



# Campus Safety and Security

(Revised 09/23/2022)

The Clery Act Appendix for the FSA Handbook contains the reporting requirements and can be accessed at:

<https://fsapartners.ed.gov/sites/default/files/attachments/2020-10/CleryAppendixFinal.pdf>

## **Athena Career Academy Campus Safety and Security Information: Geography (Chapter 2):**

Athena Career Academy (ACA) is a privately owned and controlled, single institution with the geographical on-campus location at 5203 Airport Hwy Toledo, Ohio 43615. ACA does not have on-campus student housing. ACA does not share or lease Campus space to other Title IV institutions. This individual location houses the students, faculty, and administrative employees.

ACA's geographical on-campus location is 5203 Airport Hwy. This is on the corner of Airport Hwy and Reynolds Rd. The campus area includes the sidewalk in front and to the side of the building, the parking lot in front and back, and the student parking lot to the front of the main building. ACA's public property area consists of the public sidewalks that immediately border the campus on Reynolds Rd. ACA does have a Public Transit (Bus) stop on the Reynolds Rd. side of the campus. ACA does not own or control any non-campus buildings or property.

## **Crime Statistics (Chapter 3):**

Athena Career Academy (ACA), as a postsecondary institution participating in HEA's Title IV student financial assistance programs, is required to disclose campus crime statistics and security information reported for its geographic location to all employees, applicants, enrolled students, and their families. ACA has a signed Program Participation Agreement (PPA) with the U.S. Department of Education to administer financial assistance programs. These programs include Pell Grants, Federal Supplemental Educational Opportunity Grants (FSEOGs), the Federal Work-Study Program, Federal Perkins Loans, the Federal Direct Loan Payment Program, and the Leveraging Education Assistance Partnership (LEAP). All ACA programs are completely residential in nature and no component is done through distance learning.

In 1990, Congress enacted the Crime Awareness and Campus Security Act (Title II of Public Law 101-542), which amended the Higher Education Act of 1965 (HEA). This act required all postsecondary institutions participating in Title IV student financial assistance programs to disclose campus crime statistics and security information. The act was amended in 1992, 1998, 2000 and 2008. The 1998 amendments renamed the law the Jeanne Clery Disclosure of Campus Security Policy and Campus Security Statistics Act in memory of a student who was slain in her dorm room 1986. This act is now referred to as the Clery Act and is in section 485(f) of HEA.



On March 7, 2013, The Violence Against Women Reauthorization Act of 2013 (VAWA) (Public Law 113-114) was signed into law. VAWA includes amendments to the Clery Act. These changes require ACA to disclose statistics, policies and programs related to dating violence, domestic violence, sexual assault, and stalking, among other changes.

The Clery Act requires ACA to include four (4) general categories of crime statistics: (Definitions of each of the following categories are located on-line in the Handbook for Campus Safety and Security Reporting at the above stated web address.)

- Criminal Offenses (also referred as primary crimes) ---Criminal Homicide, including Murder and Non- Negligent Manslaughter, and Manslaughter by Negligence; Sexual Assault (also referred to as sexual offenses), including Rape, Fondling, Incest and Statutory Rape; Robbery; Aggravated Assault.
- Burglary; Motor Vehicle Theft; and Arson.
- Hate Crimes--- Any of the above-mentioned offenses, and any incidents of Larceny-Theft, Simple Assault, Intimidation, or Destructive/Damage/Vandalism of Property that were motivated by Bias;
- VAWA---Any incidents of Domestic Violence, Dating Violence and Stalking. (Note that Sexual Assault is also a VAWA Offense category for Clery Act reporting purposes); and
- Arrests and Referrals for Disciplinary Action for Weapons---Carrying, Possessing, Etc. Law Violations, Drug Abuse Violations and Liquor Law Violations.

Statistics must be disclosed separately for each of these four (4) general categories without regard to the findings of a court, coroner or jury, or the decision of a prosecutor.

The HEA contains specific campus safety- and security-related requirements. The requirements fall into three (3) categories based on the configuration of the institution: (1) Clery Act crime statistics and security-related policy requirements that must be met by every institution; (2) an additional Clery Act log requirement for institutions that have campus police or security department; and (3) HEA missing student notification and fire safety requirements for institutions that have at least one on-campus student housing facility.

(1) ACA must do the following:

- Collect, classify, and count crime reports and crime statistics.
- Issue campus alerts so students and employees make informed decisions about their health and safety.
- Issue timely warnings that represent an ongoing threat to the safety of students and employees.
- Issue emergency notification upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health and safety of students or employees on campus.
- Provide educational programs and campaigns to promote the awareness of dating violence, domestic violence, sexual assault, and stalking.



- Publish an annual security report containing safety-and security-related policy statements and crime statistics and distribute it to all current students and employees, and to all prospective students and employees.
  - Submit crime statistics to the Department of Education each year in the fall via the web-based data collection site.
- (2) ACA does not maintain a campus police or security department; therefore, it does not maintain crime logs.
- (3) ACA does not have on-campus student housing:
- Therefore, it does not have to disclose missing student's notifications.
  - Therefore, it does not have to maintain housing fire safety information.
  - Therefore, it does not have to keep a fire log or published annual fire safety reports containing policy statements as well as fire statistics associated with on campus student housing.
  - Therefore, does not have to submit fire statistics to Department of Education each fall in the Web- based data.

## **Campus Security Authorities (Chapter 4)**

ACA does not have a campus police department or campus security office. ACA does have the following campus security authorities (CSA) but maintains a Security Desk that:

- Fulfilling the responsibility to annually disclose accurate crime statistics; and
- To issue or facilitate the issuance of timely warnings or emergency notifications for crimes that pose a serious or continuing threat to the campus.

Anyone who needs assistance for reporting an emergency or a criminal crime may report to any of the following individuals:

- Campus President      Anthony Restivo 419-472-1150

The duty of the Campus President or his designee is to collect, document and report crime information in a timely matter. It is not the responsibility of the Campus President to determine whether a crime took place-that is the function of the law enforcement personnel. An employee should not try to apprehend the alleged perpetrator of the crime. That too is the responsibility of law enforcement. It is also not the responsibility of the Campus President to try to convince a victim to contact law enforcement if the victim chooses not to.

The Campus President reports help to determine if there is a serious or continuing threat to the safety of the campus community that would require an alert (i.e., a timely warning or emergency notification).

The Campus President for annual campus security reporting will keep hardcopies or electronic copies of the documentation. ACA does not have to report the incident in the crime statistics with appropriate backup documentation, if there is reason to believe that a crime report was not in good faith.

The Campus President will issue the Handbook for Campus Safety and Security Reporting, 2016 edition, so the information can be reviewed and be prepared to handle crimes per policy and procedure.



## **Statistics from Local Law Enforcement Agencies (Chapter 4)**

ACA will make a good faith effort to collect crime statistics for all Clery Act crimes committed for its current geographical location from the Toledo Police Department for the following:

- Criminal Offenses-Public Property
- Hate Crimes-Public Property
- VAWA Offenses-Public Property
- Arrests-Public Property
- Disciplinary Actions-Public Property

## **Daily Crime Log: (Chapter 5)**

ACA does not maintain a campus police or security department; therefore, it does not maintain crime logs. ACA will immediately notify the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of the students or employees.

## **Timely Warnings (Chapter 6)**

Timely warnings issued for threats to property as well as threats to a person.

- a. If a situation arises, either on or off campus, that, in the judgement of the Toledo Police Department and/ or ACA's Management team constitutes an ongoing or continued threat, a campus wide "timely warning" will be issued by ACA.

### **Response:**

- ACA will issue warning immediately upon receipt of information.
  - The Campus President will meet to discuss the information regarding the warning and design a plan of action.
  - The Campus President or his designee will document the information and disseminate it through notices placed in the student's, email to all employees and all students, provide a text alert to employees and students, and/or postings throughout the campus via each division's bulletin boards.
  - Depending on the specific circumstances of the crime, especially in situations that could pose an immediate threat to the community and individuals, the Management Team may also post notices on bulletin boards throughout the campus and place notices in the student's email.
- b. ACA will annually disclose the crime statistics that apply to the Clery Act and the VAWA by September 30 of each year. The reporting period will be January 1 to December 31 of each year. ACA will disclose a minimum of the last 3 years of campus crime statistics. The Campus President or



his designee is responsible for collecting, reporting, updating and dissemination of annual crime statistics. The Campus President or his designee is responsible for the daily collections and retention of security reports and reported crimes.

c. ACA will collect information from "good faith" reported crimes via the ACA Incident Report Form, and the annual police local area report.

**Response:**

ACA will publish the Campus Safety and Security information updated annually by the Campus President or his designee and published in the Student Handbook and/or the Schools Website. The Campus President or his designee emails the annual updated Campus Safety and Security information to all current students and employees by September 30 of each year. New students will receive a weblink to reference the information.

Anyone who needs assistance for reporting an emergency or a criminal crime is to report to any of the campus management.

d. Describe institutional policies or procedures for victims or witnesses to report crimes on a voluntary, confidential basis for inclusion in the annual security report.

If you are the victim of a crime and do not want to pursue action within the ACA system or the criminal justice system, you may still consider making a confidential report. With your permission, ACA can file a report on details of the incident without revealing your identity. The purpose of the confidential reporting is to comply with your wish to keep the matter confidential, while taking steps to ensure the future safety of yourself and others. With such information, ACA, can keep an accurate record of the number of incidents involving students, determine where there is a pattern of crime regarding a specific location, method, or assailant, and alert the campus security officials to the potential danger. ACA uses reports filed in this manner to disclose annual crimes statistics for the institution while maintaining the confidentiality of the victim.

## **Procedure for collecting and reviewing crime reports from campus security authorities**

### **(Chapter 7)**

1. ACA will provide a statement of current campus policies regarding procedures for students, employees, and others to report criminal actions or other emergencies occurring on campus and policies concerning the institution's response to such reports via the annual updated Campus Safety and Security Report, or as deemed necessary.



If the Campus President or his designee receives "good faith" crime information, he or she should document it as a crime report. In "good faith" means, there is a reasonable basis for believing the information is not simply rumor or hearsay.

• **Reporting a criminal crime:**

**Response:**

- An Incident Report Form is available from the Campus President or his designee to report all events, either emergency or non-emergency, which a student or employee feels is criminal in nature.
- ACA will call the Toledo Police and a police officer will visit the school to complete the investigation of the incident.
- The reporting person and Campus President or his designee will complete the Incident Report Form and the Campus President, or his designee will follow-up.
- ACA will keep a copy of the police report and the Incident Report on file.
- The Campus President or his designee maintains all documentation.
- Reporting an emergency

**Response:**

- A medical emergency is handled by first notifying the proper medical assistance personnel (any ACA employee, the Campus President or his designee, the program directors or Management Team members AND if need be, calling 9-1-1.
- The 9-1-1 emergency team will make the call as to having the student or employee transported to a medical facility.
- ACA will do their best to administer First Aid or CPR/AED until medical help arrives.
- An Incident Report Form is available at the front desk to report the event, either emergency or non-- emergency and completed immediately after the medical emergency.
- The Campus President or his designee maintains all documentation.

**Incident Response:**

- An Incident Report Form is available at the front desk to report all events either emergency or non- emergency.
- The person wishing to report the incident completes The Incident Report.
- The Campus President or his designee receives the completed Incident Report for a follow-up plan of action, if needed.
- The Campus President or his designee maintains all documentation.

**Voluntary Confidential Reporting Procedure**

If you are the victim of a crime and do not want to pursue action within the ACA system or the criminal justice system, you may still consider making a confidential report. With your permission, ACA can file a report on details of the incident without revealing your identity. The purpose of the confidential reporting is to comply with your wish to keep the matter confidential, while taking steps to ensure the



future safety of yourself and others. With such information, ACA can keep accurate record of the number of incidents involving students, determine where there is a pattern of crime, the specific location, method, or assailant, and alert the campus security officials to the potential danger. ACA will maintain confidentiality of the victim with reports filed in this manner.

2. Provide a statement of current policies concerning security of, and access to, campus facilities including:

a. Security of and access to campus facilities, including campus residence:

**Response:**

- The Athena Career Academy (ACA) Campus is located at 5203 Airport Hwy Toledo, Ohio 43615. ACA Administrative Offices are open Monday thru Friday, 7:30 a.m. to 5:00 p.m.
- ACA has two entrances: the main entrance for administrative personal at the front of the building and the student entrance located just to the left of the main entrance in the front-of the building.
- The campus Student doors unlock at 7:30 a.m. and lock at 10:30 p.m., Monday through Friday.

b. Security consideration used in the maintenance of campus facilities.

**Response:**

- ACA's Campus President and his designee are responsible for regular checks and repair of the campus facility.
- ACA's campus front, sides and back of the building parking area is well lite to aid in maintaining the security of the campus facility.
- ACA has a vital interest in maintaining a safe, secure, healthy, and efficient learning and working environment. Towards that end, multiple provisions are in place to ensure an atmosphere that is conducive to learning including secured entrances and video surveillance with digital backup. All students and staff entering the building will be required to display a photo ID.
- ACA official photo ID badges must be clearly visible on each student, faculty member via lanyards/ clips.
- Visitors and Venders are required to sign in at the front desk and will be escorted around campus by an employee to access needed areas of the campus.

3. Provide a statement of current policies concerning campus law enforcement, including--

a. The enforcement authority of security personnel, including their working relationship with State and local police agencies.

**Response:**

- ACA's security personnel include the Campus and his designee
- The Campus President and/or his designee will maintain written copies of all security concerns and follow- up on them as soon as possible.
- ACA when needed will call 9-1-1 to assist with an emergency.



b. Statement of policies that encourage accurate and prompt reporting of all crimes to the campus police and the appropriate police agencies.

**Response:**

- ACA has the authority to ask persons for identification to determine whether individuals have lawful business with ACA. ACA will refer criminal incidents to the Toledo Police Department.
- All crime victims and witnesses should report the crime immediately to ACA and the appropriate police agency.
- Prompt reporting will assure timely warning notices on-campus and timely disclosure of crime statistics.

## **General Procedures for Reporting a Crime or Emergency: (Chapter 7)**

ACA students, faculty, staff, and guest are encouraged to report all crimes and public safety related incidents to ACA in a timely manner.

1. If the Campus President or his designee receives "good faith" crime information, he or she should document it as a crime report. In "good faith" means, there is a reasonable basis for believing the information is not simply rumor or hearsay.

2. Reporting a criminal crime:

**Response:**

- An Incident Report Form is available from the Campus President or his designee to report all events, either emergency or non-emergency, which a student or employee feels is criminal in nature.
- ACA will call the Toledo Police and a police officer will visit the school to complete the investigation of the incident.
- The reporting person and the Campus President or his designee will complete the Incident Report Form and submit it for follow-up.
- ACA will keep a copy of the police report and the Incident Report on file.
- The Campus President or his designee maintains all documentation.

3. Reporting an emergency: Response:

- A medical emergency is handled by first notifying the proper medical assistance personnel (any ACA employee, the Campus President or his designee, the program director or any member of the management team) AND if need be, calling 9-1-1.



- The 9-1-1 emergency team will make the call as to having the student or employee transported to a medical facility.
- ACA will do their best to administer First Aid or CPR/AED until medical help arrives.
- An Incident Report Form is available at the front desk to report the event, either emergency or non-emergency and completed immediately after the medical emergency.
- The Campus President or his designee maintains all documentation.

#### 4. Reporting a general incident: Response:

- An Incident Report Form is available at the front desk to report all events either emergency or non-emergency.
- The person wishing to report the incident completes The Incident Report.
- The Campus President or his designee receives the completed Incident Report for a follow-up plan of action, if needed.
- The Campus President or his designee maintains all documentation.

#### 5. Voluntary Confidential Reporting Procedure:

If you are the victim of a crime and do not want to pursue action within the ACA system or the criminal justice system, you may still consider making a confidential report. With your permission, ACA can file a report on details of the incident without revealing your identity. The purpose of the confidential reporting is to comply with your wish to keep the matter confidential, while taking steps to ensure the future safety of yourself and others. With such information, ACA can keep accurate record of the number of incidents involving students, determine where there is a pattern of crime, the specific location, method, or assailant, and alert the campus security officials to the potential danger. ACA will maintain confidentiality of the victim with reports filed in this manner.

#### **Response:**

- ACA does not have pastoral or professional counselors on staff.
- ACA will assist the student by referring them to a person or agency that is qualified to handle the specific situation.
- ACA has a list of counseling services that is in the Student Handbook on the schools website and has been distributed to all students.
- ACA will investigate all "good faith" reports on campus crime.
- ACA does not have procedures for voluntary, confidential reporting of crime statistics.
- ACA will refer violations of the law to the law enforcement agencies when the Campus President or his designee have reviewed the case for disciplinary action.
- If a situation arises, either on or off campus, that, in the judgment of the Toledo Police Department and/ or ACA's Management team constitutes an ongoing or continued threat, a campus wide "timely warning" will be issued by ACA.
- ACA will issue timely reports or warnings through classroom phone system, in-class announcements, and alarms sounds or by any other appropriate means, ACA deems necessary.



4. Provide a description of the type and frequency of programs designed to inform students about campus security procedures and practices and to encourage students to be responsible for their own security and the security of others.

**Response:**

- ACA enrolls students on a quarterly basis. Each quarter ACA requires a mandatory orientation for each student prior to the start of his/her program.
- During the academic portion of the orientation, the student receives a digital of the Student Handbook that contains campus security information, procedures, and alerts so that the student can participate in his or her own safety while on the ACA campus.
- The student is informed and signs an acknowledgment that the ACA Student Handbook is available on-line at [www.athenacareers.edu](http://www.athenacareers.edu) prior to signing an enrollment agreement. A hardcopy of the catalog is issued to the student upon request.
- The Student Handbook states policy and procedures regarding the student's responsibility for their own security, ACA's crime statistics, and how to report any type of concern to ACA. The students sign an acknowledgment that they have received and understand the information presented in the catalog and student handbook.

5. Provide a description of programs designed to inform students and employees about prevention of crimes.

**Response:**

- ACA does not have any programs other than the student's mandatory orientation prior to the first day of class. Refer to the preceding information given in Item 4 Response.
- ACA does a one-on-one orientation of each new faculty or administrative member. The employee receives during this orientation, an Employee Handbook, and the Student Handbook, which details information about crime prevention and reporting.
- ACA updates faculty and administration members when needed, via emails, messages placed in their mailbox, face-to-face or posting on the staff bulletin board. Refer to the preceding information given in Item 4 Response.
- ACA has a policy that states at least two (2) employees must be in the building or on the campus at the same time to aid in the safety of the employee. If an employee wishes to enter the building alter business hours or on Saturday and Sunday, they are required to get permission from the Campus President

6. Provide a statement of policy concerning the monitoring and recording, through local police agencies, of criminal activity in which students engaged on off-campus locations of student organizations officially recognized by the institution, including student organizations with off-campus housing.

**Response:**

- ACA does not have off-campus student organizations or off-campus student housing.



7. Provide a statement of policy regarding the possession, use and sale of alcoholic beverages and enforcement of state underage drinking laws.

**Response:**

- ACA has a Drug and Alcohol Policy published in the Student Handbook.
- ACA has a vital interest in maintaining a safe, healthy, and efficient learning and working environment. Substance use and misuse involves the use of alcohol and other drugs, including prescription, over the counter (OTC), illegal drugs, in the classroom, on the campus, on the clinical/Externship/practicum or in the workplace.
- ACA prohibits unlawful use, sale, dispensing, transfer, or possession of controlled substances, alcoholic beverages on the ACA campus.
- ACA prohibits drugs not medically authorized, or abuse or impairment caused from medically prescribed drugs, or any other substance that may impair a student or an employee academic or work performance. Please refer to the Student Handbook for detailed information, policy and procedures regarding possession of, use or sale of alcoholic beverages.
- ACA has been designated a "Drug Free" campus. Violators will be subject to but not limited to, the following: ACA disciplinary action, behavioral probation, termination, and potential criminal prosecution.

8. Provide a statement of policy regarding the possession, use and sale of illegal drugs and enforcement of federal and state drug laws.

**Response:**

- ACA prohibits unlawful use, sale, dispensing, transfer, or possession of controlled substances, alcoholic beverages on the ACA campus.
- ACA prohibits drugs not medically authorized, or abuse or impairment caused from medically prescribed drugs, or any other substance that may impair students or the employees academic or work performance. Please refer to the Student Handbook for detailed information, policy and procedures regarding possession of, use or sale of alcoholic beverages.

9. "Provide a description of any drug or alcohol abuse education program as required under Section 120(a) through (d) of HEA (Health Education Act). For meeting this requirement, an institution may cross-reference the materials it uses to comply with section 120(a-d) of HEA."

**Response:**

- ACA complies with the required regulation published in Section 120 (a) through (d) as stated below.

**SEC. 120 DRUGS AND ALCOHOL ABUSE PREVENTION**

(a) RESTRICTION ON Eligibility- Notwithstanding any other provision of law, no institution of higher education shall be eligible to receive funds or any other form of financial assistance under any Federal



program, including participation in any federally funded or guaranteed student loan program, unless the institution certifies to the Secretary that the institution has adopted and has implemented a program to prevent the use of illicit drugs and the abuse of alcohol by students and employees that, at a minimum, includes-

(1) The annual distribution to each student and employee of--

(A) Standards of conduct that clearly prohibit, at a minimum, the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on the institution's property or as part of any of the institution's activities;

(B) A description of the applicable legal sanctions under local, State, or Federal law for the unlawful possession or distribution of illicit drugs and alcohol;

A description of the health-risks associated with the use of illicit drugs and the abuse of alcohol;

A description of any drug or alcohol counseling, treatment, or rehabilitation or reentry programs that are available to employees or students; and

(E) A clear statement that the institution will impose sanctions on students and employees (consistent with local, State, and Federal law), and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution, for violations of the standards of conduct required by subparagraph (A); and

(2) A biennial review by the institution of the institution's program to--

(A) Determine the program's effectiveness and implement changes to the program if the changes are needed; and

(B) Ensure that the sanctions required by paragraph (1) (E) are consistently enforced.

**INFORMATION Availability-** Each institution of higher education that provides the certification required by subsection (a) shall, upon request, make available to the Secretary and to the public a copy of each item required by subsection (a)(I) as well as the results of the biannual review

10. "Provide a description of any drug or alcohol abuse education program as required under Section 120(a) through (d) of HEA (Health Education Act). For meeting this requirement, an institution may cross-reference the materials it uses to comply with section 120(a-d) of HEA."

**Response:**

- ACA complies with the required regulation published in Section 120 (a) through (d) as stated below.  
SEC. 120 DRUGS AND ALCOHOL ABUSE PREVENTION

(b) **RESTRICTION ON Eligibility-** Notwithstanding any other provision of law, no institution of higher education shall be eligible to receive funds or any other form of financial assistance under any Federal program, including participation in any federally funded or guaranteed student loan program, unless the institution certifies to the Secretary that the institution has adopted and has implemented a program to prevent the use of illicit drugs and the abuse of alcohol by students and employees that, at a minimum, includes-

(1) The annual distribution to each student and employee of—



- (A) Standards of conduct that clearly prohibit, at a minimum, the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on the institution's property or as part of any of the institution's activities;
- (B) A description of the applicable legal sanctions under local, State, or Federal law for the unlawful possession or distribution of illicit drugs and alcohol.

A description of the health-risks associated with the use of illicit drugs and the abuse of alcohol;

A description of any drug or alcohol counseling, treatment, or rehabilitation or reentry programs that are available to employees or students; and

- (E) A clear statement that the institution will impose sanctions on students and employees (consistent with local, State, and Federal law), and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution, for violations of the standards of conduct required by subparagraph (A); and

(2) A biennial review by the institution of the institution's program to--

- (A) Determine the program's effectiveness and implement changes to the program if the changes are needed; and

(B) Ensure that the sanctions required by paragraph (1) (E) are consistently enforced.

(c) INFORMATION Availability- Each institution of higher education that provides the certification required by subsection (a) shall, upon request, make available to the Secretary and to the public a copy of each item required by subsection (a)(I) as well as the results of the biennial review required by subsection (a)(2).

(d) REGULATIONS-

(1) IN GENERAL- The Secretary shall publish regulations to implement and enforce the provisions of this section, including regulations that provide for—

(A) The periodic review of a representative sample of programs required by subsection (a); and

(B) a range of responses and sanctions for institutions of higher education that fail to implement their programs or to consistently enforce their sanctions, including information and technical assistance, the development of a compliance agreement, and the termination of any form of Federal financial assistance.

(2) REHABILITATION PROGRAM- The sanctions required by subsection (a) (1) (E) may include the completion of an appropriate rehabilitation program.

(e) APPEALS- Upon determination by the Secretary to terminate financial assistance to any institution of higher education under this section, the institution may file an appeal with an administrative law



judge before the expiration of the 30-day period beginning on the date of the notification to the institution of the decision to terminate financial assistance under this section. Such judge shall hold a hearing with respect to such termination of assistance before the expiration of the 45-day period beginning on the date that such appeal is filed. Such judge may extend such 45-day period upon a motion by the institution concerned. The decision of the judge with respect to such termination shall be considered a final agency action.

11. Provide a statement that the institution will, upon written request, disclose 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 proceedings conducted by such institution against a student alleged perpetrator of such crime or offense. If the alleged victim is deceased because of such crime or offense, the next of kin of such victim shall be treated as the alleged victim.

**Response:**

ACA will disclose to the appropriate parties any findings or disciplinary actions taken against a student alleged perpetrator of a crime of violence, or a non-forcible sex offense. ACA will provide both the accused and the accuser with simultaneous written notification of any result of any disciplinary proceedings that arises from an allegation of dating violence, domestic violence, sexual assault or stalking. In these cases, it is not necessary for a victim to make a written request.

12. Provide a statement of policy regarding your institution's emergency response and evacuation procedure.

**Response:**

- ACA does not have on-campus housing therefore, ACA does not have a missing student notification policy.

13. Provide a statement that the institution will, upon written request, disclose 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 proceedings conducted by such institution against a student alleged perpetrator of such crime or offense. If the alleged victim is deceased because of such crime or offense, the next of kin of such victim shall be treated as the alleged victim.

**Response:**

ACA will disclose to the appropriate parties any findings or disciplinary actions taken against a student alleged perpetrator of a crime of violence, or a non-forcible sex offense. ACA will provide both the accused and the accuser with simultaneous written notification of any result of any disciplinary



proceedings that arises from an allegation of dating violence, domestic violence, sexual assault or stalking. In these cases, it is not necessary for a victim to make a written request.

14. Provide a statement of policy regarding your institution's emergency response and evacuation procedure.

**Response:**

- ACA does not have on-campus housing therefore, ACA does not have a missing student notification policy.

### **Policies, Procedures and Programs: Dating Violence, Domestic Violence, Sexual Assault and Stalking (Chapter 8).**

1.ACA's provides programs to prevent dating violence, domestic violence, sexual assault and stalking and the procedures that will be followed when one of these crimes is reported to ACA, whether the offense occurred on or off campus.

ACA prohibits dating violence, domestic violence, sexual assault and stalking as defined for purposes of the Clery Act.

### **Annual Security Report (Chapter 9)**

ACA is required to publish and distribute an annual security report by October 1 of each year to all enrolled students and all employees. ACA provides this annual report to all prospective students and all employees. The annual report contains crime statistics and various policy statements. Currently implemented policies are accurately reflected in these statements.

Statistics concerning the occurrence on campus, during the most recent calendar year, and during the two-preceding calendar years for which data are available, of the following criminal offenses reported to campus security authorities or local police agencies.

### **CRIME AWARENESS DISCLOSURE**

ACA annually updates the Crime Awareness Disclosure with documentation given to all new and current students. This form includes any criminal/safety statistics that have occurred for a minimum of the past three (3) years in the campus or on campus grounds.



## Campus Safety and Security (Revised 09/23/2022)

### **Campus Security Act and Crime Awareness**

In compliance with the Federal Crime Awareness and Campus Security Act, ACA publishes and makes annually available a campus security report. Students, employees, or other individuals who want to review the report can go to the Athena Career Academy website under Annual Notices Tab: <http://athenacareers.edu>.

Whenever any of the following crimes\* occur on this campus, the information is reported to local police agencies and recorded on an incident report. \*Murder, Sexual Assault Robbery, Aggravated Assault, Burglary, Property Theft, and Arson; these statistics are included in the annual reports. Athena encourages students and employees to report crimes and incidents as soon as possible by calling the security line and informing Athena's President.

The Emergency Plan is provided in a separate publication and is distributed to all students. General emergency procedures are posted throughout the building.

### **Timely Warning**

If a situation arises, either on or off campus that, in the judgment of the President, that constitutes an ongoing or continuing threat, a campus-wide "timely warning" will be issued. The warning will be issued through the College e-mail systems and media outlets to students, faculty, and staff.

### **Criminal Record Policy**

This policy serves to protect the clients, students, and staff of Athena Career Academy and clinical affiliation sites, and provides for the safety and well-being of patients, for whom responsible care is our primary consideration.

Students in designated programs will have a criminal record check completed prior to admission to the program and before taking the State Board exam. All employees will have a criminal record check prior to being employed at Athena. The student must obtain both a BCI and FBI fingerprinting. The Ohio Bureau of Criminal Identification will conduct the criminal records check. The results will be sent to the program facility, then the Ohio Board of Nursing. Students may be denied access to clinical sites due to a felony record. Student and Employees who have failed to disclose criminal records on their application will be immediately terminated from the program or employment and will not be allowed to return to Athena for falsification of the application.

The Ohio Board of Nursing reserves the right to refuse Licensure to any person with a criminal record that indicated the person has entered a guilty plea, been convicted of, or has a judicial finding of guilt for committing any felony.



It is the student's responsibility to contact the Ohio Board of Nursing if they feel they may have a record that could hamper their approval by the Ohio Board of Nursing.

Any misconduct on or off school property and/or clinical sites that is directly related to and impacts the welfare and morale of the school is within the scope of authority and the discretion of the Program Director with respect to discipline and/or program termination.

The applicant or employee will be counseled regarding admission, clinical site availability, potential for employment, and potential licensure.

## **Weapons Policy**

While the State of Ohio through the Ohio Revised Code Section 2923.126(A) establishes the privilege of carrying a concealed handgun, there are certain restrictions regulated by state and federal laws. Ohio Revised Code Section 2923.126(8) lists the places where concealed handguns are NOT allowed. These include "any public or private college, university, or other institution of higher education, unless the handgun is in a locked motor vehicle or ... [the licensee] is in the immediate process of placing the handgun in a locked motor vehicle." In the event this policy is violated the student and employee is subject to immediate dismissal.

## **Alcohol and Drug Policy**

Athena Career Academy has a commitment to each student, employee, and to each patient at a clinical or externship affiliation to assure that the learning clinical or externship environment is free from the effects of abuse of alcohol and drugs by a student or an employee of Athena Career Academy. Therefore, it is the school's policy to prohibit unlawful use, sale, dispensing, transfer, or possession of controlled substances, alcoholic beverages, drugs not medically authorized, or drug abuse or impairment caused from medically prescribed drugs; or any other substance that may impair an individual's academic or work performance, or pose a hazard to the individual, public, students, or employees of the school on its property (owned or leased), or at any of its clinical or externship affiliates or any activity sponsored by Athena Career Academy. All students and employees are required to comply with Athena Career Academy's Campus-Wide Drug and Alcohol Policy. Violations of this policy will lead to disciplinary actions, which may include termination of enrollment or employment and possible criminal prosecution. When necessary, Athena Career Academy will offer un-sponsored referral to treatment programs for alcohol or drug abuse.

Athena Career Academy follows the provisions of the Drug Free School and Communities Act Amendments of 1989, which applies to all students, employees, and includes policy enforcement, and drug and alcohol education, drug and alcohol testing, and referral for treatment.

In the event a student is showing evidence of being under the influence of drugs or alcohol in the classroom or the clinical setting it is Athena Career Academy the student must complete the following:

- Complete a Urine Drug test on campus or secure safe transportation to the Acute Urgent Care 5542 Airport Hwy in Toledo, Ohio 43615, or



- Provide a drug/alcohol screen to Reliable Drug Testing 7610 New West Rd Toledo Ohio 43617 at student's expense.

No student or employee will be allowed to return to campus or the clinical setting without supporting documentation of a negative alcohol and/or drug screen. In the event the alcohol screen is  $>.02$  or the drug screen is positive for illicit street drugs, the student will be immediately dismissed from the program. Athena Career Academy has a vital interest in maintaining a safe, healthy, and efficient learning and working environment. Substance abuse and misuse involves the use of alcohol and other drugs including prescription, over-the counter, and illegal drugs in the classroom, on clinical practicum, or externship in the workplace.

Being under the influence of an illegal drug, abuse of a prescribed drug, being under the influence of alcohol in the classroom, on clinical practicum or externship, or in the work environment poses a serious safety and health risk to the user and all those who are around the user. The use, sale, purchase, transfer, or possession of any illegal drug on Athena Career Academy's property (owned or leased) or at any of the student's clinical or externship sites and the use, possession, or being under the influence of alcohol poses unacceptable risks for safe, healthy, and efficient operations.

## **FIRE POLICIES AND EVACUATION PROCEDURES**

Fire drills are conducted periodically to ensure Athena Career Academy safety in the event of a fire emergency. Staff/Faculty and Students should locate the exit nearest their classroom/office location. Athena considers fire safety extremely important, students and employees have an obligation to adhere to school regulations, as well as city and state statutes. Failure to respond appropriately to fire alarms will result in judicial action for those involved and will necessitate additional drills for all Athena's Faculty/Staff and Students.

- **FALSE ALARM:** Students and employees are asked to respect Athena's property and not set off false alarms. In the event of a false alarm, every effort will be made to identify the responsible individual(s). When such persons are identified, they will be referred to the senior administrative staff for judicial action.
- **FIRE PREVENTION REGULATIONS:** The following are prohibited in Athena's offices and classrooms because of their potential as fire hazards:
  1. Turn OFF all electrical equipment at the end of the day.
  2. Extinguish any smoldering ash trays as emptied.
  3. Do not overload electrical outlets.
  4. Clean filters in air ducts regularly.
  5. Repair/replace frayed electrical cords immediately.
  6. Test fire extinguishers annually.



- **FIRE EVACUATION PROCEDURES:** When the alarm sounds, each Faculty/Staff and student should follow the established procedures:

1. Faculty/Staff should leave their doors open as they exit their classrooms and offices with the students. (If possible, everyone should take their room key, purse, car keys, and wallet s with them.)
2. Faculty/Staff and students should begin an immediate and orderly evacuation. No one should run. They should move quickly to the nearest designated stairwell and exit. They should exit the building and wait for instructions or permission to re-enter the building.
3. Athena's administrator will signal when the building is safe and ready for re-entry. No one is allowed to reenter until this signal is given. Personnel authorized to give reentry instructions include administrators and security officers. Please note that firemen may indicate a building is safe, but they cannot give permission to reenter the building. Firemen should be always treated with respect. Anyone who does not evacuate or who does not comply quickly and properly with the instructions of a staff member will be reported to the senior administrative staff. Failure to evacuate a building after a fire alarm has sounded will be subject to appropriate judicial action.
4. If Faculty/Staff or students are away from the office and school, Athena expects all to follow the proper procedure at the visiting Clinical or Training location.

- **MISUSE OF FIRE SAFETY EQUIPMENT:** Any individual who misuses or tampers with fire safety equipment will be subject to disciplinary action and the cost of repair or replacement of misused or damaged equipment, cleaning of the facility, and damage to other property. Fire safety equipment includes, but is not limited to, signs, extinguishers, smoke detectors, and pull stations.
- **SETTING FIRE:** Any individual who intentionally and/or recklessly sets a fire (commits arson) in or near a school building is subject to immediate dismissal from the school and may be charged for repairing any damage caused by the fire. In addition to being subject to school penalties, any student who starts a fire, damages or tampers with evacuation alarms, or misuses fire safety equipment also may be subject to prosecution in criminal court by the proper federal, state, county, or city authorities.

## **Missing Person/Student & Employee Policy Response and Investigation:**

Athena Career Academy Missing student: Athena does not have a facility owned or operated where anyone resides on the facility. However, we encourage students and employees to look out for each other. We are a small school in which one-person presence is noticeable when absent. When a report of a missing student is received by Athena Career Academy or local police agencies, the receiving organization will conduct a preliminary investigation to verify the complaint relating to the reported missing student or employee. If the student 's or employee's absence is verified, the incident will be reported and shared between organizations. Both organizations will continue the investigation to locate the missing student or employee. If, after further investigation the missing student or employee is not located, both organizations will determine the most efficient manner of continuing the investigation. In any event, information relating to any report of a missing student or employee shall be shared by both



parties no later than twenty-four (24) hours from the time of the initial report. If the missing student is located or returns to Athena Career Academy at any time after the matter has been reported, each party shall notify the other immediately.

## **Procedures for Reporting a Missing Person/Student on Campus:**

Athena's employee or student receiving information regarding an alleged missing person/student should immediately report it to Athena by doing one of the following:

- Call: 419-472-1150 Ext 7231 (Day Hours)
- Call: 419-461-8191 (After Hours)

Procedures for reporting a missing person/student off campus, call either:

- 911
- Toledo Police Department Non-Emergency: 419-245-3340
- Lucas County Sheriff's Department: 419-213-3901 or 419-213-4147

If a student or employee under the age of 18 years old is reported missing, his/her parents or legal guardian will be notified. Efforts will be made to ensure confidentiality of missing person reports.

## **Student and Personal Conduct Policy and Prohibition Against Harassment:**

Athena is committed to providing a work environment in which all employees and students are treated with dignity and respect. As part of our Equal Employment Opportunity Policy, Athena forbids sexual harassment and harassment on the basis of race, color, religion, age, gender, disability, or handicap, national origin, veteran status or any other classification protected by law.

This harassment policy applies to all applicants and employees and prohibits discriminatory harassment and retaliation whether engaged in by an employee including any supervisor or manager, owner/office, or someone who does business with the school (e.g., vendor, consultant, visitor, student).

## **Reporting of Harassment or Retaliation:**

If you feel that you are a victim of harassment or retaliation, you should immediately report the matter to the Director of your Academic area or Human Resources. If you are not satisfied with the response to your complaint, please report the matter to the President. Early reporting and intervention are the most effective methods of resolving actual or perceived incidents of harassment. The school strongly urges you to promptly report to your complaints in writing.

## **Investigation into Complaints of Harassment or Retaliation:**

Athena treats every allegation of harassment or retaliation seriously. Allegations will be investigated in a timely and confidential manner. A confidential manner means within the bounds necessary to conduct



an effective investigation, and that information will be divulged only on a need-to-know basis. Athena will promptly take all reasonable measures to investigate and stop any violation of this policy by non-employees.

Since there may be some confusion over what constitutes sexual or other discriminatory harassment, any conduct of this type, which offends you or makes you feel uncomfortable should be reported.

**Campus Security Authorities:**

Administration

Campus President 419-472-1150

Security:

Athena Security Desk 419-472-1150 Ext. 7231

After Hours Security Desk 419-461-8191

Program Directors:

Director of Nursing Programs 419-472-1150

Allied Health Program 419-472-1150

Early Childhood Education 419-472-1150

Admissions:

Admissions Manager 419-472-1150

Financial Aid:

Financial Aid Manager 419-472-1150

Business Office:

Accounts Controller 419-472-1150



## Annual Crime Statistics Report

The following report identifies crime statistics for Athena Career Academy and non-adjacent buildings.

Athena Career Academy, 5203 Airport Hwy Toledo, Ohio 43615

### Criminal Offenses- On Campus

Description:	2021	2020	2019
Murder/Manslaughter	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
Motor Vehicle Theft	0	0	0
Burglary/Theft	0	0	0
Arson	0	0	0
Hate Crimes	0	0	0

### Criminal Offenses- Public Property

Description:	2021	2020	2019
Murder/Manslaughter	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
Motor Vehicle Theft	0	0	0
Burglary/Theft	0	0	0
Arson	0	0	0
Hate Crimes	0	0	0



## VAWA Offenses Reporting

### GEOGRAPHIC LOCATION

OFFENSE	YEAR	ON CAMPUS PROPERTY	ON CAMPUS STUDENT HOUSING FACILITIES	NON-CAMPUS PROPERTY	PUBLIC PROPERTY
DOMESTIC VIOLENCE	2019	0	N/A	0	0
DATING VIOLENCE	2019	0	N/A	0	0
STALKING	2019	0	N/A	0	0
OFFENSE	YEAR	ON CAMPUS PROPERTY	ON CAMPUS STUDENT HOUSING FACILITIES	NON-CAMPUS PROPERTY	PUBLIC PROPERTY
DOMESTIC VIOLENCE	2020	0	N/A	0	0
DATING VIOLENCE	2020	0	N/A	0	0
STALKING	2020	0	N/A	0	0
OFFENSE	YEAR	ON CAMPUS PROPERTY	ON CAMPUS STUDENT HOUSING FACILITIES	NON-CAMPUS PROPERTY	PUBLIC PROPERTY
DOMESTIC VIOLENCE	2021	0	N/A	0	0
DATING VIOLENCE	2021	0	N/A	0	0
STALKING	2021	0	N/A	0	0



## ARRESTS and DISCIPLINARY REFERRALS

### GEOGRAPHIC LOCATION

OFFENSE	YEAR	ON CAMPUS PROPERTY	ON CAMPUS STUDENT HOUSING FACILITIES	NON-CAMPUS PROPERTY	PUBLIC PROPERTY
ARRESTS:  WEAPONS CARRYING, POSSESSING, ETC.	2019	0	N/A	0	0
DISCIPLINARY REFFERRALS:  WEAPONS CARRYING, POSSESSING, ETC.	2019	0	N/A	0	0
ARRESTS:  DRUG ABUSE VIOLATIONS	2019	0	N/A	0	0
DISCIPLINARY REFFERRALS:  DRUG ABUSE VIOLATIONS	2019	0	N/A	0	0
ARRESTS:  LIQUOR LAW VIOLATIONS	2019	0	N/A	0	0
DISCIPLINARY REFFERRALS:  LIQUOR LAW VIOLATIONS	2019	0	N/A	0	0



OFFENSE		ON CAMPUS PROPERTY	ON CAMPUS STUDENT HOUSING FACILITIES	NON-CAMPUS PROPERTY	PUBLIC PROPERTY
ARRESTS:  WEAPONS CARRYING, POSSESSING, ETC.	2020	0	N/A	0	0
DISCIPLINARY REFFERRALS:  WEAPONS CARRYING, POSSESSING, ETC.	2020	0	N/A	0	0
ARRESTS:  DRUG ABUSE VIOLATIONS	2020	0	N/A	0	0
DISCIPLINARY REFFERRALS:  DRUG ABUSE VIOLATIONS	2020	0	N/A	0	0
ARRESTS:  LIQUOR LAW VIOLATIONS	2020	0	N/A	0	0
DISCIPLINARY REFFERRALS:  LIQUOR LAW VIOLATIONS	2020	0	N/A	0	0



OFFENSE	YEAR	ON CAMPUS PROPERTY	ON CAMPUS STUDENT HOUSING FACILITIES	NON-CAMPUS PROPERTY	PUBLIC PROPERTY
ARRESTS: WEAPONS CARRYING, POSSESSING, ETC.	2021	0	N/A	0	0
DISCIPLINARY REFFERRALS: WEAPONS CARRYING, POSSESSING, ETC.	2021	0	N/A	0	0
ARRESTS: DRUG ABUSE VIOLATIONS	2021	0	N/A	0	0
DISCIPLINARY REFFERRALS: DRUG ABUSE VIOLATIONS	2021	0	N/A	0	0
ARRESTS: LIQUOR LAW VIOLATIONS	2021	0	N/A	0	0
DISCIPLINARY REFFERRALS: LIQUOR LAW VIOLATIONS	2021	0	N/A	0	0

\*Statistics are for ½ mile radius around 5203 Airport Hwy.

All statistics for the 2021 Calendar year can be located at  
the: TOLEDO POLICE DEPARTMENT  
525 N. Erie St. Toledo, Ohio 43604