Renaissance Academie

2026-2027 Annual Security Report

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RACE

Renaissance Academie

Cosmetology and Esthetics

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Renaissance Academie
Cosmetology and Esthetics

RENAISSANCE ACADEMIE COSMETOLOGY AND ESTHETICS
SAFETY & SECURITY INFORMATION

Campus safety and security are important issues at Renaissance Academie Cosmetology and Esthetics (the "Academie"). Our goal is to provide students with a safe environment in which to learn and to keep students, parents, and employees well informed about campus security. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, or Clery Act, requires institutions of higher education to provide students and families with the information they need to make informed decisions. The following policies and procedures are established to comply with the Clery Act.

A. Timely Warnings & Emergency Notifications

In the event that a situation arises, either on or off campus, that, in the judgment of the Compliance Director constitutes an ongoing or continuing threat, a campus wide "timely warning" will be issued. The Compliance Director will also immediately notify the Academie community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or staff occurring at the Academie, unless issuing a notification will compromise efforts to contain the emergency. The warning will be issued through the Academie's text message system and/or Academie email system to students, faculty, and staff. Depending on the circumstances of the threat, especially in all situations that could pose an immediate threat to the community and individuals, the Academie may also post a notice on social media providing the Academie's community with more immediate notification. Notices may also be posted in the common areas throughout the Academie. The information shall be disseminated by the Compliance Director, or by supporting staff members in a manner that aids the prevention of similar crimes. Anyone with information warranting a timely warning or emergency notification should report the circumstances to the Compliance Director by phone at (801) 373-2887 or in person at the Academie.

B. Reporting the Annual Disclosure of Crime Statistics

The Academie prepares this report to comply with the Clery Act. The full text of this report can be located on our web site at www.race.edu. This report is prepared in cooperation with the local law enforcement agencies around our campus.

Campus crime, arrest and referral statistics include those reported to the Provo Police, designated campus officials (including but not limited to the Compliance Director), and other law enforcement agencies.

Each year notification is made to all enrolled students and employees that provides the web site to access this report. Copies of the report may also be obtained in person from the Compliance Director or by calling (801) 373-2887. All prospective employees may obtain a copy online or from the Compliance Director.

C. Reporting of Criminal Offenses

Renaissance Academie Cosmetology and Esthetics encourages anyone who is the victim or witness to any crime or other emergency to report the incident as soon as possible. Contact the Compliance Director at (801) 373-2887 (non-emergencies) or dial 9-1-1 (emergencies only). Any suspicious activity or person seen loitering inside or around the Academie buildings should be reported to the Compliance Director.

Reports may also be made to the Academie's Campus Security Authorities, or CSAs. Under Federal law, the definition of CSAs includes individuals/offices designated by the Academie as those to whom crimes should be reported, and officials with significant responsibility for student and campus activities. If an Academie staff member has "significant responsibility" for students and campus activities outside of the classroom, and students potentially could report a crime / incident to that staff member, then they are a

CSA. CSAs are defined by function, not title. Administrative officials selected as CSAs hold significant responsibility for student and campus activities.

Current Academie CSAs:
Therese Taylor (801) 592-0156 therese@hairschoolonline.com
Title IX Coordinator: Mandy Humphrey (801) 373-2887 mandy@race.edu

For off campus options you may contact the Provo Police Department at (801) 852-6210 for non-emergencies. You should always dial 9-1-1 for emergency situations.

Procedures for Disciplinary Action
Filing a Disciplinary Complaint
When an individual reports an incident to the Compliance Office they will be given the opportunity to also file a disciplinary complaint to begin the procedures for disciplinary action.

Upon receipt of a complaint, the Compliance Office, or designee will review the complaint and determine if a formal investigation should be opened. The Compliance Office may work with the Provo Police Department to determine if a formal case file should be opened with a Provo City Police Department Investigator who will then direct investigation and confer with the Academie as necessary (e.g. with a need to know on interim action, accommodations for the alleged victim, or other necessary remedial short-term actions). If the investigation is internal, the CEO will investigate complaints against employees, and the Compliance Office will investigate complaints against students. If the alleged conduct is also the subject of a criminal investigation, the Academie may not wait for the conclusion of the criminal investigation to begin an investigation pursuant to this policy. However, The Academie may need to coordinate its fact-finding efforts with the police investigation.

Any complaints involving allegations of sexual harassment will be administered in accordance with the Academie's Sexual Harassment Policies and Grievance Procedures as set forth in this Annual Security Report.

D. Confidential Reporting
Renaissance Academie Cosmetology and Esthetics encourages anyone who is the victim or witness to any crime to report the incident as soon as possible. All reports will be investigated. Violations of the law will be referred to the Provo Police Department. When a potentially dangerous threat to the Academie community arises, timely reports or warnings will be issued through email messages, text messages, the posting of flyers in the Academie buildings, in-class announcements, or other appropriate means.

If you are the victim of a crime and do not want to pursue action within the campus or criminal justice systems, you may still want to consider making a confidential report. With your permission, the Compliance Director can file a report on the details of the incident without revealing your identity. The purpose of a confidential report is to comply with your wish to keep the matter confidential, while taking steps to ensure the future safety of yourself and others. With such information, the Academie can keep an accurate record of the number of incidents occurring on campus properties. In addition, this will determine where there is a pattern of crime regarding a location, method, or assailant, and alert the campus community to potential danger. Reports filed in this manner are counted and disclosed in the annual crime statistics for the Academie.

E. Access Policy
During business hours, the Academie will be open to students, parents, employees, contractors, guests, and invitees. During non-business hours, access to all facilities is by key, if issued, or by admittance via

the Compliance Director. For periods of extended closing, the Academie will admit only those with prior approval to all facilities. Maintenance personnel are also subject to the above restrictions.

F. Campus Security Authority and Jurisdiction

The Academie's administration attempts to provide a safe, secure educational environment for all students and employees. The Academie does not provide security guards on its campus premises. The ultimate authority for law enforcement at the Academie is the local police department. The Academie does not have any written agreements with local police departments for the investigation of alleged criminal offenses. Academie officials have the authority to contact the local police to request assistance in preventing or reacting to crime within or in the immediate vicinity of school facilities. The Compliance Director is the Academie's coordinator of security issues. The Compliance Director is not authorized to arrest individuals but does have the authority to detain suspected criminal offenders if it is deemed safe to do so. If possible, the Compliance Director shall attempt to non-violently deal with the crime or emergency with the appropriate agency. Individual discretion must be used, as undue risk should not be taken. The administration at Renaissance Academie Cosmetology and Esthetics has a working relationship with the local police and work in partnership to offer students and employees the safest possible environment.

Note: Renaissance Academie does not have campus residences.

G. Security Awareness and Prevention Programs

Information about emergency response procedures is provided at the beginning of enrollment at student orientation, and it is re-emphasized throughout the year on a campus-wide basis as other relevant advisories are issued. Information on how to receive emergency notifications is also located in The Academie's annual security report which is provided electronically to the entire campus community on an annual basis.

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

The Academie provides crime prevention and awareness information to incoming students and new employees. The Academie's primary prevention and awareness program includes a description of safe and positive options for bystander intervention as well as information about risk reduction. For more information about the Academie's primary prevention and education programs please see Section 13 of the Academie's Sexual Harassment Policies & Grievance Procedures

Renaissance Academie Cosmetology and Esthetics does not officially recognize any off-campus student organizations.

H. Criminal Activity Off Campus

Renaissance Academie Cosmetology and Esthetics does not provide law enforcement services to off-campus activities on behalf of the Academie.

I. Emergency Response Preparation and Evacuation

The Compliance Director has overall responsibility for coordinating and implementing the Emergency Response Preparation and Evacuation Plan.

The Academie will immediately notify the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus. Confirmation means that a designated official (or officials) has verified that a legitimate emergency or dangerous situation exists. Confirmation doesn't necessarily mean that all of the pertinent details are known or even available.

The Academie will confirm that there is an emergency or dangerous situation on a case-by-case basis after consideration of the available facts, including factors such as the nature of the emergency and the continuing danger or risk to the campus community. The Compliance Director or designee will confer with the CEO and if needed, local authorities in order to confirm an emergency.

The Compliance Director is the designated coordinator to enact emergency procedures and communication.

If the determination is made that an emergency notification will be issued, the Compliance Director will confer with the appropriate public and Academie officials in order to make a determination of who needs to be notified, and what the content of the notification should be.

This determination will be made giving consideration to who may be endangered by the emergency, who else may be affected by it, and what information is appropriate to communicate to them. The Compliance Director has the flexibility to discern whom to alert according to who may be at risk. In general, the entire campus community will be notified when there is at least the potential that a very large segment of the community will be affected by the situation, or when the situation threatens the operation of the campus as a whole. There will be continuing assessment of the situation and additional notifications may be issued if a situation warrants such action.

The Compliance Director will determine how much information is appropriate to disseminate at different points in time. Depending on what segments of the community notifications target, the content may differ.

Initiating the Notification System
The Academie will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to resolve the emergency.
As soon as the Academie has confirmed that a significant emergency or dangerous situation exists, the Compliance Director shall:

- Take into account the safety of the campus community
- Determine what information to release about the situation
- Begin the notification process

The only reason the Compliance Director would not immediately issue a notification for a confirmed emergency or dangerous situation would be if doing so would compromise efforts to:

- Assist a victim
- Contain the emergency
- Respond to the emergency
- Otherwise mitigate the emergency.

The Academie will notify the campus community that there's an emergency or dangerous situation as follows:

- Notify first applicable local first responders
- Prompt campus alarms and public address system
- Text message system
- Email notification; to include more specific information as it comes available

Compliance Director: Mandy Humphrey is responsible for initiating the emergency notification system.
Responsible Office: Compliance

Mandy Humphrey Compliance Director (801) 373-2887 mandy@race.edu

Responsibilities: Containing the Emergency
Mandy Humphrey Compliance Director (801) 373-2887 mandy@race.edu
Responsibilities: Emergency Notifications/Coordination of public responders
Therese Taylor CEO (801) 592-0156 therese@hairschoolonline.com
Responsibilities: Containing the Emergency
Provo City Police Department (801) 852-6210
Provo City Fire Department (801) 852-6321
Public Health Department (801) 851-7000
911 Emergency

Disseminating emergency information to the larger community.
The Academie disseminates emergency information to individuals and/or organizations outside of the campus community in the following ways:

- Text alerts to students, and as necessary to parents and guardians
- Use of radio and/or TV alerts for the neighboring community
- FaceBook community page

The Compliance Office is responsible for developing the information to be disclosed and for overseeing the dissemination of pertinent information to the larger community.

Testing of the Emergency Response and Evacuation Procedures
The Academie tests the emergency response and evacuation procedures on at least an annual basis. Testing includes:

- Tests that may be announced or unannounced. Tests are regularly scheduled drills, include exercises and appropriate follow-through activities, designed for assessment and evaluation of The Academie's emergency plans and capabilities.
- Tests are conducted, at a minimum, at least once a year and may be announced or not.

Evacuation Procedure. Evacuation should take place if it is determined that it is safer outside than inside the building (fire, explosion, intruder) and staff, students and visitors can safely reach the evacuation location without danger.

The Compliance Director will call or designate another to immediately call public safety (911) (police, fire and emergency responders) to give notice the Academie has been evacuated. The Compliance Director will communicate the need to evacuate the building to the occupants by activating the fire alarm or by in-class announcements. The Compliance Director will determine evacuation routes based on location of the incident and type of emergency and communicate changes in evacuation routes based on location and type of emergency. The Compliance Director will communicate when it is safe to re-enter the building.

Academie employee responsibilities:

- Instruct students and guests to exit the building using the designated emergency exit routes or as directed by the Compliance Director. Emergency exit routes should be diagrammed on the school floor plan drawing posted near the light switch inside each room.
- Use a secondary route if the primary route is blocked or hazardous.
- Help those needing special assistance.
- Do not lock classroom doors when leaving, close door and turn off lights.
- Do not stop for student or staff belongings.
- Take class roster, phone lists, first-aid kit and other emergency supplies with you. Check the bathrooms, hallways and common areas for visitors, staff or students while exiting.
- Go to the designated evacuation assembly area.

- When outside the building, check for injuries.
- Account for all students. Immediately report any missing or injured students to the Compliance Director.
- Wait for additional instructions.

Lockdown Procedure. Lockdown is the initial physical response to provide a time barrier during an active shooter/intruder event. Lockdown is not a stand-alone defensive strategy. When securing in place, this procedure should involve barricading the door and readying a plan of evacuation or counter tactics should the need arise.

The Compliance Director will make an announcement that the Academie is experiencing an emergency situation and that it is now under lockdown. The Compliance Director will designate staff to call 9-1-1, identify the name and address of the Academie, describe the emergency, state the Academie is locking down, and provide intruder description and weapon(s) if known. The Compliance Director will instruct staff to stay on the phone to provide updates and additional information.

Academie employee responsibilities:

- Clear the hallway and bathrooms by your room, moving everyone into the classroom.
- Lock your doors.
- Move any large objects in front of the door to barricade door. All moveable items such as chairs should be used as well.
- Take attendance and be prepared to notify the Compliance Director or local law enforcement of missing students or additional students, staff or guests sheltered in your classroom.
- Do not place students in one location within the room. In the event that entry is gained by a shooter or intruder, students should consider exiting by running past the shooter/intruder.
- Staff and students may utilize methods to distract the shooter/intruder's ability to accurately shoot or cause harm, such as loud noises or aiming and throwing objects at the shooter/intruder's face or person.
- Allow no one outside of the classroom until the Compliance Director or local law enforcement gives the "All Clear" signal unless a life-threatening situation exists and a means to safe exit is available (through a window or other safe passage).
- If students and Academie personnel are outside of the school building at the time of a lockdown, Academie personnel will move students to the designated off-site assembly location.

Shelter-In-Place Procedure. The shelter-in-place procedure provides a refuge for students, staff and the public inside the school building during an emergency. Shelters are located in areas of the building that maximize the safety of occupants. Shelter-in-place is used when evacuation would place people at risk. Shelters may change depending on the emergency.

The Compliance Director will announce that the Academie is experiencing an emergency situation and needs to implement shelter-in-place procedures. Students, guests and staff will be directed to move to the designated shelter locations in the Academie. All students, guests and staff outside will be directed to immediately move to an inside room.

The Compliance Director will designate staff to monitor radio, Internet, and other media for information on incident conditions that caused the shelter-in-place. The Compliance Director will contact and consult with public safety officials as appropriate and be prepared to announce additional procedures due to changing conditions of the incident, or to announce an "All Clear."

Academie employee responsibilities:

- Move students into designated safe areas such as inside rooms with no windows, bathrooms, utility closets or hallways without large windows or doors.
- Close classroom doors and windows when leaving.
- Have everyone kneel down and be ready to cover their heads to protect from debris, if appropriate.
- All persons must remain in the shelter until notified by the Compliance Director or public safety official that it is safe to exit.

Fire Response Procedure.
Any staff discovering fire or smoke will activate the fire alarm, and report the fire to the Compliance Director, or call 911 if conditions require and/or injured are in need of medical assistance. Staff, students, and visitors will immediately evacuate the building using prescribed routes or alternate routes to the assembly areas.

No one may re-enter building(s) until it is declared safe by the fire department.

Once the fire department arrives, it is critical to follow the instructions of, and cooperate with, the fire department personnel who have jurisdiction at the scene.

The Compliance Director will call or direct staff to call 911 to confirm the alarm is active, identify the school name and location, provide exact location of the fire or smoke, if any staff or students are injured, and state the building is being evacuated. The Compliance Director will ensure that staff, students, and visitors immediately evacuate the building using prescribed routes or alternate routes due to building debris to the assembly areas. Assembly areas may need to be relocated because of the building collapse or unsafe areas from the fire. The Compliance Director will designate staff to obtain student roll from instructors and identify any missing students.

The Compliance Director will not allow staff, students or guests to return to the building until the fire department with jurisdiction over the scene has determined that it is safe to do so and given the “All Clear”.

Academie employee responsibilities:

- Take the class roster and first-aid kit and any other supplies or resources relevant to the incident and lead students as quickly and quietly as possible out of the building to the designated assembly area.
- Use alternate escape routes if the regular route is blocked or there is a safety hazard.
- Assist or designate others to assist students with functional needs.
- Close the classroom door and turn out the lights upon exiting and confirm all students and personnel are out of the classroom.
- Take attendance at the assembly area. Report any missing students or staff members and/or any injuries to the Compliance Director or the emergency response personnel at the scene.
- Keep class together and wait for further instructions.
- Remain in safe area until the “All Clear” signal has been issued.

No one may re-enter building(s) until it is declared safe by the fire department.

Medical Emergency Procedure. These procedures are in place to assist staff, students, and guests in the event of a medical emergency.

The Academie’s staff should:

- Quickly assess the situation. Make sure the situation is safe for you to approach (i.e., live electric wires, gas leak, building damage, etc.).
- Immediately notify the Compliance Director.
- Assess the seriousness of the injury or illness.
- Call or have someone call 9-1-1 immediately. Be prepared to provide the school name and address, exact location (floor, room number); describe illness or type of injury; and age of the victim(s).
- Protect yourself against contact with body fluids (blood borne pathogens).
- Administer appropriate first aid according to your level of training until help arrives.
- Comfort and reassure the injured person. Do Not Move an injured person unless the scene is unsafe.

The Compliance Director will direct staff to call 9-1-1, if necessary, and provide appropriate information to emergency responders. The Compliance Director will send Academie staff with first responder/ first-aid training to the scene if this has not already occurred. The Compliance Director will assign a staff member to meet emergency medical service responders and lead them to the injured person and assign a staff member to remain with the injured person if they are transported to the hospital. If the injured person is a member of Academie personnel or a student, the Compliance Director will notify that person's emergency contact of the situation, include type of injury or illness, medical care given and location where the injured person has been transported. The Compliance Director will ensure that student or staff medical information from administrative records is sent to the hospital. The Compliance Director will develop and maintain written documentation of the incident.

J. Fire Prevention and Workplace Hazards

It is the responsibility of all faculty and staff to alert the Compliance Director of any and all conditions that could potentially pose a fire hazard or other unsafe condition in or around the building. No smoking is permitted in the building and flammable chemicals are confined and stored in a locked area, meeting all OSHA requirements. Good housekeeping practices will be the responsibility of all faculty, staff, and students. Waste materials are to be discarded in their proper places and all aisles, doorways, hallways and exit doors are to be kept clear at all times.

K. Alcoholic Beverages or Controlled Substances

It is the policy of Renaissance Academie Cosmetology and Esthetics that the unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance or alcohol is prohibited while in the workplace, on Academie premises, or as part of any Academie sponsored activities. Any employee or student violating this policy will be subject to disciplinary action up to and including termination or expulsion and referral for prosecution. The specifics of this policy can be found in the Drug and Alcohol Prevention Policy.

L. Alcohol and Substance Abuse Education

The Academie has developed a program to prevent the illicit use of drugs and the abuse of alcohol by students and employees. The program provides services related to drug use and abuse including dissemination of information materials, referrals, and Academie disciplinary actions.

A violation of any law regarding drugs or alcohol is also a violation of the Academie's Drug and Alcohol Prevention Policy and will be treated as a separate disciplinary matter by the Academie.

Please see the Academie's Drug and Alcohol Prevention Policy, which is part of this Annual Security Report, for contact information to local mental health and substance abuse services.

M. Sexual Harassment Policies & Grievance Procedures

Renaissance Academie Cosmetology and Esthetics is committed to providing a working and educational environment for all students, faculty and staff that is free from sex discrimination, including sexual harassment. Every member of the school community should be aware that the Academie is strongly opposed to sexual harassment, and that such behavior is prohibited by state and federal laws.

The Academie's Sexual Harassment Policies & Grievance Procedures are part of this Annual Security Report. It describes the Academie's programs to prevent sexual harassment, and the procedures that the Academie will follow once an incident of sexual harassment has been reported. This Policy is disseminated widely to the Academie community through publications, the Academie website, new employee orientations, student orientations, and other appropriate channels of communication. Copies of the Policy can be obtained from the Compliance Director or downloading from the Academie's website at www.race.edu. The Academie provides training to key staff members to enable the Academie to handle any allegations of sexual misconduct promptly and effectively. The Academie will respond promptly to all reports of sexual harassment, and will take appropriate action to prevent, to correct, and if necessary, to discipline behavior that violates this policy.

The Academie's Sexual Harassment Policies & Grievance Procedures govern sexual harassment that occurs in the Academie's education programs or activities. This Policy applies to all students, employees, and third parties conducting business with the Academie, regardless of the person's gender, gender identity, sexual orientation, age, race, nationality, class status, ability, religion or other protected status. The Academie encourages victims of sexual harassment to talk to somebody about what happened – so victims can get the support they need, and so the Academie can respond appropriately. As further described in this Policy, the Academie will seek to respect a victim's request for confidentiality to the extent possible, while remaining ever mindful of the victim's well-being.

N. Sexual Offender Registration

in accordance with the Campus Sex Crimes Prevention Act of 2000, the Clery Act, and the Family Rights and Privacy Act of 1974, the school is providing information for where students and employees may obtain information regarding registered sex offenders. The Utah Sex Offenders Registry may be found at:

https://bci.utah.gov/offender-registries/

The Campus Sex Crimes Prevention Act requires institutions of higher education to provide a statement advising the campus community where law enforcement information provided by a state concerning registered sex offenders can be obtained.

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RENAISSANCE ACADEMIE COSMETOLOGY AND ESTHETICS
CAMPUS CRIME REPORT

The Compliance Director prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. The report is prepared in cooperation with the local law enforcement agencies surrounding our campus. Campus crime, arrest, and referral statistics include those reported to the Compliance Director and local law enforcement agencies. Copies of the report may be obtained in the Compliance Director's Office or by calling (801) 373-2887. All prospective employees may obtain a copy from the Compliance Director or by calling (801) 373-2887.

To Report A Crime: Contact the Compliance Director at (801) 373-2887 (non-emergencies) or dial 9-1-1 (emergencies only). Any suspicious activity or person seen loitering inside or around the Academie buildings should be reported to the Compliance Director.

Offense	**On Campus**			**Non Campus**			**Public Property**		
	2023	2024	2025	2023	2024	2025	2023	2024	2025
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
VAWA Offenses	**On Campus**			**Non Campus**			**Public Property**		
Domestic Violence	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0
Arrests & Disciplinary Referrals	**On Campus**			**Non Campus**			**Public Property**		
Liquor Law Arrests	0	0	0	0	0	0	0	0	0
Liquor Law Violations Referred for Disciplinary Action	0	0	0	0	0	0	0	0	0
Drug Law Arrests	0	0	0	0	0	0	0	0	0
Drug Law Arrests Referred for Disciplinary Action	0	0	0	0	0	0	0	0	0
Illegal Weapons Possession Arrests	0	0	0	0	0	0	0	0	0
Illegal Weapons Possession Violations Referred for Disciplinary Action	0	0	0	0	0	0	0	0	0

Hate Crimes – There were no Hate Crimes reported for 2023, 2024, or 2025.

Hazing Incidents – In 2025, there were 0 hazing incidents on campus, 0 on noncampus property, and 0 on public property. Hazing statistics were not required for 2023 or 2024.

RENAISSANCE ACADEMIE COSMETOLOGY AND ESTHETICS
DRUG AND ALCOHOL PREVENTION POLICY

Renaissance Academie Cosmetology and Esthetics (the "Academie") has adopted and implemented a Drug and Alcohol Prevention Program for its students and employees. This program includes annual distribution in writing to each student, regardless of the length of the student's program of study, and to all employees the following information:

(1) The standard of conduct expected of students and employees in relation to the possession, use, or distribution of drugs and alcohol
(2) The standard of conduct related to the misuse of prescription drugs, alcohol, and tobacco
(3) A description of the applicable legal sanctions under state and Federal law that may arise from the unlawful possession or distribution of drugs
(4) A description of the health risks associated with the use of illegal drugs
(5) A description of Academie and local substance abuse counseling and treatment resources available to students and employees.
(6) A clear statement of the disciplinary sanctions that may be imposed upon students and employees for violations of the Academie's Drug-Free School Policy.

The Academie believes that it is very important to provide a safe environment for all of its students and employees. Substance abuse, while at work, school or otherwise, seriously endangers the safety of students and employees, as well as the general public, and creates a variety of problems including increased theft, decreased morale, decreased productivity, and a decline in the quality of services provided. It is also our Policy to prevent the use and/or presence of these substances in the school. Renaissance Academie Cosmetology and Esthetics will strive to provide an environment conducive to making conscientious and healthy decisions when students are faced with difficult choices associated with the use of legal and illegal drugs.

It is a violation of Academie policy for any student to:

- Use illegal drugs or misuse prescription drugs;
- Misuse alcohol;
- Possess, trade, manufacture, distribute, dispense, buy, or offer for sale alcohol, illegal and/or prescription drugs while on duty, during break periods, or on school property;
- Arrive or return to school intoxicated from use of illegal drugs, misused prescription drugs or alcohol;
- Engage in the use of illegal drugs, misuse of prescription drugs or alcohol during school hours or while on school property (including parking lots); or
- Use prescription drugs or non-prescription drugs that may affect the safety of the student or fellow students, and members of the public.

No employee or student is to report to work, attend class, or participate in any activity while under the influence of one or more illegal drugs or alcohol.

Any student who is taking any prescription or non-prescription drug which might impair safety, performance, or any motor functions must advise his/her Instructor or the Compliance Director before providing services under such medication.

The possession and use of alcoholic beverages by employees, students, and guest of the Academie are always subject to applicable state alcoholic beverage laws, as well as city ordinances within our service

area, and the Academie's policy. Students are individually responsible for being aware of applicable laws, regulations, ordinances, and the Academie's policy for complying with them. Renaissance Academie Cosmetology and Esthetics will assist in that endeavor by providing current information on an ongoing basis to all students.

Distribution Procedures
Annual Notifications:
In order to comply with the Drug-Free Schools and Campuses Regulations, Part 86, procedures for distributing annual Alcohol and Other Drug (AOD) notifications to all enrolled students and all employees the Academie performs the following:

- Safe Colleges: The Academie posts to *all* employees and students individual portal a notice to review and acknowledge receipt of the annual AOD notifications. The AOD PDF is available for access anytime through the individual's Safe College access.
- The Academie emails all employees and students a direct link to both their Safe College portal for access and the direct link to the Academie website for access and review of AOD notifications.

If requested, the Academie will make available a copy of each requested item in the drug prevention program and the results of the biennial review.

Orientation:
New students and employees are provided with a copy of the Academie's Annual Security Report that includes information addressing campus safety, drug and alcohol awareness, sexual harassment, assault prevention and emergency procedures.

The Academie's goal is that all new students and employees are informed of local laws, Academie policies and general campus conduct information.

Drug & Alcohol Health Risks

Alcohol: People drink to socialize, celebrate, and relax. Alcohol often has a strong effect on people—and throughout history, people have struggled to understand and manage alcohol's power. Why does alcohol cause people to act and feel differently? How much is too much? Why do some people become addicted while others do not?
Alcohol's effects vary from person to person, depending on a variety of factors, including:

- How much you drink
- How often you drink
- Your age
- Your health status
- Your family history

While drinking alcohol is itself not necessarily a problem—drinking too much can cause a range of consequences and increase your risk for a variety of problems.

Cocaine: Cocaine is a powerfully addictive stimulant drug. Cocaine increases levels of the natural chemical messenger *dopamine* in brain circuits controlling pleasure and movement. This flood of dopamine ultimately disrupts normal brain communication and causes cocaine's high.

Short-term effects include constricted blood vessels, nausea, faster heartbeat, extreme happiness and energy, irritability, and paranoia. Long-term effects include nosebleeds, severe bowel decay, higher risk of contracting HIV, hepatitis C, and other bloodborne diseases, malnourishment,

restlessness, and severe paranoia with auditory hallucinations. A person can overdose on cocaine, which can lead to death.

Marijuana: Marijuana contains the mind-altering chemical THC and other related compounds. THC over-activates certain brain cell receptors, resulting in effects such as altered senses, changes in mood, impaired body movement, difficulty with thinking and problem-solving, and impaired memory and learning. Marijuana use can have a wide range of health effects, including hallucinations and paranoia, breathing problems, and possible harm to a fetus's brain in pregnant women. Marijuana use can cause some very uncomfortable side effects, such as anxiety and paranoia and, in rare cases, extreme psychotic reactions. Marijuana use can lead to a substance use disorder, which can develop into an addiction in severe cases.

Hallucinogens and Dissociative Drugs: Hallucinogens and dissociative drugs—which have street names like acid, angel dust, and vitamin K—distort the way a user perceives time, motion, colors, sounds, and self. These drugs can disrupt a person's ability to think and communicate rationally, or even to recognize reality, sometimes resulting in bizarre or dangerous behavior. Hallucinogens such as LSD, psilocybin, peyote, DMT, and ayahuasca cause emotions to swing wildly and real-world sensations to appear unreal, sometimes frightening. Dissociative drugs like PCP, ketamine, dextromethorphan, and *Salvia divinorum* may make a user feel out of control and disconnected from their body and environment. In addition to their short-term effects on perception and mood, hallucinogenic drugs are associated with psychotic-like episodes that can occur long after a person has taken the drug, and dissociative drugs can cause respiratory depression, heart rate abnormalities, and a withdrawal syndrome.

Methamphetamine: The abuse of methamphetamine—a potent and highly addictive stimulant—remains an extremely serious problem in the United States. The consequences of methamphetamine abuse are terrible for the individual—psychologically, medically, and socially. Abusing the drug can cause memory loss, aggression, psychotic behavior, damage to the cardiovascular system, malnutrition, and severe dental problems. Methamphetamine abuse has also been shown to contribute to increased transmission of infectious diseases, such as hepatitis and HIV/AIDS.

Reasonable Search:
To ensure that illegal drugs and alcohol do not enter or affect the Academie, Renaissance Academie Cosmetology and Esthetics reserves the right to search all vehicles, containers, lockers, or other items on school property in furtherance of this Policy. Individuals may be requested to display personal property for visual inspection upon the Academie's request. Searches will be conducted only where Renaissance Academie Cosmetology and Esthetics has reason to believe that the student has violated the Academie's Policy. Failure to consent to a search or display of personal property for visual inspection will be grounds for discipline, up to and including termination from the program or denial of access to school premises. Searches of a student's personal property will take place only in the student's presence. All searches under this Policy will occur with the utmost discretion and consideration for the student involved. Individuals may be required to empty their pockets, but under no circumstances will a student be required to remove articles of clothing to be physically searched.

Student Assistance:
Renaissance Academie Cosmetology and Esthetics holds all students accountable in terms of substance use but also supports getting help for students. Students who come forward voluntarily to identify that they have a substance problem will not be reprimanded. It is important for the student to come to an understanding regarding the extent of the problem in order to correct the problem and be able to avoid

future usage in violation of the Academie's Policy. This is required in order to correct the problem and be able to avoid violating the Academie's Policy in the future. If the student is willing to actively engage in resolving the substance use problem, the Academie will refer the student to a Substance Abuse Professional for an assessment and possible outpatient counseling at the student's expense. If a leave of absence is requested, it must follow the Leave of Absence Policy as stipulated in the catalog. This leave will be conditioned upon receipt of reports from the treatment providers that the student is cooperating and making reasonable progress in the treatment program. The student will be permitted to return to school only if (s)he passes a drug /alcohol test and has satisfactory medical evidence that (s)he is fit for attendance.

This protection does not cover a student who confesses a problem after an incident or accident that requires a substance use test, or after being notified that a reasonable suspicion test is required.

Alcohol & Drug Prevention & Treatment
Numerous options exist for alcohol and drug abuse treatment, and individuals are encouraged to voluntarily seek help. The Compliance Office provides literature and information for programs about prevention and the harmful effects of alcohol and other drugs. It also offers local resources offering education programs on topics such as alcohol and other drugs, sexually transmitted diseases, date rape and smoking cessation

Students may meet with the Compliance Office Director for assistance in a referral to off campus resources.

Community Resources

The National Alliance on Mental Illness Utah (NAMI Utah)
450 South 900 East, Suite 160
Salt Lake City, Utah 84102
Toll free 1-877-230-6264; 801-323-9900

Wasatch Mental Health
Crisis Intervention
750 N. Freedom Blvd.
Provo, UT 84601
Main Number: (801) 373-4760
24 Hour Crisis Line: (801) 373-7393

Utah Department of Substance Abuse
195 North 1950 West Salt Lake City, UT 84116
Phone: 801.538.3939
Fax: 801.538.9892

Utah Valley Hospital
1134 N 500 W
Provo, UT 84604
(801) 357-7850

<u>Hotlines:</u>

Alcoholics Anonymous: 1-800-356-9996
American Council on Alcoholism Help Line: 1-800-527-5344
National Academy on Drug Abuse Hotline: 1-800-662-HELP

Cocaine Hotline: 1-800-COCAINE
National Council on Alcoholism 1-800-NCA-CALL

Additional information about drug and alcohol abuse, health risks, addiction, and prevention is available from the National Institute on Alcohol Abuse and Alcoholism (https://www.niaaa.nih.gov/publications/brochures-and-fact-sheets/college-drinking) and the National Institute on Drug Abuse (https://nida.nih.gov/research-topics/drugs-a-to-z).

Disciplinary Action:
The Academie will impose penalties and sanctions against individuals who violate this policy, consistent with local, state and federal law. Consequences are severe and include disciplinary action, up to and including termination from employment, referral for prosecution, academic sanctions, referral to voluntary/mandatory treatment, and removal/expulsion from campus.

Employees: It is a violation of this policy for any employee to jeopardize the operation or interests of the Academie through the unlawful manufacture, dispensation, possession, use, or distribution of any controlled substance, including illicit drugs, marijuana or alcohol. Sanctions for employees who are found to be in violation of this policy may include discipline up to and including termination of employment. Compliance with this policy is a condition of employment for all employees.

Students: Students found in violation of this policy shall be subject to sanctions or consequences as follows: The student may be required to perform a specific number of hours of community service, complete a reflection or research paper, attend a class, workshop, program, or lecture, or be involved with the community in a way that brings about a new understanding of the community and how his/her behavior may have impacted others. This is not an exhaustive list but should serve as a reference for the types of educational sanctions that may be levied.

The Academie may adjudicate violations of standards occurring both on and off-campus that are determined to have caused, or may have threatened to cause, an impact on the Academie's activities, or on the health, safety and/or security of the Academie, its members, or the community. This decision is made at the discretion of the Academie's Administration team.

Criminal Sanctions: Violations of this policy may also violate local, state and federal criminal law and will be referred to the local police department for investigation which may result in separate penalties such as monetary fines or imprisonment. Individuals concerned about specific circumstances should seek the advice of their personal attorney.

Confidentiality:
All information, interviews, reports, statement memoranda and drug test results, written or otherwise, received by Renaissance Academie Cosmetology and Esthetics as part of this Drug and Alcohol Prevention Policy are confidential communications. Unless authorized by state laws, rules or regulations, the Academie will not release such information without a written consent form signed voluntarily by the person tested. Information on drug testing results will not be released unless such information or records are compelled by a court or a professional or occupational licensing board.

Biennial Review:
The Academie will review the drug and alcohol prevention program every two years. Any recommendations, data, and/or assistance available to substance abusers will be updated and distributed to all students and staff of Renaissance Academie Cosmetology and Esthetics.

Overview of Federal Controlled Substance Penalties

The Controlled Substances Act (CSA) places all substances which were in some manner regulated under existing federal law into one of five schedules. This placement is based upon the substance's medical use, potential for abuse, and safety or dependence liability. The Act also provides a mechanism for substances to be controlled (added to or transferred between schedules) or decontrolled (removed from control). The procedure for these actions is found in Section 201 of the Act (21U.S.C. §811).

The CSA provides penalties for unlawful manufacturing, distribution, and dispensing of controlled substances. The penalties are basically determined by the schedule of the drug or other substance, and sometimes are specified by drug name, as in the case of marijuana. As the statute has been amended since its initial passage in 1970, the penalties have been altered by Congress. The following charts are an overview of the penalties for trafficking or unlawful distribution of controlled substances.

FEDERAL TRAFFICKING PENALTIES

<table>
<tr><th>DRUG/SCHEDULE</th><th>QUANTITY</th><th>PENALTIES</th><th>QUANTITY</th><th>PENALTIES</th></tr>
<tr><td>Cocaine (Schedule II)</td><td>500–4999 grams mixture</td><td rowspan="8">First Offense: Not less than 5 yrs, and not more than 40 yrs. If death or serious injury, not less than 20 or more than life. Fine of not more than $5 million if an individual, $25 million if not an individual.

Second Offense: Not less than 10 yrs, and not more than life. If death or serious injury, life imprisonment. Fine of not more than $8 million if an individual, $50 million if not an individual.</td><td>5 kgs or more mixture</td><td rowspan="5">First Offense: Not less than 10 yrs, and not more than life. If death or serious injury, not less than 20 or more than life. Fine of not more than $10 million if an individual, $50 million if not an individual.

Second Offense: Not less than 15 yrs, and not more than life. If death or serious injury, life imprisonment. Fine of not more than $20 million if an individual, $75 million if not an individual.

2 or More Prior Offenses: Not less than 25 yrs. Fine of not more than $20 million if an individual, $75 million if not an individual.</td></tr>
<tr><td>Cocaine Base (Schedule II)</td><td>28–279 grams mixture</td><td>280 grams or more mixture</td></tr>
<tr><td>Fentanyl (Schedule II)</td><td>40–399 grams mixture</td><td>400 grams or more mixture</td></tr>
<tr><td>Fentanyl Analogue (Schedule I)</td><td>10–99 grams mixture</td><td>100 grams or more mixture</td></tr>
<tr><td>Heroin (Schedule I)</td><td>100–999 grams mixture</td><td>1 kg or more mixture</td></tr>
<tr><td>LSD (Schedule I)</td><td>1–9 grams mixture</td><td>10 grams or more mixture</td><td rowspan="3">First Offense: Not less than 10 yrs, and not more than life. If death or serious injury, not less than 20 or more than life. Fine of not more than $10 million if an individual, $50 million if not an individual.

Second Offense: Not less than 15 yrs, and not more than life. If death or serious injury, life imprisonment. Fine of not more than $20 million if an individual, $75 million if not an individual.

2 or More Prior Offenses: Not less than 25 yrs. Fine of not more than $20 million if an individual, $75 million if not an individual.</td></tr>
<tr><td>Methamphetamine (Schedule II)</td><td>5–49 grams pure or 50–499 grams mixture</td><td>50 grams or more pure or 500 grams or more mixture</td></tr>
<tr><td>PCP (Schedule II)</td><td>10–99 grams pure or 100–999 grams mixture</td><td>100 gm or more pure or 1 kg or more mixture</td></tr>
<tr><th colspan="5">PENALTIES</th></tr>
<tr><td>Other Schedule I & II drugs (and any drug product containing Gamma Hydroxybutyric Acid)

Flunitrazepam (Schedule IV)</td><td>Any amount

1 gram</td><td colspan="3">First Offense: Not more than 20 yrs. If death or serious injury, not less than 20 yrs, or more than life. Fine $1 million if an individual, $5 million if not an individual.

Second Offense: Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine $2 million if an individual, $10 million if not an individual.</td></tr>
<tr><td>Other Schedule III drugs</td><td>Any amount</td><td colspan="3">First Offense: Not more than 10 years. If death or serious injury, not more than 15 yrs. Fine not more than $500,000 if an individual, $2.5 million if not an individual.

Second Offense: Not more than 20 yrs. If death or serious injury, not more than 30 yrs. Fine not more than $1 million if an individual, $5 million if not an individual.</td></tr>
</table>

All other Schedule IV drugs	Any amount	First Offense: Not more than 5 yrs. Fine not more than $250,000 if an individual, $1 million if not an individual.
Flunitrazepam (Schedule IV)	Other than 1 gram or more	Second Offense: Not more than 10 yrs. Fine not more than $500,000 if an individual, $2 million if other than an individual.
All Schedule V drugs	Any amount	First Offense: Not more than 1 yr. Fine not more than $100,000 if an individual, $250,000 if not an individual. Second Offense: Not more than 4 yrs. Fine not more than $200,000 if an individual, $500,000 if not an individual.

FEDERAL TRAFFICKING PENALTIES—MARIJUANA

DRUG	QUANTITY	1st OFFENSE	2nd OFFENSE
Marijuana (Schedule I)	1,000 kg or more marijuana mixture; or 1,000 or more marijuana plants	Not less than 10 yrs. or more than life. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine not more than $10 million if an individual, $50 million if other than an individual.	Not less than 15 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than $20 million if an individual, $75 million if other than an individual.
Marijuana (Schedule I)	100 kg to 999 kg marijuana mixture; or 100 to 999 marijuana plants	Not less than 5 yrs. or more than 40 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine not more than $5 million if an individual, $25 million if other than an individual.	Not less than 10 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than $20 million if an individual, $75million if other than an individual.
Marijuana (Schedule I)	More than 10 kgs hashish; 50 to 99 kg marijuana mixture More than 1 kg of hashish oil; 50 to 99 marijuana plants	Not more than 20 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine $1 million if an individual, $5 million if other than an individual.	Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine $2 million if an individual, $10 million if other than an individual.
Marijuana (Schedule I)	Less than 50 kilograms marijuana (but does not include 50 or more marijuana plants regard-less of weight) 1 to 49 marijuana plants;	Not more than 5 yrs. Fine not more than $250,000, $1 million if other than an individual.	Not more than 10 yrs. Fine $500,000 if an individual, $2 million if other than individual.
Hashish (Schedule I)	10 kg or less		
Hashish Oil (Schedule I)	1 kg or less		

*The minimum sentence for a violation after two or more prior convictions for a felony drug offense have become final is a mandatory term of life imprisonment without release and a fine up to $20 million if an individual and $75 million if other than an individual.

Key Provisions of Utah Drug & Alcohol Laws

Driving Under the Influence (DUI) - Utah Code section 41-6a-502 & 41-6a-503
A person may not operate or be in physical control of a vehicle if the offender:

- Has a blood or breath alcohol concentration of 0.05 grams or greater at the time that the test is administered
- Is under the influence of alcohol, any drug, or the combined influence of alcohol and any drug to a degree that renders the driver incapable of safely operating a vehicle, or

- Has a blood or breath alcohol concentration of 0.05 grams or greater at the time of operation or actual physical control of the vehicle

Penalty: First or second offense is generally a Class B misdemeanor. Up to six months imprisonment and/or $1,000 fine. Violation may be a Class A misdemeanor or third degree felony if injuries occur or for repeat offenses.

Minor in Possession (MIP) - Utah Code section 32B-4-409
It is illegal for minors (under 21) to purchase alcohol, attempt to purchase alcohol, solicit another person to purchase alcohol, possess alcohol, or consume alcohol.
Penalty: Suspension of driving privileges. Class B misdemeanor.Up to 6 months imprisonment and/or $1,000 fine.

Selling or furnishing alcohol to a minor – Utah Code section 32B-4-403
It is unlawful to sell, offer for sale, or furnish an alcoholic product to a minor.
Penalty: Class A misdemeanor. Up to 1 year imprisonment and /or up to $2,500 fine.

False identification - Utah Code section 32B-4-411
It is illegal for a minor to use false proof of age for purposes of purchasing alcohol, soliciting another person to purchase alcohol, possessing alcohol, or consuming alcohol.
Penalty: Class B misdemeanor. Up to 6 months imprisonment and/or $1,000 fine.

Utah law prohibits the possession and distribution of controlled substances, which include such drugs as marijuana, heroin, cocaine, and prescribed medications. See Utah Code section 58-37-4. It is unlawful in Utah to possess or use a controlled substance except pursuant to a valid prescription. Violation of this law may result in charges ranging from a class B misdemeanor to second degree felony depending upon the quantity of drugs within the individual's possession See Utah Code section 58-37-8(2). Penalties for drug violations in Utah may include incarceration for varying periods of time and fines ranging from $750 to $10,000 depending upon the nature and circumstances of the offense. In certain circumstances enhanced penalties may apply.

Notice of Federal Student Aid (FSA) Penalties for Drug Law Violations:
Under the FAFSA Simplification Act, the former general prohibition on receiving Title IV federal student aid because of a drug-related conviction was eliminated. A drug conviction, including one occurring while a student received Title IV aid, does not by itself make the student ineligible for federal student aid. Applicants must still meet all other applicable student and program eligibility requirements.

A separate restriction may apply when a federal or state judge orders denial of certain federal benefits under the Anti-Drug Abuse Act of 1988 (21 U.S.C. 862). The U.S. Department of Education checks applicants against a federal drug abuse hold file. Students subject to such a hold may be denied federal student aid while the hold remains in effect.

Students with questions about federal aid eligibility, including a possible drug abuse hold, should contact the Academie's Financial Aid Office or consult current guidance at https://studentaid.gov/.

These federal student aid rules apply only to otherwise eligible students enrolled in Title IV-eligible programs. RACE's Nail Technology and Lash & Brow Technology programs are not eligible for Federal Student Aid. Financial Aid options where available for those who qualify.

Academie Flexibility:
Renaissance Academie Cosmetology and Esthetics reserves the right to alter or amend any portion of this policy at any time without prior notice. The Academie reserves the right to alter or modify this policy in a given situation depending on the totality of the circumstances. Time periods stated herein for the performance of any act or provision of any notice by the Academie are for guidance only and failure of Renaissance Academie Cosmetology and Esthetics to strictly meet any time frame provided herein shall not preclude the Academie from taking any action provided herein. Under no circumstances shall failure to perform any act within the time frames herein excuse or relieve any student from his or her obligations or relieve any student from the consequences of any violation of this Policy.

RENAISSANCE ACADEMIE COSMETOLOGY AND ESTHETICS
SEXUAL HARASSMENT POLICIES & GRIEVANCE PROCEDURES

1. Introduction

Renaissance Academie Cosmetology and Esthetics (the "Academie") is committed to providing a working and educational environment for all students, faculty and staff that is free from sex discrimination, including sexual harassment. Every member of the Academie community should be aware that the Academie is strongly opposed to sexual harassment, and that such behavior is prohibited by state and federal laws.

The Academie does not discriminate on the basis of sex in its educational, extracurricular, or other programs or in the context of employment. Sex discrimination is prohibited by Title IX of the Education Amendments of 1972, a federal law that provides:

No person in the United States shall, on the basis of 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.

As part of the Academie's commitment to providing a working and learning environment free from sexual harassment, this Policy shall be disseminated widely to the Academie community through publications, the Academie website, new employee orientations, student orientations, and other appropriate channels of communication. The Academie provides training to key staff members to enable the Academie to handle any allegations of sexual harassment promptly and effectively. The Academie will respond promptly to all reports of sexual harassment, and will take appropriate action to prevent, to correct, and if necessary, to discipline behavior that violates this policy.

2. Scope of the Policy

This Policy governs sexual harassment that occurs in the Academie's education programs or activities. This Policy applies to all students, employees, and third parties conducting business with the Academie, regardless of the person's gender, gender identity, sexual orientation, age, race, nationality, class status, ability, religion or other protected status. The Academie encourages victims of sexual harassment to talk to somebody about what happened – so victims can get the support they need, and so the Academie can respond appropriately. As further described in this Policy, the Academie will seek to respect a victim's request for confidentiality to the extent possible, while remaining ever mindful of the victim's well-being.

3. Prohibited Conduct

Sexual harassment comprises a broad range of behaviors focused on sex that may or may not be sexual in nature. Sexual harassment includes a Academie employee conditioning the provision of a Academie aid, benefit, or service on an individual's participation in unwelcome sexual conduct. 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 Academie's education programs or activities also constitutes sexual harassment. Sexual assault, stalking, domestic violence, and dating violence are all forms of sexual harassment. Retaliation following an incident of alleged sexual harassment or attempted sexual harassment is strictly prohibited. The definitions for specific acts of sexual harassment can be found in the Definitions of Key Terms at the end of this Policy statement.

Sexual harassment can occur between strangers or acquaintances, or people who know each other well, including between people involved in an intimate or sexual relationship, can be committed by anyone regardless of gender identity, and can occur between people of the same or different sex or gender. **This Policy prohibits all forms of sexual harassment.**

4. Options for Assistance Following an Incident of Sexual Harassment

The Academie strongly encourages any victim of sexual harassment to seek immediate assistance. Seeking prompt assistance may be important to ensure a victim's physical safety or to obtain medical care. The Academie strongly advocates that a victim of sexual harassment report the incident in a timely manner. Time is a critical factor for evidence collection and preservation.

Reporting Incidents of Sexual Harassment.

Victims of sexual harassment may file a report with the Provo Police Department. Victims may also file a report with the Academie's Title IX Coordinator. More information about reporting an incident of sexual harassment can be found in Section 6 of this Policy, below.

The Academie will respond promptly when it has actual knowledge of sexual harassment in its education programs or activities. The Title IX Coordinator will promptly contact the complainant to discuss the availability of supportive measures as described below, 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. The Academie will also provide the complainant with written notification about assistance available both within the Academie community and without.

A complainant may choose for the investigation to be pursued through the criminal justice system and/or through the Academie's disciplinary procedures by filing a formal complaint as describe in this Policy. The Academie and the criminal justice system work independently from each other. Law enforcement officers do not determine whether a violation of this Policy has occurred. The Title IX Coordinator will guide the complainant through the available options and support the complainant in his or her decision.

Supportive Measures.

The Academie's Title IX Coordinator will work with all students affected by sexual harassment to ensure their safety and support their wellbeing. This assistance may include providing supportive measures to support or protect a student after an incident of sexual harassment and while an investigation or disciplinary proceeding is pending. Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant or the respondent before or after the filing of a formal complaint or where no formal complaint has been filed. Such measures are designed to restore or preserve equal access to the Academie's education programs and activities without unreasonably burdening the other party, including measures designed to protect the safety of all parties or the Academie's educational environment, or deter sexual harassment.

Supportive measures may include:

- counseling,
- extensions of deadlines or other course-related adjustments,
- modifications of work or class schedules,
- campus escort services,
- mutual restrictions on contact between the parties,
- changes in work or housing locations,
- leaves of absence,
- increased security and monitoring of certain areas of the campus, and
- other similar measures.

The Academie will maintain as confidential any supportive measures provided to the complainant or respondent, to the extent that maintaining such confidentiality would not impair the ability of the Academie to provide the supportive measures. The Title IX Coordinator is responsible for coordinating the effective implementation of supportive measures.

The measures needed by each student may change over time, and the Title IX Coordinator will communicate with each student throughout any investigation to ensure that any supportive measures are necessary and effective based on the students' evolving needs. Students who report an incident of sexual harassment may also be able to obtain a formal protection order from a civil or criminal court. The Academie will work with the student and the applicable court to assist in the enforcement of any such protective orders.

Support Services Available.
Counseling, advocacy, and support services are available for complainants, whether or not a complainant chooses to make an official report or participate in the Academie's disciplinary or criminal process. *Renaissance Academie Cosmetology and Esthetics does not provide counseling or health care services. Personal counseling offered by the Academie will be limited to initial crisis assessment and referral.*

Sexual harassment crisis and counseling options are available locally and nationally through a number of agencies, including:

National Resources:

National Sexual Assault Hotline: 800-656-4673
National Domestic Violence Hotline: 800-799-7233
National Institute of Mental Health: www.nimh.nih.gov
Substance Abuse and Mental Health Administration: www.samhsa.gov/find-help/national-helpline, 1-800-662-HELP (4357)

Local Resources:

American Fork Hospital	801-855-3300
Center for Women/Children in Crisis	801-377-5500
Evening-Child Abuse Hotline	801-376-8261
LDS Family Services	801-422-7620
Mountain View Hospital-Behavioral Health	801-465-7000
Protective Services (Department of Human Services)	801-538-4100
Provo Police Department Victim Advocate	801-852-6375
Rape and Sexual Assault Crisis Intervention	801-356-2511
Utah State Hospital (Psychiatric Care)	801-344-4400
Utah Valley Regional Medical Center: General Information	801-357-7850
Emergency Room	801-357-7001
Outpatient Psychology	801-357-7525
Wasatch Mental Health-Adult Outpatient	801-373-7393

Other Sexual Assault Information
The U.S. Department of Education Office for Civil Rights provides information about Title IX rights and filing a complaint at https://www.ed.gov/laws-and-policy/civil-rights-laws/file-complaint.

Evidence Preservation
Victims of sexual assault, domestic violence or dating violence should consider seeking medical attention as soon as possible. It is important that a victim of sexual assault not bathe, douche, smoke, change clothing or clean the bed/linen where they were assaulted so that evidence necessary to prove criminal activity may be preserved. In circumstances where the victims do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address health concerns. Victims of sexual harassment are encouraged to also preserve evidence by saving text messages, instant messages,

social networking pages, other communications, and keeping pictures, logs or other copies of documents, if they have any, that would be useful in connection with an Academie or police investigation.

5. Title IX Coordinator

The Academie's Title IX Coordinator is responsible for monitoring and overseeing the Academie's compliance with Title IX and the prevention of sexual harassment and discrimination. The Title IX Coordinator is:

- Knowledgeable and trained in Academie policies and procedures and relevant state and federal laws;
- Available to advise any individual, including a complainant, respondent, or a third party, about Academie and community resources and reporting options;
- Available to provide assistance to any Academie employee regarding how to respond appropriately to a report of Title IX-related prohibited conduct and related retaliation;
- Participates in ensuring the effective implementation of this Policy, including monitoring compliance with all procedural requirements, record keeping, and timeframes; and
- Responsible for overseeing training, prevention, and education efforts and annual reviews of climate and culture.

Inquiries or concerns about Title IX may be referred to the Academie's Title IX Coordinator:

Mandy Humphrey, Director
1460 N Moonriver Dr.
Provo, UT 84604
Phone: (801) 373-2887 Email: mandy@race.edu

6. Reporting Policies and Protocols

Renaissance Academie Cosmetology and Esthetics strongly encourages all members of the Academie community to report information about any incident of sexual harassment as soon as possible. Reports can be made either to the Academie and/or to law enforcement.

Reporting to the Academie

An incident of sexual harassment may be reported to the Academie's Title IX Coordinator or to a designated Academie official as described in Section 7, below. No other Academie officials or employees have the authority to institute corrective measures under these Policies and Procedures on behalf of the Academie. The Academie will not be deemed to have actual knowledge of alleged sexual harassment unless the Academie's Title IX Coordinator or a designated Academie official possess such knowledge. Reports of sexual harassment to Academie officials or employees other than the Title IX Coordinator or a designated Academie official will not confer actual knowledge to the Academie of such allegations, unless the Title IX Coordinator or designated Academie official subsequently obtain such actual knowledge.

If the Academie's Title IX Coordinator is the alleged perpetrator of the sexual harassment, the report should be submitted to a designated Academie official and vice versa. Filing a report with a Academie official will not obligate the victim to prosecute, nor will it subject the victim to scrutiny or judgmental opinions from officers.

Any person may report sex discrimination, including sexual harassment (whether or not the person reporting is the person alleged to be the victim of conduct that could constitute sex discrimination or sexual harassment), in person, by mail, by telephone, or by electronic mail, using the contact information listed in Section 6 for the Title IX Coordinator, or by any other means that results in the Title IX Coordinator or a designated Academie official receiving the person's verbal or written report. Such a

report may be made at any time (including during non-business hours) by using the telephone number or email address, or by mail to the office address, listed for the Title IX Coordinator.

While there is no time limit for reporting, reports of sex discrimination or harassment should be brought forward as soon as possible. All incidents should be reported even if significant time has elapsed, but prompt reporting will better enable the Academie to respond, investigate, provide an appropriate remedy, and impose discipline if appropriate. Note that if a complainant seeks to file a formal complaint for the Academie to initiate an investigation into allegations of sexual harassment, the complainant must be participating in or attempting to participate in the Academie's education programs or activities at the time of filing such formal complaint. The Academie is committed to supporting the rights of a person reporting an incident of sexual harassment to make an informed choice among options and services available.

The Academie will respond to all reports in a manner that treats each individual with dignity and respect and will take prompt responsive action to end any harassment, prevent its recurrence, and address its effects.

Reporting to Law Enforcement
An incident of sexual harassment can be reported to law enforcement at any time, 24 hours a day/7 days a week, by calling 911. At the complainant's request, the Academie will assist the complainant in contacting law enforcement. If the complainant decides to pursue the criminal process, the Academie will cooperate with law enforcement agencies to the extent permitted by law. A complainant has the option to decide whether or not to participate in any investigation conducted by law enforcement. Filing a police report will:

- Ensure that a victim of sexual assault receives the necessary medical treatment and tests
- Provide the opportunity for collection of evidence helpful in prosecution, which cannot be obtained later (ideally a victim of sexual assault should not wash, douche, use the toilet, or change clothing prior to a medical/legal exam)

Reporting of Crimes & Annual Security Reports
Campus safety and security are important issues at Renaissance Academie Cosmetology and Esthetics. Our goal is to provide students with a safe environment in which to learn and to keep students, parents, and employees well informed about campus security. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, or Clery Act, requires institutions of higher education to record and report certain information about campus safety, including the number of incidents of certain crimes on or near campus, some of which constitute sexual harassment under this Policy.

Each year the Academie prepares this report to comply with the Clery Act. The full text of this report can be located on the Academie's web site at www.race.edu. This report is prepared in cooperation with the local law enforcement agencies around our campus. Each year notification is made to all enrolled students and employees that provides the web site to access this report. Copies of the report may also be obtained in person from the Compliance Director or by calling (801) 373-2887. All prospective employees may also obtain a copy from the Compliance Director.

Timely Warnings & Emergency Notifications
In the event that a situation arises, either on or off campus, that, in the judgment of the Compliance Director constitutes an ongoing or continuing threat, a campus wide "timely warning" will be issued. The Compliance Director will also immediately notify the Academie community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or staff occurring at the Academie, unless issuing a notification will compromise efforts to contain the emergency. The warning will be issued through the most effective and efficient means available and

may include instant messaging to students and Academie employees. Notices may also be posted in the common areas throughout the Academie. Anyone with information warranting a timely warning or emergency notification should report the circumstances to the Compliance Director by phone at (801) 373-2887 or in person at the Academie. The Academie will provide adequate follow-up information to the community as needed.

Third-Party and Anonymous Reporting
In cases where sexual harassment is reported to the Title IX Coordinator or Compliance Director by someone other than the complainant (by an instructor, classmate, or friend, for example), the Title IX Coordinator will promptly notify the complainant that a report has been received. This Policy and the Procedures will apply in the same manner as if the complainant had made the initial report. The Title IX Coordinator will make every effort to meet with the complainant to discuss available options and resources. Reports from an anonymous source will be treated in a similar fashion.

No Retaliation
The Academie prohibits retaliation 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. The Academie will take strong responsive action if retaliation occurs. Any incident of retaliation should be promptly reported to the Title IX Coordinator or the Compliance Director.

Except as may otherwise be required by law, the Academie 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 violation of the Academie's code of conduct 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.

Coordination With Drug Free School Policy
Students may be reluctant to report instances of sexual harassment because they fear being disciplined pursuant to the Academie's alcohol or drug policies. The Academie encourages students to report all instances of sexual harassment and will take into consideration the importance of reporting sexual harassment in addressing violations of the Academie's alcohol and drug policies. This means that, whenever possible, the Academie will respond educationally rather than punitively to student alcohol or drug policy violations associated with reported sexual harassment.

7. Academie Policy on Confidentiality

The Academie encourages victims of sexual harassment to talk to somebody about what happened – so victims can get the support they need, and so the Academie can respond appropriately.

This policy is intended to make students aware of the various reporting and confidential disclosure options available to them – so they can make informed choices about where to turn should they become a victim of sexual harassment. The Academie encourages victims to talk to someone identified in one or more of these groups.

Privileged and Confidential Communications – Professional & Pastoral Counselors
Professional, licensed counselors and pastoral counselors who provide mental-health counseling to members of the community (and including those who act in that role under the supervision of a licensed

counselor) are not required to report any information about an incident to the Title IX coordinator without a victim's permission. *The Academie does not provide professional or pastoral counseling, but can assist a victim of sexual harassment in obtaining support services from these groups or agencies*. Contact information for these support organizations is listed in Section 4 of this Policy.

NOTE: While these professional and pastoral counselors and advocates may maintain a victim's confidentiality vis-à-vis the Academie, they may have reporting or other obligations under state law.

ALSO NOTE: If the Academie determines that the alleged perpetrator(s) pose a serious and immediate threat to the Academie community, the Academie's Compliance Director may be called upon to issue a timely warning to the community. Any such warning should not include any information that identifies the victim.

Reporting to a Designated Academie Official
A "designated Academie official" is a Academie employee who has the authority to Academie corrective measures on behalf of the Academie upon actual notice of sexual harassment.

A designated Academie official will report to the Title IX coordinator all relevant details about the alleged sexual harassment shared by the complainant – including the names of the complainant and respondent, any witnesses, and any other relevant facts, including the date, time and specific location of the alleged incident.

To the extent possible, information reported to a designated Academie official will be shared only with people responsible for handling the Academie's response to the report. Designated Academie officials should not share information with law enforcement without the complainant's consent or unless the complainant has also reported the incident to law enforcement.

In addition to the Title IX Coordinator, the Academie's designated Academie officials include the CEO, Education Director, Admissions Director, and Financial Aid Director.

Before a complainant reveals any information to a designated Academie official, the official should ensure that the complainant understands the official's reporting obligations – and, if the complainant wants to maintain confidentiality, direct the complainant to confidential resources.

If the complainant wants to tell the designated Academie official what happened but also maintain confidentiality, the official should tell the complainant that the Academie will consider the request but cannot guarantee that the Academie will be able to honor it. In reporting the details of the incident to the Title IX Coordinator, the official will also inform the Coordinator of the complainant's request for confidentiality.

Designated Academie officials will not pressure a complainant to request confidentiality, but will honor and support the complainant's wishes, including for the Academie to fully investigate an incident. By the same token, designated Academie officials will not pressure a complainant to make a formal complaint and initiate a Academie investigation if the complainant is not ready to do so.

A complainant who at first requests confidentiality may later decide to file a formal complaint with the Academie or report the incident to local law enforcement, and thus have the incident fully investigated.

Reporting to Title IX Coordinator
To the extent possible, information reported to the Title IX Coordinator will be shared only with people responsible for handling the Academie's response to the report. The Title IX Coordinator should not share information with law enforcement without the complainant's consent or unless the complainant has also reported the incident to law enforcement.

Before a complainant reveals any information to the Title IX Coordinator, the Coordinator should ensure that the complainant understands the Coordinator's reporting obligations – and, if the complainant wants to maintain confidentiality, direct the complainant to confidential resources. If the complainant wants to tell the Title IX Coordinator what happened but also maintain confidentiality, the Coordinator should tell the complainant that the Academie will consider the request but cannot guarantee that the Academie will be able to honor it.

The Title IX Coordinator will not pressure a complainant to request confidentiality, but will honor and support the complainant's wishes, including for the Academie to fully investigate an incident. By the same token, the Title IX Coordinator will not pressure a complainant to make a formal complaint and initiate a Academie investigation if the complainant is not ready to do so.

Requesting Confidentiality: How the Academie Will Weigh the Request and Respond.
If a complainant discloses an incident to the Title IX Coordinator but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, the Academie must weigh that request against the Academie's obligation to provide a safe, non-discriminatory environment for all students, including the complainant.

If the Academie honors the request for confidentiality, a complainant must understand that the Academie's ability to investigate the incident and pursue disciplinary action against the respondent will be limited. A complainant may provide the Title IX Coordinator with confidential knowledge of alleged sexual harassment and receive supportive measures from the Academie without the complainant filing a formal complaint and initiating an investigation. Although rare, there are times when the Academie may not be able to honor a complainant's request in order to provide a safe, non-discriminatory environment for all students.

The Title IX Coordinator will evaluate requests for confidentiality. When weighing a complainant's request for confidentiality or that no investigation or discipline be pursued, the Title IX Coordinator will consider a range of factors, including the following:

- The increased risk that the respondent will commit additional acts of sexual harassment or other violence, such as:
    - whether there have been other sexual harassment complaints about the same respondent;
    - whether the respondent has a history of arrests or records from a prior School indicating a history of violence;
    - whether the respondent threatened further sexual harassment or other violence against the complainant or others;
    - whether the sexual harassment was committed by multiple respondents;
- Whether the sexual harassment was perpetrated with a weapon;
- Whether the complainant is a minor;
- Whether the Academie possesses other means to obtain relevant evidence of the sexual harassment (e.g., security cameras or personnel, physical evidence);
- Whether the complainant's report reveals a pattern of perpetration (e.g., via illicit use of drugs or alcohol) at a given location or by a particular group.

The presence of one or more of these factors could lead the Title IX Coordinator to file a formal complaint to investigate and, if appropriate, pursue disciplinary action. If none of these factors is present, the Academie will likely respect the complainant's request for confidentiality.

If the Academie determines that it cannot maintain a complainant's confidentiality, the Academie will inform the complainant prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the Academie's response. The Academie will remain ever mindful of the complainant's well-being, and will take ongoing steps to protect the complainant from retaliation or harm and work with the complainant to create a safety plan. Retaliation against the complainant, whether by students or Academie employees, will not be tolerated. The Academie will also:

- assist the complainant in accessing other available victim advocacy, academic support, counseling, disability, health, or mental health services, and legal assistance;
- provide other security and support, which could include issuing a no-contact order, helping arrange a change of course schedules (including for the respondent pending the outcome of an investigation) or adjustments for assignments or tests; and
- inform the complainant of the right to report a crime to local law enforcement – and provide the complainant with assistance if the complainant wishes to do so.

The Academie may not require a complainant to participate in any investigation or disciplinary proceeding.

Because the Academie is under a continuing obligation to address the issue of sexual harassment campus-wide, reports of sexual harassment (including non-identifying reports) will also prompt the Academie to consider broader remedial action – such as increased monitoring, supervision or security at locations where the reported sexual harassment occurred; increasing education and prevention efforts, including to targeted population groups; conducting climate assessments/ victimization surveys; and/or revisiting its policies and practices.

If the Academie determines that it can respect a complainant's request for confidentiality, the Academie will also take action as necessary to protect and assist the complainant. This includes the Title IX Coordinator promptly contacting the complainant to discuss the availability of supportive measures. A complainant's request for confidentiality will limit the Academie's ability to investigate a particular matter. The Academie may take steps to limit the effects of the alleged sexual harassment and prevent its recurrence without initiating formal action against the respondent or revealing the identity of the student complainant. Examples include: providing increased monitoring, supervision, or security at locations or activities where the harassment occurred; providing training and education materials for students and employees; revising and publicizing the Academie's policies on sexual harassment; and conducting climate surveys regarding sexual harassment.

Off-campus Counselors and Advocates. Off-campus counselors, advocates, and health care providers will also generally maintain confidentiality and not share information with the Academie unless the complainant requests the disclosure and signs a consent or waiver form. Contact information for these off-campus resources can be found in Section 4 of this Policy.

8. Formal Complaint Investigation Procedures and Protocols

The Academie will investigate all formal complaints of sexual harassment. A formal complaint must be in writing filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the Academie investigate the allegation of sexual harassment. A formal

complaint form may be obtained from the Title IX Coordinator, although no particular form is required to submit a formal complaint so long as the complaint is in writing, signed by a complainant, alleges sexual harassment against a respondent, and requests an investigation. The Academie's Title IX Coordinator oversees the Academie's investigation, response to, and resolution of all reports of prohibited sexual harassment, and of related retaliation, involving students, faculty, and staff.

As soon as practicable after receiving a formal complaint, the Title IX Coordinator will make an initial assessment of the formal complaint to determine whether the formal complaint, on its face, alleges an act prohibited by this Policy. If the Title IX Coordinator determines the formal complaint states facts which, if true, could constitute sexual harassment in violation of this Policy, the Title IX Coordinator will proceed through the formal investigation process (see below). If the Title IX Coordinator determines the complainant's report does not state facts that, if true, could constitute a violation of this Policy, the Title IX Coordinator will communicate this determination in writing to the complainant. In such circumstances the complainant may still file a report with the federal Office for Civil Rights, the police, or seek available civil remedies through the judicial system. The complainant may also re-file the report with the Academie upon discovery of additional facts.

The Academie will dismiss a formal complaint if the conduct alleged in the formal complaint would not constitute sexual harassment under Title IX even if proved, did not occur in the Academie's education program or activity, or did not occur against a person in the United States. ***Such dismissal does not preclude action under another provision of the Academie's code of conduct***. The Academie may dismiss the formal complaint if a complainant notifies the Title IX Coordinator in writing that the complainant would like to withdraw the formal complaint; the respondent is no longer enrolled or employed by the Academie; or specific circumstances prevent the Academie from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein. The Academie will promptly send written notice of the dismissal and reasons therefor simultaneously to the parties.

Notice
Upon receipt of a formal complaint, the Academie will provide written notice of the Academie's grievance process to the parties who are known. The Academie will also provide the parties with notice of the allegations of sexual harassment potentially constituting sexual harassment, including sufficient details known at the time and with sufficient time to prepare a response before any initial interview. Sufficient details include the identities of the parties involved in the incident, if known, the conduct allegedly constituting sexual harassment, and the date and location of the alleged incident, if known. The written notice will include a statement that the respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the grievance process. The written notice will 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 that is submitted to and/or collected by the Academie in connection with the investigation. The written notice will also inform the parties of any provision in the Academie's code of conduct that prohibits knowingly making false statements or knowingly submitting false information during the grievance process.

If, in the course of an investigation, the Academie decides to investigate allegations about the complainant or respondent that are not included in a prior notice provided to the parties, the Academie will provide notice of the additional allegations to the parties whose identities are known.

Voluntary Resolution
Voluntary resolution, when selected by all parties and deemed appropriate by the Title IX Coordinator, is a path designed to eliminate the conduct at issue, prevent its recurrence, and remedy its effects in a manner that meets the safety and welfare of the Academie community. If all parties voluntarily agree to

participate in an informal resolution that does not involve a full investigation and adjudication after receiving notice of a formal complaint and if the Academie determines that the particular formal complaint is appropriate for such a process, the Academie will facilitate an informal resolution to assist the parties in reaching a voluntary resolution. The Academie retains the discretion to determine which cases are appropriate for voluntary resolution.

Voluntary resolution may include: conducting targeted or broad-based educational programming or training for relevant individuals or groups; providing increased monitoring, supervision, or security at locations or activities where the harassment occurred; facilitating a meeting with the respondent with the complainant present; and any other remedy that can be tailored to the involved individuals to achieve the goals of the Policy.

Voluntary resolution may also include restorative principles that are designed to allow a respondent to accept responsibility for harassment and acknowledge harm to the complainant or to the Academie community. Restorative models will be used only with the consent of both parties and following a determination by the Title IX Coordinator that the matter is appropriate for a restorative approach.

The Academie will not compel parties to engage in mediation or to participate in any particular form of informal resolution. As the title implies, participation in voluntary resolution is a choice, and either party can request to end this manner of resolution and pursue an investigation and adjudication at any time, including if voluntary resolution is unsuccessful at resolving the complaint.

In connection with any informal resolution process, the Academie will provide written notice to the parties disclosing the allegations and the requirements of the informal resolution process. The Academie will notify the 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. The Academie must obtain the parties' voluntary, written consent to the informal resolution process. The informal resolution process may not be utilized to resolve allegations that a Academie employee sexually harassed a student.

The time frame for completion of voluntary resolution may vary, but the Academie will seek to complete the process within 15 days of all the parties' request for voluntary resolution.

Formal Investigation Process
The burden of proof and the burden of gathering evidence sufficient to reach a determination regarding responsibility rests on the Academie and not on the parties. The Title IX Coordinator is responsible for the investigation of a formal complaint. The Title IX Coordinator may designate a specially trained investigator (or team of investigators) to conduct the investigation.

The Academie's process for responding to, investigating, and adjudicating sexual harassment reports will continue during any law enforcement proceeding. The investigator may need to temporarily delay an investigation while the police are gathering evidence but will resume the investigation after learning that the police department has completed its evidence-gathering and will generally not wait for the conclusion of any related criminal proceeding.

The investigator will interview the complainant, respondent, and any witnesses. They will also gather pertinent documentary materials (if any) and other information. The Academie will 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. Each party shall have an equal opportunity to present witnesses, including fact and

expert witnesses, and other inculpatory and exculpatory evidence. The Academie will not restrict the ability of either party to discuss the allegations under investigation or to gather and present relevant evidence.

Time Frame for Investigation
Consistent with the goal to maximize educational opportunities and minimize the disruptive nature of the investigation and resolution, the Title IX Coordinator seeks to resolve all reports in a timely manner. In general, an investigation may last up to 30 days, from receipt of a formal complaint from the complainant or the Title IX Coordinator of the request to proceed with an investigation. Adjudication will generally take up to 30 days from the date the investigative report is provided to both the complainant and the respondent. The Title IX Coordinator may set reasonable time frames for required actions under the Policy. Those time frames may be extended for good cause as necessary to ensure the integrity and completeness of the investigation, comply with a request by external law enforcement, accommodate the availability of witnesses, accommodate absences or delays by the parties, the need for language assistance or accommodation of disabilities, account for Academie breaks or vacations, or address other legitimate reasons, including the complexity of the investigation (including the number of witnesses and volume of information provided by the parties) and the severity and extent of the alleged conduct. Any extension of the timeframes, and the reason for the extension, will be shared simultaneously with the parties in writing. Best efforts will be made to complete the process in a timely manner by balancing principles of thoroughness and fundamental fairness with promptness.

Where necessary, the Academie will take prompt steps to protect complainants pending the final outcome of an investigation, including the provision of supportive measures to the complainant and/or the respondent. The Academie may remove a respondent from the Academie's education programs or activities on an emergency basis, provided that the Academie 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. The Academie may place a non-student employee respondent on administrative leave during the pendency of a grievance process.

The Academie will 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 the formal complaint, including the evidence upon which the Academie does not intend to rely in reaching a determination regarding responsibility and inculpatory or exculpatory evidence whether obtained from a party or other source, so that each party can meaningfully respond to the evidence prior to conclusion of the investigation. Prior to completion of the investigative report, the Academie will send to each party and the party's advisor, if any, the evidence subject to inspection and review in an electronic format or a hard copy, and the parties will have at least 10 days to submit a written response, which the investigator will consider prior to completion of the investigative report. The Academie will make all such evidence subject to the parties' inspection and review available at any hearing to give each party equal opportunity to refer to such evidence during the hearing, including for purposes of cross-examination

Investigation Report
The investigator will prepare an investigative report that fairly summarizes relevant evidence and, at least 10 days prior to a hearing, send to each party and the party's advisor, if any, the investigative report in an electronic format or a hard copy, for their review and written response. Such report will include a statement of the allegations and issues, the positions of the complainant and respondent, a summary of the evidence (including from interviews and documentation gathered), an explanation why any proffered evidence was not investigated, assessment of individual credibility, and findings of fact and an analysis of

whether a violation of the Policy has occurred. The investigator will use “preponderance of the evidence” as the standard of proof to determine whether a violation of the Policy occurred. Preponderance of the evidence means that the investigator must be convinced based on the information it considers that the respondent was more likely than not to have engaged in the conduct at issue in order to find the respondent responsible for violating the Policy. The complainant and respondent will be simultaneously notified of the completion of the investigation and provided with the investigator’s report.

9. Grievance/Adjudication Procedures

Hearing Panel
The Academie will convene a hearing panel following the end of the investigation. The hearing panel determines whether the respondent is responsible or not responsible for a violation of the Policy.

The hearing panel will consist of one to three members, as determined by the Title IX Coordinator. The Title IX Coordinator will designate the members of the hearing panel but will not serve as a panel member. The investigator responsible for the Academie’s investigation of the formal complaint may not serve as a panel member. The hearing panel members may include administrators, officers, lawyers or other individuals with relevant experience and special training. Panel members may participate remotely so long as the Academie utilizes technology enabling the panel members and parties to simultaneously see and hear the party or witness answering questions. All panelists will receive training from experts in the field at least once a year. In addition to training on how the adjudicatory process works, the training will include specific instruction about how to approach students about sensitive issues that may arise in the context of sexual harassment. The complainant and respondent will be informed of the panel’s membership before the hearing process begins. A complainant and/or respondent may challenge the participation of a panel member because of perceived conflict of interest, bias, or prejudice. Such challenges, including rationale, must be made to the Title IX Coordinator at least three days prior to the commencement of the hearing. At its discretion, the Title IX Coordinator will determine whether such a conflict of interest exists and whether a panel member should be replaced. Postponement of a hearing may occur if a replacement panelist cannot be immediately identified.

Advisors
Both the complainant and the respondent are entitled to be accompanied to any meeting or proceeding relating to the allegation of sexual harassment by an advisor or support person of their choice, provided the involvement of such advisor or support person does not result in the postponement or delay of such meeting as scheduled.

Written Submissions
Both the complainant and respondent will have the opportunity to submit written responses to the investigation report and other relevant information to the hearing panel. Each of the complainant and respondent will have the opportunity to review any written submissions by the other. The hearing panel may set reasonable parameters for these written submissions. The hearing panel will review the investigation report and written submissions.

Hearing Procedures
The Title IX Coordinator will give the complainant and respondent at least 10 days’ advance notice of the hearing. The Title IX Coordinator may arrange to hold the hearing at an off-campus location. The hearing is a closed proceeding, meaning that no one other than the panel members, the complainant and respondent, their respective advisors, witnesses (when called), and necessary Academie personnel may be present during the proceeding. The Director of Education will work with Academie staff so that any student whose presence is required may participate in the hearing.

In general, hearings will proceed as follows:

- The Title IX Coordinator may set reasonable time limits for any part of the hearing. Each of the complainant and respondent will have the opportunity to present witnesses and other information consistent with the Policy and these Procedures. The panel may determine the relevance of, place restrictions on, or exclude any witnesses or information. When the complainant and respondent are not able to be present for the hearing panel, arrangements will be made for participation virtually, with technology enabling the participants simultaneously to see and hear each other.
- In cases where either the complainant or respondent opts not to participate in the hearing, the panel may still hear from the other.
- Additional hearing rules include:
    - Cross Examination. At the hearing, the hearing panel shall 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 Academie will provide for the hearing to occur with the parties located in separate rooms with technology enabling the hearing panel members 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 hearing panel 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 Academie will provide without fee or charge to that party, an advisor of the Academie's choice, who may be, but is not required to be, an attorney, to conduct cross-examination on behalf of that party.
    - Information Regarding Romantic or Sexual History. 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. The existence of a prior consensual dating or sexual relationship between the complainant and respondent by itself does not support an inference of consent to alleged sexual harassment.
    - Prior Conduct Violations. The hearing panel will not consider the respondent's prior conduct violations, unless the investigator provided that information to the hearing panel because the respondent was previously found to be responsible, and the previous incident was substantially similar to the present allegation(s) and/or the information indicates a pattern of behavior by the respondent.
    - The hearing panel may consider statements made by parties or witnesses, even if those parties or witnesses do not participate in cross-examination at the live hearing, in reaching a determination regarding responsibility.
    - The Academie will 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.
    - Live hearings may be conducted with all parties physically present in the same geographic location or, at the Academie'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 Academie will create an audio or audiovisual recording, or transcript, of any hearing and make it available to the parties for inspection and review. The panelists may request a copy or transcript of the recording. Cell phones and recording devices may not be used in the hearing room(s) unless approved by the panel in advance.

Panel Determinations/Standard of Proof
The hearing panel will issue a written determination regarding responsibility. The panel will use "preponderance of the evidence" as the standard of proof to determine whether a violation of the Policy occurred. Preponderance of the evidence means that a panel must be convinced based on the information it considers that the respondent was more likely than not to have engaged in the conduct at issue in order to find the respondent responsible for violating the Policy. The panel will find a student responsible, or not responsible, based on a majority vote. The panel will generally render a written determination within 10 days after the conclusion of a hearing.

The panel's written determination will include:

a) Identification of the allegations potentially constituting sexual harassment;
b) A description of the procedural steps taken from the receipt of the formal complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held;
c) Findings of fact supporting the determination;
d) Conclusions regarding the application of the Academie's code of conduct to the facts;
e) A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility, any disciplinary sanctions the Academie imposes on the respondent, and whether remedies designed to restore or preserve equal access to the Academie's education program or activity will be provided by the Academie to the complainant; and
f) The Academie's procedures and permissible bases for the complainant and respondent to appeal.

The parties will be informed of the results of the adjudication hearing by simultaneous written notice to both parties of the outcome of the formal complaint. The determination regarding responsibility becomes final either on the date that the Academie provides the parties with the written determination of the result of the appeal, if an appeal is filed, or if an appeal is not filed, the date on which an appeal would no longer be considered timely.

10. Sanctions and Other Remedies
The hearing panel shall be responsible for imposing sanctions that are:

- Fair and appropriate given the facts of the particular case;
- Consistent with the Academie's handling of similar cases;
- Adequate to protect the safety of the campus community; and
- Reflective of the seriousness of sexual harassment.

No disciplinary sanctions or other actions that are not supportive measures will be imposed against a respondent until the completion of the Academie's grievance procedures, including any applicable appeal.

The hearing panel will consider relevant factors, including if applicable: (1) the specific sexual harassment at issue (such as penetration, touching under clothing, touching over clothing, unauthorized recording, etc.); (2) the circumstances accompanying the lack of consent (such as force, threat, coercion, intentional incapacitation, etc.); (3) the respondent's state of mind (intentional, knowing, bias-motivated, reckless,

negligent, etc.); (4) the impact of the offense on the complainant; (5) the respondent's prior disciplinary history; (6) the safety of the Academie community; and (7) the respondent's conduct during the disciplinary process. The sanctioning decision will be communicated in writing to the complainant and the respondent as part of the hearing panel's written determination.

The Academie may impose any one or more of the following sanctions on a student determined to have violated the Policy:

- Reprimand/warning
- Changing the respondent's academic schedule
- Disciplinary probation
- Restricting access to Academie facilities or activities
- Community service
- Issuing a "no contact" order to the respondent or requiring that such an order remain in place
- Dismissal or restriction from Academie employment
- Suspension (limited time or indefinite)
- Expulsion

In addition to any other sanction (except where the sanction is expulsion), the Academie may require any student determined to be responsible for a violation of the Policy to receive appropriate education and/or training related to the sexual harassment violation at issue. The Academie may also recommend counseling or other support services for the student.

Whatever the outcome of the hearing process, a complainant may request ongoing or additional supportive measures and the Title IX Coordinator will determine whether such supportive measures are appropriate. Potential ongoing supportive measures include:

- Providing an escort for the complainant
- Changing the complainant's academic schedule
- Allowing the complainant to withdraw from or retake a class without penalty
- Providing access to tutoring or other academic support, such as extra time to complete or re-take a class

The Academie may also determine that additional measures are appropriate to respond to the effects of the incident on the Academie community. Additional responses for the benefit of the Academie community may include:

- Increased monitoring, supervision, or security at locations or activities where the harassment occurred
- Additional training and educational materials for students and employees
- Revision of the Academie's policies relating to sexual harassment
- Climate surveys regarding sexual harassment

11. Appeals

Either the respondent or the complainant or both may 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. A procedural irregularity that affected the outcome of the matter;
2. New evidence that was not reasonably available at the time of the determination regarding

responsibility or dismissal was made, that could affect the outcome of the matter; and
3. The Title IX Coordinator, investigator(s), or hearing panel member(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

Disagreement with the finding or sanctions is not, by itself, grounds for appeals.

The decision maker(s) for the appeal may not be the same person as the hearing panel members, the investigator(s), or the Title IX Coordinator. The appealing party must submit the appeal in writing to the Academie within seven days after receiving the written determination regarding responsibility. If either the complainant or respondent submits an appeal, the Title IX Coordinator will notify the other that an appeal has been filed and the grounds of the appeal. The non-appealing party may submit a written response within seven days after notice of an appeal.

If the decision-maker concludes that a change in the hearing panel's determination is warranted, the Academie may enter a revised determination, reconvene the panel to reconsider the determination, or return the matter for additional investigation. If both the complainant and respondent appeal, the appeals will be considered concurrently.

The decision maker will issue a written decision describing the result of the appeal and the rationale for the result, and provide the written decision simultaneously to both parties. Appeals decisions will be rendered within 15 days after the receipt of the written appeal. All appeal decisions are final.

12. Records Disclosure & Recordkeeping

Disciplinary proceedings conducted by the Academie are subject to the Family Educational Records and Privacy Act (FERPA), a federal law governing the privacy of student information. FERPA generally limits disclosure of student information outside the Academie without the student's consent, but it does provide for release of student disciplinary information without a student's consent in certain circumstances.

Any information gathered in the course of an investigation may be subpoenaed by law enforcement authorities as part of a parallel investigation into the same conduct or required to be produced through other compulsory legal process.

Additional information about FERPA can be found on the Academie's website at www.race.edu.

The Academie will, upon written request, disclose to the alleged victim of a crime of violence (as that term is defined in Section 16 of Title 18, United States Code), or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by the Academie against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

The Academie will maintain for a period of not less than seven years records of –

a) Each sexual harassment investigation including any determination regarding responsibility and any audio or audiovisual recording or transcript from a hearing conducted in response to a formal complaint, any disciplinary sanctions imposed on the respondent, and any remedies provided to the complainant designed to restore or preserve equal access to the Academie's education programs or activities;
b) Any appeal and the result therefrom;
c) Any informal resolution and the result therefrom; and

d) All materials used to train Title IX Coordinators, investigators, hearing panel members, decision-makers, and any person who facilitates an informal resolution process. The Academie will make these training materials publicly available on its website.

The Academie will create and maintain for a period of not less than seven years, records of any actions, including any supportive measures, taken in response to a report or formal complaint of sexual harassment. In each instance, the Academie will document the basis for its conclusion that its response was not deliberately indifferent, and document that it has taken measures designed to restore or preserve equal access to the Academie's education program or activity. If the Academie does not provide a complainant with supportive measures, then the Academie will document the reasons why such a response was not clearly unreasonable in light of the known circumstances. The documentation of certain bases or measures does not limit the Academie in the future from providing additional explanations or detailing additional measures taken.

13. Education and Prevention Programs

As set forth in Section 3 of this Policy statement, Sexual Assault, Sexual Harassment, Dating Violence, Domestic Violence, and Stalking are all forms of Prohibited Conduct.

The Academie is committed to offering educational programs to promote awareness and prevention of Prohibited Conduct. Educational programs include an overview of the Academie's policies and procedures; relevant definitions, including prohibited conduct; discussion of the impact of alcohol and illegal drug use; consent; safe and positive options for bystander intervention; review of resources and reporting options available for students, faculty, and staff; and information about risk reduction. Incoming students and new employees will receive primary prevention and awareness programming as part of their orientation.

As part of the Academie's commitment to provide an educational and work environment free from Prohibited Conduct, this Policy will be disseminated widely to the Academie community through e-mail communication, publications, websites, new employee orientations, student orientations, and other appropriate channels of communication.

The Title IX Coordinator, investigators, hearing panel members, and anyone else who is involved in responding to, investigating, or adjudicating sexual harassment will receive annual training from experts in the field. In addition to training on how the adjudicatory process works, the training will include specific instruction about how to approach students about sensitive issues that may arise in the context of sexual harassment.

Definitions of Sexual Misconduct under Utah Law

Sexual Assault is any unwanted physical contact of a sexual nature that occurs either without the consent of each participant or when a participant is unable to give consent freely. Sexual assault can occur either forcibly and/or against a person's will, or when a person is unable to give consent freely.
Non-consensual sexual intercourse is any form of sexual intercourse (vaginal, anal or oral) with any object without consent. Non-consensual sexual contact is any intentional sexual touching, however slight, with any object without a person's consent.
The Utah Code includes the following definitions with respect to incidents of sexual assault:

Utah Code Ann. §76-5-402 Rape.
(1) A person commits rape when the actor has sexual intercourse with another person without the victim's consent.

Utah Code Ann. §76-5-402.2 Object rape.
(1) A person who, without the victim's consent, causes the penetration, however slight, of the genital or anal opening of another person who is 14 years of age or older, by any foreign object, substance, instrument, or device, including a part of the human body other than the mouth or genitals, with intent to cause substantial emotional or bodily pain to the victim or with the intent to arouse or gratify the sexual

desire of any person, commits an offense which is a first degree felony,
Utah Code Ann. §76-5-404 Forcible sexual abuse.
(1) A person commits forcible sexual abuse if the victim is 14 years of age or older and, under circumstances not amounting to rape, object rape, sodomy, or attempted rape or sodomy, the actor touches the anus, buttocks, or any part of the genitals of another, or touches the breast of a female, or otherwise takes indecent liberties with another, or causes another to take indecent liberties with the actor or another, with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person, without the consent of the other, regardless of the sex of any participant.

Under Utah law, Utah Code Ann. §76-5-406, sexual offenses "without consent" of the victim arise when:
(1) the victim expresses lack of consent through words or conduct;
(2) the actor overcomes the victim through the actual application of physical force or violence;
(3) the actor is able to overcome the victim through concealment or by the element of surprise;
(4)(i) the actor coerces the victim to submit by threatening to retaliate in the immediate future against the victim or any other person, and the victim perceives at the time that the actor has the ability to execute this threat; or
(ii) the actor coerces the victim to submit by threatening to retaliate in the future against the victim or any other person, and the victim believes at the time that the actor has the ability to execute this threat; ("to retaliate" includes threats of physical force, kidnapping, or extortion)
(5) the actor knows the victim is unconscious, unaware that the act is occurring, or physically unable to resist;
(6) the actor knows that as a result of mental disease or defect, or for any other reason the victim is at the time of the act incapable either of appraising the nature of the act or of resisting it;
(7) the actor knows that the victim submits or participates because the victim erroneously believes that the actor is the victim's spouse;
(8) the actor intentionally impaired the power of the victim to appraise or control his or her conduct by administering any substance without the victim's knowledge;
(9) the victim is younger than 14 years of age;
(10) the victim is younger than 18 years of age and at the time of the offense the actor was the victim's parent, stepparent, adoptive parent, or legal guardian or occupied a position of special trust in relation to the victim;
(11) the victim is 14 years of age or older, but younger than 18 years of age, and the actor is more than three years older than the victim and entices or coerces the victim to submit or participate, under circumstances not amounting to the force or threat required under Subsection (2) or (4); or
(12) the actor is a health professional or religious counselor, the act is committed under the guise of providing professional diagnosis, counseling, or treatment, and at the time of the act the victim reasonably believed that the act was for medically or professionally appropriate diagnosis, counseling, or treatment to the extent that resistance by the victim could not reasonably be expected to have been manifested.

Under the Utah Code, a person is guilty of stalking who intentionally or knowingly engages in a course of conduct directed at a specific person and knows or should know that the course of conduct would cause a reasonable person: (a) to fear for the person's own safety or the safety of a third person; or (b) to suffer other emotional distress. Utah Code Ann. §76-5-106.5(2).

"Course of conduct" (Utah Code Ann. §76-5-106.5(1)(b)) means two or more acts directed at or toward a specific person, including:
(i) acts in which the actor follows, monitors, observes, photographs, surveils, threatens, or communicates to or about a person, or interferes with a person's property:
(A) directly, indirectly, or through any third party; and
(B) by any action, method, device, or means; or
(ii) when the actor engages in any of the following acts or causes someone else to engage in any of these acts:
(A) approaches or confronts a person;
(B) appears at the person's workplace or contacts the person's employer or coworkers;
(C) appears at a person's residence or contacts a person's neighbors, or enters property owned, leased, or occupied by a person;
(D) sends material by any means to the person or for the purpose of obtaining or disseminating information about or communicating with the person to a member of the person's family or household, employer, coworker, friend, or associate of the person;
(E) places an object on or delivers an object to property owned, leased, or occupied by a person, or to the person's place of employment with the intent that the object be delivered to the person; or
(F) uses a computer, the Internet, text messaging, or any other electronic means to commit an act that is a part of the course of conduct.

"Immediate family" (Utah Code Ann. §76-5-106.5(1)(c)) means a spouse, parent, child, sibling, or any other person who regularly resides in the household or who regularly resided in the household within the prior six months.

"Emotional distress" (Utah Code Ann. §76-5-106.5(1)(d)) means significant mental or psychological suffering, whether or not medical or other professional treatment or counseling is required.

"Reasonable person" (Utah Code Ann. §76-5-106.5(1)(e)) means a reasonable person in the victim's circumstances.

"Text messaging" (Utah Code Ann. §76-5-106.5(1)(g)) means a communication in the form of electronic text or one or more electronic images sent by the actor from a telephone or computer to another person's telephone or computer by addressing the communication to the recipient's telephone number.

Under the Utah Code, "Domestic violence" or "domestic violence offense" means any criminal offense involving violence or physical harm or threat of violence or physical harm, or any attempt, conspiracy, or solicitation to commit a criminal offense involving violence or physical harm, when committed by one cohabitant against another. Utah Code Ann. §77-36-1(4).

For purposes of defining domestic violence of domestic violence offense:
(1) "Abuse" means intentionally or knowingly causing or attempting to cause a cohabitant physical harm or intentionally or knowingly placing a cohabitant in reasonable fear of imminent physical harm.
(2) "Cohabitant" means an emancipated person pursuant to Section 15-2-1 or a person who is 16 years of age or older who:
(a) is or was a spouse of the other party;
(b) is or was living as if a spouse of the other party;
(c) is related by blood or marriage to the other party;
(d) has or had one or more children in common with the other party;
(e) is the biological parent of the other party's unborn child; or
(f) resides or has resided in the same residence as the other party.
(3) Notwithstanding Subsection (2), "cohabitant" does not include:
(a) the relationship of natural parent, adoptive parent, or step-parent to a minor; or
(b) the relationship between natural, adoptive, step, or foster siblings who are under 18 years of age.
Utah Code Ann. §78B-7-102

The Utah Code provides the following with respect to Dating Violence:

Utah Code Ann. §78B-7-403 Abuse or danger of abuse -- Dating violence protective orders.
(1) A person may seek a protective order if the person is subjected to, or there is a substantial likelihood the person will be subjected to:
(a) abuse by a dating partner of the person; or
(b) dating violence by a dating partner of the person.
(2) A person may seek an order described in Subsection (1) whether or not the person has taken other action to end the relationship.

Utah Code Ann. §78B-7-402 Definitions.
As used in this part:
(1) "Abuse" means intentionally or knowingly:
(a) causing or attempting to cause physical harm to a dating partner; or
(b) placing a dating partner in reasonable fear of imminent physical harm.
(2) (a) "Dating partner" means a person who:
(i) (A) is an emancipated person under Section 15-2-1 or Title 78A, Chapter 6, Part 8, Emancipation; or
(B) is 18 years of age or older; and
(ii) is, or has been, in a dating relationship with the other party.
** * **
(3) (a) "Dating relationship" means a social relationship of a romantic or intimate nature, or a relationship which has romance or intimacy as a goal by one or both parties, regardless of whether the relationship involves sexual intimacy.
(b) "Dating relationship" does not mean casual fraternization in a business, educational, or social context.
(c) In determining, based on a totality of the circumstances, whether a dating relationship exists:
(i) all relevant factors shall be considered, including:
(A) whether the parties developed interpersonal bonding above a mere casual fraternization;
(B) the length of the parties' relationship;
(C) the nature and the frequency of the parties' interactions, including communications indicating that the parties intended to begin a dating relationship;
(D) the ongoing expectations of the parties, individual or jointly, with respect to the relationship;
(E) whether, by statement or conduct, the parties demonstrated an affirmation of their relationship to others; and

(F) whether other reasons exist that support or detract from a finding that a dating relationship exists; and
(ii) it is not necessary that all, or a particular number, of the factors described in Subsection (3)(c)(i) are found to support the existence of a dating relationship.
(4) "Dating violence" means:
(a) any criminal offense involving violence or physical harm, or threat of violence or physical harm, when committed by a person against a dating partner of the person; or
(b) any attempt, conspiracy, or solicitation by a person to commit a criminal offense involving violence or physical harm against a dating partner of the person.

Bystander Intervention
The Academie's primary prevention and awareness program includes a description of safe and positive options for bystander intervention. Active bystanders take the initiative to help someone who may be targeted for a sexual assault. They do this in ways that are intended to avoid verbal or physical conflict. Active bystanders also take the initiative to help friends, who are not thinking clearly, from becoming offenders of crime. Intervention does not mean that you directly intervene to stop a crime in progress; rather, these steps are "early intervention" – before a crime begins to occur. There are three important components to consider before taking action that we refer to as the ABCs:

- **A**ssess for safety. Ensure that all parties are safe, and whether the situation requires calling authorities. When deciding to intervene, your personal safety should be the #1 priority. When in doubt, call for help.
- **B**e with others. If it is safe to intervene, you are likely to have a greater influence on the parties involved when you work together with someone or several people. Your safety is increased when you stay with a group of friends that you know well.
- **C**are for the person. Ask if the target of the unwanted sexual advance/attention/behavior is okay – does he or she need medical care? Ask if someone they trust can help them get safely home.

Risk Reduction
The Academie's primary prevention and awareness program includes information on risk reduction. This includes:

Avoiding Dangerous Situations. While you can never completely protect yourself from sexual assault, there are some things you can do to help reduce your risk of being assaulted.

- Be aware of your surroundings. Knowing where you are and who is around you may help you to find a way to get out of a bad situation.
- Try to avoid isolated areas. It is more difficult to get help if no one is around.
- Walk with purpose. Even if you do not know where you are going, act like you do.
- Trust your instincts. If a situation or location feels unsafe or uncomfortable, it probably is not the best place to be.
- Try not to load yourself down with packages or bags as this can make you appear more vulnerable.
- Make sure your cell phone is with you and charged and that you have cab money.
- Do not allow yourself to be isolated with someone you do not trust or someone you do not know.
- Avoid putting music headphones in both ears so that you can be more aware of your surroundings, especially if you are walking alone.

Safety Planning. Things to think about:

- How to get away if there is an emergency? Be conscious of exits or other escape routes. Think about options for transportation (car, bus, subway, etc.).
- Who can help? Friends and/or family, or support centers in your area. Please see Section 4 of this Policy for a list of support organizations.

- Where to go? Options may include a friend's house or relative's house, or you may consider going to a domestic violence or homeless shelter. You may also go to the police. **Important Safety Note:** If the dangerous situation involves a partner, go to the police or a shelter first.
- What to bring? This may include important papers and documents such birth certificate, social security card, license, passport, medical records, lease, bills, etc. This will also include house keys, car keys, cash, credit cards, medicine, important numbers, and your cell phone. If you are bringing children with you, remember to bring their important papers and legal documents. You can keep all of these things in an emergency bag. You should hide the bag—it is best if it is not in your house or car. If the bag is discovered, you can call it a "tornado" or "fire" bag.

Protecting Your Friends. You have a crucial role to play in keeping your friends safe. No matter what the setting, if you see something that doesn't feel quite right or see someone who might be in trouble, there are some simple things you can do to help out a friend.

- Distract. If you see a friend in a situation that does not feel quite right, create a distraction to get your friend to safety. This can be as simple as joining or redirecting the conversation: suggest to your friend that you leave the party or ask them to walk you home. Try asking questions like: "Do you want to head to the bathroom with me?" or "Do you want to head to another party – or grab pizza?"
- Step in. If you see someone who looks uncomfortable or is at risk, step in. If you feel safe, find a way to de-escalate the situation and separate all parties involved. Do not be shy about directly asking the person if they need help or if they feel uncomfortable.
- Enlist others. You do not have to go it alone. Call in friends or other people in the area as reinforcements to help defuse a dangerous situation and get the at-risk person home safely. There is safety in numbers.
- Keep an eye out. Use your eyes and ears to observe your surroundings. If you see someone who has had too much to drink or could be vulnerable, try to get them to a safe place. Enlist friends to help you. Even if you were not around when the assault occurred, you can still support a friend in the aftermath.

Social Situations. While you can never completely protect yourself from sexual assault, there are some things you can do to help reduce your risk of being assaulted in social situations.

- When you go to a social gathering, go with a group of friends. Arrive together, check in with each other throughout the evening, and leave together. Knowing where you are and who is around you may help you to find a way out of a bad situation.
- Trust your instincts. If you feel unsafe in any situation, go with your gut. If you see something suspicious, contact law enforcement immediately.
- Do not leave your drink unattended while talking, dancing, using the restroom, or making a phone call. If you have left your drink alone, just get a new one.
- Do not accept drinks from people you do not know or trust. If you choose to accept a drink, go with the person to the bar to order it, watch it being poured, and carry it yourself. At parties, do not drink from the punch bowls or other large, common open containers.
- Watch out for your friends, and vice versa. If a friend seems out of it, is way too intoxicated for the amount of alcohol they have had, or is acting out of character, get him or her to a safe place immediately.
- If you suspect you or a friend has been drugged, contact law enforcement immediately. Be explicit with doctors so they can give you the correct tests (you will need a urine test and possibly others).
  Information on Risk Reduction was provided by RAINN: Rape, Abuse & Incest National Network: www.rainn.org.

14. Amendments

The Academie may amend the Policy or the Procedures from time to time. Nothing in the Policy or Procedures shall affect the inherent authority of the Academie to take such actions as it deems appropriate to further the educational mission or to protect the safety and security of the Academie community.

Renaissance Academie Cosmetology and Esthetics
Sexual Harassment Policies & Grievance Procedures

Definitions of Key Terms

- Sexual Harassment - means conduct on the basis of sex that satisfies one or more of the following:
  1) An employee of the Academie conditioning the provision of an aid, benefit, or service of the Academie 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 Academie's education programs or activities; or
  3) "Sexual assault," "dating violence," "domestic violence," or "stalking" as defined herein.

- Sexual Assault - An offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's Unified Crime Reporting ("UCR") program.
  - Rape - The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
  - Sex Offenses - Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent.
    - Fondling—The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
    - Incest—Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
    - Statutory Rape—Sexual intercourse with a person who is under the statutory age of consent.

- Domestic Violence - A felony or misdemeanor crime of violence committed (i) by a current or former spouse or intimate partner of the victim; (ii) by a person with whom the victim shares a child in common; (iii) by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; (iv) by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred, or (v) by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

- Dating Violence - Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. For the purpose of this definition dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence.

- "Education program or activity" includes locations, events, or circumstances over which the Academie exercises substantial control over both the respondent and the context in which the sexual harassment occurs. It includes all of the academic, educational, extra-curricular, and other programs of the Academie, whether they take place in the facilities of the Academie, at a class or training program sponsored by the Academie at another location, or elsewhere. An instructor's

alleged sexual harassment of a student would likely constitute sexual harassment in the Academie's education programs or activities even if the alleged harassment occurs off campus. The Academie's education programs and activities may also include computer and internet networks, digital platforms, and computer hardware or software owned or operated by, or used in the operations of, the Academie.

- Prohibited Conduct – The Academie prohibits Sexual Assault, Sexual Harassment, Dating Violence, Domestic Violence, and Stalking as defined in these Definitions of Key Terms.

- Stalking - Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others, or suffer substantial emotional distress. Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling. Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.

- Retaliation – The Academie shall not, and no individual shall, intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under Title IX and/or this Policy. The exercise of rights protected under the First Amendment does not constitute retaliation. 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.

- Consent is a voluntary agreement to engage in sexual activity.
    - Past consent does not imply future consent.
    - Silence or an absence of resistance does not imply consent.
    - Consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another.
    - Consent can be withdrawn at any time.
    - Coercion, force, or threat of either invalidates consent.

  Someone who is incapacitated cannot consent. Incapacitation refers to a situation in which a person is not capable of providing consent because the person lacks the ability to understand her or his decision. This situation may occur due to the use of drugs or alcohol, when a person is asleep or unconscious, or because of an intellectual or other disability that prevents the student from having the capacity to give consent.

- Complainant – means an individual who is alleged to be the victim of conduct that could constitute sexual harassment.

- Respondent – means an individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment.

HAZING PREVENTION POLICY AND CAMPUS HAZING TRANSPARENCY REPORT

Renaissance Academie Cosmetology and Esthetics ("RACE" or the "Academie") prohibits hazing by any student or student organization, whether or not the organization is established or recognized by the Academie.

For purposes of this policy, hazing means any intentional, knowing, or reckless act committed by a person, individually or with others, against another person or persons, regardless of willingness to participate, that (1) occurs in connection with initiation into, affiliation with, or maintenance of membership in a student organization; and (2) causes or creates a risk, above the reasonable risk encountered in ordinary participation in the Academie or the organization, of physical or psychological injury. Hazing may include physical brutality; coerced consumption of food, alcohol, drugs, or other substances; forced physical activity; sleep deprivation or exposure to the elements; kidnapping or confinement; coerced sexual acts; or conduct that requires a person to commit a criminal violation.

Reporting and Response

Students and employees should report suspected hazing immediately to the Compliance Director or a Campus Security Authority using the contact information in this report. Call 911 when there is an immediate threat to health or safety. Retaliation for making a good-faith report or participating in an investigation is prohibited. The Academie will promptly review reports, take appropriate interim safety measures, investigate under applicable conduct, disciplinary, and employment procedures, and refer matters to law enforcement when appropriate. Sanctions may include warning, suspension, dismissal, termination, loss of privileges or recognition, and other corrective action, as applicable.

Applicable Law

Utah Code § 76-5-107.5 prohibits hazing and establishes criminal penalties. The current law is available at https://le.utah.gov/xcode/Title76/Chapter5/76-5-S107.5.html.

Prevention and Awareness

The Academie will provide students and employees with research-informed hazing-prevention and awareness information addressing the nature of hazing, warning signs, bystander intervention, prevention, reporting options, and the prohibition against retaliation.

Campus Hazing Transparency Report

This section serves as RACE's Campus Hazing Transparency Report. As of publication, RACE had no findings of hazing violations by any student organization. RACE will update this report as required by federal law.