



ANNUAL CAMPUS SECURITY/FIRE SAFETY REPORT 2026

Lexington Healing Arts Academy has published the crime statistics described in 34 CFR 668.46 for the last three (3) years reporting periods at <https://www.lexingtonhealingarts.com/> and copies of the crime statistics for the reporting period covered under this report can be found in the student lounge on campus. Students, faculty, and staff can also request a hard copy from the Registrar's Office.

How to Report Criminal Offenses

To report an emergency, always dial **911**. LHAA has three designated Campus Security Authorities – the Executive Director, the Registrar and the Faculty Administrator. The Campus Security Authority, upon receiving notification of a crime incident on LHAA property, will verify the circumstances and create an incident report. The data is used in the reporting of the Annual Security Report.

Executive Director-William Booker Bill@lexingtonhealingarts.com 859-252-5656 ext. 24

Registrar-Patricia Seaman Patricia@lexingtonhealingarts.com 859-252-5656 ext. 26

Faculty Administrator-Robyn Hardy rhardy@lexingtonhealingarts.com 859-252-5656 ext. 31

Confidentiality and Assurance against Retaliation

Every effort will be made to ensure confidentiality of information received as a part of this policy and to protect the privacy of all parties involved. Retaliation against employees and/or students who report concerns is strictly prohibited and may be grounds for disciplinary action.

Reporting and Disclosure of Campus Safety Policies and Annual Crime Statistics

All current students, employees and staff will be provided, through printed or electronic publications, a notice that contains a brief description of LHAA's Campus Safety Policies and Annual Crime Statistics.

- The notice will disclose that LHAA's annual crime statistics are available at their website address and in hard copy publications at the campus upon request.
- The notice will contain the exact electronic Website address and the method to obtain a copy of the current published hard copy.
- The notice will also disclose that anyone is entitled to a paper copy of the crime information upon request.

LHAA's Annual Security Report includes statistics for the previous three years concerning reported crimes that occurred on campus, property owned or controlled by LHAA, and on public property within, or immediately adjacent to and accessible from, the campus. The report includes institutional policies concerning alcohol and drug use, crime prevention, the reporting of crimes, sexual assault, and other related matters.

The data for the annual crime statistics is monitored daily. LHAA has three designated Campus Security Authorities – the Executive Director, the Registrar and the Faculty Administrator. The Campus Security Authority, upon receiving notification of a crime incident on LHAA property, will verify the circumstances and create an incident report. The data is used in the reporting of the Annual Security Report.

Safety Awareness and Crime Prevention

During orientation in all academic programs, LHAA reviews student safety procedures.

Part of crime prevention is individual safety consciousness and awareness of personal environment. The school suggests the following crime prevention measures, which can contribute to the safety and security of LHAA community.

- Lock your car.
- Take and keep your car keys with you at all times.
- At night, travel in well-lighted areas, and in pairs if possible. Avoid short cuts and deserted areas.
- Do not leave valuable items in your car, including personal items and school related materials such as textbooks.
- Do not park in isolated areas.
- Leave items of high monetary value at home.
- Do not leave personal property unattended.
- Do not carry more cash than necessary and certainly do not advertise what you have.
- Keep your purse, backpack or briefcase close to your body.
- Mark personal items that you bring on campus.
- Do not bring any kind of weapon onto LHAA's property.
- The carrying of weapons on campus or when meeting with campus personnel is prohibited and subject to disciplinary action.
- If anything makes you feel unsafe or threatened – speak with campus personnel or dial 911.

The Campus Security Authority will post advisements when there has been a known systematic pattern of crime or series of crimes that may pose a threat to the safety or welfare of the campus community.

These reports will be made available through staff and campus bulletin boards and will be posted in visible and accessible areas on the campus. All members of the campus communities are encouraged to report any known problems or hazards to the Campus Security Authority. Prompt reporting enhances campus safety for all concerned.

Reporting Criminal Activities

LHAA encourages students, employees, and staff to report all criminal activity and emergencies that have occurred at the campus. A student may confidentially report a crime by filling out a crime report available in the student lounge and putting the report in the mailbox of the Executive Director or the Registrar.

Reporting Emergency Criminal Activities

- In emergency situations, first dial 911.
- Thereafter, report the criminal offense to the Campus Security Authorities.

Reporting Non-Emergency Criminal Activities

- In non-emergency situations, report criminal offenses to the Campus Security Authorities.

The Executive Director, the Registrar and the Faculty Administrator are defined as the Campus Security Authorities. All criminal activity reports should be forwarded to them.

Access to the Campus

LHAA secures access to the school's classroom building via an assigned key fob system. The building is kept locked at all times. All students and staff receive a key fob that electronically opens the door. Students and employees have certain access hours. The system identifies anyone who enters with a key fob. After the student enters, the door is automatically locked. Students are not allowed to let anyone in the school. Visitors go to the front door, ring the doorbell and are met by an employee who has them sign in and guides them where they need to go. When a student's status is changed from active to inactive, their key is deactivated and collected. The maintenance staff has keys and access to the buildings. Students and the public have access to the School's clinic building only when it is open for business and an employee is present.

SEXUAL HARASSMENT POLICY & PROCEDURES FOR RESPONDING TO SEXUAL HARASSMENT (Revised December 2025)

1. Introduction

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

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

No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.

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

2. Scope of the Policy

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

3. Prohibited Conduct

Sexual misconduct comprises a broad range of behaviors focused on sex that may or may not be sexual in nature. Any intercourse or other intentional sexual touching or activity without the other person's consent is sexual assault, which is a form of sexual harassment under this Policy. Sexual harassment and sexual exploitation, stalking, domestic violence, and dating violence are also forms of sexual harassment. Intimidation for one of these purposes is sexual harassment, as is retaliation following an incident of alleged sexual harassment or attempted sexual harassment. The definitions for specific acts of sexual harassment can be found in the Definitions of Key Terms at the end of this Policy statement.

Misconduct can occur between strangers or acquaintances, or people who know each other well, including between people involved in an intimate or sexual relationship, can be committed by anyone regardless of gender identity, and

can occur between people of the same or different sex or gender. **This Policy prohibits all forms of sexual harassment.**

4. Options for Assistance Following an Incident of Sexual harassment

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

Reporting Incidents of Sexual harassment.

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

LHAA will respond promptly when it has actual knowledge of sexual harassment in its education programs, clinic or activities. The Title IX Coordinator will promptly contact the complainant to discuss the availability of supportive measures as described below, consider the complainant's wishes with respect to supportive measures, inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the complainant the process for filing a formal complaint. LHAA will also provide the complainant with written notification about assistance available both within LHAA community and without.

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

Supportive Measures.

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

Supportive measures may include:

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

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

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

Support Services Available.

Counseling, advocacy, and support services are available for victims of sexual harassment, whether or not a victim chooses to make an official report or participate in LHAA's disciplinary or criminal process. Lexington Healing Arts LHAA does not provide counseling or health care services. Personal counseling offered by LHAA will be limited to initial crisis assessment and referral.

Sexual harassment crisis and counseling options are available locally and nationally through several agencies, including:

Kentucky Association of Sexual Assault Programs (KASAP)

toll-free 866.375.2727

website www.kasap.org

National Human Trafficking Hotline

1.888.373.7888

Sexual Violence Resource Center of the Bluegrass

859-253-2511

<https://www.svrckentucky.org/contact-us>

Rape, Abuse, & Incest National Network (RAINN)

website www.rainn.org

National Center for Missing & Exploited Children

toll-free 1.800.THE.LOST (1.800.843.5678)

website www.missingkids.org

The Polaris Project | Combating Human Trafficking

phone 202.745.1001

website www.polarisproject.org

National Sexual Assault Hotline

800-656-4673

National Domestic Violence Hotline

800-799-7233

Evidence Preservation

Victims of sexual assault, domestic violence or dating violence should consider seeking medical attention as soon as possible. It is important that a victim of sexual assault not bathe, douche, smoke, change clothing or clean the bed/linen where they were assaulted so that evidence necessary to prove criminal activity may be preserved. In circumstances where the victims do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address health concerns. Victims of sexual harassment are encouraged to also preserve evidence by saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs or other copies of documents, if they have any, that would be useful in connection with an LHAA or police investigation.

5. Title IX Coordinator

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

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

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

Patricia Seaman
272 Southland Drive
Lexington, KY 40503
phone 859-252-5656, ext. 26
email: patricia@lexingtonhealingarts.com

6. Reporting Policies and Protocols

The Lexington Healing Arts LHAA strongly encourages all members of LHAA community to report information about any incident of sexual harassment as soon as possible, whether the incident occurred on or off campus. Reports can be made either to LHAA and/or to law enforcement.

Reporting to LHAA

An incident of sexual harassment may be reported to LHAA's Title IX Coordinator or to LHAA's Executive Director. No other LHAA officials or employees have the authority to institute corrective measures under these Policies and Procedures on behalf of LHAA. LHAA will not be deemed to have actual knowledge of alleged sexual harassment unless LHAA's Title IX Coordinator or Executive Director possess such knowledge. Reports of sexual harassment to LHAA officials or employees other than the Title IX Coordinator or the Executive Director will not confer actual knowledge to LHAA of such allegations, unless the Title IX Coordinator or Executive Director subsequently obtain such actual knowledge.

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

Any person may report sex discrimination, including sexual harassment (whether or not the person reporting is the person alleged to be the victim of conduct that could constitute sex discrimination or sexual harassment), in person, by

mail, by telephone, or by electronic mail, using the contact information listed in Section 5 for the Title IX Coordinator, or by any other means that results in the Title IX Coordinator or the Executive Director receiving the person's verbal or written report. Such a report may be made at any time (including during non-business hours) by using the telephone number or email address, or by mail to the office address, listed for the Title IX Coordinator.

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

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

Reporting to Law Enforcement

An incident of sexual harassment can be reported to law enforcement at any time, 24 hours a day/7 day a week, by calling 911. At the complainant's request, LHAA will assist the complainant in contacting law enforcement. If the complainant decides to pursue the criminal process, LHAA will cooperate with law enforcement agencies to the extent permitted by law. A complainant has the option to decide whether to participate in any investigation conducted by law enforcement. Filing a police report will:

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

Reporting of Crimes & Annual Security Reports

Campus safety and security are important issues at the Lexington Healing Arts LHAA. Our goal is to provide students with a safe environment in which to learn and to keep students, parents, and employees well informed about campus security. The Jeanne Clery Campus Safety Act, or Clery Act, requires institutions of higher education to record and report certain information about campus safety, including the number of incidents of certain crimes on or near campus, some of which constitute sexual harassment under this Policy.

Each year LHAA prepares this report to comply with the Clery Act. The full text of this report can be located on LHAA's web site at www.lexingtonhealingarts.com. This report is prepared in cooperation with the local law enforcement agencies around our campus. Each year notification is made to all enrolled students and employees providing the web site to access this report. Copies of the report may also be obtained in person from the Registrar or by calling 859.232.5656, ext. 26. All prospective employees may obtain a copy from the Registrar.

Timely Warnings & Emergency Notifications

If a situation arises, either on or off campus, that, in the judgment of the Executive constitutes an ongoing or continuing threat, a campus wide "timely warning" will be issued. The Executive Director will immediately notify LHAA community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or staff occurring at LHAA, unless issuing a notification will compromise efforts to contain the emergency. The warning will be issued through the most effective and efficient means available and may include instant messaging to students and LHAA employees. Notices may also be posted in the common areas throughout LHAA. Anyone with information warranting a timely warning or emergency notification should report the circumstances to the Executive Director by phone 859.252.5656 or in person at LHAA.

Third-Party and Anonymous Reporting

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

No Retaliation

LHAA prohibits retaliation against any individual for the purpose of interfering with any right or privilege secured by Title IX or, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in a Title IX investigation, proceeding, or hearing. LHAA will take strong responsive action if retaliation occurs. Any incident of retaliation should be promptly reported to the Title IX Coordinator or LHAA's Executive Director.

Except as may otherwise be required by law, LHAA will keep confidential the identity of any individual who has made a report or complaint of sex discrimination, including any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, and any witness.

Charging an individual with a violation of LHAA's code of conduct for making a materially false statement in bad faith in the course of a grievance proceeding does not constitute retaliation, provided, however, that a determination regarding responsibility, alone, is not sufficient to conclude that any party made a materially false statement in bad faith.

Coordination With Drug Free School Policy

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

7. LHAA Policy on Confidentiality

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

This policy is intended to make students aware of the various reporting and confidential disclosure options available to them – so they can make informed choices about where to turn should they become a victim of sexual harassment.

LHAA encourages victims to talk to someone identified in one or more of these groups.

Privileged and Confidential Communications – Professional & Pastoral Counselors

Professional, licensed counselors and pastoral counselors who provide mental-health counseling to members of the community (and including those who act in that role under the supervision of a licensed counselor) are not required to report any information about an incident to the Title IX coordinator without a victim's permission. LHAA does not provide professional or pastoral counseling but can assist a victim of sexual harassment in obtaining support services from these groups or agencies. Contact information for these support organizations is listed in Section 4 of this Policy.

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

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

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

Reporting to a Designated LHAA Official

A “designated LHAA official” is an LHAA employee who has the authority to institute corrective measures on behalf of LHAA upon actual notice of sexual harassment.

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

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

In addition to the Title IX Coordinator, LHAA’s designated LHAA officials include the Executive Director.

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

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

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

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

Reporting to Title IX Coordinator

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

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

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

Requesting Confidentiality From LHAA: How LHAA Will Weigh the Request and Respond.

If a complainant discloses an incident to the Title IX Coordinator but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, LHAA must weigh that request against LHAA’s obligation to provide a safe, non-discriminatory environment for all students, including the complainant.

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

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

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

The presence of one or more of these factors could lead LHAA to investigate and, if appropriate, pursue disciplinary action. If none of these factors are present, LHAA will likely respect the complainant's request for confidentiality.

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

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

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

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

If LHAA determines that it can respect a complainant's request for confidentiality, LHAA will also take immediate action as necessary to protect and assist the complainant. This includes the Title IX Coordinator promptly

contacting the complainant to discuss the availability of supportive measures. A complainant's request for confidentiality will limit LHAA's ability to investigate a particular matter. LHAA may take steps to limit the effects of the alleged sexual harassment and prevent its recurrence without initiating formal action against the respondent or revealing the identity of the student complainant. Examples include: providing increased monitoring, supervision, or security at locations or activities where the harassment occurred; providing training and education materials for students and employees; revising and publicizing LHAA's policies on sexual harassment; and conducting climate surveys regarding sexual harassment.

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

8. Formal Complaint Investigation Procedures and Protocols

LHAA will investigate all formal complaints of sexual harassment. A formal complaint must be in writing filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that LHAA investigate the allegation of sexual harassment. A formal complaint form may be obtained from the Title IX Coordinator, although no particular form is required to submit a formal complaint so long as the complaint is in writing, signed by a complainant, alleges sexual harassment against a respondent, and requests an investigation. LHAA's Title IX Coordinator oversees LHAA's investigation, response to, and resolution of all reports of prohibited sexual harassment, and of related retaliation, involving students, faculty, and staff.

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

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

Notice

Upon receipt of a formal complaint, LHAA will provide written notice of LHAA's grievance process to the parties who are known. LHAA will also provide the parties with notice of the allegations of sexual harassment potentially constituting sexual harassment, including sufficient details known at the time and with sufficient time to prepare a response before any initial interview. Sufficient details include the identities of the parties involved in the incident, if known, the conduct allegedly constituting sexual harassment, and the date and location of the alleged incident, if known. The written notice will include a statement that the respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the grievance process. The written notice will inform the parties that they may have an advisor of their choice, who may be, but is not required to be, an attorney, and may inspect and review evidence that is submitted to and/or collected by LHAA in connection with

the investigation. The written notice will also inform the parties of any provision in LHAA's code of conduct that prohibits knowingly making false statements or knowingly submitting false information during the grievance process.

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

Voluntary Resolution

Voluntary resolution, when selected by all parties and deemed appropriate by the Title IX Coordinator, is a path designed to eliminate the conduct at issue, prevent its recurrence, and remedy its effects in a manner that meets the safety and welfare of LHAA community. If all parties voluntarily agree to participate in an informal resolution that does not involve a full investigation and adjudication after receiving notice of a formal complaint and if LHAA determines that the particular formal complaint is appropriate for such a process, LHAA will facilitate an informal resolution to assist the parties in reaching a voluntary resolution. LHAA retains the discretion to determine which cases are appropriate for voluntary resolution.

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

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

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

In connection with any informal resolution process, LHAA will provide written notice to the parties disclosing the allegations and the requirements of the informal resolution process. LHAA will notify the parties that any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the grievance process with respect to the formal complaint. LHAA must obtain the parties' voluntary, written consent to the informal resolution process. The informal resolution process may not be utilized to resolve allegations that an LHAA employee sexually harassed a student.

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

Formal Investigation Process

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

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

The investigator will interview the complainant, respondent and any witnesses. They will also gather pertinent documentary materials (if any) and other information. LHAA will provide, to a party whose participation is invited or expected, written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings, with sufficient time for the party to prepare to participate. Each party shall have an equal opportunity to present witnesses, including fact and expert witnesses, and other inculpatory and exculpatory evidence. LHAA will not restrict the ability of either party to discuss the allegations under investigation or to gather and present relevant evidence.

Time Frame for Investigation

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

Where necessary, LHAA will take prompt steps to protect complainants pending the final outcome of an investigation, including the provision of supportive measures to the complainant and/or the respondent. LHAA may remove a respondent from LHAA's education programs, clinic or activities on an emergency basis, provided that LHAA undertakes an individualized safety and risk analysis, determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal, and provides the respondent with notice and an opportunity to challenge the decision immediately following the removal. LHAA may place a non- student employee respondent on administrative leave during the pendency of a grievance process.

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

Investigation Report

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

Preponderance of the evidence means that the investigator must be convinced based on the information it considers that the respondent was more likely than not to have engaged in the conduct at issue in order to find the respondent responsible for violating the Policy. The complainant and respondent will be simultaneously notified of the completion of the investigation and provided with the investigator's report.

9. Grievance/Adjudication Procedures

Hearing Panel

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

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

Advisors

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

Written Submissions

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

Hearing Procedures

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

In general, hearings will proceed as follows:

- The Title IX Coordinator may set reasonable time limits for any part of the hearing. Each of the complainant and respondent will have the opportunity to present witnesses and other information consistent with the Policy and these Procedures. The panel may determine the relevance of, place restrictions on, or exclude any witnesses or information. When the complainant and respondent are not able to be present for the hearing panel, arrangements will be made for participation virtually, with technology enabling the participants simultaneously to see and hear each other.
- In cases where either the complainant or respondent opts not to participate in the hearing, the panel may

still hear from the other.

- Additional hearing rules include:
 - Cross Examination. At the hearing, the hearing panel shall permit each party's advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility. Such cross-examination at the live hearing must be conducted directly, orally, and in real time by the party's advisor of choice and never by a party personally.
 - At the request of either party, LHAA will provide for the hearing to occur with the parties located in separate rooms with technology enabling the hearing panel members and parties to simultaneously see and hear the party or the witness answering questions.
 - Only relevant cross-examination and other questions may be asked of a party or witness. Before a complainant, respondent, or witness answers a cross-examination or other question, the hearing panel must first determine whether the question is relevant and explain any decision to exclude a question as not relevant.
 - If a party does not have an advisor present at the live hearing, LHAA will provide without fee or charge to that party, an advisor of LHAA's choice, who may be, but is not required to be, an attorney, to conduct cross-examination on behalf of that party.
 - Information Regarding Romantic or Sexual History. Questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence about the complainant's prior sexual behavior are offered to prove that someone other than the respondent committed the conduct alleged by the complainant, or if the questions and evidence concern specific incidents of the complainant's prior sexual behavior with respect to the respondent and are offered to prove consent. The existence of a prior consensual dating or sexual relationship between the complainant and respondent by itself does not support an inference of consent to alleged sexual harassment.
 - Prior Conduct Violations. The hearing panel will not consider the respondent's prior conduct violations, unless the investigator provided that information to the hearing panel because the respondent was previously found to be responsible, and the previous incident was substantially similar to the present allegation(s) and/or the information indicates a pattern of behavior by the respondent.
 - The hearing panel may consider statements made by parties or witnesses, even if those parties or witnesses do not participate in cross-examination at the live hearing, in reaching a determination regarding responsibility.
 - LHAA will not require, allow, rely upon, or otherwise use questions or evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege.
 - Live hearings may be conducted with all parties physically present in the same geographic location or, at LHAA's discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually, with technology enabling participants simultaneously to see and hear each other.

LHAA will create an audio or audiovisual recording, or transcript, of any hearing and make it available to the parties for inspection and review. The panelists may request a copy or transcript of the recording. Cell phones and recording devices may not be used in the hearing room(s) unless approved by the panel in advance.

Panel Determinations/Standard of Proof

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

The panel's written determination will include:

- a) Identification of the allegations potentially constituting sexual harassment;
- b) A description of the procedural steps taken from the receipt of the formal complaint through the

determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held;

- c) Findings of fact supporting the determination;
- d) Conclusions regarding the application of LHAA's code of conduct to the facts;
- e) A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility, any disciplinary sanctions LHAA imposes on the respondent, and whether remedies designed to restore or preserve equal access to LHAA's education program, clinic or activity will be provided by LHAA to the complainant; and
- f) LHAA's procedures and permissible bases for the complainant and respondent to appeal.

If the panel finds the respondent responsible, the matter will proceed to the sanctions stage.

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

10. Sanctions and Other Remedies

The hearing panel shall be responsible for imposing sanctions that are:

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

The Title IX Coordinator will consider relevant factors, including if applicable: (1) the specific sexual harassment at issue (such as penetration, touching under clothing, touching over clothing, unauthorized recording, etc.); (2) the circumstances accompanying the lack of consent (such as force, threat, coercion, intentional incapacitation, etc.); (3) the respondent's state of mind (intentional, knowing, bias-motivated, reckless, negligent, etc.); (4) the impact of the offense on the complainant; (5) the respondent's prior disciplinary history; (6) the safety of LHAA community; and (7) the respondent's conduct during the disciplinary process. The sanctioning decision will be communicated in writing to the complainant and the respondent as part of the hearing panel's written determination.

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

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

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

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

include:

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

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

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

11. Appeals

Either the respondent or the complainant or both may appeal from a determination regarding responsibility, and from a recipient's dismissal of a formal complaint or any allegations therein, on the following bases:

1. A procedural irregularity that affected the outcome of the matter;
2. New evidence that was not reasonably available at the time of the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; and
3. The Title IX Coordinator, investigator(s), or hearing panel member(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

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

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

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

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

12. Records Disclosure

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

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

Additional information about FERPA can be found on LHAA's website at www.lexingtonhealingarts.com/consumer-information/.

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

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

- a) Each sexual harassment investigation including any determination regarding responsibility and any audio or audiovisual recording or transcript from a hearing conducted in response to a formal complaint, any disciplinary sanctions imposed on the respondent, and any remedies provided to the complainant designed to restore or preserve equal access to LHAA's education programs, clinic or activities;
- b) Any appeal and the result therefrom;
- c) Any informal resolution and the result therefrom; and
- d) All materials used to train Title IX Coordinators, investigators, hearing panel members, decision-makers, and any person who facilitates an informal resolution process. LHAA will make these training materials publicly available on its website.

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

13. Education and Prevention Programs

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

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

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

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

Reported Offenses

The following list of crimes is compiled in accordance with the definition used in the Uniform Crime Reporting System of the Department of Justice, FBI, as modified by the Hate Crime Statistics Act.

- **Aggravated Assault**

- Arson
- Burglary
- Domestic violence
- Dating violence
- Stalking
- Drug Abuse Violations
- Liquor Law Violations
- Destruction/damage/vandalism of property
- Motor Vehicle Theft
- Simple assault
- Murder/Non-negligent Manslaughter
- Manslaughter by Negligence
- Rape, Forcible and Non-Forcible Sexual Offenses
- Statutory Rape
- Fondling
- Incest
- Robbery
- Intimidation
- Larceny-Theft
- Weapons Possessions

Additional Reportable Offense

- Attempted Motor Vehicle Theft
- Vandalism

LHAA supports a close cooperative working relationship with federal, state, and local law enforcement agencies. Campus crime, arrest and referral statistics include those reported to the LFUCG Police. The Campus Crime Statistics cover crimes reported to LHAA that occurred on campus and on public property within or immediately adjacent to and accessible from the campus, over the previous three years. A copy of LHAA's Campus Crime Statistics Report is located at www.lexingtonhealingarts.com

**CRIMINAL OFFENSES-ON
CAMPUS**

	2023	2024	2025
Murder/Non-negligent manslaughter	0	0	0
Manslaughter by Negligence	0	0	0
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft (not including theft from a motor vehicle?)	0	0	0
Arson	0	0	0

**CRIMINAL OFFENSES-PUBLIC
PROPERTY**

	2023	2024	2025
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Murder/Non-negligent manslaughter	0	0	0
Manslaughter by Negligence	0	0	0
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft (not including theft from a motor vehicle?)	0	0	0
Arson	0	0	0

HATE CRIMES-ON CAMPUS 2025

[illegible]

HATE CRIMES-ON CAMPUS 2024

[illegible]

Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor vehicle theft (not including theft form a motor vehicle?)	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple assault	0	0	0	0	0	0	0	0	0
Larceny-theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalis m of property	0	0	0	0	0	0	0	0	0

[illegible][illegible]

Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor vehicle theft (not including theft form a motor vehicle?	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple assault	0	0	0	0	0	0	0	0	0
Larceny-theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0

HATE CRIMES-PUBLIC PROPERTY 2024

	TOTAL	RACE	RELIGION	SEXUAL ORIENTATION	GENDER	GENDER IDENTITY	DISABILITY	ETHNICITY	NATIONAL ORIGIN
Murder/Non-negligent manslaughter	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor vehicle theft (not including theft form a motor vehicle?	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple assault	0	0	0	0	0	0	0	0	0
Larceny-theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0

HATE CRIMES-PUBLIC PROPERTY 2023

	TOTAL	RACE	RELIGION	SEXUAL ORIENTATION	GENDER	GENDER IDENTITY	DISABILITY	ETHNICITY	NATIONAL ORIGIN
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Murder/Non-negligent manslaughter	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor vehicle theft (not including theft form a motor vehicle?)	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple assault	0	0	0	0	0	0	0	0	0
Larceny-theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalis m of property	0	0	0	0	0	0	0	0	0

VAWA OFFENSES-ON CAMPUS

	2023	2024	2025
Domestic violence	0	0	0
Dating violence	0	0	0
Rape	0	0	0

VAWA OFFENSES-PUBLIC PROPERTY

	2023	2024	2025
Domestic violence	0	0	0
Dating violence	0	0	0
Rape	0	0	0

ARREST-ON CAMPUS

	2023	2024	2025
Weapons: carrying, possessions, etc.	0	0	0
Drug abuse violations	0	0	0
Liquor law violations	0	0	0

ARREST-PUBLIC PROPERTY

	2023	2024	2025
Weapons: carrying, possessions, etc.	0	0	0
Drug abuse violations	0	0	0

Liquor law violations	0	0	0
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DISCIPLINARY ACTIONS-ON CAMPUS

	2023	2024	2025
Weapons: carrying, possessions, etc.	0	0	0
Drug abuse violations	0	0	0
Liquor law violations	0	0	0

DISCIPLINARY ACTIONS-PUBLIC PROPERTY

	2023	2024	2025
Weapons: carrying, possessions, etc.	0	0	0
Drug abuse violations	0	0	0
Liquor law violations	0	0	0

UNFOUNDED CRIMES

	2023	2024	2025
TOTAL UNFOUNDED CRIMES	0	0	0

Fire Statistics: Fire on Campus

2017 - 0 2018 – 0 2019 – 0
2020 –0 2021 – 0 2022-0
2023-0 2024-0 2025-0

Alcohol and Drug Policies

LHAA does not tolerate the unlawful use, sale, solicitation, possession and/or distribution of illegal drugs and alcohol. The information that follows may help inform LHAA community of the standards of conduct required regarding illicit drugs and alcohol and the possible consequences of inappropriate behavior.

Alcohol and Drug Prevention and Counseling Services

The agencies below can provide guidance and assistance in identifying a counseling, treatment, or rehabilitation program that meets individual needs. The following agencies are here to assist any member of LHAA community who may have a drug or alcohol problem:

- KY Help Call Center- provides referrals across the state- 1-833-8KY-HELP, text HOPE to 96714, www.findhelpnowky.org
- Alcoholics Anonymous Bluegrass Intergroup –859-559-5368

- Operation Unite- toll free referral line for anyone seeking assistance with drug addiction. 1-866-908-6483
- Get Help Lex- online resource people seeking facilities and services for substance use disorder (abuse/addiction) www.gethelpflex.org
- SAMHSA- Substance Abuse and Mental Health Service (SAMHSA) Behavioral Health Treatment Services Locator (a confidential and anonymous source of information for persons seeking treatment facilities in the United States or U.S. Territories) to find resources in your area. www.samhsa.gov/find-treatment

Health Risks of Alcohol and Other Drugs

- Health risks of using alcohol or other drugs are both disturbing and well documented. They range from mood altering to life threatening.
- Alcohol and/or drug abuse may lead to the deterioration of physical health by causing or contributing to varied health conditions,
- The health consequences of drugs depend on the frequency, duration, and the intensity of use.
- For all drugs, there is a risk of overdose. Overdose can result in coma, convulsions, psychosis, or death. Combinations of certain drugs, such as alcohol and barbiturates, can be lethal. The purity and strength of doses of illegal drugs are uncertain.
- Continued use of substances can lead to tolerance (requiring more and more of a drug to get the same effect), dependence (physical or psychological need), or withdrawal (a painful, difficult, and dangerous symptom when stopping the use of drugs).
- Long-term chronic use of drugs can lead to malnutrition, organic damage to the body, and psychological problems. The risk of AIDS and other diseases increases if drugs are injected.
- The consumption of alcohol or drugs by pregnant woman may cause abnormalities (such as Fetal Alcohol Syndrome, the third leading cause of birth defects) in babies.

Standards of Conduct

LHAA adheres to a code of conduct that recognizes that the unlawful manufacture, sale, delivery, unauthorized possession, or use of any illicit drug is prohibited on property owned or otherwise controlled by LHAA. This is also true of any unlawful solicitation of drugs or alcohol of students, faculty, or staff, on or off campus. Conduct that violates this definition, poses unacceptable risks, and disregards the health, safety and welfare of members of LHAA shall result in disciplinary action up to and including suspension and termination. If an individual associated with the school is apprehended for violating any drug or alcohol related law when on campus, LHAA will fully support and cooperate with federal and state law enforcement agencies.

Disciplinary Action for Alcohol or Drug Violations

Any member of LHAA community found consuming or selling alcohol or drugs on campus shall be subject to disciplinary actions. LHAA has the authority to penalize or impose sanctions on students, faculty or staff who violate the Standards of Conduct and Drug/Alcohol policy. Discipline will be based on the seriousness of the situation.

- Each reviewed case may result in dismissal from the school.
- Warning, probation, counseling referral, suspension are other possible sanctions.

In all cases, the school will abide by local, state, and federal sanctions regarding unlawful possession of drugs and the consumption of alcohol.

Federal Trafficking Penalties, Federal penalties and sanctions may result in penalties anywhere from not less than five (5) years and not more than life in prison, depending on the number of offenses. See LHAA Alcohol and Drug Policy in Student Handbook and “Drugs of Abuse”, A DEA Resource Guide 2022

Emergency Preparedness Plan

Objective and Authority

The purpose of the Emergency Preparedness Plan is to establish policies and procedures for response to emergencies occurring at Lexington Healing Arts Academy (LHAA). The objectives of this plan are to:

- Protect the health and safety of the campus population.
 - Attempt to identify nature and severity of threat and all affected areas.
 - Establish emergency communications.
 - Assess personal injuries and track status of injured or missing individuals.
 - Evacuate and isolate affected locations pending additional assessment.
 - Identify and rescue persons trapped in damaged facilities.
 - Determine need for assistance from public safety agencies – request as needed.
 - Communicate critical information and instructions to students, faculty and staff.
- Protect campus assets.
 - Assess facilities • Reinforce, barricade, or secure damaged facilities that pose safety hazards.
 - Shutdown critical utility, data, and telecommunication systems
 - Rescue critical records, backups, and other data, where possible
 - Determine need for outside assistance and/or expertise – request as needed.
 - Document damages
- Preserve LHAA's ability to operate and ensure a timely recovery from a crisis event.
 - Initiate reactivation and restart of shutdown systems.
 - Establish temporary facilities for displaced activities.
 - Normalize delivery of supplies and equipment to campus
 - Provide psychological and personal assistance to those affected by the event.
 - Provide space, equipment, or materials to external agencies, as necessary.
- Centralize and define the procedures to be implemented in response to crisis event.

The objectives listed above may not apply to every possible situation but are included here to provide a framework of global priorities to be considered at any incident.

There are exit signs located throughout the classroom and clinic buildings, leading to an exit door at front or rear of buildings. Evacuation routes are posted in each room in the classroom building and, in the hallways, and main rooms of the clinic building. Students are provided information on this Emergency Preparedness Plan during orientation. It is reviewed yearly with faculty and staff at meetings. Copies of this plan are available for reference at the main office, clinic, and student lounge.

The Emergency Management Team is responsible for the Emergency Preparedness Plan.

To report an emergency, always dial **911**.

Lexington Healing Arts Academy has five members on its Emergency Management Team, designated Campus Security Authorities – the Executive Director, the Registrar, the Assistant Registrar, the Faculty Administrator and Clinic Manager.

Executive Director-William Booker Bill@lexingtonhealingarts.com 859-252-5656 ext. 24

Registrar-Patricia Seaman Patricia@lexingtonhealingarts.com 859-252-5656 ext. 26

Assistant Registrar- Zack Sneed Zack@lexingtonhealingarts.com 859-252-5656 ext. 30

Faculty Administrator- Robyn Hardy Rhardy@lexingtonhealingarts.com 859-252-5656 ext.31

Clinic Manager-Jason Washburn jason@lexingtonhealingarts.com 859-252-5656 ext. 21

Communication Plan

- LHAA is committed to ensuring the campus community receives timely, accurate, and useful information in the event of a significant emergency or dangerous situation on campus or in the local area that poses an immediate threat to the health and safety of campus community members. Once the Emergency Management Team confirms that there is, in fact, an emergency or dangerous situation that poses an immediate threat to the health or safety of some or all members of the campus community, they will notify local Police (911) and issue the emergency notification through the Student Information System (STARS) and notify faculty and staff through a mass text. Clients will be notified by their therapist or receptionist if in the clinic building. Clients will be notified via phone call or text if they have an upcoming appointment during the alert time. Closing or delayed starts for both the classroom and clinic will be updated on the local news station website- LEX 18- <https://www.lex18.com/weather/school-closings-delays>
- All students are registered for the emergency text system when the Registrar's office enrolls them into our Student Information System (STARS) and are aware that they need to let the Registrar department know if any of their personal contact information changes. All clients provide contact information.
- These messages will contain essential information about the emergency and/or specific response instructions.
- Depending upon the nature of the emergency and the immediate threat presented, notifications may be sent to specific groups or all the students, faculty, staff and clients.
- LHAA's Emergency Management Team will rely on first responders and the local police/fire department to disseminate emergency information to the larger community.
- If the situation warrants, the school's Emergency Management Team will establish a telephone call-in center to communicate with the school community during an emergency.
- Social Media: In some situations, social media can be used to disseminate information quickly, but it is not the primary means of communication.
- Website Banner: A prominent banner on LHAA website can provide updates and instructions.

Risk Assessment

LHAA has divided its risk assessment into two sections with emergency plans and procedures for each:

1. Weather Emergencies
2. Non-Weather Emergencies

1) Weather Emergencies

The most common weather alerts are tornado/severe thunderstorm warnings, high wind warnings, or snow/ice warning.

Tornado/Severe Thunderstorms/High Winds

A tornado is defined as a violent rotating column of air extending from a thunderstorm to the ground. The most violent tornadoes are capable of tremendous destruction with wind speeds of 250 mph or more. Damage paths can be more than one mile wide and 50 miles long. Tornadoes may occur with little or no advance warning, whenever conditions are favorable for development. There may not be time to issue an Alert. Stay alert to changing conditions.

Before the storm

Stay informed through local media sources on days when severe weather is expected.

- **Severe Thunderstorm Watch:** Severe thunderstorms are possible in and near the watch area. Stay informed and be ready to act if a severe thunderstorm warning is issued.
- **Severe Thunderstorm Warning:** Severe weather has been reported by spotters or indicated by radar. Warnings indicate imminent danger to life and property. Take shelter in a substantial building.
- **Tornado Watch:** Tornadoes are possible in and near the watch area. Review and discuss your emergency plans. Be ready to act quickly if a warning is issued or you suspect a tornado is approaching.
- **Tornado Warning:** A tornado has been sighted or indicated by weather radar. There is imminent danger to life and property. Move to an interior room on the lowest floor of a sturdy building. Avoid windows. If in a vehicle, or outdoors, move to the closest substantial shelter and protect yourself from flying debris.

During the storm

- During hours of operation, the Emergency Management Team monitors local broadcast media for severe weather alerts. Upon receipt of a severe weather notification, the Registrar will activate the Alert system.
- Please note storms travel quickly, alert messages may not arrive before an immediate threat. When in doubt, act!
- If a tornado or severe storm warning is issued in our area, faculty and staff will lead students to the designated tornado shelter area in the classroom building. Clinic staff will lead students and clients to the designated tornado shelter area in the clinic building.

After the storm passes

- Watch out for fallen power lines or broken gas lines
- Stay out of damaged buildings
- If you smell gas or hear a hissing noise, open a window, and get everyone out of the building quickly
- Alerts will be issued to provide information soon after the passes, if possible.

Winter Weather Storms, Snow, and Ice

Depending on incident complexity and severity, every reasonable effort will be made for decisions to cancel classes, close the campus or evacuate the campus by the Emergency Management team in a timely and safe manner.

Definitions: A Winter Storm Watch is issued when there is the potential for significant and hazardous winter weather within 48 hours. It does not mean that significant and hazardous winter weather will occur it only means it is possible.

A Winter Storm Warning is issued when a significant combination of hazardous winter weather is occurring or imminent. Significant and hazardous winter weather is defined as a combination of: Five inches or more of snow/sleet within a 12 hour period or 7 inches or more of snow/sleet within a 24 hour period AND/OR Enough ice accumulation to cause damage to trees or powerlines AND/OR life threatening or damaging combination of snow and/or ice accumulation with wind.

An Ice Storm Warning is issued when ¼ inch or more of ice accumulation is likely.

When a winter storm is approaching:

- The Emergency Management Team will meet to aid preparations and make key decisions and communicate information pertaining to the weather event to the campus and clinic communities. They will determine whether there is a campus closure or an evacuation and when it will occur.
- All campus units will implement strategies to enable continued functioning and to minimize their downtime after a storm
- The Registrar will educate campus personnel due to the potential power loss issues on securing computers and files, and will secure their own computers and data files
- In the absence of specific guidance or direction, use common sense and make the most sensible decision.
- Plan for worst-case scenarios since it is easier to scale back than to scale up in an emergency. Consider: possible physical damage (downed power lines, downed trees, branches, and debris); personnel disruption (challenges to making contact afterward, inability to reach campus afterward, evacuation, disordered personal life, child care problems, etc.); scheduling disruptions; power disruptions: loss of campus power infrastructure, telephone (especially cell phone) disruptions.
- Remind individuals that they must tend to their personal and family preparation in addition to what is expected at the University

During the Storm

- If we use Shelter-in-place, all persons are directed to stay indoors throughout the entire storm. Shelter in place means seeking immediate, temporary shelter inside a building or area. Notification of the need to shelter in place may come through in several ways: Emergency notification system; direct observation of sense of dangerous situation; directly from staff or emergency personnel.
 - Actions: Close all doors and windows to the outside.
 - Activate communication devices and prepare to receive additional emergency information and instructions via emergency notification system.
 - Remain Calm, stay inside building remain in place until you are told that it is safe to leave.
 - All persons on campus should follow the instructions of the Emergency Management Team.
 - All individuals restrict telephone calls to emergencies only, since non-emergency calls can overload the phone systems.

After Storm

- LHAA Staff will assess damage to the campus and report conditions to the Executive Director. Damages are documented and photographed.
- Executive Director informs utility companies of damage or outages.
- Emergency Management Team will notify all remaining personnel when to report back to campus for normal duties.
- All employees check email for updates and status of campus.
- The Emergency Management team makes the determination regarding resumption of classes and clinic.
- The Emergency Management team will revise schedules to make up for the class or clinic activities suspended during the warning.
- Emergency Management Team remains operational until campus/ clinic activity has been restored to a sufficient level that it is no longer necessary. They will set a date and time to conduct an after-action review and policy adjustment if needed.

2) Non-Weather Emergencies

Active Shooter Threat/Emergency Lockdown

An active threat is an individual actively engaged in killing or attempting to kill people in a confined and populated area, typically using firearms. Always be aware of your surroundings. Take note of the nearest exits anywhere you are.

An active threat is an individual actively engaged in killing or attempting to kill people in a confined and populated area, typically using firearms. Always be aware of your surroundings. Take note of the nearest exits anywhere you are.

What you should do:

Run:

- Leave your belongings behind.
- Keep your hands visible.
- Warn others and tell them to run.
- If possible, leave the campus.

Hide:

- Hide in an area out of the assailant's view.
- Barricade entry to your hiding place and lock the doors if possible.
- Silence your cell phone.
- Close the blinds and turn out the lights.
- Those in hallways or other public, open areas are to immediately seek shelter in the nearest classroom, treatment room or lockable space.

Fight:

- As a last resort and only when your life is in imminent danger.
- Attempt to incapacitate the assailant.
- Act with physical aggression and throw items at the assailant.
- Fire extinguishers make good weapons. They can be discharged in the face, thrown at the assailant, or used as a blunt weapon.

Lockdown Procedure

- The first person who observes a threat must dial 911 and inform them of the situation once in a safe location. When calling 911 be prepared to give:
 - Location of the assailant(s).
 - Number of assailants.
 - Physical description of the assailant(s).
 - Number and type of weapons.
 - Number of known victims at your location
- Access to the school is restricted. The Registrar, if possible, initiates a lockdown on the exterior classroom doors. The clinic doors are all locked to avoid entry, if possible.
- An emergency lockdown will be announced campus-wide by communication via the emergency notification messaging system and through verbal, person-to-person communication. Persons in the immediate area should be notified of the emergency by passing information person-to-person.
- All classroom doors are locked by the instructors. Instructors will stay with student in the classroom. The Administration office is locked down and all visitors are required to remain inside of the offices with staff.
- All treatment room doors are locked by the therapists. Therapists will stay with student/clients in the treatment rooms. Clinic main office is locked down and all visitors not in a treatment room are required to remain in the main clinic office or yoga studio with staff.
- Lights are turned off.
- Close windows, blinds, and any window treatments present.
- Remain concealed as much as possible by crouching down in areas not visible from doors and windows. Sit on floor and do your best to remain out of view, still, and quiet.
- Once secured, do not open doors for anyone who cannot be clearly identified as a law enforcement officer.
- All cell phones are to be turned to vibrate or silent.

- A member of the Emergency Management team, who is available at the time of the emergency, maintains in cellular communication with other staff members on campus as well as external agencies.
- All offices, treatment rooms and classrooms are to remain locked until the “all clear” is given.

When law enforcement arrives:

- Remain calm and follow instructions.
- Put down any items in your hands, including phones.
- Raise your empty hands in the air with your fingers spread.
- Keep your hands visible at all times.
- Avoid quick movements towards officers.
- Do not grab them or try to thank them.
- Avoid pointing, screaming, or yelling.
- Do not ask officers for help or directions when evacuating.
- Do exactly what they tell you to do.

Bomb Threat

In the event of a bomb threat the first person who would likely receive the call is the front desk of the clinic.

- **DO NOT HANG UP THE PHONE!** Keep the caller on the line as long as possible. Use another telephone line to have someone contact 911 and report as many details as possible.
 - What the caller says (every word, exactly as spoken, if possible).
 - Pay particular attention to any discernable background sounds and make notes of such.
 - Try to identify voice characteristics (accent, slur, pronunciation.)
 - Try to get specifics on the bomb, i.e. locations, detonation time, etc.
 - Record the number the call was received on.
 - Record the time, date, and duration of the call.

Follow instructions of the responding 911 official.

What to do:

- Once the institution is notified of a bomb threat all classes and treatment rooms must be evacuated in accordance with the evacuation routes posted in each office, classroom, and treatment room.
- All evacuations are led by the Emergency Management Team.
- All individuals must move towards the campus designated area, this is the southwest rear parking lot of the admin/classroom building.

What Not to do:

- Do not assume a bomb threat is a prank. Assume it is real.
- Do not touch, move, or cover a suspected bomb. Note its description, exact location and report to security
- Do not use cell phones or radio communication devices in the area.
- Do not turn electrical switches on or off.

Fire Emergency

Smoke Detectors and Emergency Evacuation floor plans are in each, classroom, office, student/therapists' lounges and treatment room in the Classroom/Clinic buildings. In event of a fire, if you are not familiar with already, please look at your building's Emergency Evacuation floor plans for the specific exit you are to use determined by your current location.

The following describes the general duties and procedures that are to be utilized by all staff, faculty and therapists and clients in the event of a fire.

- The person discovering the fire should notify personnel in the Administration building or Clinic building of the circumstances depending on which building they are in.
- That staff/faculty member notifies a member of the Emergency Management Team immediately so that the alarm can be given.
- Staff should proceed with informing all occupants in their area to vacate the premises, in accordance with the routes outlined on the floor plans. (Your floor plan will outline the primary route for leaving the building and should be used in all instances except when circumstances prevent it, such as the location of the fire/emergency. In that event, an alternate route will be determined at the time of the incident and will be based on the best route available.)
- The Executive Director is responsible for making an immediate call to 911. (Should the Executive Director not be in the building at the time of the emergency, this responsibility falls to the staff or faculty personnel easily available).

Clinic Building Procedure-

- The Clinic Director or Manager, Executive Director or senior therapist will assign staff members to assist any person with health conditions or impairments out of the building.
- After leaving the building, staff, therapists, and clients are to report directly to the Southwest rear parking lot of the Administration/classroom building.
- They are to remain there until all persons are notified it is safe to enter the building by the Office Staff.
- If possible, clinic staff, must proceed with checking each room in their respective areas, making certain that all rooms, including bathrooms, interview rooms, supply rooms, etc., are vacated and that the doors are closed upon leaving.
- A member of the Office Staff will notify the personnel in the Classroom building.
- The Office Staff are to proceed to the student lounge in the classroom building and account for all staff. The Clinic Director or Manager will identify and account for everyone in the clinic building.
- After accounting for everyone, faculty and staff will report to the Executive Director.
- The staff and faculty must keep the Executive Director informed of the circumstances relating to the emergency until all persons have been evacuated from the building.

Administrative/Classroom Building Procedure-

- The Executive Director or senior staff member will assign staff members to assist any person with health conditions or impairments out of the building.
- After leaving the building, staff, faculty and students are to report directly to the Southwest rear parking lot of the Administration/classroom building. They are to remain there until all persons are notified it is safe to enter the building by a senior staff member.
- The staff designated by the Executive Director, must proceed with checking each room in their respective areas, making certain that all rooms, including classrooms bathrooms, interview rooms, supply rooms, etc., are vacated and that the doors are closed upon leaving.
- A member of the staff will notify the personnel in the clinic building.
- The Executive Director or senior staff member will account for all staff, faculty, and students. After accounting for everyone, faculty and staff will report to the Executive Director.
- The staff and faculty must keep the Executive Director informed of the circumstances relating to the emergency until all persons have been evacuated from the building.

Medical Emergency

To obtain prompt professional emergency medical treatment, you should immediately call 911. When asked for the address, it is:

Clinic- 272 Southland Drive

Administration- 2013 Regency Road

- When requesting an ambulance, be prepared to provide the following information:
 - Your name and telephone number.
 - Exact location of emergency.
 - Extent of the incident, injury, or illness.
 - Location where someone will meet the ambulance for directing personnel to the patient.
 - Patient details, such as: age, sex, known medical conditions, is the patient conscious, and is the patient breathing.
 - The individual making the call should continue to stay on the phone with the dispatcher. Answer as many questions as possible regarding the condition of the injured person so that information can be forwarded to the responding emergency personnel.
- First Aid - If you provide first aid, consider the following:
 - Is immediate action needed to save a life?
 - Will I place myself in harm or jeopardy?
 - First aid is just that. Do not jeopardize your health or the health of the patient. Wait for professional help if you are not able to provide proper first aid safety.

Utility Failure

The possibility exists for a utility failure of some nature and magnitude. If you discover a water leak, gas leak, or other major utility failure which presents some immediate threat to personnel, notify a member of the Emergency Management Team immediately. Do not attempt to correct the problem on your own. The Emergency Management Team will notify the necessary response personnel.

Yearly Evaluation of Plans

- The Emergency Preparedness Plan will be evaluated yearly. This evaluation will occur during the summer by the Emergency Management Team and the campus staff. The evaluation will include:
- Inspection of fire extinguishers
- Inspection of door lock
- Updates or changes to evacuation/lockdown plans
- Changes to the campus/clinic risk assessments

Training Plan

To ensure LHAA's emergency operation plans remain current and actionable, LHAA will conduct a fire drill once a year in the summer. LHAA will also conduct an emergency management exercise once a year. These exercises may include tabletop drills, emergency operations center exercises or full-scale emergency response exercises. The school conducts after-action reviews of all emergency management exercises.

LHAA also conducts an annual test of its Emergency Notification System.

Sex Offenders Registration

In accordance with the Sex Crime Prevention Act of 2000, Lexington Healing Arts Academy is providing a link Kentucky State Sex Offenders Registry. <https://kentuckystatepolice.org/sex-offender-registry/>

Missing Student Notification

The Department of Education requires that any institution that provides on campus student housing facilities must include a statement of policy regarding missing student notification procedures in its annual security report. Lexington healing Arts does not have any on-campus student housing facilities.