the drugs in possession, whichever is greater. Having no prior convictions, jailtime ranges from none to a year and up to 15 years of imprisonment with having two prior convictions.
- **Marijuana** – Being caught with less than two pounds of marijuana is a Class 6 felony and if determined personal use, can be reduced to a misdemeanor. Producing the marijuana results in a Class 5 felony charge. If the marijuana in possession is for resale, this results in a Class 4 felony charge, facing a fine of no less than \$2,000 or three times the value of the marijuana in possession, whichever is the higher amount. With no prior convictions, jailtime ranges from none to up to a year in jail. Having prior convictions could increase to 3.75 years in jail.
- **DUI** - In Arizona, driving under the influence of drugs or alcohol is illegal for both adults and minors. Arizona has some of the strongest penalties for DUI. Jail time is mandatory for anyone convicted of DUI. Other sanctions can vary, depending on previous offenses and severity of current offense, which may include fines, mandatory ignition interlock devices be installed in vehicle, and alcohol/drug treatment.

If you or someone you know is struggling with drug or alcohol abuse, please call 1-877-335-HOPE (4673) for a referral or one of the treatment centers provided in the table below. Please note: Penrose Academy does not have a professional relationship with or endorse any of these treatment centers.

DRUG AND ALCOHOL TREATMENT FACILITIES:

FACILITY	STREET ADDRESS/WEB ADDRESS	PHONE
Desert Cove Recovery	6613 N Scottsdale Rd. Suite 200	833.924.2137
Pathfinders Scottsdale Drug & Alcohol Addiction	7600 East Redfield Road Scottsdale, AZ	866.414.0220
Cogue Recovery Center	4122 North 17th Street, Building A Phoenix, AZ 85016	877.437.6408
Continuum Recovery Center	3710 W Greenway Rd., Suite 104 Phoenix, AZ 85053	855.574.6260

Any student who violates this policy is subject to suspension or expulsion from the program. Any staff or faculty member who violates this policy is subject to sanctions leading up to or including termination.

SUBSTANCE ABUSE PREVENTION PLAN

Penrose Academy does not tolerate drug and alcohol use and distributes the Substance Abuse Prevention Policy to each student during the admissions process and to new employees, through the Employee Handbook. The most current policy is published on the Penrose App providing both students and employees instant access to view, email and print the policy. Once yearly, a message is sent directly to each student through the Penrose App and to each employee through an email, with the most current policy attached, inviting both students and employees to read and review the Substance Abuse Prevention Policy including steps guiding them to the location of the policy.

Penrose Academy also employs the use of a "Certified Narcotics Detection Team" including a private drug detection dog that may perform both announced and unannounced visits on campus including all classrooms,

salon and spa areas, offices, student and staff locker contents and any other areas on campus. Any detection of an illegal substance will be fully investigated.

The Student Catalog reads as follows:

"Drug abuse can have a pervasive effect on an entire community. Understanding drug use risk factors and spreading the word through prevention programs is the best defense against drug abuse.

Drug abuse prevention has become an important first step in informing our Staff, Faculty and Students about the dangers of addiction, prevention techniques and where to find recovery help if necessary.

The use of drugs and alcohol can cause numerous health problems and can lead to death. The effects to a person's health include respiratory failure, heart attack, overdose, acute intoxication and transmittable diseases such as Hepatitis C and AIDS. Thousands of deaths are caused each year by drug overdoses, allergic reactions to drugs, toxic combinations of drugs and alcohol poisoning.

Some drugs legally purchased at a pharmacy, whether they're prescribed by a doctor or bought over-the-counter (OTC), can be just as dangerous and impair your judgement. Look for warning labels or ask your pharmacist if you are in doubt about a drug's capacity for impairment.

Penrose Academy has a zero-tolerance policy for drugs and alcohol use. For the safety of Penrose Academy, Students, Staff, Faculty and its guest's, the manufacture, distribution, dispense of, possession, use, sale, purchase, offer to buy/sell or use of alcohol, illegal drugs or related paraphernalia and the illegal use of drugs (including the misuse of prescription drugs) at Penrose Academy, on campus or while engaged in the course curriculum, is strictly prohibited.

Students, Staff or faculty under the influence of nonprescription or prescription drugs (those that impair judgment, alertness, concentration or motor skills), alcohol, or any unknown substance (including before school, during school, on a field trip or at a Penrose Academy event) will be asked to leave the premises immediately. An investigation and termination proceedings may follow and may be subject to criminal prosecution. Penrose Academy further reserves the right to take any and all appropriate and lawful action necessary to enforce this substance abuse policy including, but not limited to, the inspection of school issued lockers, desks or other suspected areas of concealment, as well as personal property when the school has reasonable suspicion to believe the student, staff or faculty member has violated this policy. The use of a drug detection dog may also be used for searches.

Penrose Academy also prohibits such conduct during non-curriculum time to the extent that, in the judgment of Penrose Academy, it impairs a student's ability to progress through the curriculum, threatens the reputation and/or integrity of the school or violates the law.

Penrose Academy will refer violators to the authorities for prosecution consistent with local, state and federal law in accordance the Arizona Revised Statutes Title 13 Criminal Code, Chapter 34 Drug Offenses, Sections 3401 – 3421 which can be found online at www.azleg.state.az.us.

You may request a paper copy of Penrose Academy's Substance Abuse Prevention Policy from the Student Services department at any time for resources on prevention of or overcoming substance abuse and a description of different charges and penalties, associated with these offenses, that could be faced. This policy is also provided digitally for every student and posted on the Penrose App."

Paper copies are available upon request and are located in the Student Services office.

STUDENT CATALOG VIOLATIONS

A student's willingness to learn sets the foundation for education. Student Catalog Policy Violations are instances where a student's behavior is not consistent with the Penrose Academy Catalog. Below is the process by which such standard violations are handled:

- Student may receive a verbal warning or redirection by a Penrose Academy employee.
- Student may be suspended for a period of time.
- Student may be scheduled for a meeting with any department head or President for further action.
- Student may be terminated.
- If a student is terminated for a Student Catalog Policy Violation. The student will not be permitted to enter Penrose Academy premises. Upon termination, the student will be responsible for immediately returning all materials, publications and equipment advanced by Penrose Academy. The student will not be entitled to graduate.
- If a student is terminated under this provision, the student may file an appeal for reinstatement with the Board of Grievances as defined in this Student Catalog.

- If a student is terminated for gross misconduct, which refers to deliberately or willfully disregarding the standards of behavior expected and/or displays a behavior serious enough and possibly criminal, such as stealing, threats, cheating, attending school under the influence of alcohol or illegal drugs, insubordination or bullying, the termination is determined as final and an appeal will not be permitted.

SECURITY CAMERAS

There are video surveillance security cameras located throughout Penrose Academy for the safety of our students, staff, faculty and guests.

USE OF PHOTOGRAPHY AND VIDEOGRAPHY

Students at Penrose Academy give permission for Penrose Academy to use any student photos, pictures or renderings in all forms of advertising, pamphlets, brochures and catalogs for the benefit of Penrose Academy. They release Penrose Academy of all claims made, regarding the use of photos for the benefit of Penrose Academy. This release shall remain in effect even after graduation from Penrose Academy. Further, pictures or videos of Penrose Academy may not be taken without the consent of the Penrose Academy President.

VISITORS

Students, staff and faculty may not receive visitors during school hours unless approved by the President or Senior Directors, under special circumstances. This policy includes the student lounge, student patio and parking lot during breaks and lunch.

PARKING

Student parking is allowed in all uncovered spaces behind the building and in front of the building. Students must enter the front parking lot to access this parking area. Penrose Academy will notify students via the Penrose App with any parking updates. Students are recommended to drive no more than 5mph and to carefully enter and exit the lot. Any collisions or fender benders must be handled independently by students' individual insurance companies.

CAMPUS SEARCHES

To protect the safety and well-being of our students, campus searches may occur at any time and without notice. Searches may include student issued lockers, book bags or personal belongings in the case of suspected theft or wrongdoing. The use of a drug detection dog may also be used for searches. Those suspected of criminal activity will be turned over to the proper authorities.

ACCESS POLICY

During normal business hours, Penrose Academy is open to all students, staff, faculty, approved contractors and guests. During non-business hours, access to Penrose Academy is by key and security code via select staff members and janitorial contractor. In periods of extended closing, access to Penrose Academy will be granted to those issued a key, and who have obtained prior approval.

REGISTERED SEX OFFENDERS

Arizona requires offenders to register with their local Sheriff's Department based on their Arizona Risk Assessment score. Information can be found on the website www.azdps.gov/services/public/offender. Various free of charge search results can be obtained using information such as violator last name, the zip code for area of interest and a specific address with results for the surrounding three-square miles. A downloadable listing of sex offender information can be obtained for a fee at www.azdps.gov/services/public/offender. Arizona currently does not have any law against offenders seeking or obtaining employment or living near any educational institution.

HATE CRIMES

Penrose Academy does not condone violence or hate crimes of any kind. Penrose Academy strives to safeguard the rights of American citizens that are mandated by the Constitution of the United States, regardless of ethnicity, national origin, religion, gender, sexual identity, disability and political or religious beliefs.

TITLE IX

Title IX of the Education Amendments Act of 1972 is a federal law that states: "No person in the United States shall, based on sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.

Penrose Academy adheres to the specifications of Title IX. The Title IX Coordinator for Penrose Academy is the Sr. Director of Education and Student Services. The Title IX Deputy is Missy Conti, Assistant Director of Education.

VAWA

Congress passed the **Violence Against Women Act** of 1994 (VAWA 1994) as part of the Violent Crime Control and Law Enforcement Act of 1994. In recognition of the severity of the crimes associated with domestic violence, sexual assault and stalking.

PENROSE ACADEMY TITLE IX AND VAWA POLICY

Penrose Academy is committed to providing a work and school environment free of unlawful harassment or discrimination. Students and employees are required to take our mandatory Sexual Harassment, Sexual Violence, Sexual Assault, Sexual Abuse Awareness and Prevention Training. This training will occur during New Hire Orientation or New Student Orientation. The academy's policy prohibits harassment or discrimination based on race, religion, creed, color, national origin, ancestry, sex (including pregnancy, childbirth or related medical conditions), military or veteran status, physical or mental disability, medical condition, marital status, age, sexual orientation, gender, gender identity or expression, genetic information or any other basis protected by the federal, state or local law. Additionally, in accordance with Title IX of the Education Amendments of 1972 and The Violence Against Women Act of 1994 (VAWA) the academy prohibits discrimination based on sex, which includes sexual harassment and sexual violence, and the academy has jurisdiction over Title IX complaints.

Sexual harassment means conduct on the basis of sex that satisfies one or more of the following:

- (1) An employee of the academy conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct.
- (2) Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the academy's education program or activity; or "Sexual assault," "dating violence," "domestic violence," or "stalking" as defined for VAWA purposes

Penrose Academy's Title IX policy applies to all persons involved in the operation of the academy and prohibits unlawful harassment by any employee of the academy, students, customers, vendors or anyone who does business with the academy. Any employee, student or contract worker who violates this policy will be subject to disciplinary action. To the extent, a customer, vendor, or other person with whom Penrose Academy does business engages in unlawful harassment or discrimination, Penrose Academy will take appropriate corrective action.

This policy shall be disseminated to the school community through publications, the Penrose Academy website, new employee orientations, student orientations and other appropriate channels of communication. The academy will respond quickly to all reports and will take appropriate action to prevent, to correct and if necessary, to discipline behavior that violates this policy. Additional information can be found on the Office of Civil Rights website at www.HHS.gov or call Toll Free: (800)368.1019.

DEFINITIONS

Sexual Harassment is defined as unwelcome conduct of a sexual nature. It includes unwelcome sexual advances, requests for sexual favors and other verbal, nonverbal or physical conduct of a sexual nature. Sexual harassment is conduct that explicitly or implicitly affects a person's employment or education, interferes with a person's work or educational performance or creates an environment such that a reasonable person would find the conduct intimidating, hostile or offensive.

Sexual Violence is defined as physical sexual acts engaged in without the consent of the other person or when the other person is unable to consent to the activity. Sexual violence includes sexual assault, rape, battery and sexual coercion; domestic violence; dating violence; and stalking.

Domestic Violence is defined as abuse committed against an adult or a minor who is a spouse or former spouse, cohabitant or former cohabitant or someone with whom the abuser has a child, has an existing dating or engagement relationship or has had a former dating or engagement relationship.

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

Sexual Assault occurs when a physical sexual activity is engaged in without the consent of the other person or when the other person is unable to consent to the activity. The activity or conduct may include physical force, violence, threat or intimidation, ignoring the objections of the other person, causing the other person's intoxication or incapacitation through the use of drugs or alcohol and taking advantage of the other person's incapacitation (including voluntary intoxication).

Stalking is behavior in which a person repeatedly engages in conduct directed at a specific person that places that person in reasonable fear of his or her safety or the safety of others.

Consent is informed, voluntary and revocable. Consent is an affirmative, unambiguous and conscious decision by each participant to engage in mutually agreed-upon sexual activity. It must be given without coercion, force, threats or intimidation. Consent must be ongoing throughout a sexual encounter and can be revoked at any time. Once consent is withdrawn, the sexual activity must stop immediately.

NON-DISCRIMINATION STATEMENT

The school in its admission, instruction and graduation policies does not discriminate based on age, sex, race, ethnic origin, color, religion, financial status, country or area of origin or residence, sexual orientation or on the basis of disability. Penrose Academy has designated Nikki Parcels, the Senior Director of Education as the Compliance Coordinator, to ensure the school's compliance. If a student believes that Penrose Academy has failed to provide these services or if a student believes they have been discriminated against on the basis age, assault and stalking, sex, race, ethnic origin, color, religion, financial status, country or area of origin or residence, sexual orientation or on the basis of disability, a student can file a grievance with the Compliance coordinator, Penrose Academy President or the Office of Civil Rights at HHS.gov, by email: OCRComplaint@hhs.gov or Toll Free at (800)368.1019.

PROHIBITED CONDUCT

This policy strictly prohibits sexual or other unlawful harassment or discrimination as well as sexual violence, as defined above. Sexual or other unlawful harassment or discrimination includes any verbal, physical or visual conduct based on sex, race, age, national origin, disability or any other legally protected basis if: submission to such conduct is made either explicitly or implicitly; a term or condition of an individual's education or employment; submission to or rejection of such conduct by an individual is used as a basis for decisions concerning that individual's education or employment; or it creates a hostile or offensive work environment, which means the alleged conduct is sufficiently serious to limit or deny a student's ability to participate or benefit from the student's education program. Unlawful harassment or discrimination may include racial epithets, slurs and derogatory remarks, stereotypes, jokes, posters or cartoons based on race, national origin, age, disability, marital status or other legally protected categories. Sexual harassment is conduct based on sex, whether directed towards a person of the opposite or same sex and may include explicit sexual propositions, sexual innuendo, suggestive comments, sexually oriented "kidding" or "teasing", practical jokes, jokes about or displays of obscene printed or visual material, questions about sexual fantasies, preferences or history and physical contact such as patting, pinching or intentionally brushing against another person's body. Gender-based harassment, including acts of verbal, nonverbal or physical aggression, intimidation or hostility based on sex or sex-stereotyping are strictly prohibited, even if those acts do not involve conduct of a sexual nature.

COMPLAINT PROCEDURE

Notify the Title IX Coordinator as soon as possible after the incident.

Penrose Academy Title IX Coordinator
Nikki Parcels, Sr. Director of Education and Student Services
13402 North Scottsdale Road, Suite B-160
Scottsdale, AZ 85254
480.222.9450 Ext 208
compliance@penrose.edu

Penrose Academy Title IX Deputy
Missy Conti, Assistant Director of Education
13402 North Scottsdale Road, Suite B-160
Scottsdale, AZ 85254
480.222.9540 Ext. 204
compliance@penrose.edu

Formal complaint means a document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the academy investigates the allegation of sexual harassment. At the time of filing a formal complaint, a complainant must be participating in or attempting to participate in the education program or activity of the academy with which the formal complaint is filed. Respondent means an individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment and do not allow an inappropriate situation to continue by not reporting it, regardless of who is creating the situation. No employee, contract worker, student, vendor or other person who does business with Penrose Academy is exempt from the prohibitions in this policy. Faculty/Staff will refer all harassment complaints to the Title IX Coordinator for student-related complaints and complaints involving an employee. To facilitate the investigation, a student complaint should include details of the incident or incidents, names of the individuals involved and names of any witnesses. Please contact the appropriate Title IX Coordinator for an Incident Report. The Title IX Coordinator can assist students in completion of this report and/or notifying the appropriate authorities, if necessary and requested by the alleged victim. Penrose Academy ensures that the employee designated to serve as Title IX Coordinator has adequate training on what constitutes sexual harassment, including sexual violence and that students understand how Penrose Academy's complaint procedures operate.

TITLE IX COORDINATOR AND DEPUTY TRAINING

Penrose Academy's Title IX Coordinator and Deputy are trained in the Title IX policies and regulation through Thompson Coburn. A module-based program, the Title IX Training is an online, asynchronous training consisting of an introduction, formal complaints, investigations, informal resolutions, hearings, determinations and appeals. The 10-hour training is current as of July 2020. [youtube/thompsoncoburn](https://www.youtube.com/watch?v=thompsoncoburn)

INVESTIGATION OF COMPLAINTS

In response to all complaints, Penrose Academy ensures prompt and equitable resolution through a reliable and impartial investigation of complaints, including the opportunity for both parties to present witnesses or other evidence. The time necessary to investigate will vary based on complexity but will generally be completed within sixty (60) days of receipt of the complaint. Penrose Academy shall maintain confidentiality for all parties to the extent possible, but absolute confidentiality cannot be guaranteed. In cases where a student/staff member does not give consent for an investigation, Penrose Academy will weigh the student/staff member's request for confidentiality against the impact on the academy safety to determine whether an investigation must proceed. Complainants should be aware that in a formal investigation due process generally requires that the identity of the charging party and the substance of the complaint be revealed to the person charged with the alleged harassment.

The preponderance of the evidence standard will apply to investigations, meaning Penrose Academy will evaluate whether it is more likely than not that the alleged conduct occurred. Both parties will receive written notice of the outcome of the complaint.

During the investigation, the academy will provide interim measures, as necessary, to protect the safety and wellbeing of employees/students involved. Reasonable academic accommodations will be provided during and after the alleged Title IX or VAWA offense.

If the academy determines that unlawful harassment or sexual violence has occurred, immediate appropriate corrective action will be taken in accordance with the circumstances involved and the academy will take steps to prevent the recurrence of any harassment or discrimination. Any employee or student determined by the academy to be responsible for unlawful harassment or discrimination will be subject to appropriate disciplinary action, up to and including termination.

To initiate a criminal investigation, reports of sexual violence should be made to "911" or local law enforcement. The criminal process is separate from the academy's disciplinary process. To the extent that an employee or contract worker is not satisfied with the school's handling of a harassment or discrimination complaint, he or she may also contact the appropriate state or federal enforcement agency for legal relief.

When investigating a formal complaint and throughout the grievance process, the academy will:

1. Ensure that the burden of proof and the burden of gathering evidence sufficient to reach a determination regarding responsibility rest on the academy and not on the parties
2. Provide an equal opportunity for the parties to present witnesses, including fact and expert witnesses, and other inculpatory and exculpatory evidence.
3. Not restrict the ability of either party to discuss the allegations under investigation or to gather and present
4. Provide the parties with the same opportunities to have others present during any grievance proceeding, including an advisor of their choice, relevant evidence.
5. Provide, to a party whose participation is invited or expected, written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings, with sufficient time for the party to prepare to participate.
6. Provide both parties an equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in a formal complaint; and Create an investigative report that fairly summarizes relevant evidence and, at least 10 days prior to a hearing or other time of determination regarding responsibility, send to each party and the party's advisor, if any, the investigative report, for their review and written response.

HEARINGS

Penrose Academy's grievance process provides a live hearing. At the live hearing, the decision-maker(s) must permit each party's advisor to ask the other party and any witnesses all relevant questions and follow-up

questions, including those challenging credibility. Such cross-examination at the live hearing must be conducted directly, orally, and in real time by the party's advisor of choice and never by a party personally. At the request of either party, the academy will provide for the live hearing to occur with the parties located in separate rooms with technology enabling the decisionmaker(s) and parties to simultaneously see and hear the party or the witness answering questions. Only relevant cross-examination and other questions may be asked of a party or witness. Before a complainant, respondent, or witness answers a cross-examination or other question, the decision-maker(s) must first determine whether the question is relevant and explain any decision to exclude a question as not relevant. If a party does not have an advisor present at the live hearing, the academy will provide without fee or charge to that party, an advisor of the academy's choice, who may be, but is not required to be, an attorney, to conduct cross-examination on behalf of that party. Questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence about the complainant's prior sexual behavior are offered to prove that someone other than the respondent committed the conduct alleged by the complainant, or if the questions and evidence concern specific incidents of the complainant's prior sexual behavior with respect to the respondent and are offered to prove consent. If a party or witness does not submit to cross-examination at the live hearing, the decision-maker(s) must not rely on any statement of that party or witness in reaching a determination regarding responsibility. Live hearings may be conducted with all parties physically present in the same geographic location or, at the academy's discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually, with technology enabling participants simultaneously to see and hear each other. The academy will create an audio or audiovisual recording, or transcript, of any live hearing and make it available to the parties for inspection and review.

DETERMINATION REGARDING RESPONSIBILITY

The decision-maker(s), who cannot be the same person(s) as the Title IX Coordinator or the investigator(s), must issue a written determination regarding responsibility.

The written determination will include:

1. Identification of the allegations potentially constituting sexual harassment.
2. A description of the procedural steps taken from the receipt of the formal complaint through the determination.
3. Findings of fact supporting the determination.
4. Conclusions regarding the application of the academy's code of conduct to the facts.
5. A statement of, and rationale for, the result as to each allegation and the academy's procedures and permissible bases for the complainant and respondent to appeal.
6. The academy will provide the written determination to the parties simultaneously.
7. The Title IX Coordinator is responsible for effective implementation of any remedies.

APPEALS

Penrose Academy will offer both parties an appeal from a determination regarding responsibility, and from a recipient's dismissal of a formal complaint or any allegations therein, on the following bases:

1. Procedural irregularity that affected the outcome of the matter.
2. New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; and the Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias that affected the outcome.

INFORMAL RESOLUTION

At any time prior to reaching a determination regarding responsibility the academy may facilitate an informal resolution process, such as mediation, that does not involve a full investigation and adjudication, provided that the academy:

1. Provides to the parties a written notice disclosing the allegations and the requirements of the informal resolution process.
2. Notifies parties that any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the grievance process with respect to the formal complaint.
3. Obtains the parties' voluntary, written consent to the informal resolution process; and does not offer or facilitate an informal resolution process to resolve allegations that an employee sexually harassed a student.

RECORDKEEPING

Penrose Academy will maintain for a period of seven years records of:

1. Each sexual harassment investigation including any determination regarding responsibility and any audio or audiovisual recording or transcript required, any disciplinary sanctions imposed on the respondent, and any remedies provided.
2. Any appeal and the result therefrom.
3. Any informal resolution and the result therefrom; and all materials used to train Title IX Coordinators. These training materials must be publicly available on the website.

In response to receipt of actual knowledge of sexual harassment, the academy will create, and maintain for a period of seven years, records of any actions, including any supportive measures, taken in response to a report or formal complaint of sexual harassment.

RETALIATION PROHIBITED

Penrose Academy or other person may not intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX or, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in a Title IX investigation, proceeding, or hearing. Except as otherwise noted in the regulations, Penrose Academy will keep confidential the identity of any individual who has made a report or complaint of sex discrimination, including any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, and any witness. Charging an individual with a code of conduct violation for making a materially false statement in bad faith in the course of a grievance proceeding does not constitute retaliation, provided, however, that a determination regarding responsibility, alone, is not sufficient to conclude that any party made a materially false statement in bad faith.

RESPONSE TO SEXUAL HARASSMENT

A recipient with actual knowledge of sexual harassment in an education program or activity of the academy against a person in the United States, must respond promptly in a manner that is not deliberately indifferent. A recipient is deliberately indifferent only if its response to sexual harassment is clearly unreasonable in light of the known circumstances.

Education program or activity, includes locations, events, or circumstances over which the academy exercised substantial control over both the respondent and the context in which the sexual harassment occurs, and also includes any building owned or controlled by a student organization that is officially recognized by a postsecondary institution. The academy will treat complainants and respondents equitably. The Title IX Coordinator must promptly contact the complainant to discuss the availability of supportive measures, consider the complainant's wishes with respect to supportive measures, inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the complainant the process for filing a formal complaint.

REPORTING REQUIREMENTS

Victims of sexual misconduct should be aware that school administrators must issue timely warnings for incidents reported to them that pose a substantial threat of bodily harm or danger to other members of the campus community. Penrose Academy will make every effort to ensure that a victim's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the danger. Penrose Academy reserves the right to notify parents/guardians of dependent students regarding any health or safety risk or a change in student status.

RESPONSE TO A FORMAL COMPLAINT

In response to a formal complaint, Penrose Academy will follow a grievance process that complies with § 106.45. With or without a formal complaint.

Emergency removal. The academy may remove a respondent from the education program or activity on an emergency basis, provided that the academy undertakes an individualized safety and risk analysis, determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal, and provides the respondent with notice and an opportunity to challenge the decision immediately following the removal.

Administrative leave. A non-student employee respondent may be placed on administrative leave during the pendency of a grievance process.

ADDITIONAL INFORMATION

The U.S. Department of Education Office for Civil Rights ("OCR") investigates complaints of unlawful harassment of students in educational programs or activities. This agency may serve as a neutral fact finder and will attempt to facilitate the voluntary resolution of disputes with the parties. For more information, visit the OCR website at:

<http://www.HHS.gov/ocr/>

GRIEVANCE POLICY AND PROCEDURE

In the event a student has a concern or grievance that cannot be resolved with the student's immediate Educator, Senior Director of Education or Student Services Department, the student may file the concern in written form as a grievance. The written grievance will then be referred to the Board of Grievances. If a student is suspended, terminated for Student Catalog Policy Violation or failure to achieve Satisfactory Academic Progress and wishes to appeal the decision, the student will also provide a written appeal to the Board of Grievances as described below.

Procedural Items:

- Notify the President of Penrose Academy that a grievance has been filed.
- Provide notice to all parties involved in the incident.
- Title IX Coordinator will conduct an investigation of the grievance.
- If the problem is not clearly defined, a request to clarify the grievance shall be made upon the student who files the written grievance.
- Set a date for the hearing which shall not be later than ten (10) days from the date all parties are sent a notice of the written grievance.

Composition: The Board of Grievances shall be comprised of three or more people from Penrose Academy's Administration and Educators. If for any reason the written grievance is filed against or regarding actions of an educator or administrative member that serves on the Board of Grievances, then that member shall be replaced by another educator or administrative member chosen by the President and/or Co- Founder.

Hearings Conducted by the Board of Grievances:

The Board of Grievances shall conduct a hearing on the documents submitted and testimony of any relevant party. The student who filed the written grievance shall present his/her case first. Thereafter, the Board of Grievances shall permit the opposing party an opportunity to be heard. If a grievance is filed against the administration or an educator, a member of the administration or an educator appointed by the President may present the case on behalf of Penrose Academy. Both student and opposing party shall only be permitted one (1) hour to present his/her case, including all testimony. Thereafter, the Board of Grievances shall discuss the matter without the presence of the student or any opposing party until each member of the Board has made an independent decision. The Board of Grievances' decision shall be by majority rule and shall be the final decision made by Penrose Academy regarding the matter.

Arbitration: In the event any grievance is pursued beyond the Board of Grievances decision, student agrees and acknowledges that any matter concerning the Enrollment Agreement or Student Catalog must be submitted to a single arbitrator assigned by the American Arbitration Act ("AAA").

Any matter to be submitted to the AAA must be filed within five (5) days of the Board of Grievances decision. However, prior to pursuing binding arbitration, student must exhaust all means available through the Board of Grievances. The cost of any such arbitration shall be paid by the party pursuing such arbitration. The results of the arbitration shall be binding on the parties and shall preclude parties from seeking further litigation. The parties agree to make all reasonable efforts to ensure that any dispute going to arbitration shall be resolved within sixty (60) days of filing arbitration documents.

REQUIREMENTS FOR A GRIEVANCE PROCESS

1. Treat complainants and respondents equitably.
2. Require an objective evaluation of all relevant evidence.
3. Require that any individual designated by Penrose Academy as a Title IX Coordinator, investigator, decision-maker, or any person designated to facilitate an informal resolution process, not have a conflict of interest or bias. Title IX Coordinators, et. al. must receive proper training.
4. Include a presumption that the respondent is not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the grievance process.
5. Include reasonably prompt time frames for conclusion of the grievance process.
6. Describe the range of possible disciplinary sanctions and remedies that the academy may implement following any determination of responsibility.

7. State the standard of evidence to be used to determine responsibility (preponderance of the evidence or clear and convincing evidence).
8. Include the procedures and permissible bases for the complainant and respondent to appeal.
9. Describe the range of supportive measures available to complainants and respondents; and Not require, allow, rely upon, or otherwise use questions or evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege.

NOTICE OF ALLEGATIONS UPON RECEIPT OF FORMAL COMPLAINT

1. Notice of the grievance process
2. Notice of the allegations of sexual harassment, including:
 - a. Sufficient details with sufficient time to prepare a response before any initial interview
 - b. A statement that the respondent is presumed not responsible and that a determination regarding responsibility is made at the conclusion of the grievance process
 - c. Notice must inform the parties that they may have an advisor of their choice, who may be, but is not required to be, an attorney, and may inspect and review evidence
 - d. Notice must inform the parties of any provision in the academy's code of conduct that prohibits knowingly making false statements or knowingly submitting false information during the grievance process

DIMISSAL OF FORMAL COMPLAINT

1. The academy may dismiss the formal complaint if:
 - a. A complainant notifies the Title IX Coordinator in writing that the complainant would like to withdraw the formal complaint.
 - b. The respondent is no longer enrolled or employed by the academy; or specific circumstances prevent the academy from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein.

In the event that a grievance may not be resolved at the institutional level, a formal grievance may be filed with the Council on Occupational Education, Arizona State Board of Cosmetology and/or Arizona Department of Health Services.

Council on Occupational Education

7840 Roswell Rd. Bldg. 300, Ste. 325
Atlanta, GA 30350
770) 396-3898 or (800) 917-2081
www.council.org

Arizona State Board of Cosmetology

1740 W. Adams St. Suite 4400
Phoenix, AZ 85007
(480) 784-4539
www.azboc.gov

Arizona Department of Health Services

150 North 18th Avenue
Phoenix, AZ 85007
(602) 542-1025
<https://www.azdhs.gov/>

INFORMATION ON RISK REDUCTION

At the individual level, there are practical methods and strategies for reducing risk of sexual misconduct, but it is important to know that no method or strategy would be able to eliminate the risk of sexual misconduct completely, and that it is never your fault if you are harmed by sexual misconduct.

STALKING

Below are some practical methods and strategies for reducing risk of stalking, but it is important to know that no method or strategy would be able to eliminate the risk of stalking completely, and that it is never your fault if you are stalked.

- Trust your instincts. If something does not feel right, tell someone (preferably Title IX Coordinator and/or law enforcement).
- Do not post or remove any posting of personal contact information on social media and other websites.
- Do not give your passwords or log in information to anyone including your significant other.
- If someone tells you they do not want to communicate with you, or if they stop responding, take the hint and stop contacting them.
- Change your routes and routines.

SEXUAL ASSAULT

Below are some practical methods and strategies for reducing risk of sexual assault, but it is important to know that no method or strategy would be able to eliminate the risk of sexual assault completely, and that it is never your fault if you are sexually assaulted.

- Always monitor your drink, and do not accept drinks from anyone you do not know or trust.
- Trust your gut. Do not hesitate to leave or ask for help if something does not feel right.
- Make a pact with your friends to watch out for one another and make sure everyone gets home safely.
- Be an active bystander.

UNDERSTANDING AND OBTAINING CONSENT

- Understand that mixing alcohol or drugs with sexual activity is always risky. Do not engage in sexual activity if either or both parties are intoxicated.
- Talk to your partner about your needs, limits and boundaries.
- Listen and watch for signs that your partner is not consenting. Remember you are looking for an enthusiastic yes!
- If your partner gives anything less than an enthusiastic yes, stop what you are doing and ask your partner if they are ok and if they want to continue.
- Listen and watch for signs that your partner is not consenting.

SEXUAL HARRASSMENT

Below are some practical methods and strategies for reducing risk of sexual harassment, but it is important to know that no method or strategy would be able to eliminate the risk of sexual harassment completely, and that it is never your fault if you are sexually harassed.

- Do not continue to ask someone out if they have already declined.
- Do not touch someone without their permission.
- Respect a person's wishes related to contact with them.
- Say "that wasn't funny" if you hear someone telling an offensive joke.
- Tell someone if you see or hear of someone exhibiting behavior that is making you uncomfortable.
- Take a minute to consider the implication of comments, jokes, or stories before sharing them with others.
- Do not post sexually explicit material on social media or in public spaces.
- Do not send or post pictures of yours or other's genitalia.

BYSTANDER INTERVENTION

Effective bystander programs foster an encouraging environment for others to speak out against sexist attitudes, rape myth beliefs, and sexual violence itself. Confronting sexual violence can help change the social norms of a community and society as a whole. The most used bystander intervention model outlines the following five steps.

1. Recognize signs that an act of sexual violence may occur or is occurring.
2. Identify that the potential victim is at risk and that intervention is appropriate.
3. Decide whether to take responsibility to intervene.
4. Decide the most appropriate and safest way to intervene.
5. Implement the decision to intervene safely to diffuse the situation.

STUDENT RECORDS & RIGHT OF ACCESS AND PRIVACY

Penrose Academy respects the privacy and security of your personal information and your educational records. Penrose Academy does not publish private student information; however, Section 99.37 of FERPA permits Penrose Academy to disclose, upon request, directory information (student's name, address, telephone number, date and place of birth, field of study, dates of attendance) without the student's consent unless the student has otherwise directed Penrose Academy, in writing. The school provides and permits access to student and other school records as required by the Arizona Board of Cosmetology.

Student records are maintained for a minimum of three (3) years. Student records/files are only available to restricted staff, COE and certain government agencies may gain access to all students' files at any time.

Collection and Use of Personal and Educational Records: Penrose Academy collects information from various sources including but not limited to your enrollment application and forms. We also obtain information due to transactions you have with us or that we have with third parties on your behalf. We use that information to provide you with products and/or services you have requested from us and to comply with reporting and/or other legal requirements or mandates.

Safeguarding Records: Penrose Academy keeps student educational and financial records in secure offices and in a manner so to maintain them safely (storage cabinets, fireproof file cabinets, etc.). Penrose Academy maintains physical, electronic, and procedural safeguards that comply with the regulations and leading industry standards. Your non-public personal information is restricted to staff/faculty members Penrose Academy has determined to have legitimate educational interests. This includes contractors, consultants or other parties to which Penrose Academy has outsourced institutional services or functions.

Release of Information with Student Consent: Students (or parent/guardian of dependent minors) may authorize the release of information to outside/third parties if they wish. Requests must be made to the Student Services, Education, Financial Aid, Admissions or Compliance Departments in writing. This request must include the desired record, purpose of and party/class of parties to disclose the information to. Blanket releases are not permitted. Information will not be released without the student's (or parent/guardian of dependent minors) consent.

Release of Information without Student Consent: Family Educational Rights and Privacy Act (FERPA) permits the disclosure of PII from students' education records, without consent of the student, if the disclosure meets certain conditions of the FERPA regulations. Except for disclosures to school officials, disclosures related to some judicial orders or lawfully issued subpoenas, disclosures of directory information and disclosures to the student, FERPA regulations requires Penrose Academy to record the disclosure. Eligible students have a right to inspect and review their record of disclosures. Penrose Academy may disclose PII from the education records without obtaining prior written consent of the student to:

- Accrediting bodies, the U.S. Department of Education, the Secretary of Education or State, the U.S. Attorney General and others, relating to our status as a candidate school for programs, in connection with an audit or evaluation of Federal or State supported education programs or for the enforcement of/compliance with Federal legal requirements related to those programs.
- Comply with a judicial order or lawfully issued subpoena.
- Appropriate officials in connection with a health or safety emergency.
- Parents of an eligible student if the student is a dependent for IRS tax purposes.
- A victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense. The disclosure may only include the results of the disciplinary proceeding with respect to that alleged crime or offense, regardless of the finding.
- The general public, as a final result of a disciplinary proceeding, if Penrose Academy determines the student is an alleged perpetrator of a crime of violence or non-forcible sex offense and the student has committed a violation of rules or policies with respect to the allegation made against him or her.
- Parents of a student under the age of 21, if Penrose Academy determines the student committed a disciplinary violation of any Federal, State or local law or of any rule or policy of Penrose Academy that governs the use or possession of alcohol or a controlled substance.
- Determine if necessary, the eligibility, amount of aid or enforcement of the terms and conditions relating to financial aid a student has applied for or received.
- Organizations conducting studies for or on behalf of Penrose Academy to develop, validate or administer predictive tests, administer student aid programs or improve instruction.
- Accrediting organizations to carry out their accrediting functions.

Records will be released to such agencies to fulfill the duties, directives or orders of such or to assist Penrose Academy in fulfilling its missions and objectives and will be indicated on file if such a review has been performed.

STUDENTS RIGHTS: Penrose Academy guarantees each student (or parent/guardian of dependent minors) the right to access their records and to consent to or withhold the disclosure of Personally Identifiable Information (PII). Penrose Academy does not currently produce a student directory; however, should a directory be published in the future you will have the right to withhold PII from it. Such a request should be made in writing to the Academy President.

You have the right to inspect and review your educational records. Requests must be made in writing and will be complied to within 45 days of the request. During a review of your educational records, if you find an item(s) you feel to be inaccurate, misleading, or otherwise in violation of your privacy rights under FERPA, you may submit a written request, including any supporting documentation that proves the information is incorrect, to the Sr. Director of Education and Student Services to amend the information. A written response explaining the outcome of the request will be provided.

If you feel Penrose Academy has failed to comply with the requirements of FERPA, you have the right to file a written complaint with the U.S. Department of Education concerning the alleged failures. Written complaints

should be mailed to: Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Avenue, SW, Washington, DC 20202.

HIPAA & FERPA: Health Insurance Portability and Accountability Act (HIPAA) applies to Health Care Providers, private benefit plans and health care clearinghouses. HIPAA does not apply to other types of organizations whose receipt or maintenance of health records is incidental to their normal course of business. FERPA provides safeguards of education records and does not limit what records a school may obtain, create or maintain. Penrose Academy follows requirements for the privacy of health records (HIPAA). The Student Services and Education Departments maintain health records for students requesting services, waivers, or accommodations. Receipt and maintenance of health records is well established. If a health record is used to make a decision in regard to a student's education program the health record may be construed to be an education record, in which case the normal FERPA provisions for safeguarding the record would apply.

COPYRIGHT INFRINGEMENT

Copyright infringement is the act of exercising, without permission or legal authority, one or more of the exclusive rights granted to the copyright owner under section 106 of the Copyright Act (Title 17 of the United States Code). These rights include the right to reproduce or distribute a copyrighted work. In the file-sharing context, downloading or uploading substantial parts of a copyrighted work without authority constitutes an infringement. The Higher Education Opportunity Act of 2008 (HEOA) includes provisions that are designed to reduce the illegal uploading and downloading of copyrighted material through peer-to-peer (P2P) file sharing. These provisions include requirements that:

- Institutions certify to the Secretary of Education that they have developed plans to "effectively combat" the unauthorized distribution of copyrighted material.
- Institutions make an annual disclosure that informs students that the illegal distribution of copyrighted materials may subject them to criminal and civil penalties and describes the steps that institutions will take to detect and punish illegal distribution of copyrighted materials
- Institutions publicize alternatives to illegal file sharing

PREVENTION OF UNAUTHORIZED DISTRIBUTION OF COPYRIGHTED MATERIAL

Penrose Academy currently employs bandwidth-shaping technology to prioritize network traffic, and blocks students' ability to access unsafe and non-educational sites from the student computer networks. Penrose Academy responds to legitimate notices or letters of illegal copyright infringement and directs both our Information Technology vendor and Compliance staff to investigate and respond.

SANCTIONS

Penrose Academy will cooperate fully with any investigation by public authorities related to illegally downloaded copyrighted information. Students found guilty will be subject to the full extent of fines and penalties imposed, as well as facing automatic loss of Penrose Academy network access and possible suspension. For more information, please see the Web site of the U.S. Copyright Office at www.copyright.gov.

ANNUAL DISCLOSURE

Penrose Academy's Copyright Infringement policy is included in the Student Catalog. The Student Catalog is distributed to the student upon enrollment. This information is also accessible on the Penrose Academy website under Consumer Information.

ALTERNATIVES TO ILLEGAL FILE SHARING

Penrose Academy does not block access from campus to all legitimate sources of copyrighted material. Although we cannot maintain an up-to-date list of alternatives, we point students to the Educause list at <https://www.educause.edu/focus-areas-and-initiatives/policy-and-security/educause-policy/legal-sources-onli>

MAINTENANCE OF PLAN

Penrose Academy will review this plan each year to insure it is current and maintains the appropriate and necessary information to effectively combat illegal file sharing, as well as update the methods employed as new technological deterrents become available.

STATEMENT OF NON-DISCRIMINATION AND ACCOMMODATION

Penrose Academy does not discriminate on the basis of disability in its admissions practices or other policies. The licensing requirements and physical expectations for courses offered at the school may restrict some applicants. Questions regarding licensing requirements and the physical expectations of the industry may be answered by the President. Penrose Academy is committed to providing accommodations for enrolled students who have

documented disabilities and are entitled to a reasonable accommodation to ensure that they have full and equal access to the educational resources at Penrose Academy under Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) ("Section 504") and the Americans with Disabilities Act of 1990 (42 U.S.C. § 12182) ("ADA") and their related statutes and regulations. Section 504 prohibits discrimination on the basis of disability in any program or activity receiving federal financial assistance. The ADA prohibits a place of public accommodation from discriminating on the basis of disability. The applicable law and regulations may be examined in the office of the ADA Compliance Coordinator, who has been designated to coordinate the efforts of the Institute to comply with Section 504 and ADA.

It is the responsibility of the student to seek available assistance at Penrose Academy and to request reasonable accommodations prior to the first day of the program.

Additionally, Penrose Academy is not obligated to provide accommodations that fundamentally alter any of the school's programs. In a case where the request is unreasonable, the coordinator will promptly search for an equally effective alternative for the student that would not alter the program fundamentally and offer this accommodation to the student.

ADA Compliance Coordinator:

Nikki Parcels, Senior Director of Education and Student Services
13402 N. Scottsdale Road Suite B-160, Scottsdale, AZ 85254
480.222.9540 ext. 208
nikki@penrose.edu or compliance@penrose.edu

HANDICAPPED ACCESS

Penrose Academy is readily accessible with handicapped restroom facilities for disabled individuals. While the facility is handicap accessible and the academy adheres to the American with Disabilities Act, some of the Student Salon, Student Nail Spa or Student Spa services may require the ability to climb on top of a spa bed/pedicure chair to receive or give that service. Also, our programs require manual dexterity which may not be suitable for all individuals.

REQUESTS FOR ACCOMMODATION

Individuals with disabilities wishing to request a reasonable accommodation must contact the ADA Compliance Coordinator. A disclosure of a disability or a request for an accommodation made to a faculty or staff member, other than the ADA Compliance Coordinator, will not be treated as a request for an accommodation. However, if a student discloses a disability to faculty or staff member, he or she is required to direct the student to the ADA Compliance Coordinator.

The ADA Compliance Coordinator will provide a student or applicant with a Request for Reasonable Accommodations form.

Reasonable accommodations are available for students and applicants who provide the appropriate documentation of a disability. Such documentation should specify that a student has a physical or mental impairment, how that impairment substantially limits one or more major life activities and how the disability affects the student's functions in a learning environment (academic*, attendance or both). In general, the supporting documentation must be dated less than three years from the date a student requests a reasonable accommodation (may be waived upon President's approval) and must be completed by a qualified professional in the area of the student's disability as enumerated in the following table:

Disability	Qualified Professional
Physical disability	MD, DO
Visual impairment	MD, Ophthalmologist, Optometrist
Mobility, orthopedic impairment	MD, DO
Hearing impairment	MD, Audiologist (Au.D) *audiology exam should not be more than a year old
Speech and language impairment	Licensed speech professional
Learning disability	PhD Psychologist, college learning disability specialist, other appropriate professional
Acquired brain impairment	MD Neurologist, Neuropsychologist
Psychological disability	Psychiatrist, PhD Psychologist, LMFT or LCSW
ADD/ADHD	Psychiatrist, PhD Psychologist, LMFT or LCSW
Other disabilities	MD who practices or specializes within the field of the disability

Documentation used to evaluate the need and reasonableness of potential accommodations may include a licensed professional's current medical diagnosis and date of diagnosis, evaluation of how the student's disability affects one or more of the major life activities and recommendations, psychological and/or emotion diagnostic tests, functional effects or limitations of the disability, and/or medications and recommendations to ameliorate the effects or limitations.

Penrose Academy may request additional documentation as needed and may, at its discretion, waive the requirement for medical documentation to support accommodation requests that relate to obvious impairments and/or are minimal in nature.

Requested accommodations which compromise the essential elements of the course of study, may not be reasonable. Students must seek assistance prior to the start of the course of study. Prospective students who fail to seek reasonable accommodations at the beginning of the course of study may find that the scope of available accommodations becomes limited.

After the ADA Compliance Coordinator receives the Request Form and the required documentation, he/she will engage the student or applicant in an interactive process to determine what available accommodations may be reasonable.

If the student or applicant is denied the requested accommodation, he/she may file a grievance using the Grievance Process below or he/she may file a complaint with the U.S. Department of Education's Office for Civil Rights or a similar state entity.

Penrose Academy will make appropriate arrangements to ensure that disabled persons are provided other accommodations, if needed, to participate in this grievance process. The ADA Compliance Coordinator will be responsible for such arrangements.

*Students requiring academic accommodations may not exceed 100% in attendance. Individual accommodations will be provided by the Senior Director of Education.

Title VI Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964 is a federal law that prohibits discrimination on the basis of race, color or national origin in any program and activity that receives federal funding or other federal financial assistance.

Title VI States that: No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial Assistance.

The policy of Penrose Academy is to comply with Title VI of the Civil Rights Act of 1964 and its regulations that prohibit unlawful discrimination based on race, color, sex, age, disability and national origin.

The Title VI Compliance Officer is the Senior Director of Education and Student Services at Penrose Academy, who has been appointed to coordinate the efforts to comply with the law.

Any person who believes that he or she has been subjected to discrimination or retaliation based on their race, color, sex, age, disability or national origin may file a Title VI complaint.

Complaints may be filed directly to the Senior Director of Education and Student Services. Complaints must be filed within 180 days of the date of the alleged discriminatory act.

COMPLAINT PROCEDURE

Notify the Senior Director of Education and Student Services as soon as possible after the incident.

Nikki Parcels, Sr. Director of Education and Student Services

13402 North Scottsdale Road, Suite B-160

Scottsdale, AZ 85254

480.222.9450 Ext 208

compliance@penrose.edu

Grievance procedures to address complaints of discrimination based on race, color, sex, age, disability and national origin are set forth in the student grievance procedure published in the student catalog.

STUDENT RESOURCES/ HELP LIST

The following resources are provided to students via the Penrose app. A student can obtain a hard copy in the Student Services office.

Arizona Self Help Organization	855.777.8590	www.arizonaselfhelp.org
Crime Stop - Phoenix Police Department	602.262.6151	www.phoenix.gov/police
Arizona Coalition Against Domestic Violence	602.279.2900	www.azcadv.org
Child Abuse Hotline	800.422.4453	http://www.childhelp.org/contact/
Alcoholics Anonymous	602.264.1374	www.aa.org
Narcotics Anonymous	480.897.4636	www.na.org
Marijuana Anonymous	800.766.6779	www.marijuana-anonymous.org
Gamblers Anonymous	602.266.9784	www.gamblersanonymous.org
Community Bridges:		
Drug/ Alcohol Additional Resources	877.931.9142	https://communitybridgesaz.org/
Suicide Prevention Lifeline	800.273.8255	www.suicidepreventionlifeline.org
EMPACT Suicide Hotline	800.SUICIDE	http://www.suicidehotlines.org
Mental Health Association of Arizona	800. 273.talk	www.mhaarizona.org
The Mandel Center (Holistic Therapy)	480.734.1199	www.mandelcenter.com
AZ & National lines & Centers for Sexual Assault:		
• CASA, Center for Prevention of Abuse & Violence	602.254.6400	https://www.casacares.org/
• City of Phoenix Family Advocacy	888.246.0303	www.phoenix.gov/humanservices/
The Meadows Ranch:		
• Eating Disorder Treatment & Recovery	855.317.6503	https://www.meadowsranch.com/
• A New Beginning (Eating Disorders)	480.941.4247	https://anewbeginning.com/
• Overeaters Anonymous	602.234.1195	www.oa.org
• Homeless Shelter	602.263.7654	https://homewardboundaz.org/
Apply for Food stamps	855.432.7587	www.azahccs.gov
Veterans Crisis Line	800.273.8255	www.veteranscrisisline.net

EMERGENCY PROCEDURES

In the event of emergency, fire, inclement weather, evacuation or shelter in place, students and employees are alerted by verbal announcement from Penrose Academy's Leadership Team and/or Faculty member. Additionally, students will receive a second alert to each of their smart devices via the Penrose Application.

- In the event of fire or other emergency requiring evacuation of the facility, all students, staff, faculty and guests shall evacuate immediately by direction of a leadership team member.
- In the event of an emergency, faculty, staff, students and guests of the Academy shall evacuate by means of the nearest available marked exit.
- Portable fire extinguishers are provided in the school for employee use. In the event of fire, any employee may use extinguishers to attempt to extinguish the fire before evacuating. Extinguishers are in the front lobby, spa and salon clinic, salon dispense, hot storage room, student lounge and staff lounge (under the sinks).
- In the event of an emergency, the following employees are to remain in the school to shut down or monitor critical operations before they evacuate: president, Sr. Director of Education and Student Services department.
- After an emergency evacuation, students and employees are to gather in the following location: The Super Pumper gas station located across the street to the south of the building at 13240 n Scottsdale Rd., Scottsdale, AZ 85254. Faculty must take roll at the location.
- After an emergency evacuation, the procedure for accounting for all students and employees is: all employees will check-in with their direct supervisor, all students will check-in with their educator they were assigned to when they evacuated the building.
- In the event of an emergency, leadership team member is responsible and will immediately call 9-1-1.
- First aid kits are available in each classroom, student salon, student spa and are replenished periodically by the Operations Department. If you have hurt yourself or witnessed an accident, immediately notify a staff member.

SHELTER IN PLACE PROCEDURE

Sheltering in place is in response to severe weather, environmental danger, chemical, biological or radiological contamination that may have been released into the environment.

- Faculty, staff, students and guests of the Academy will be notified by the leadership team and/or faculty that we are in "shelter in place mode". This message will be sent through the Penrose App and/or in person, stating "shelter and place".
- In the event of a shelter in place, faculty, staff, students and guests of the Academy will select an interior room or rooms with few or no windows.
- Depending on the type of threat, the room has been chosen, staff and faculty will seal windows, doors and ventilation systems using tape, plastic and weather stripping to avoid a chemical disturbance or weather-related disturbance.
- Faculty will perform roll call to account for all students, all employees will check-in with their direct department head.
- All staff, students, faculty and guests of the Academy will remain there until notified by leadership and/or student services department that the threat is gone.

LOCKDOWN

A lockdown procedure is used when there is an immediate threat to the building occupants. When people are instructed to lock down, it is in response to an active shooter. Upon confirmation that there is a significant emergency or dangerous situation:

- Faculty, staff, students and guests of the Academy will be notified by the leadership team and/or faculty that we are in "lock down mode". This message will be sent through the Penrose App and/or in person, stating "Lockdown".
- Leadership team member is responsible and will immediately call 9-1-1.
- In the event of a lockdown, faculty, staff, students and guests of the Academy will be instructed to secure themselves in the room they are in and not leave until the situation has been curtailed.
- All faculty, staff, students and guests of the Academy in classrooms should remain there and close all

doors.

- Faculty will perform roll call to account for all students, all employees will check-in with their direct department head.
- All entrances and exits to the school will be locked by a member of the leadership team.
- When it is safe, a member of the leadership team will perform a “walk-through” to notify students, staff, faculty and guests of the Academy that the threat is gone, and the doors will be unlocked.

Leadership Team Members

President and Founder

Owner and Creative Director

Senior Director of Medical and Cosmetic Programs

Senior Director of Education and Student Services

Senior Director of Admissions and Financial Aid

Director of Business Development and Marketing Manager

Assistant Director of Education and Title IX Deputy

Student Services Manager

Financial Aid Manager

Student Salon Manager

TIMELY WARNING POLICY

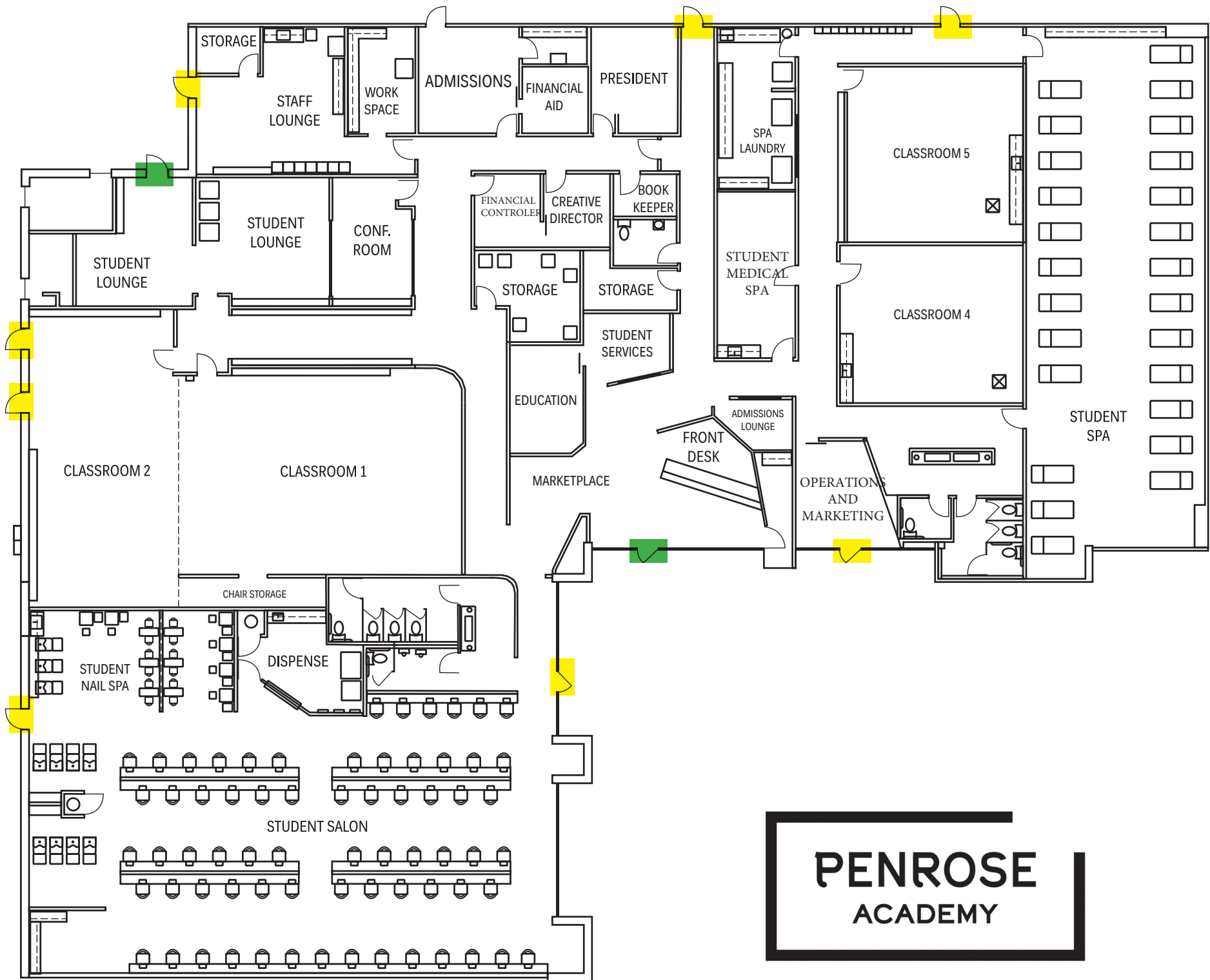
The Timely Warning Alarm differs from the notification of a ‘emergency situation’, the catalyst differs from crime, such as violent crime against a person or substantial crime against property, rather than an immediate threat to health and safety of students and employees such as a weather emergency or power failure. In the case of a timely warning alarm during normal business hours, a verbal announcement will be made by a Penrose Academy leadership team member, as listed above. Instruction will be made on a situational basis. Should a timely warning notification be made after business hours, an email blast will be made, by method of the Penrose app as well as posting to the Penrose Academy intranet, with instruction as to how to proceed.

SAFETY AND SECURITY MEASURES

- **Fire Alarms, Lockdown and Shelter in Place Drills** - Practice drill, announced and unannounced, are held periodically throughout the year to practice proper evacuation procedures and where to gather in the case of an emergency, these drills are scheduled and led by the Student Services Department.
- **Fire Alarms, Lockdown and Shelter in Place evacuation** plans are published on the Penrose app in the Health and Safety Plan.
- **Test Drills** are scheduled and documented via Microsoft Outlook calendar bi-annually.
- **Safety** is maintained twenty-four hours a day, seven days a week with an alarm monitored security system and video surveillance cameras throughout the facility which only management and assigned staff have access to view camera DVR system (can save video in the event of any criminal activity). Codes for entering the building are changed periodically for safety measures by the Student Services Department.
- **Local Police** - Penrose Academy has communicated with local police requesting their cooperation in informing the institution about situations reported to them that may warrant an emergency response and/or timely warnings.

FIRE SAFETY REPORT

Since opening in August 2006, Penrose Academy has zero fire related incidents causing injury to a person or property. Please refer to Emergency Evacuation diagram



PENROSE
ACADEMY

Campus Safety and Security Survey Completion Certificate

The Campus Safety and Security data for

Penrose Academy

(460914)

were completed and locked on **November 30, 2020**.

Thank you for your participation in the 2020 data collection.

This certificate was prepared on **November 30, 2020**

Printable Read-Only Institution Forms

Registration

First Name

Jill

Last Name

Kohler

Title

President

Address 1

13402 North Scottsdale Road

Address 2 (Optional)

Suite B-160

City

Scottsdale

State

Arizona

ZIP Code

852544065

Phone

4802229540

Extension (Optional)

Fax (Optional)

E-mail Address

compliance@penrose.edu

Comment

** Please use this box if you would like to provide additional contact information such as a cell phone number or the best time to reach you if there are questions about your survey. Also, if the person listed above is not the person who enters the data, please provide the name and contact information for the person who enters the data. This information is for the survey help desk staff only. It will not be seen by the public.*

Survey data entered by Nikki Parcels, Senior Director of Education and Student Services,
Nikki@penrose.edu

Institution Information

General Information

Institution Name : Penrose Academy

Address : 13402 North Scottsdale Road; Suite B160
Scottsdale, AZ 85254-4065Web Address (*Optional*)

Chief Administrative Officer information

Name

Title

E-mail Address

Phone

Extension (*Optional*)

Campus Information

Campus Name

Location

☒ State or Outlying Area ☐ Other Country

Address

City

State or Outlying Area

ZIP Code

County (*Optional*)Description (*Optional*)

Campus Safety Officer

General Information

Name

Nicole Parcels

Title

Senior Director Of Education and Student Serv

E-mail Address

Nikki@penrose.edu

Phone

(480) 222-9540

Extension (Optional)

208

Address

Location

☒ State or Outlying Area ☐ Other Country

Address

13402 North Scottsdale Road Suite B160

City

Scottsdale

State or Outlying Area

Arizona ▼

ZIP Code

85254-4065

Campus Fire Safety Officer

General Information

Name

Nicole Parcels

Title

Senior Director Of Education and Student Serv

E-mail Address

Nikki@penrose.edu

Phone

(480) 222-9540

Extension (*Optional*)

208

Address

Location

☒ State or Outlying Area ☐ Other Country

Address

13402 North Scottsdale Road Suite B160

City

Scottsdale

State or Outlying Area

Arizona ▼

ZIP Code

85254-4065

Lead Title IX Coordinator

General Information

Name

Nicole Parcells

Title

Senior Director Of Education and Student Serv

E-mail Address

Nikki@penrose.edu

Phone

(480) 222-9540

Extension (*Optional*)

208

Address

Location

☒ State or Outlying Area ☐ Other Country

Address

13402 North Scottsdale Road Suite B160

City

Scottsdale

State or Outlying Area

Arizona ▼

ZIP Code

85254-4065

Does your Institution have other designees who share these responsibilities?

☒ Yes ☐ No

Update Status

Date Completed: 11/30/2020

Updated

2020 Campus Safety and Security Survey

Institution: Main Campus (460914001)

User ID: C4609141

Screening Questions

Please answer these questions carefully. The answers you provide will determine which screens you will be asked to complete for this data collection.

1. Does your institution provide On-campus Student Housing Facilities?

- ☒ **No.**
- ☐ **Yes.** (If Yes is selected, you must enter the number of student housing facilities below and enter Fire Statistics for each facility.)

Number of On-campus Student Housing Facilities:

2. Does your institution have any noncampus buildings or properties?

- ☐ **Yes**
- ☒ **No**

3. Have you combined statistics that you received from the local or state police with your institution statistics for this report? If you answer No to this question, you will be asked to provide the data you received from the local and state police separately.

- ☒ **Yes.** Local and/or state law enforcement agencies provided us with statistics that we are combining with statistics collected by our campus security authorities.
- ☐ **No.** We are not combining the statistics because we cannot determine whether the statistics we obtained from local and/or state law enforcement agencies are for on-campus incidents or public property incidents.
- ☐ **Not available.** We cannot determine if the statistics we obtained from local and/or state law enforcement agencies are for our Clery geography.
- ☐ **Not available.** We made a good-faith effort to obtain statistics from local and/or state law enforcement agencies, but the agencies did not comply with our request.

Criminal Offenses - On campus

For each of the following criminal offenses, enter the number reported to have occurred On Campus.

Criminal offense	Total occurrences On campus		
	2017	2018	2019
a. <u>Murder/Non-negligent manslaughter</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
b. <u>Manslaughter by Negligence</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
c. <u>Rape</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
d. <u>Fondling</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
e. <u>Incest</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
f. <u>Statutory rape</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
g. <u>Robbery</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
h. <u>Aggravated assault</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
i. <u>Burglary</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
j. <u>Motor vehicle theft</u> (Do not include theft from a motor vehicle)	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
k. <u>Arson</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

Criminal Offenses - Public Property

For each of the following criminal offenses, enter the number reported to have occurred on Public Property.

Criminal offense	Total occurrences on Public Property		
	2017	2018	2019
a. <u>Murder/Non-negligent manslaughter</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
b. <u>Manslaughter by Negligence</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
c. <u>Rape</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
d. <u>Fondling</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
e. <u>Incest</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
f. <u>Statutory rape</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
g. <u>Robbery</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
h. <u>Aggravated assault</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
i. <u>Burglary</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
j. <u>Motor vehicle theft</u> (Do not include theft from a motor vehicle)	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
k. <u>Arson</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

Hate Crimes - On campus

For the criminal offenses listed below, first enter the total number of Hate Crimes that were reported to have occurred On campus. Then break down each total by category of bias (e.g., race, religion).

YEAR 2019

Criminal offense	Total	Occurrences of Hate crimes (Category of Bias for crimes)							
		Race	Religion	Sexual orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
a. <u>Murder/ Non-negligent manslaughter</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
c. <u>Rape</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
d. <u>Fondling</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
e. <u>Incest</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
f. <u>Statutory rape</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
g. <u>Robbery</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
h. <u>Aggravated assault</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
i. <u>Burglary</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
j. <u>Motor vehicle theft</u> (Do not include theft from a motor vehicle)	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
k. <u>Arson</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
l. <u>Simple assault</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>

m. Larceny-theft

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

n. Intimidation

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

o. Destruction/damage/
vandalism of property

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

YEAR 2018

Criminal offense

Total

Occurrences of Hate crimes (Category of Bias for crimes)

Race	Religion	Sexual orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
------	----------	-----------------------	--------	--------------------	------------	-----------	--------------------

a. Murder/ Non-negligent
manslaughter

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

c. Rape

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

d. Fondling

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

e. Incest

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

f. Statutory rape

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

g. Robbery

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

h. Aggravated assault

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

i. Burglary

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

j. Motor vehicle theft(Do not include theft from a
motor vehicle)

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

k. Arson

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

l. Simple assault

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

m. Larceny-theft

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

n. Intimidation

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

o. Destruction/damage/
vandalism of property

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

YEAR 2017

Criminal offense**Total****Occurrences of Hate crimes (Category of Bias for crimes)**

		Race	Religion	Sexual orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
a. <u>Murder/ Non-negligent manslaughter</u>	0	0	0	0	0	0	0	0	0
c. <u>Rape</u>	0	0	0	0	0	0	0	0	0
d. <u>Fondling</u>	0	0	0	0	0	0	0	0	0
e. <u>Incest</u>	0	0	0	0	0	0	0	0	0
f. <u>Statutory rape</u>	0	0	0	0	0	0	0	0	0
g. <u>Robbery</u>	0	0	0	0	0	0	0	0	0
h. <u>Aggravated assault</u>	0	0	0	0	0	0	0	0	0
i. <u>Burglary</u>	0	0	0	0	0	0	0	0	0

j. Motor vehicle theft

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

k. Arson

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

l. Simple assault

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

m. Larceny-theft

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

n. Intimidation

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

o.
Destruction/damage/
vandalism of property

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

--

Hate Crimes - Public Property

For the criminal offenses listed below, first enter the total number of Hate Crimes that were reported to have occurred on Public Property. Then break down each total by category of bias (e.g., race, religion).

YEAR 2019

Criminal offense	Total	Occurrences of Hate crimes (Category of Bias for crimes)							
		Race	Religion	Sexual orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
a. <u>Murder/ Non-negligent manslaughter</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
c. <u>Rape</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
d. <u>Fondling</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
e. <u>Incest</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
f. <u>Statutory rape</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
g. <u>Robbery</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
h. <u>Aggravated assault</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
i. <u>Burglary</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
j. <u>Motor vehicle theft</u> (Do not include theft from a motor vehicle)	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
k. <u>Arson</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
l. <u>Simple assault</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>

m. Larceny-theft

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

n. Intimidation

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

o. Destruction/damage/
vandalism of property

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

YEAR 2018

Criminal offense

Total

Occurrences of Hate crimes (Category of Bias for crimes)

Race

Religion

Sexual
orientation

Gender

Gender
Identity

Disability Ethnicity

National
Origina. Murder/ Non-negligent
manslaughter

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

c. Rape

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

d. Fondling

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

e. Incest

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

f. Statutory rape

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

g. Robbery

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

h. Aggravated assault

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

i. Burglary

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

j. Motor vehicle theft(Do not include theft from a
motor vehicle)

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

k. Arson

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

l. Simple assault

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

m. Larceny-theft

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

n. Intimidation

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

o. Destruction/damage/
vandalism of property

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

YEAR 2017

Criminal offense**Total****Occurrences of Hate crimes (Category of Bias for crimes)**

		Race	Religion	Sexual orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
a. <u>Murder/ Non-negligent manslaughter</u>	0	0	0	0	0	0	0	0	0
c. <u>Rape</u>	0	0	0	0	0	0	0	0	0
d. <u>Fondling</u>	0	0	0	0	0	0	0	0	0
e. <u>Incest</u>	0	0	0	0	0	0	0	0	0
f. <u>Statutory rape</u>	0	0	0	0	0	0	0	0	0
g. <u>Robbery</u>	0	0	0	0	0	0	0	0	0
h. <u>Aggravated assault</u>	0	0	0	0	0	0	0	0	0
i. <u>Burglary</u>	0	0	0	0	0	0	0	0	0

j. Motor vehicle theft

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

k. Arson

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

l. Simple assault

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

m. Larceny-theft

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

n. Intimidation

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

o.
Destruction/damage/
vandalism of property

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

--

VAWA Offenses - On Campus

For each of the following crimes, enter the number reported to have occurred On Campus.

Crime	Total occurrences On Campus		
	2017	2018	2019
a. <u>Domestic violence</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
b. <u>Dating violence</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
c. <u>Stalking</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

VAWA Offenses - Public Property

For each of the following crimes, enter the number reported to have occurred on Public Property.

Crime	Total occurrences on Public Property		
	2017	2018	2019
a. <u>Domestic violence</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
b. <u>Dating violence</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
c. <u>Stalking</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

Arrests - On campus

Enter the number of Arrests for each of the following crimes that occurred On Campus.

Crime	Number of Arrests		
	2017	2018	2019
a. <u>Weapons: carrying, possessing, etc.</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
b. <u>Drug abuse violations</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
c. <u>Liquor law violations</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>

Please Note: Do NOT include drunkenness or driving under the influence in liquor law violations.

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

Arrests - Public Property

Enter the number of Arrests for each of the following crimes that occurred on Public Property.

Crime	Number of Arrests		
	2017	2018	2019
a. <u>Weapons: carrying, possessing, etc.</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
b. <u>Drug abuse violations</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
c. <u>Liquor law violations</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>

Please Note: Do NOT include drunkenness or driving under the influence in liquor law violations.

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

Disciplinary Actions - On Campus

Enter the number of persons referred for disciplinary action for crimes that occurred On Campus for each of the following categories.

Do not include disciplinary actions that were strictly for school policy violations.

If the disciplinary action is the result of an arrest, please do not count it here; count the violation as 1 arrest.

Crime	Number of persons referred for Disciplinary Action		
	2017	2018	2019
a. <u>Weapons: carrying, possessing, etc.</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
b. <u>Drug abuse violations</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
c. <u>Liquor law violations</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>

Please Note: Do NOT include drunkenness or driving under the influence in liquor law violations.

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

Disciplinary Actions - Public Property

Enter the number of persons referred for disciplinary action for crimes that occurred on Public Property for each of the following categories.

Do not include disciplinary actions that were strictly for school policy violations.

If the disciplinary action is the result of an arrest, please do not count it here; count the violation as 1 arrest.

Crime	Number of persons referred for Disciplinary Action		
	2017	2018	2019
a. <u>Weapons: carrying, possessing, etc.</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
b. <u>Drug abuse violations</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
c. <u>Liquor law violations</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>

Please Note: Do NOT include drunkenness or driving under the influence in liquor law violations.

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

Unfounded Crimes

Of those crimes that occurred On Campus, in On-campus Student Housing Facilities, on or in Noncampus property or buildings, and on Public Property, enter the number of crimes that were unfounded.

The total number of unfounded crimes should include all criminal offenses, hate crimes, domestic violence, dating violence, or stalking incidents that have been unfounded. Arrests and disciplinary actions cannot be unfounded.

Number

2017

2018

2019

a. Total unfounded crimes

0

0

0

Please Note: If a reported crime is investigated by law enforcement authorities and found to be false or baseless, the crime is "unfounded." Only sworn or commissioned law enforcement personnel may unfound a crime.

Count unfounded crimes in the year in which they were originally reported.

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

Fires - Summary

	2017			2018			2019		
Name of Facility	Fires	Injuries	Deaths	Fires	Injuries	Deaths	Fires	Injuries	Deaths
Total									