

5644 Vineland Ave | NoHo | CA 91601 | Tel: 818.980.8990 | www.sochi.edu | info@sochi.edu

Southern California Health Institute



2024 Annual Safety and Security Report



This information is provided in compliance with federal law, known as the Clery Act and Violence Against Women Act (VAWA), to students and employees of Southern California Health Institute by October 1, 2025.

TABLE OF CONTENTS

SECTION I - ANNUAL SECURITY REPORT PURPOSE	pg. 5
Introduction	pg. 5
Background	pg. 5
Crime Statistics For Southern California Health Institute – 2019	pg. 6
Crime Statistics For Southern California Health Institute – 2020	pg. 7
Crime Statistics For Southern California Health Institute – 2021	pg. 8
Crime Statistics For Southern California Health Institute – 2022	pg. 9
Crime Statistics For Southern California Health Institute – 2023	pg. 10
Crime Statistics For Southern California Health Institute – 2024	pg. 11
 SECTION II – BASIC PROVISIONS AND COMPLIANCE REQUIREMENTS	 pg. 12
Basic Provisions of the Clery Act	pg. 12
Specific Requirements that Do Not Apply to SOCHI	pg. 12
SOCHI Emergency Procedures Manual	pg. 13
Compliance Requirements – Timeframes	pg. 13
Regulatory Audits and Penalties for Non-Compliance	pg. 14
 SECTION III – Campus Geography and Requirements of the Clery Act	 pg. 15
“On-Campus Geography” and “Public Property Geography” – Defined	pg. 15
Geographical Areas for Southern California Health Institute	pg. 16
SOCHI Building	pg. 16
Common Areas/Public Property Geography (all are outdoors)	pg. 16
Non-Campus Buildings or Property	pg. 16
Clery Act Requirements for Externship Sites – Reporting Not Required	pg. 16
Clery Act Requirements for Special Events Sites – Reporting Not Required	pg. 16
 SECTION IV – Crime Statistics and Crime Classifications for Clery Act Reporting	 pg. 17
SOCHI Policy for Reporting Crimes and Incidents Not Covered by the Clery Act	pg. 17
Reporting Procedures – Students	pg. 17
Reporting Procedures – Employees	pg. 18
Protecting the Confidentiality of Crime Victims – SOCHI Policy	pg. 19

Classifications of Reportable Crimes under the Clery Act	pg. 19
Determining Whether a Criminal Incident is Reportable under the Clery Act	pg. 19
Handling False Reports of Crimes	pg. 20
Revising Reports – False/Unfounded Crime Reports	pg. 20
How to Classify Specific Crimes for Clery Act Reporting	pg. 21
How to Classify Crimes for Clery Act Reporting Requirements	pg. 22
What Must Schools Disclose in their Reports	pg. 22
SOCHI Policy – Disclosure of Unnecessary Information is Prohibited	pg. 22

SECTION V – Campus Security Authorities / Reporting Duties: Obtaining

Information from Local Law Enforcement Agencies	pg. 23
“Campus Security Authorities” under the Clery Act	pg. 23
Duties of the Campus Security Authorities at SOCHI	pg. 23
Duties of the Campus Security Authority Coordinator	pg. 24
Security of the SOCHI Campus	pg. 24
Records and Statistics of Campus Police and/or Security Departments	pg. 25
Records and Statistics of Local Law Enforcement Agencies	pg. 25
Obtaining Crime Statistics Information – Responsibility	pg. 25
Refusal to Provide Crime Statistics Information	pg. 25
Payment for Crime Statistics Information	pg. 26
Scope and Content of Crime Statistics Information	pg. 26

SECTION VI – Daily Crime Logs and Fire Logs / Fire and Rescue Agency Procedures

Daily Crime Logs	pg. 27
Daily Fire Logs	pg. 27
SOCHI Policy Regarding Fire Records / Contact with Fire & Rescue Officials	pg. 27

SECTION VII – Emergency Notifications and Timely Warnings Requirements

Emergency Situations	pg. 28
Order to Evacuate the Campus – Compliance Required	pg. 28
Compliance with Administrative Staff Orders in an Emergency	pg. 29
Compliance with Law Enforcement and/or Fire and Rescue Personnel Orders	pg. 29
Disclosing the School’s Emergency Procedures – Required	pg. 29
Notification of an Emergency Situation on Campus – Notifying Students and Staff	pg. 29
Notifying Outside Agencies of an Emergency Situation on Campus	pg. 30
Critical Incident – All Employees and Students Shall Make Immediate Notification	pg. 30
Notifying the Building Security of an Emergency Situation on Campus	pg. 31

Testing Emergency Procedures	pg. 31
Timely Warnings – Defined	pg. 32
Timely Warnings – When are They Required	pg. 32
SOCHI Policy – Issuing Timely Warnings	pg. 32
Who Shall Issue Timely Warnings	pg. 33
How Timely Warnings Shall be Made	pg. 33
Timely Warnings – Official Record	pg. 33
Timely Warnings and FERPA Compliance	pg. 33

SECTION VIII – Sex Offense Prevention / Sex Offenders **pg. 34**

SOCHI Policy – Prevention of Sex Offenses	pg. 34
Procedure for Dealing with a Report of Sexual Harassment and Sex Offenses	pg. 34
Victims of Criminal Sex Offenses – On-Campus and Off-Campus Counseling	pg. 35
Notification to Law Enforcement of an Alleged Criminal Sex Offense	pg. 35
Identifying Potential Witnesses	pg. 36
Preservation of Evidence – Employees’ Responsibilities	pg. 36
Rendering Assistance to Victims and Witnesses	pg. 37
Sex Offenses on Campus – Media Relations	pg. 37
Actions to be Taken in the Aftermath of a Criminal Sex Offense on Campus	pg. 37
School Disciplinary Actions in Cases of Criminal Sex Crimes	pg. 38
Registered and/or Convicted Sex Offenders	pg. 38
Disciplinary Investigation Required	pg. 38
Disciplinary Investigation – Panel Composition	pg. 39
Disciplinary Investigation – Right to Call Witnesses and Present Evidence	pg. 39
Findings and Decisions of the Disciplinary Investigation – Duty to Notify	pg. 39
Criminal Sexual Offenses Committed by SOCHI Employees	pg. 40
Obtaining Information on Registered Sex Offenders in the Area of the School	pg. 40

SECTION IX – SOCHI Policies Regarding Illegal Possession, Distribution and Use of Alcohol and Drugs / Substance Abuse **pg. 42**

Substance Abuse Prevention Policy	pg. 43
Students May Notify Confidentially	pg. 43
Confronting a Student Suspected of Being Under the Influence of Drugs or Alcohol	pg. 43
Interviewing a Student Suspected of Being Under the Influence of Drugs or Alcohol	pg. 44
Student Admits to Being Under the Influence of Drugs or Alcohol	pg. 44
Transporting an Impaired Student from the Campus	pg. 44
Safety Concerns Outweigh Privacy Concerns	pg. 45

Student Denies Being Under the Influence of Drugs or Alcohol	pg. 45
Determination of Impairment – Negative	pg. 45
Determination of Impairment – Positive	pg. 45
Students with Substance Abuse Problems – Assistance with Obtaining Treatment	pg. 46
Academic Dean Shall Not Conduct Counseling	pg. 46
Academic Dean – No Legal Confidentiality	pg. 46
Academic Dean Shall Not Offer any Legal Advice	pg. 47
Drug and Alcohol Abuse Prevention Methods – Announcements	pg. 47
Drug and Alcohol Abuse Prevention Methods – Information on the Law	pg. 47
Drug and Alcohol Abuse Prevention Methods – Health Hazard and Criminal Conviction Information	pg. 48
Drug and Alcohol Dependency Treatment Counseling – Outside Services	pg. 49
Drug and Alcohol Dependency Treatment Programs at SOCHI	pg. 49
Students with Substance Abuse Problems – Attending Classes	pg. 50
Students who Fail to Provide a Clearance Letter	pg. 50
Students Withdrawn for Substance Abuse Problems – Re-Admittance	pg. 51
SOCHI Policy and Criminal Law	pg. 51
Crimes on Campus Involving Drugs or Alcohol	pg. 51
Bi-Annual Review of Campus Drug and Alcohol Abuse Prevention Measures and Policies	pg. 51
Changes to Policy – Approval and Implementation	pg. 52
Changes to Policy – Notification and Implementation	pg. 52
SECTION X – The Violence Against Women Act of 1994	pg. 53
Background	pg. 53
SECTION XI – The Clery Act Annual Security Report	pg. 54
Annual Report – Required	pg. 54
Distribution of the Annual Report – SOCHI Policy	pg. 54
Distribution of the Annual Report – Methods	pg. 54
Completion and Distribution of the Annual Report – Responsibilities	pg. 54
Annual Report – Retention Requirements	pg. 55
Annual Report / Crime Statistics – Submission to the U.S. Department of Education	
Content of the Annual Report	pg. 55
Contributions to the Annual Report – Who May Contribute Information	pg. 55

SECTION I - ANNUAL SECURITY REPORT PURPOSE

Introduction

This Southern California Health Institute 2023 Annual Safety and Security Report is published in compliance with the Jeanne Clery Campus Security Disclosure and Crime Statistic Act (“Clery Act”) and the Violence Against Women Act (VAWA). Such compliance is mandatory under federal law. This Report can be found at www.sochi.edu and more specifically at <https://www.sochi.edu/data/general/annual-safety-security-report.pdf>

Under the Clery Act, all schools that participate in Title IV Federal Student Aid programs must compile, maintain and disclose certain information regarding crimes committed on or in the immediate vicinity of the school’s campus or other property. Crime statistics gathered and recorded under the Clery Act¹ must be submitted to the U.S. Department of Education annually, on October 1st. These crime statistics must also be made available to all students and prospective students of the school. The U.S. Department of Education is responsible for monitoring overall compliance with the provisions of the Clery Act. Failure by a school to comply with these provisions can result in disciplinary measures; up to and including fines of up to \$27,500.00 per violation discovered,² as well as termination of the school’s eligibility to participate in Title IV Federal Student Aid programs.

Background

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

CONTACT US

SOCHI

5644 Vineland Ave
North Hollywood, CA 91601
(818) 980-8990

¹ The Clery Act specifies that only certain types of crimes are required to be reported to the U.S. Department of Education. These classifications are addressed in Section III of this policy.

² U.S. Department of Education’s *Handbook for Campus Safety and Security Reporting*, pg. 9.

CRIME STATISTICS FOR SOUTHERN CALIFORNIA HEALTH INSTITUTE – 2019

	2019					
	On-Campus Property				Public Property	Non-campus Property
	On-Campus Residence		Total On-campus			
OFFENSES						
Murder/Non-negligent Manslaughter	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0
Sex Offenses, Forcible	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Sex Offenses, Non-forcible	0	0	0	0	0	0
Incest	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0
VAWA OFFENSES	0	0	0	0	0	0
Dating Violence	N/A	N/A	N/A	N/A	N/A	N/A
Domestic Violence	N/A	N/A	N/A	N/A	N/A	N/A
Stalking	N/A	N/A	N/A	N/A	N/A	N/A
ARRESTS	0	0	0	0	0	0
Alcohol	0	0	0	0	0	0
Drugs	0	0	0	0	0	0
Illegal Weapons	0	0	0	0	0	0
REFERRALS	0	0	0	0	0	0
Alcohol	0	0	0	0	0	0
Drugs	0	0	0	0	0	0
Illegal Weapons	0	0	0	0	0	0
HATE CRIMES	0	0	0	0	0	0

CRIME STATISTICS FOR SOUTHERN CALIFORNIA HEALTH INSTITUTE – 2020

	2020					
	On-Campus Property				Public Property	Non-campus Property
	On-Campus Residence		Total On-campus			
OFFENSES						
Murder/Non-negligent Manslaughter	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0
Burglary	0	0	1	0	0	0
Motor Vehicle Theft	0	0	1	0	0	0
Arson	0	0	0	0	0	0
Sex Offenses, Forcible	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Sex Offenses, Non-forcible	0	0	0	0	0	0
Incest	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0
VAWA OFFENSES	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0
Stalking	0	0	0	0	0	0
ARRESTS	0	0	0	0	0	0
Alcohol	0	0	0	0	0	0
Drugs	0	0	0	0	0	0
Illegal Weapons	0	0	0	0	0	0
REFERRALS	0	0	0	0	0	0
Alcohol	0	0	0	0	0	0
Drugs	0	0	0	0	0	0
Illegal Weapons	0	0	0	0	0	0
HATE CRIMES	0	0	0	0	0	0

CRIME STATISTICS FOR SOUTHERN CALIFORNIA HEALTH INSTITUTE – 2021

	2021					
	On-Campus Property				Public Property	Non-campus Property
	On-Campus Residence		Total On-campus			
OFFENSES						
Murder/Non-negligent Manslaughter	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0
Sex Offenses, Forcible	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Sex Offenses, Non-forcible	0	0	0	0	0	0
Incest	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0
VAWA OFFENSES	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0
Stalking	0	0	0	0	0	0
ARRESTS	0	0	0	0	0	0
Alcohol	0	0	0	0	0	0
Drugs	0	0	0	0	0	0
Illegal Weapons	0	0	0	0	0	0
REFERRALS	0	0	0	0	0	0
Alcohol	0	0	0	0	0	0
Drugs	0	0	0	0	0	0
Illegal Weapons	0	0	0	0	0	0
HATE CRIMES	0	0	0	0	0	0

CRIME STATISTICS FOR SOUTHERN CALIFORNIA HEALTH INSTITUTE – 2022

	2022					
	On-Campus Property				Public Property	Non-campus Property
	On-Campus Residence		Total On-campus			
OFFENSES						
Murder/Non-negligent Manslaughter	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0
Sex Offenses, Forcible	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Sex Offenses, Non-forcible	0	0	0	0	0	0
Incest	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0
VAWA OFFENSES	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0
Stalking	0	0	0	0	0	0
ARRESTS	0	0	0	0	0	0
Alcohol	0	0	0	0	0	0
Drugs	0	0	0	0	0	0
Illegal Weapons	0	0	0	0	0	0
REFERRALS	0	0	0	0	0	0
Alcohol	0	0	0	0	0	0
Drugs	0	0	0	0	0	0
Illegal Weapons	0	0	0	0	0	0
HATE CRIMES	0	0	0	0	0	0

CRIME STATISTICS FOR SOUTHERN CALIFORNIA HEALTH INSTITUTE – 2023

	2023					
	On-Campus Property				Public Property	Non-campus Property
	On-Campus Residence		Total On-campus			
OFFENSES						
Murder/Non-negligent Manslaughter	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0
Sex Offenses, Forcible	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Sex Offenses, Non-forcible	0	0	0	0	0	0
Incest	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0
VAWA OFFENSES	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0
Stalking	0	0	0	0	0	0
ARRESTS	0	0	0	0	0	0
Alcohol	0	0	0	0	0	0
Drugs	0	0	0	0	0	0
Illegal Weapons	0	0	0	0	0	0
REFERRALS	0	0	0	0	0	0
Alcohol	0	0	0	0	0	0
Drugs	0	0	0	0	0	0
Illegal Weapons	0	0	0	0	0	0
HATE CRIMES	0	0	0	0	0	0

CRIME STATISTICS FOR SOUTHERN CALIFORNIA HEALTH INSTITUTE – 2024

	2024					
	On-Campus Property				Public Property	Non-campus Property
	On-Campus Residence		Total On-campus			
OFFENSES						
Murder/Non-negligent Manslaughter	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0
Sex Offenses, Forcible	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Sex Offenses, Non-forcible	0	0	0	0	0	0
Incest	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0
VAWA OFFENSES	0	0	0	0	0	0
Dating Violence	N/A	N/A	N/A	N/A	N/A	N/A
Domestic Violence	N/A	N/A	N/A	N/A	N/A	N/A
Stalking	N/A	N/A	N/A	N/A	N/A	N/A
ARRESTS	0	0	0	0	0	0
Alcohol	0	0	0	0	0	0
Drugs	0	0	0	0	0	0
Illegal Weapons	0	0	0	0	0	0
REFERRALS	0	0	0	0	0	0
Alcohol	0	0	0	0	0	0
Drugs	0	0	0	0	0	0
Illegal Weapons	0	0	0	0	0	0
HATE CRIMES	0	0	0	0	0	0

SECTION II – BASIC PROVISIONS AND COMPLIANCE REQUIREMENTS

Basic Provisions of the Clery Act

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

- Collect, compile, classify³ and record all incidents of crimes that are covered by the Clery Statistics that take place on school grounds, or on property deemed by the Clery Act to be part of the school's "Campus Geography."
- Provide timely warnings ("Campus Alerts") to all students and employees of all incidents and/or situations that represent (or may represent) a threat to their safety.
- Issue "Emergency Notifications" upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to students and employees.
- Publish an annual Campus Security Report. The Campus Security Report shall contain safety and security-related policy statements and crime statistics, and shall be distributed to all current students and employees of the school.
- Inform all prospective students and prospective employees of the existence and availability of this report.
- Maintain all crime statistics compiled under the Clery Act on campus for at least eight (8) years.⁴
- Implement and disclose all emergency evacuation and notification procedures for the school.
- Implement a Program Participation Agreement (PPA) requirement concerning the disclosure of the results of any institutional disciplinary proceedings to the alleged victim of any crime of violence, or a non-forcible sex offense.

Specific Requirements that Do Not Apply to SOCHI

There are additional specific requirements of the Clery Act that do not apply to Southern California Health Institute because (a.) the school has no on-campus student housing, and (b.) the school has no Campus Police force or Campus Security personnel. These requirements include the establishment and maintenance of a Daily Campus Crime Log, establishing procedures for issuing alerts in the event of a missing student, fire safety procedures, etc. These

³ The Clery Act specifies the use of the Federal Crime Classification system for classifying crimes. See: Section III of this policy.

⁴ The time period was increased to eight (8) years as of January 2012.

other requirements may be reviewed in the U.S. Department of Education's *Handbook for Campus Safety and Security Reporting* (2016 Edition).⁵ This *Handbook* is available in the Office of the Academic Dean.

SOCHi Emergency Procedures

Southern California Health Institute has procedures for evacuating the campus in the event of a fire, earthquake or other emergency situation. Evacuation plans with maps are located around the campus in each classroom. These procedures are updated whenever necessary. These emergency procedures, as well as direct contact information for local law enforcement, fire, and rescue paramedics are contained in the Office of the President.

All students and employees of Southern California Health Institute should familiarize themselves with the evacuation plan. Annual fire drills are conducted under the direction of the building management. Any questions regarding these procedures shall be addressed to the Academic Dean.

Compliance Requirements - Timeframes

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

Clery Act Requirement	Timeframe for Compliance
Have procedures for Emergency Notifications and Evacuation of the school's campus.	The campus is notified of all emergencies through an email notification system. Campus has the ability to send mass text messages and emails to students during times of emergency
Issuance of Timely Warnings.	Issue a Timely Warning in all cases of a threat that crime is ongoing and may be repeated.
Request Crime Statistics from local Law Enforcement agencies.	Request these statistics annually; preferably at the beginning of the calendar year.

⁵ This *Handbook* is updated as needed by the U.S. Department of Education.

Submit crime and fire statistics to the U.S. Department of Education via the Department's web-based collection facility.	Submit these statistics by or on October 1 st of the year.
Publish an Annual Security Report	The Annual Security Report shall be completed and published by October 1 st . The Report shall be made available to all current students and employees.

Regulatory Audits and Penalties for Non-Compliance

The U.S. Department of Education conducts periodic audits of school compliance with the Clery Act, and investigates all allegations of non-compliance thoroughly. Any school found not to be in compliance with the provisions of the Clery Act shall receive the results, conclusions and penalties for non-compliance in a Final Review Determination Report. This Report is a public record; accessible to anyone. All schools with sustained violations are listed on the U.S. Department of Education's website: <http://www.ifap.ed.gov>.

Federal law also affords whistleblower protection to individuals who report violations and/or non-compliance to the U.S. Department of Education.⁶

⁶ This protection is included in the amended text of the Higher Education Act of 1965.

SECTION III – Campus Geography and Requirements of the Clery Act

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

“On-Campus Geography” and “Public Property Geography” – Defined

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

“On-Campus Geography” is defined as follows:

Any building or property owned or controlled by an institution (school) within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution’s educational purposes, and any building or property that is within or reasonably contiguous to those areas described above, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes.⁷

“Public Property Geography” is defined as follows:

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

Geographical Areas for Southern California Health Institute

⁷ “Reporting Geography” for schools is described in great detail in the *Handbook for Campus Safety and Security Reporting*, Chapter 2.

Under this definition, Southern California Health Institute’s “On-Campus Geography” and “Public Property Geography” covers the main campus (4th and 5th Floors), the building lobby, and the adjacent parking lot directly south of the campus.

SOCHi Campus Building

Note: Southern California Health Institute is reporting data which was collected for the 2018 calendar year, at which time Southern California Health Institute was located at 5644 Vineland Ave, North Hollywood, CA 91601.

- All rooms, hallways and areas of the main campus on the 4th and 5th floors of 5644 Vineland Ave
- All elevators in the building at 5644 Vineland Ave
- All stairwells in the building at 5644 Vineland Ave
- All restrooms on the 4th and 5th floors of 5644 Vineland Ave
- The lobby of the building at 5644 Vineland Ave

Common Areas/Public Property Geography

- The North/South sidewalk on the east side of 5644 Vineland Ave.
- The street surfaces of Vineland, directly in front of the campus building.
- The parking lot for 5644 Vineland Ave

Non-Campus Buildings or Property

Southern California Health Institute currently has no non-campus buildings or properties as defined by the Clery Act.

Clery Act Requirements for Externship Sites – Reporting Not Required

According to the provisions of the Clery Act, Southern California Health Institute is not required to report incidents of crime or threats to health and/or safety, or to collect and report statistics on such incidents, if they occur at an Externship Site. Since our Externship agreements are with the Externship Sites for the purposes of our educational programs, and not for control of the facility in which the Externship Site is located, Southern California Health Institute has no collection or reporting requirements for these sites.

Clery Act Requirements for Special Events Sites – Reporting Not Required

Unless SOCHi enters into a contract with the owner(s) of a site used for special events, and unless that contract gives SOCHi control of the physical space used for the duration of the event, then

information regarding incidents of crimes or threats to health and/or safety is not required for these sites.

While not required by the Clery Act, it is the policy of Southern California Health Institute to collect and record information regarding crimes or threats to safety experienced by our students while at their Externship Site. This information shall be for institutional use, and shall be provided to law enforcement authorities whenever necessary.

SECTION IV – Crime Statistics and Crime Classifications for Clery Act Reporting

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

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

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

Reporting Procedures – Students

In the event that a student of Southern California Health Institute is the victim of a crime, becomes aware of a crime, or becomes aware of a threat to the health and/or safety of any person or persons at SOCHI, the student should immediately report to a designated Campus Security Authority of the school. These authorities are:

- Academic Dean: Jessica Kallio: (818) 980-8990 ext. 105

This can be accomplished in any way that the student sees fit to do so: in person, by e-mail, by telephone, by text message, etc. Students shall be provided with current lists of all designated Campus Security Authorities. However, if need be, a student may report an incident of crime or

threat to health and/or safety to any employee of Southern California Health Institute. It is essential that any such incidents of crime or threats to health and/or safety be reported immediately. This policy shall not be construed to interfere with the prompt and efficient reporting of any incident of crime or threat to the health and/or safety of students, employees and visitors to the school.

Students may also report any crime directly to the local law enforcement agency or call **911** in the event of an emergency. Southern California Health Institute's campus is within the jurisdiction of the Los Angeles Police Department's West Valley Community Police Station, which is located at:

11640 Burbank Blvd

North Hollywood, CA 91601

The non-emergency telephone number is:

(818) 754-8300

Reporting Procedures – Employees

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

Protecting the Confidentiality of Crime Victims – SOCHi Policy

It is the policy of Southern California Health Institute that the privacy and confidentiality of any victim of any crime committed on campus, or within the school's geographic boundaries, shall be protected from disclosure to the fullest extent of the law. No person who reports a crime to school personnel, or to any law enforcement agency, shall have their name(s) and/or personal information released. No personal or identifying information regarding the victim of any crime shall be released under any circumstances, except to law enforcement and/or fire & rescue

personnel as required by law. Any student who violates this policy shall be withdrawn immediately and shall not be allowed to return or re-enroll at any time. Any employee who violates this policy shall be subject to disciplinary action; up to and including termination of employment with Southern California Health Institute.

Classifications of Reportable Crimes under the Clery Act

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

- **Offenses:** Murder and Non-Negligent Manslaughter, Negligent Manslaughter, robbery, aggravated assault, burglary, motor vehicle theft, arson.
- **Sex Offenses Forcible:** Rape, fondling
- **Sex Offenses, non-forcible:** incest, statutory rape
- **VAWA Offenses:** Dating violence, domestic violence, stalking
- **Arrests and Referrals for Disciplinary Action:** Alcohol, drugs, illegal weapons
- **Hate Crimes**

Determining Whether a Criminal Incident is Reportable under the Clery Act

For purposes of complying with the Clery Act, the various reportable criminal incidents, and their classifications, are addressed in detail in Chapter 3 of the U.S. Department of Education's *Handbook for Campus Safety and Security Reporting*. It shall be the responsibility of the Academic Dean to review all incidents of crime (or suspected crime) reported to the school and to determine which, if any, of the categories are applicable to the incident.

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

Handling False Reports of Crimes

Unfortunately, false crime reports are not unknown. It is not for any employee of Southern California Health Institute to make such a determination, with respect to reporting incidents and reports of crimes to the U.S. Department of Education. That is a matter solely for the appropriate law enforcement agency. However; in the event that a sworn or commissioned law enforcement officer informs the school, in his or her official capacity, that a report of a crime was determined to be “unfounded,” the school shall not include that incident in the annual report. Remember: *only* a sworn or commissioned law enforcement officer can determine that a crime report is “unfounded.”

It is not the responsibility of Southern California Health Institute, or its employees, to ascertain the final adjudication of every incident of crime reported to the police. The standard for inclusion of an incident under the Clery Act is that the incident is *reported* to the school, or to recognized Campus Security Authorities, or to a law enforcement agency. Unless otherwise informed by the law enforcement agency having jurisdiction over the incident in question, Southern California Health Institute shall accept as valid all reports of crime incidents that occur within the school’s reporting geography, and shall proceed accordingly on such reports.

Revising Reports – False/Unfounded Crime Reports

In the event that a crime is reported to the U.S. Department of Education under the Clery Act, and it is later determined to have been “unfounded” by a sworn or commissioned law enforcement officer, and a sworn or commissioned law enforcement officer informs the school of this fact, then the school shall revise the earlier statistics and remove that “unfounded” crime from the reporting statistics. See the U.S. Department of Education’s *Handbook for Campus Safety and Security Reporting* for details on how to perform this revision.⁸

How to Classify Specific Crimes for Clery Act Reporting

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

- *Criminal Offenses*: When reporting and classifying criminal offenses, schools are required to use the F.B.I.’s *Uniform Crime Reporting* classifications when submitting official crime statistics to the U.S. Department of Education. These classifications can be found in the F.B.I.’s *Uniform Crime Reporting Handbook*.⁹

⁸ See Chapter 3; Pg. 72 of the *Handbook*.

⁹ A copy of the F.B.I.’s *Uniform Crime Reporting Handbook* is available in the Office of the Director of Regulatory Compliance.

- *Sex Offenses*: When reporting and classifying sex offenses, schools are required to use the definitions contained in the F.B.I.'s National Incident-Based Reporting System (NIBRS) of the Bureau's *Uniform Crime Reporting Handbook*.
- *Hate Crimes*: When reporting and classifying hate crimes, schools are required to use the F.B.I.'s *Uniform Crime Reporting /Hate Crime Reporting Data Collection Guidelines*. These guidelines are found in the F.B.I.'s *Uniform Crime Reporting /Hate Crime Reporting Data Collection Guidelines* and *Training for Hate Crimes Data Collection Handbooks*.¹⁰
- *Arrests and Referrals for Disciplinary Action*: The classifications for an "arrest" and for a "referral for disciplinary action" under the Clery Act are found in the U.S. Department of Education's *Handbook for Campus Safety and Security Reporting*. Include all incidents involving an "arrest" as defined in the *Handbook*.

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

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

How to Classify Crimes for Clery Act Reporting Requirements

The classification of crimes for purposes of complying with the reporting provisions of the Clery Act is somewhat complicated, and requires very specific methodologies for both counting and classifying incidents. The processes for completing these tasks are described in great detail in Chapter 3 of the U.S. Department of Education's *Handbook for Campus Safety and Security Reporting*. SOCHI personnel involved in preparing the annual report shall refer to the *Handbook* for specific guidance on classification and collating crime statistics.

What Must Schools Disclose in their Reports

Schools are required to disclose only reported offenses. Schools are not required to disclose the findings of courts, the Medical Examiner's Office, the District Attorney's Office or the City Attorney's Office. In the event that the school comes into possession of these findings, or if the

¹⁰ Copies of these *Handbooks* are available in the Office of the Director of Regulatory Compliance,

school is informed of these findings, this information shall not be included in the annual Clery Act report.

SOCHi Policy – Disclosure of Unnecessary Information is Prohibited

Employees of Southern California Health Institute shall not disclose any information in official reports of crime statistics to the U.S. Department of Education that is not required by the Clery Act. Disclosures of additional information could have unintended consequences, such as constituting a violation of FERPA regulations, federal and/or state privacy laws, etc.

The Academic Dean shall review all reports to be submitted to the U.S. Department of Education under Clery Act requirements to ensure that they comply with this policy.

SECTION V – Campus Security Authorities / Reporting Duties: Obtaining Information from Local Law Enforcement Agencies

While Southern California Health Institute keeps records, and is aware of, incidents of crime and situations that threaten the health and/or safety of students and employees, this does not mean that the school's records and statistics are complete. Schools are required under the Clery Act to obtain (or at least attempt to obtain) crime statistics for its geographical reporting area(s) from the local law enforcement agency, as well as from any persons or entities that the Clery Act designates as "Campus Security Authorities."¹¹

"Campus Security Authorities" under the Clery Act

The Clery Act is specific regarding who constitutes a "Campus Security Authority." Obviously, Campus Police Department personnel (if the school has a Campus Police Department) and Campus Security Guards (if the school has such guards) would fall under this classification. While Southern California Health Institute has no Campus Police Department or Security Guards, certain

¹¹ See: U.S. Department of Education's *Handbook for Campus Safety and Security Reporting*; Chapter 4; Pg. 73.

employees do fall under the definition of “Campus Security Authorities.” The criteria for a Campus Security Authority under the Clery Act are as follows:

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

Duties of the Campus Security Authorities at SOCHI

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

It is not the responsibility or the duty of a Campus Security Authority to conduct investigations into allegations of crimes, seek to determine the validity of an allegation of a crime, or attempt to arrest or detain the alleged perpetrator(s) of a crime. These duties are the responsibility of the police, and no Campus Security Authority shall engage in any of these actions. To do so is a violation of SOCHI policy, and may serve to hinder or even irreparably damage the legitimate criminal investigation by the police.

Duties of the Campus Security Authority Coordinator

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

- To receive all reports of crimes and threats to health and/or safety within the designated Campus Geography as specified for Clery Act reporting requirements.
- To maintain these reports in an organized fashion
- To ensure that all students are made aware of the existence of Southern California Health Institute’s crime reporting and emergency policies and procedures
- To provide written copies of these policies and procedures as requested
- To ensure that all designated Campus Security Authorities provide a written report of any reports of crimes or threats to health and/or safety that they received during the calendar year

¹² See: U.S. Department of Education’s *Handbook for Campus Safety and Security Reporting*; Chapter 4; Pgs. 74-75.

¹³ The *Handbook* does not specify what these “particular issues” are or could be.

Security of the SOCHi Campus

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

- All students are provided with an official photographic identification card. This identification card must be displayed at all times by all students while on the campus grounds.
- Students are required to wear a highly visible and recognizable student uniform while on campus.
- Photographs are taken when a student begins his or her program of study. These photographs are uploaded into the campus management computer system (Diamond SIS). All employees with supervisory duties have access to this system and may view any student's photograph and identifying information whenever necessary.
- The Los Angeles Police Department's West Valley Community Police Station is 1.8 miles from the campus.
- There is a security guard on premise 24 hours Monday through Friday. Employees of Southern California Health Institute maintain regular contact with the building's private security.

Records and Statistics of Campus Police and/or Security Departments

Southern California Health Institute does not have a Campus Police Department; nor does it maintain a Security Department. The building security is not employed by Southern California Health Institute, nor is it responsible to the school's administration. Therefore, SOCHi has no obligation under the Clery Act to obtain crime records and statistics from such agencies.

Records and Statistics of Local Law Enforcement Agencies

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

All LAPD Divisions maintain a Crime Analysis Unit that tracks, compiles and analyzes area crime statistics. Therefore, the information needed to comply with the Clery Act requirements should be available from this Unit.

For this reporting year, the local police station was contacted and a good faith effort was made to collect the data. Unfortunately, the police department did not comply with SOCHi's request.

Obtaining Crime Statistics Information – Responsibility

The Academic Dean shall be responsible for obtaining crime statistics records from the local law enforcement agency. This shall be done by sending a letter, on SOCHI letterhead stationary, to the Patrol Captain of the LAPD North Hollywood Station. This letter shall be sent in time to allow for the compilation and delivery of all necessary crime statistics by the police. A copy of this letter shall be maintained by the Academic Dean. In the event that the requested crime statistics are not provided by the police, or in the event that they are provided too late to meet the October 1st deadline as set by the Clery Act, the letter shall be evidence of a good-faith effort by the school to obtain these statistics and comply with the provisions of the Clery Act.

Refusal to Provide Crime Statistics Information

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

Payment for Crime Statistics Information

Under the Clery Act, schools are not required to pay the local law enforcement agency for crime statistics information. If the local law enforcement agency insists on payment for such statistics, the Academic Dean shall consult with the School President and the Director of Operations and decide whether to pay the requested fee.

Scope and Content of Crime Statistics Information

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

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

Additional specific information regarding how to request crime statistics from local law enforcement agencies is provided in the U.S. Department of Education's *Handbook for Campus Safety and Security Reporting* (Chapter 4).

SECTION VI – Daily Crime Logs and Fire Logs / Fire and Rescue Agency Procedures

Daily Crime Logs

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

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

Daily Fire Logs

According to the Clery Act, only those schools with residential student housing are required to create and maintain a Daily Fire Log. Southern California Health Institute has no on-campus student housing, and is therefore not required to create and maintain a Daily Fire Log for purposes of the Clery Act. Southern California Health Institute does not use or maintain a Daily Fire Log.

SOCHI Policy Regarding Fire Records / Contact with Fire & Rescue Officials

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

SECTION VII – Emergency Notifications and Timely Warnings Requirements

Emergency situations can occur at any time. Southern California is particularly vulnerable to such things as earthquakes and wildfires, but numerous other emergency situations can threaten the health and safety of our students and employees: major accidents, structural damage caused by equipment failures such as gas leaks, major civil disturbances, etc. Southern California Health Institute has in place a system whereby it notifies students and employees of any emergency situation either by iAlert email or text messaging using a Google application, in a timely way.

The Clery Act sets forth two (2) notification requirements for schools: Emergency Notifications and Timely Warnings.

Emergency Situations

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

Order to Evacuate the Campus – Compliance Required

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

Once a year, the property manager conducts fire drills of the entire building.

Compliance with Administrative Staff Orders in an Emergency

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

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

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

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

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

Disclosing the School's Emergency Procedures – Required

The Clery Act requires the school to disclose a statement of policy regarding Emergency Procedures in the Annual Report. The Academic Dean shall ensure that this statement of policy is included with the Annual Report.¹⁴

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

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

Notifying Outside Agencies of an Emergency Situation on Campus

¹⁴ For details on the content of this policy statement, see: U.S. Department of Education's *Handbook for Campus Safety and Security Reporting*; Chapter 6; Pg. 98.

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

In the event of an emergency situation that obviously requires the response of emergency personnel and agencies, any employee or student may, and shall, call for emergency personnel and agencies immediately. The Academic Dean shall be informed of who placed the call, as well as the justification for the call, when the emergency situation has been resolved safely. No disciplinary or adverse action shall be taken against any employee or student who notifies any emergency response agency and requests that they respond to the campus, as long as the employee or student had reason to believe that this was the prudent course of action. The safety of all persons on Southern California Health Institute's campus and surrounding areas is, of course, paramount. See: Southern California Health Institute's policy regarding Critical Incidents listed below.

Critical Incident – All Employees and Students Shall Make Immediate Notification

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

Notifying the Building Security of an Emergency Situation on Campus

The Academic Dean shall notify the building security personnel of any Emergency Situation on campus. Notification shall be made by telephone, or verbally in person. The Academic Dean may delegate this authority to other employees of Southern California Health Institute as he sees fit to do so.

Testing Emergency Procedures

The Clery Act requires schools to test their Emergency Situation procedures at least once per calendar year. Here at Southern California Health Institute, this requirement raises a number of problems, as the school does not own the buildings in which the two wings of the campus are located; nor is Southern California Health Institute the only tenant in these two buildings. Live rehearsal tests must be sanctioned by and coordinated with the building management. However, the property manager conducts an emergency evacuation drill once per year.

Southern California Health shall comply with this testing requirement through the use of simulated exercises (called “Table Top Exercises” in the *Handbook*). The Academic Dean shall create and implement procedures for such simulated emergency drills. A record of these drills shall be kept by the Academic Dean. Any shortcomings to existing Emergency Procedures shall be documented, and corrective measures shall be implemented to address such shortcomings. A copy of the record of these test drills shall be included with the school’s Annual Report.

The Clery Act requires that tests conducted be classified as “announced” or “unannounced.” “Table Top” simulations shall be documented as “announced,” as this is the only way such a theoretical drill can be conducted. In the event that Southern California Health Institute holds an Emergency Situation drill involving students, and with the permission and cooperation of the buildings’ owners, management and security personnel, the test shall be “unannounced.” This will provide the best evidence of the effectiveness of the school’s Emergency Situation response procedures. Currently, the property manager does conduct an announced emergency evacuation drill.

Timely Warnings – Defined

According to the Clery Act, a “Timely Warning” is a preemptive measure designed to alert students and employees to a dangerous situation that exists, or that has a significant probability of existing, on or very near the school’s campus. The purpose of a Timely Warning is to alert students and employees to a potential danger to their health and/or safety, so that they might take steps to avoid that danger.¹⁵ Timely Warnings shall be issued in every case where:

- A crime falling under the designation of the Clery Act as a reportable crime occurs on or very near the campus
- An Emergency Situation occurs on or very near the campus

¹⁵ See: U.S. Department of Education’s *Handbook for Campus Safety and Security Reporting*; Chapter 6; Pg. 113.

- The crime or emergency Situation is considered by the school to represent a serious and/or continuing threat to the health and/or safety of students and/or employees

Timely Warnings – When are They Required

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

SOCHi Policy – Issuing Timely Warnings

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

Who Shall Issue Timely Warnings

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

How Timely Warnings Shall be Made

The information contained in the Timely Warning shall be disseminated by several different means. Employees and students shall be notified by company e-mail, as well as in-person verbally.¹⁶ Written notifications shall be posted throughout the school's two campus buildings

¹⁶ At the present time, in person verbal notifications are feasible due to the small size of our campus and the small number of students currently enrolled. This policy shall change if the campus size and/or student population size increases to a point where in person verbal notifications are no longer feasible.

alerting students, employees and visitors of the dangerous situation, and they shall contain information that will help students, employees and visitors avoid the dangerous situation.

Timely Warnings – Official Record

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

Timely Warnings and FERPA Compliance

Because of the nature and the seriousness of crimes and incidents that warrant the issuance of a Timely Warning, federal law allows for FERPA regulations regarding the privacy of personal information of students to be suspended. The safety of students and employees in the event of a serious, immediate and ongoing threat supersedes the privacy requirements of FERPA.¹⁷

It is the policy of Southern California Health Institute that no information protected by FERPA shall be included in a Timely Warning without the authorization of the School President. The School President shall consult with the Director of Operations and the Academic Dean before issuing instructions to release a Timely Warning that contains information protected by FERPA. If a Timely Warning must contain information protected by FERPA, the school's administration shall make every effort to limit the amount of FERPA-protected information that is released in the announcement.

SECTION VIII – Sex Offense Prevention / Sex Offenders

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

SOCHI Policy – Prevention of Sex Offenses

Southern California Health Institute is committed to providing a safe and welcome environment to all students, employees and visitors. It is the policy of this school that there is, and shall always be, zero tolerance for sexual harassment and inappropriate conduct of a sexual nature. This

¹⁷ See: U.S. Department of Education's *Handbook for Campus Safety and Security Reporting*; Chapter 6; Pg. 114.

policy is contained in the School Catalog, and every student receives a copy of this Catalog. Given the unique nature of the subjects taught by SOCHi, many programs of study contain a class in professional ethics that contains extensive training on personal boundaries and the hazards and inappropriateness of improper sexual conduct.¹⁸ All employees of Southern California Health Institute are advised of the school's zero tolerance policy regarding sexual harassment and inappropriate conduct of a sexual nature.

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

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

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

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

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

Southern California Health Institute has no resources for, and therefore does not provide, any on-campus professional counseling services to victims of criminal sex offenses. Southern California Health Institute does not enter into contracts or agreements with, and therefore is unable to recommend, any specific off-campus counseling services for victims of a criminal sex offense. Victims of criminal sex offenses shall be encouraged to learn of such available services

¹⁸ Professional Ethics and Hygiene class.

and resources from law enforcement and fire & rescue personnel, who will have such information and who can assist the victim in obtaining these services.

The Los Angeles Police Department – West Valley Community Police Station will have this information, and will make it available free of charge to any person or persons who ask. Contact the Los Angeles Police Department – North Hollywood Station at:

Los Angeles Police Department – West Valley Community Police Station
19020 Vanowen Street
North Hollywood, CA 91601
(818) 374-7611
(818) 715-1566 (TDD/TTY)

Notification to Law Enforcement of an Alleged Criminal Sex Offense

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

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

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

Identifying Potential Witnesses

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

Neither the Academic Dean, nor any employee of Southern California Health Institute, shall attempt to conduct a criminal investigation of an alleged sex offense. SOCHI personnel do not

possess the training and experience to do so, and doing so could compromise the official police investigation. All employees of Southern California Health Institute shall allow the police to conduct the official criminal investigation, and shall cooperate fully and immediately with all law enforcement personnel.

Preservation of Evidence – Employees’ Responsibilities

The preservation of evidence is a critical factor in any criminal investigation. Employees of Southern California Health Institute shall make every reasonable effort to preserve all potential evidence of a criminal sex offense by isolating the crime scene and not allowing any person to enter, with the exception of law enforcement. SOCHI employees shall not allow any person to discard or otherwise do away with any object or materials that might be of evidentiary value to the police. If necessary, SOCHI employees are permitted to take possession of any such discarded items and preserve them for the police. However, SOCHI employees shall not attempt to identify or gather evidence for the police, as employees do not have the training and experience to do this properly. No person, other than a law enforcement officer, shall be allowed to remove any item from an alleged crime scene.

Rendering Assistance to Victims and Witnesses

The Clery Act requires schools to comply with a student’s request for a change in his or her academic situation if he or she is a victim of a criminal sex offense.¹⁹ Southern California Health Institute shall provide all possible assistance to victims and witnesses of criminal sex offenses. No punitive or otherwise negative actions shall be taken against any victim or witness who wishes to miss classes, or who wishes to be assigned to a different class or cohort group as a result of the incident.

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

Sex Offenses on Campus – Media Relations

Employees of Southern California Health Institute shall not under any circumstances speak to media personnel regarding an allegation of a criminal sex offense on campus. If an official statement is to be made by and on behalf of the school, it shall be made by the School President, or by the Director of Operations or the Academic Dean at the request of the School President.

¹⁹ See: U.S. Department of Education’s *Handbook for Campus Safety and Security Reporting*; Chapter 8; Pg. 143.

No photographs shall be taken, or allowed to be taken, of the crime scene. Only law enforcement personnel shall be permitted to photograph the crime scene.

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

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

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

School Disciplinary Actions in Cases of Criminal Sex Crimes

The Clery Act requires schools to conduct disciplinary actions for students accused of committing a criminal sex offense in a prescribed manner. As a result, Southern California Health Institute shall process student disciplinary actions for students of committing a criminal sexual offense in a manner that is more involved, and more complicated, than is the manner for processing other disciplinary actions.

Any student who is convicted of a criminal sex offense shall be permanently withdrawn from school immediately. The student shall not be permitted to re-enroll under any circumstances. A criminal conviction for a violent felony crime is cause for immediate and permanent withdrawal.²⁰ Allowing such a student to remain enrolled and participate in classes and activities would expose students and employees to an unacceptable threat to their safety, and would seriously disrupt the school's environment to the degree that it would hinder the educational mission of Southern California Health Institute.

Registered and/or Convicted Sex Offenders

²⁰ It would serve no purpose to allow such a student to remain enrolled, because the various licensing and certification bodies that govern the professions taught at SOCHI will not credential a person convicted of a violent felony crime.

Given the specific and unique nature of the programs of study offered by Southern California Health Institute, it is the policy of Southern California Health Institute to not admit any prospective student who has been convicted for a criminal offense of a sexual nature.²¹

Disciplinary Investigation Required

In the event that the alleged perpetrator is a student, and the student is not charged and convicted of the offense in a criminal court, Southern California Health Institute shall conduct an investigation to determine whether the accused student should be temporarily or permanently withdrawn from school, or whether the accused student should be allowed to remain in school. The investigation results shall be presented to an Administrative Panel for review and decision on the proper course of action. In the event the Administrative Panel determines that the accused student has committed misconduct, the Panel shall recommend to the School President that the student be involuntarily and permanently withdrawn from Southern California Health Institute. Such investigations shall not be conducted until the conclusion of the criminal investigation conducted by law enforcement personnel; nor shall they be conducted before the conclusion of the accused student's criminal trial, if the student is charged and tried for the offense.

Disciplinary Investigation – Panel Composition

The panel that shall decide whether to allow the student to remain in school shall be composed of the Academic Dean, the Director of Operations and the Dean of Student and Academic Affairs. Upon reviewing the case, and after hearing from all witnesses, the panel shall render a decision. This decision shall be presented to the School President. The School President shall make the final determination. The School President may concur with the recommendation of the Disciplinary Investigation Panel and involuntarily and permanently withdraw the student from Southern California Health Institute, or she may reduce the recommended penalty to a suspension not to exceed 180 calendar days. Students may not appeal a final decision from the School President.

Disciplinary Investigation – Right to Call Witnesses and Present Evidence

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

Any student facing involuntary withdrawal shall not have the right to confront the alleged victim in the course of a Disciplinary Investigation. While this right exists for defendants in a court of

²¹ See footnote 19 above.

law, a school Disciplinary Investigation is not a court of law. To subject the alleged victim of a criminal sex offense to questioning by the alleged perpetrator would place the alleged victim in a position that is clearly dangerous to his or her health and well-being. The Disciplinary Investigation Panel shall accept statements from both the alleged victim and the alleged perpetrator, at different times and in different locations.

Findings and Decisions of the Disciplinary Investigation – Duty to Notify

Under the Clery Act, both the alleged victim and the alleged perpetrator of a criminal sex offense must be notified of the outcome of any internal investigation into the matter. The Academic Dean shall notify both the alleged victim and the alleged perpetrator of the outcome of the investigation, as well as what disciplinary action the school shall take (or not take) in the matter.²²

Criminal Sexual Offenses Committed by SOCHI Employees

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

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

Southern California Health Institute is located in the San Fernando Valley area that has both commercial and residential properties. Because there is no on-campus housing, students and prospective students often seek residence near the school. Students and prospective students have a right to obtain current information regarding the possible presence of registered sex offenders in the area of the campus. This information is available free of charge from the appropriate authorities. Southern California Health Institute does not maintain such information on campus.

In accordance with California Penal Code §290.46 (commonly known as “Megan’s Law”), information on Registered Sex Offenders residing or working near the campus may be obtained either from local law enforcement, or from an internet database maintained by the California Department of Justice. To obtain information on registered sex offenders from the Los Angeles Police Department – North Hollywood Division, contact them directly:

²² Informing the alleged victim and the alleged perpetrator of these findings does not constitute a FERPA violation. See: U.S. Department of Education’s *Handbook for Campus Safety and Security Reporting*; Chapter 8; Pg. 144.

Los Angeles Police Department – West Valley Community Police Station
19020 Vanowen Street
North Hollywood, CA 91601
(818) 374-7611
(818) 705-1566 (TDD/TTY)

To obtain information on California registered sex offenders from the California Department of Justice’s website, go to: <http://www.meganslaw.ca.gov>.

Individuals seeking information on registered sex offenders in California must keep in mind that there are certain restrictions on the release of information, as well as criminal penalties for anyone who misuses information obtained from the California sex offender registration database. All persons seeking information on registered sex offenders in California are strongly urged to familiarize themselves with these restrictions and legal requirements. This information is available at the California Department of Justice website: <http://www.meganslaw.ca.gov>.

SECTION IX – SOCHI Policies Regarding Illegal Possession, Distribution and Use of Alcohol and Drugs / Substance Abuse

Southern California Health Institute has a zero tolerance policy for any student or employee who possesses, uses, sells, or furnishes illegal drugs and/or alcoholic beverages. The possession, distribution, and use of illegal drugs are serious violations of the law, and create a hazardous environment for students, employees and visitors of Southern California Health Institute. Students and employees may not bring onto campus any alcoholic beverage or illegal drugs at any time. Because there is no residential housing for students or employees on campus, SOCHI has adopted a complete prohibition of alcoholic beverages and illegal drugs anywhere on campus, at any time and by any person, under any circumstances.

Southern California Health Institute regarding alcoholic beverages and illegal drugs is as follows:²³

As a matter of policy, Southern California Health Institute prohibits the unlawful manufacture, possession, use, sale, dispensation, or distribution of controlled substances and the possession or use of alcohol by students and employees on its property and at any school activity held off premises. Any violation of these policies will result in appropriate disciplinary actions up to and including expulsion in the case of students and termination in the case of employees, even for a first offense. Possession, distribution, and/or use of any illegal drugs will be reported to the police without exception. Information on our drug-free awareness program and drug and alcohol abuse prevention program may be obtained from the Academic Dean.²⁴

Because Southern California Health Institute has no on-campus residential housing, the school is not in the most advantageous position to detect students who suffer with a substance abuse problem. Nevertheless, SOChi is committed to assisting our students in living healthy and productive lives; free of drug and/or alcohol dependence. To that end, the school's Drug-Free Awareness program and Alcohol Abuse Prevention program are designed to assist students who find themselves caught in the grip of substance abuse. Southern California Health Institute's Drug-Free Awareness program and Alcohol Abuse program utilize a two-pronged approach:

Substance Abuse Prevention Policy

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

Students May Notify Confidentially

²³ Taken from the *Southern California Health Institute School Catalog* (2018 Edition): Pg. 16.

²⁴ This information regards services provided by outside institutions. Southern California Health Institute has no in-house alcohol and/or drug awareness or treatment programs; nor does the school contract with any person or agency to provide such services.

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

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

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

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

The student shall be taken to a private office. No non-essential personnel shall be present during the interview. The interview shall be conducted by the Academic Dean and the Dean of Student and Academic Affairs. Any of these school officials may conduct the interview. One other employee of Southern California Health Institute (preferably one of the two persons authorized to conduct the interview) shall be present as a witness.

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

Student Admits to Being Under the Influence of Drugs or Alcohol

If the student admits to being under the influence of drugs or alcohol, the interviewer shall remind the student that it is school policy to prohibit the possession, sale, or use of drugs and/or

alcohol on campus. The student shall be informed that he or she shall not be permitted to return to class that day.

Transporting an Impaired Student from the Campus

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

Safety Concerns Outweigh Privacy Concerns:

No employee of Southern California Health Institute shall transport a student suspected of being under the influence of drugs or alcohol without the prior permission of the Academic Dean or the Director of Operations. In the event that SOCHi employees must transport a student home for his or her safety, two (2) employees of Southern California Health Institute will transport the student.

Student Denies Being Under the Influence of Drugs or Alcohol

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

***Note:** Employees of Southern California Health Institute are not doctors; nor are they law enforcement officers. They lack the training and expertise to make a conclusive diagnosis of drug or alcohol impairment, so they shall not attempt to do so. No employee of Southern California Health Institute shall attempt to conduct a medical examination of a student, a Drug Recognition Expert Evaluation of a student, or attempt to administer a field sobriety test (FST) to a student. Any employee of Southern California Health Institute who does or attempts to do any of the aforementioned things shall be subject to discipline; up to and including termination.

Determination of Impairment – Negative

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

Determination of Impairment – Positive

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

Students with Substance Abuse Problems – Assistance with Obtaining Treatment

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

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

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

Academic Dean Shall Not Conduct Counseling

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

Academic Dean – No Legal Confidentiality

The Academic Dean shall inform the student that neither she nor any employee of Southern California Health Institute has any recognized legal authority to keep what a student says in strict confidence. There is no confidentiality in their relationship, as there is with Doctor/Patient and Attorney/Client or Priest/Penitent relationships. If a student were to disclose information regarding criminal activity, the Academic Dean is required by law to notify the police. Anything that a student tells the Academic Dean—or any employee of Southern California Health Institute—can and must be disclosed under certain circumstances (i.e., as a result of a court subpoena).

Academic Dean Shall Not Offer any Legal Advice

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

Drug and Alcohol Abuse Prevention Methods – Announcements

All students and employees of Southern California Health Institute shall be provided with a written copy of the school's official policy regarding the possession, use, transfer, sale and distribution of alcoholic beverages and illegal drugs. Students shall be provided this written policy statement upon enrollment. Employees shall be provided this written policy statement upon being hired. This policy shall be distributed to all employees (and to those students whose enrollments extend beyond one calendar year) annually.

Drug and Alcohol Abuse Prevention Methods – Information on the Law

All students and employees of Southern California Health Institute shall be informed in writing that unlawful possession of drugs is a crime in the State of California; punishable by a fine and/or imprisonment in the County Jail or the State Prison. The California Health and Safety Code §11350(a) defines the possession of certain types of drugs to be a felony, and lists the applicable

punishments for violations. The California Health and Safety Code §11351 covers possession of certain illegal drugs for purposes of sale or distribution. Unlawful use and/or being under the influence of certain drugs are covered in §11550. Other statutes of the California Health and Safety Code and the Los Angeles Municipal Code also apply to the illegal possession, sale, distribution and use of illegal drugs. Many illegal drugs are covered under various Federal Criminal statutes.

Specific information on drug laws for the State of California can be found on the California Department of Justice/Office of the Attorney General website at: <http://www.oag.ca.gov/>

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

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

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

- According to the Center for Disease Control, over 15,000 people die every year from overdoses of pain-killing drugs alone.²⁵
- There are over 100 fatal drug overdoses *per day* in the United States.²⁶
- Drug overdose rates in the United States have *tripled* since 1990.²⁷
- Alcohol is a factor in many drug overdose fatalities.
- People of any age, gender, ethnicity or socioeconomic status can and do become addicted to drugs and/or alcohol.²⁸
- Drug and Alcohol addiction can lead to physical ailments, long-term health problems (often serious), accidents due to impairment, increased likelihood of contracting a communicable disease, depression, suicidal thoughts, severe mood swings, alienation and even death.²⁹

²⁵ CDC. *Vital Signs: Overdoses of Prescription Opioid Pain Relievers – United States, 1999-2008*. MMWR 2011; 60: 1-6.

²⁶ *Ibid.*

²⁷ CDC. Warner M., Chen, L.H., Makuc, D.M.: "Increase in Fatal Poisonings Involving Opioid Analgesics in the United States, 1999-2006," *Data Brief*, 22 September 2009).

²⁸ The Mayo Clinic: *Information on Drug Addiction*. See: <http://www.mayoclinic.com/health/drug-addiction/DS00183/DSECTION=risk-factors>

²⁹ *Ibid.*

- Nearly 50% of all persons incarcerated in Federal prisons are serving sentences for drug offenses.³⁰
- Nearly two-thirds of all inmates in California State prisons are serving time for drug offenses.³¹
- People convicted of felony drug offenses in the State of California are required to register with the police as Drug Offenders.
- A criminal conviction for a drug offense can make it extremely difficult to find housing and employment.
- Drug and alcohol abuse affects people other than the addict: family, friends, employers and colleagues are all affected by your substance abuse.
- A criminal conviction for drug-related offenses can render a student ineligible for Title IV Federal Student Aid, even if the student has already qualified for and is presently receiving Title IV Federal Student Aid.

Drug and Alcohol Dependency Treatment Counseling – Outside Services

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

Drug and Alcohol Dependency Treatment Programs at SOCHI

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

³⁰ U.S. Department of Justice / Federal Bureau of Prisons – Inmate Population Statistics. See: <http://www.bop.gov/news/quick.jsp>

³¹ State of California Legislative Analyst's Office: Crime & Punishment - Prison Population by Type of Offense: http://www.lao.ca.gov/laoapp/laomenus/sections/crim_justice/8_cj_whatcrimes.aspx?catid=3

be counseled to consult qualified medical professionals for the treatment of such a medical condition.

The Academic Dean maintains a number of informational booklets and publications produced by the U.S. Department of Health and Human Services' Substance Abuse and Mental Health Services Administration (SAMHSA). These publications are available to any student (or employee) at no cost from the Office of the Academic Dean.

Students with Substance Abuse Problems – Attending Classes

No student shall be allowed to attend classes if he or she is believed to be under the influence of drugs or alcohol. Students who are undergoing treatment for a substance abuse problem must obtain a letter from a licensed medical professional stating that they are fit to continue classes while in treatment and that they pose no threat to the health and safety of the students, employees and visitors of Southern California Health Institute.³²

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

Students who are not permitted to continue their programs of study because they are undergoing treatment for a substance abuse problem shall be either withdrawn from school and the reason will be recorded as "Medical" or placed on a Leave of Absence (L.O.A.) not to exceed 180 calendar days. The reason for the Leave of Absence shall be recorded as "Medical." No additional information shall be maintained in the student's file or in the student's computer file in the campus management system (Diamond SIS). Students returning from a Leave of Absence after or while in treatment will be required to either (a.) present a letter from a licensed medical professional that they are fit to resume their studies, or (b.) obtain a letter from a licensed medical professional stating that they are fit to resume their studies while still in treatment. Likewise, students reentering their program of study during or after treatment must provide a letter from a medical professional indicating that he or she is fit to resume their program of study.

Students who Fail to Provide a Clearance Letter

³² Because many programs of study at Southern California Health Institute contain a practicum component in which the students apply techniques directly to the bodies of other students, instructors and visitors, it would pose an unacceptable risk to allow students undergoing treatment for a substance abuse problem to continue their studies. The potential for injuring another person is too great.

Any student who is placed on a Leave of Absence because he or she is undergoing treatment for a substance abuse problem, who fails to provide a clearance letter from a licensed medical professional stating that the student is fit to resume his or her studies, shall be withdrawn from school at the end of the maximum time frame (180 calendar days). The reason for the student's withdrawal shall be recorded as "Medical." No additional information shall be placed in the student's file or in the student's computer file in the campus management system (Diamond SIS). All information regarding the student being withdrawn from school because of a substance abuse problem shall be kept in a separate confidential file in the Office of the Academic Dean.

Students Withdrawn for Substance Abuse Problems – Re-Admittance

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

SOCHi Policy and Criminal Law

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

Crimes on Campus Involving Drugs or Alcohol

Southern California Health Institute has a zero-tolerance policy regarding criminal behavior; including crimes involving drugs or alcohol. The commission of any crime involving illegal drugs or alcohol while on campus places the school in legal jeopardy. Any student found in possession of illegal drugs while on campus shall be reported to the police. Any student found committing any criminal offense involving illegal drugs or alcohol while on campus Employees of Southern California Health Institute shall cooperate with law enforcement authorities in any instance involving illegal drugs or alcohol. There shall be no exceptions to this policy.

Bi-Annual Review of Campus Drug and Alcohol Abuse Prevention Measures and Policies

All SOCHi policies and procedures pertaining to drug and alcohol abuse prevention shall be reviewed on a bi-annual basis to determine whether these policies are effective, and whether these policies can be improved. All SOCHi policies dealing with illegal drugs, alcoholic beverages and substance abuse problems among students shall also be reviewed whenever there has been

a significant change in the municipal, county, state or federal laws that might render existing school policies out of date and in conflict with the law.

The bi-annual review shall be conducted by the Academic Dean and a chosen bi-annual team. Any necessary changes to existing policies shall be completed and implemented as soon as possible.

Changes to Policy – Approval and Implementation

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

Changes to Policy – Notification and Implementation

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

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

SECTION X – The Violence Against Women Act of 1994

Background

The Violence Against Women Act was developed and passed as a result of extensive grassroots efforts in the late 1980s and early 1990s, with advocates and professionals from the battered women's movement, sexual assault advocates, victim services field, law enforcement agencies, prosecutors' offices, the courts, and the private bar urging Congress to adopt significant legislation to address domestic and sexual violence. Since its original passage in 1994, VAWA's focus has expanded from domestic violence and sexual assault to also include dating violence and stalking. It funds services to protect adult and teen victims of these crimes, and supports

training on these issues, to ensure consistent responses across the country. One of the greatest successes of VAWA is its emphasis on a coordinated community response to domestic violence, sex dating violence, sexual assault, and stalking; courts, law enforcement, prosecutors, victim services, and the private bar currently work together in a coordinated effort that had not heretofore existed on the state and local levels. VAWA also supports the work of community-based organizations that are engaged in work to end domestic violence, dating violence, sexual assault, and stalking; particularly those groups that provide culturally and linguistically specific services. Additionally, VAWA provides specific support for work with tribes and tribal organizations to end domestic violence, dating violence, sexual assault, and stalking against Native American women.

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

SECTION XI – The Clery Act Annual Security Report

Annual Report – Required

Schools are required to create and submit an Annual Report detailing all reportable crimes for the past three (3) years, daily crime logs³³ and daily fire logs.³⁴ The Annual Report must be submitted no later than the October 1st deadline.³⁵ The Annual Report must be distributed to the following persons:

- All current students
- All current employees
- All prospective students (on request)

³³ Daily crime logs are required only if a school has a Campus Police Department or Campus Security Department. Southern California Health Institute does not have either, so these logs are not required.

³⁴ Daily fire logs are required only if a school has on-campus housing. Southern California Health Institute has no on-campus housing, so these logs are not required.

³⁵ See: U.S. Department of Education's *Handbook for Campus Safety and Security Reporting*; Chapter 9; Pg. 149.

Distribution of the Annual Report – SOCHi Policy

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

Distribution of the Annual Report – Methods

The Annual Report shall be posted on the school's website <https://www.sochi.edu/data/general/annual-safety-security-report.pdf> which is available to any student, employee, prospective student, or to any person who views the school's website. Current students and employees shall be informed of the availability of the Annual Report by written announcement.

Completion and Distribution of the Annual Report – Responsibilities

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

Annual Report – Retention Requirements

Southern California Health Institute shall maintain copies of all Annual Reports permanently. The Clery Act requires schools to maintain Annual Reports for three (3) years from the date of publication. The Annual Reports shall be retained in the Office of the Academic Dean.

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

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

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

Content of the Annual Report

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

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

Contributions to the Annual Report – Who May Contribute Information

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