



Annual Safety and Security Report 2023

10803 John Galt Blvd, Omaha NE 68137

Additional Classroom Space located
at 12100 West Center Road, Suite 108
Omaha NE 68144

P:402-333-3329 F: 402-333-9614

www.capitolomaha.com

SAFETY AND SECURITY REPORTING

The campus security authorities for Capitol Beauty School ("Capitol" or "the school") are Kylie Rader, School Director and Stacey Tessendorf, Clinic Floor Director. The "Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act" is a federal law that requires institutions of higher education in the United States to disclose campus security information including crime statistics for the campus and surrounding areas. For more information contact either the CEO, Nancy Meduna at (402)333-3329 or the Office of Civil Rights. Toll Free: (800)368.1019 [HHS.gov](https://www.hhs.gov).

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

- Crime and fire statistics report compiled from Omaha Police Department for years 2020-2023.
- Disclosure of Capitol Beauty School's Security Policy
- Guidance on prompt crime reporting

This information is available:

- Electronically on Capitol's website, www.capitolomaha.com
- In paper form, available upon request, in the Student Services office on campus

SECURITY POLICY

Capitol Beauty School prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. Students, parents, and staff may access this report in full by contacting the Omaha Police Department. A complete copy of this report is also available online at capitolomaha.com.

Campus crime, arrest and referral statistics include those reported to the Omaha Police Department and the Capitol Beauty School designated campus officials. Please note that Capitol Beauty School's main campus is located at 10803 John Galt Blvd, Omaha NE 68137 and has additional classroom space located in the BelAir Plaza at 12100 West Center Road, Suite 108, Omaha NE 68137, which houses the first 8 weeks of training for the Cosmetology program. Capitol provides no campus housing, nor is there any public property that is immediately adjacent to, or accessible from, our campus.

Capitol Beauty School does not have a campus police staff, nor do the campus security officials have any arresting authority. Local law enforcement has the arresting authority on Capitol Beauty School's Campus. Upon written request, Capitol Beauty School will disclose to the alleged victim of any crime of violence or non-forcible sex offense, the results of any disciplinary hearing conducted by Capitol Beauty School against a student who is the alleged perpetrator of such crime or offense. Each year, by October 1, Capitol Beauty School will compile an Annual Safety and Security Report that includes fire and crime statistics from the incident and crime reports given to the campus security authorities. The crime statistics will be sent to the U.S. Department of Education each year upon receipt of the letter requesting the crime reports. This information will be uploaded via <http://surveys.ope.ed.gov/security> by the School Director. Crime statistics from the area surrounding Capitol Beauty School noncampus area of the BelAir Plaza (120th to 122nd Streets, Center Street to Arbor Street) will also be requested from the Omaha Police Department and will be disclosed in the annual crime report. Each year, a message will be sent to all enrolled students and staff via email, giving the website address to access this updated report. New faculty and staff members and students will be informed of this report during their new hire orientation or student orientation and directed to the Capitol Beauty School website to review this report.

TO REPORT A CRIME

The campus security authorities for Capitol Beauty School ("Capitol" or "the school") are Kylie Rader, School Director, and Stacey Tessendorf, Clinic Floor Director. Contact the campus security authorities immediately of a crime by calling 402.333.3329. If unavailable by phone, please email MsRader@capitolomaha.com, MrT@capitolomaha.com, medunas@capitolomaha.com, or compliance@capitolomaha.com (only in non-emergency situations). The campus security authorities do not have arresting authority. For emergencies, dial 9-1-1. Every crime that is reported to the campus security authorities will be investigated. Please note that due to the public nature of police reports, Capitol Beauty School cannot ensure the complete confidentiality of any crime report. All incident reports are reviewed by the School Director.

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

STUDENT GUIDELINES

Through meaningful educational experiences, Capitol Beauty School educates, empowers, and connects students to their professional goals. To achieve that goal, it is our responsibility to maintain an environment that is safe, relevant, educational, and consistent with our mission. Capitol Beauty School has established policies to ensure the safety and well-being of this school and to respond promptly and accurately to actions that are contrary to our purpose and mission. Capitol Beauty School complies with all local, state, and federal laws that

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

STUDENT CODE OF CONDUCT POLICY

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

STUDENT CATALOG VIOLATIONS

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

- Student may receive a verbal warning or redirection by a Capitol Beauty School employee.
- Student may be suspended for a period of time.
- Student may be scheduled for a meeting with any department head or School Director for further action.
- Student may be terminated.
- If a student is terminated for a Student Catalog Policy Violation, the student will not be entitled to graduate and will not be permitted to enter Capitol Beauty School premises. Upon termination, the student will be responsible for immediately returning all materials, publications, and equipment advanced by Capitol Beauty School.
- If a student is terminated under this provision, the student may file an appeal for reinstatement with the Board of Grievances as defined in this Student Catalog.
- If a student is terminated for gross misconduct, which refers to deliberately or willfully disregarding the standards of behavior expected and/or displays a behavior serious enough and possibly criminal, such as stealing, threats, cheating, attending school under the influence of alcohol or illegal drugs, insubordination or bullying, the termination is determined as final, and an appeal will not be permitted.

SAFETY, SANITATION AND INFECTION CONTROL (SSIC)

Capitol Beauty School follows an Emergency Preparedness Plan and Safety, Sanitation, and Infection Control (SSIC) is a significant component of it. Our goal is to educate our community, especially our students about the diseases, infections and threats not only throughout their career in the professional beauty industry, but also on our 20,000 square foot campus. Diseases including MRSA, Hepatitis B and C, HIV, AIDS, Tuberculosis and COVID-19 and many more. To keep our community safe, we have developed and continually enhance our SSIC policies. These policies contribute to the safety and wellbeing of the Capitol community.

CLEANING & DISINFECTING PRACTICES

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

BEHAVIORAL PRACTICES

- Avoid touching your eyes, nose, and mouth.
- Proper handwashing, following CDC guidelines.
- Wear clean clothes each day to campus.
- Cover coughs and sneezes with a tissue or inside of the elbow.
- No eating on salon floor or spa. Drinks must have lids.
- Stay home when sick.

TECHNOLOGY

- Online booking.
- Continuously wipe down guest check in and out areas screens/devices.
- Attempt to achieve paperless environment.

PERSONAL PROTECTIVE GEAR (PPG)

- Guests will be draped with capes; to be laundered after each guest. Disposable neck strips applied under capes on each guest.
- Gloves available upon request.
- Change all PPG, such as gloves, gowns, drapes, linens, and eye coverings between each guest.
- All used PPG items cleaned and disinfected or discarded in a closed container.
- Additional steps should be added as we review and improve procedures and protocols.

ADDITIONAL STEPS TO BE TAKEN ON CAMPUS:

- Training staff and faculty cleaning and other SSIC policies.
- Discontinue use of printed receipts, email receipts only

SUBSTANCE ABUSE PREVENTION POLICY

Capitol Beauty School is committed to maintaining a Company free of substance abuse. No employee that performs work for Capitol Beauty School or student who is enrolled at Capitol Beauty School is allowed to consume, possess, sell, purchase, or be under the influence of alcohol or illegal drugs, as defined by federal law, on any property owned by or leased on behalf of Capitol Beauty School, or in any vehicle owned or leased on behalf of the Company or while on Company business. The use of over-the-counter drugs and legally prescribed drugs is permitted as long as they are used in the manner for which they were prescribed and provided that such use does not hinder an employee's ability to safely perform his or her job or hinder a student's ability to safely perform his or her training. Employees should inform their department head if they believe their medication will impair their job performance, safety, or the safety of others, or if they believe they need a reasonable accommodation when using such medication. Students should inform Student Services if they believe their medication will impair their training performance, safety, or the safety of others, or if they believe they need a reasonable accommodation when using such medication. Capitol Beauty School will not tolerate employees who report for work while impaired by the use of alcohol or drugs. All employees should report evidence of alcohol or drug abuse to their department head or the School Director immediately. In cases in which the use of alcohol or drugs creates an imminent threat to the safety of persons or property, employees are required to report the violation. Failure to do so may result in disciplinary action, up to and including termination of employment. Capitol Beauty School will not tolerate students who report to school while impaired by the use of alcohol or drugs. All students should report evidence of alcohol or drug abuse to the Student Services department immediately. In cases in which the use of alcohol or drugs creates an imminent threat to the safety of persons or property, students are required to report the violation. Failure to do so may result in disciplinary action, up to and including termination of enrollment. As a part of our effort to maintain a campus free of substance abuse, Capitol Beauty School employees and students may be asked to submit to a medical examination and/or clinical testing for the presence of alcohol and/or drugs. Within the limits of federal, state, and local laws, Capitol Beauty School reserves the right to examine and test for drugs and alcohol at our discretion. As a condition of employment and enrollment with Capitol Beauty School, employees and students must comply with this Drug & Alcohol Use Policy. Be advised that no part of the Drug & Alcohol Use Policy shall be construed to alter or amend the at-will employment relationship between Capitol Beauty School and its employees. Employees and Students found in violation of this policy may be subject to disciplinary action, up to and including termination of employment. Drug abuse can have a pervasive effect on an entire community. against drug abuse. Drug abuse prevention has become an important first step in informing our staff, faculty, and students about the dangers of addiction, prevention techniques and where to find recovery help if necessary. The use of drugs and alcohol can cause numerous health problems and can lead to death. The effects to a person's health include respiratory failure, heart attack, overdose, acute intoxication, and transmittable diseases such as Hepatitis C and AIDS. Thousands of deaths are caused each year by drug overdoses, allergic reactions to drugs, toxic combinations of drugs and alcohol poisoning. Some drugs legally purchased at a pharmacy, whether they're prescribed by a doctor or bought over the counter (OTC), can be just as dangerous and impair your judgement. Look for warning labels or ask your pharmacist if you are in doubt about a drug's capacity for impairment. Capitol Beauty School has a zero-tolerance policy for drugs and alcohol use. For the safety of Capitol Beauty School, students, staff, faculty and its guest's, the manufacture, distribution, dispense of, possession, use,

sale, purchase, offer to buy/sell or use of alcohol, illegal drugs or related paraphernalia and the illegal use of drugs (including the misuse of prescription drugs) at Capitol Beauty School, on campus or while engaged in the course curriculum, is strictly prohibited. Students, staff, or faculty under the influence of nonprescription or prescription drugs (those that impair judgment, alertness, concentration, or motor skills), alcohol, or any unknown substance (including before school, during school, on a field trip or at a Capitol Beauty School event) will be asked to leave the premises immediately. An investigation and termination proceedings may follow and may be subject to criminal prosecution. Capitol Beauty School further reserves the right to take all appropriate and lawful action necessary to enforce this substance abuse policy including, but not limited to, the inspection of school issued lockers, desks, or other suspected areas of concealment, as well as personal property when the school has reasonable suspicion to believe the student, staff or faculty member has violated this policy. The use of a drug detection dog may also be used for searches. Capitol Beauty School also prohibits such conduct during non-curriculum time to the extent that, in the judgment of Capitol Beauty School, it impairs a student's ability to progress through the curriculum, threatens the reputation and/or integrity of the school or violates the law. Capitol Beauty School will refer violators to the authorities for prosecution consistent with local, state, and federal law. The penalties for drug possession can vary and are dependent on the kind and quantity of drugs or substances in possession, previous criminal history, and whether your charges are simple possession, which is for personal use, or possession with the intent to sell. Students and staff members who use prescription drugs should follow the prescribing physician's directions for use and all prescriptions are to be kept with the prescription bottle with name of person medication prescribed for. If use of a prescription drug may impair your performance or affect safety while performing course related services, you should notify your educator or immediate supervisor, so Capitol Beauty School can take appropriate action protect your safety and that of fellow students, coworkers, and guests. Any student or staff member found in violation of this policy is subject to suspension or expulsion from the program.

Below are some examples of different charges and penalties that might be faced:

- Dangerous Drug – Being charged with having a dangerous drug is a Class 4 felony. With no prior felony convictions and if the drug in possession was not meth or any kind of amphetamine, there is the possibility of being reduced to a Class 1 misdemeanor, along with a fine of at least \$2,000 or three times the value of the drugs in possession, whichever is the greater amount. Having no prior convictions, jailtime ranges from none to one-year, which could increase to up to 3.75 years having prior convictions.
- Narcotics – Possession of narcotics is a Class 4 felony. Having no prior convictions, charges might be reduced to a Class 1 misdemeanor, along with a fine of no less than \$2,000 or three times the value of the drugs in possession, whichever is greater. Having no prior convictions, jailtime ranges from none to a year and up to 15 years of imprisonment with having two prior convictions.
- Marijuana – Possession for personal use of less than 2 pounds of marijuana is a Class 6 felony, punishable by a minimum sentence of 6 months, a maximum sentence of 1.5 years, and a minimum fine of \$1000 or a fine to exhaust the proceeds of the drug offense
- DUI - Driving under the influence of drugs or alcohol is illegal for both adults and minors. Sanctions can vary, depending on previous offenses and severity of current offense, which may include fines, mandatory ignition interlock devices be installed in vehicle, and alcohol/drug treatment.

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

DRUG AND ALCOHOL TREATMENT FACILITIES:

FACILITY	STREET ADDRESS/WEB ADDRESS	PHONE
Omaha Treatment Center	11215 John Galt Blvd, Omaha NE 68137	402.592.5900
Complete Family Treatment Services	10846 John Galt Blvd, Omaha NE 68137	402.325.1290
Northpoint Omaha	8710 Frederick St #100, Omaha NE 68124	402.433.6036
Santa Monica Inc.	130 N 39 th St, Omaha NE 68131	402.558.7088

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

SUBSTANCE ABUSE PREVENTION PLAN

Capitol Beauty School does not tolerate drug and alcohol use and distributes the Substance Abuse Prevention Policy to each student during the admissions process and to new employees, through the Employee Handbook. The most current policy is published on Capitol website providing both students and employees instant access to view, email and print the policy. Annually, a message is sent directly to each student and employee with the most current policy attached, inviting both students and employees to read and review the Substance Abuse Prevention Policy including steps guiding them to the location of the policy. Capitol Beauty School also employs the use of a "Certified Narcotics Detection Team" including a private drug detection dog that may perform both announced and unannounced visits on campus including all classrooms, salon and spa areas, offices, student and staff locker contents and any other areas on campus. Any detection of an illegal substance will be fully investigated. The Student Catalog reads as follows:

"Capitol School standards of conduct prohibit the unlawful possession, use or distribution of drugs and alcohol by students and employees on the school's property, or as any part of school activities. Anyone possessing, using or distributing drugs or alcohol at Capitol school, will be terminated immediately and must follow any applicable appeal process for reinstatement. Re-enrollment will require receipt of written documentation, stating proof of treatment and release from an appropriate agency. The final decision for re-enrollment is left to the Director of Operations. As a condition of enrollment any student will notify the Director of Operations of any criminal drug statue convictions within five (5) days of such conviction. Failure to make notification within five (5) days could lead to immediate termination.

SECURITY CAMERAS

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

USE OF PHOTOGRAPHY AND VIDEOGRAPHY

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

VISITORS

Students, staff, and faculty may not receive visitors during school hours unless approved by a Department Director, under special circumstances. This policy includes the student lounge during breaks and lunch.

PARKING

Student parking is allowed in all assigned spaces as directed during orientation. Students may not park in client parking areas. Students are recommended to drive no more than 5mph and to carefully enter and exit the lot. Any collisions or fender benders must be handled independently by students' individual insurance companies.

CAMPUS SEARCHES

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

ACCESS POLICY

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

REGISTERED SEX OFFENDERS

Nebraska State Statute 29-4002 declares that sex offenders present a high risk to commit repeat offenses and that efforts of law enforcement agencies to protect their communities, conduct investigations, and quickly apprehend sex offenders are impaired by the lack of available information about individuals who have pleaded guilty to or have been found guilty of sex offenses and who live in their jurisdiction. Because of that, the legislature

determined that state policy should assist efforts of local law enforcement agencies to protect their communities by requiring sex offenders to register with local law enforcement agencies as provided by the Sex Offender Registration Act. Information can be found at: <https://sor.nebraska.gov/>

HATE CRIMES

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

TITLE IX

Title IX of the Education Amendments Act of 1972 is a federal law that states: "No person in the United States shall, based on sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance. Capitol Beauty School adheres to the specifications of Title IX. The Title IX Coordinator for Capitol Beauty School is Chelsea Claus. The Title IX Deputy is Nancy Meduna.

VAWA

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

TITLE IX AND VAWA POLICY

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

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

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

Capitol Beauty School's Title IX policy applies to all persons involved in the operation of the school and prohibits unlawful harassment by any employee, students, customers, vendors, or anyone who does business with the school. Any employee, student or contract worker who violates this policy will be subject to disciplinary action. To the extent, a customer, vendor, or other person with whom Capitol Beauty School does business engages in unlawful harassment or discrimination, Capitol Beauty School will take appropriate corrective action. This policy shall be disseminated to the school community through publications, the Capitol Beauty School website, new employee orientations, student orientations and other appropriate channels of communication. The school will respond quickly to all reports and will take appropriate action to prevent, to correct and if necessary, to discipline behavior that violates this policy. Additional information can be found on the Office of Civil Rights website at www.HHS.gov or call Toll Free: (877)969.6775.

DEFINITIONS

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

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

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

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

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

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

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

NON-DISCRIMINATION STATEMENT

The school in its admission, instruction and graduation policies does not discriminate based on age, sex, race, ethnic origin, color, religion, financial status, country or area of origin or residence, sexual orientation or on the basis of disability. Capitol Beauty School has designated Nancy Meduna of Capitol Beauty School as the Compliance Coordinator, to ensure the school's compliance. If a student believes that Capitol Beauty School has failed to provide these services or if a student believes they have been discriminated against on the basis age, assault, and stalking. sex, race, ethnic origin, color, religion, financial status, country or area of origin or residence, sexual orientation or on the basis of disability, a student can file a grievance with the Compliance coordinator, Capitol Beauty School Director, or the Office of Civil Rights at HHS.gov, by email: OCRComplaint@hhs.gov or Toll Free at 1.800.368.1019.

PROHIBITED CONDUCT

Capitol Beauty School will not tolerate prohibited conduct violations. Prohibited conduct violations will bring severe penalties, and the involvement of law enforcement, in some incidents. Also, be advised that carrying or using a firearm will have the swiftest and most severe penalties available to the academy.

- Students must obey federal, state, and local laws and the policies of Capitol Beauty School.
- Students are prohibited from making false statements and/or providing false information to Capitol Beauty School's personnel, including Title IX coordinators and investigators.
- Students shall not take pictures or videos of other students, guests, faculty, or staff without consent.
- Students are prohibited from bullying other students. If you see someone being bullied, intervene by telling them to stop or immediately report it to school personnel. Bullying is defined as bullying as any written, verbal, or physical act/electronic communication, including social media, intended to harm a student and will not be tolerated.
- Students are prohibited from possessing weapons or controlled dangerous substances on any school property or at any school function on or off school property.
- The obstruction of teaching; disrupting or obstructing teaching and learning is prohibited.

Disruptions are behaviors that continue after a warning and which a faculty member would view as being likely to interfere with the conduct of a class substantially or repeatedly.

Examples may include but are not limited to Unauthorized use of cell phones and electronic devices in the classroom and student clinics, persistent speaking without being recognized, talking with classmates while a faculty member or another student who has the floor) is talking, arriving late, leaving early, or leaving and returning to class while the course is in session without approval.

Capitol Beauty School has a zero-tolerance policy for drug and alcohol use. The manufacture, distribution, dispensing of, possession, use, sale, purchase, offer to buy/sell or use of alcohol, illegal drugs, or related paraphernalia and the illegal use of drugs (including the use of prescription drugs that cause impairment and medical marijuana) at Capitol Beauty School is prohibited.

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| • Tobacco | • Sexual Violence | • Fraud |
| • E-cigarettes | • Intimidation | • Damage of property |
| • Illegal drugs | • Retaliation | • Dishonesty |
| • Substance Abuse | • Violence | • Forgery |
| • Vaping indoors | • Weapons | • Physical abuse |
| • Drug paraphernalia | • Stalking | • Verbal abuse |
| • Gambling | • Theft | • Disorderly conduct |
| • Sexual harassment | • Harassment | • Discrimination |
| • Sexual misconduct | • Arson | • Alcohol |

COMPLAINT PROCEDURE

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

Capitol Beauty School Title IX Coordinator

Chelsea Claus

10803 John Galt Blvd

Omaha NE 68137

402.333.3329 extension 223

compliance@capitolomaha.com

Capitol Beauty School Title IX Deputy

Nancy Meduna

10803 John Galt Blvd

Omaha NE 68137

402.333.3329 extension 999

compliance@capitolomaha.com

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

TITLE IX COORDINATOR AND DEPUTY TRAINING

Capitol Beauty School's Title IX Coordinator and Deputies are trained in the Title IX policies and regulation through DL Training Solutions LLC. A module-based program, the Title IX Training is an online, asynchronous training consisting of an introduction, formal complaints, investigations, informal resolutions, hearings, determinations and appeals. The training is current as of August 2022. www.regionspccs.com

INVESTIGATION OF COMPLAINTS

In response to all complaints, Capitol Beauty School ensures prompt and equitable resolution through a reliable and impartial investigation of complaints, including the opportunity for both parties to present witnesses and other evidence. The time necessary to investigate will vary based on complexity but will generally be completed within sixty (60) days of receipt of the complaint. Capitol Beauty School shall maintain confidentiality for all parties to the extent possible, but absolute confidentiality cannot be guaranteed. In cases where a student/staff member does not give consent for an investigation, Capitol Beauty School will weigh the student/staff member's request for confidentiality against the impact on the school safety to determine whether an investigation must proceed. Complainants should be aware that in a formal investigation due process generally requires that the identity of the charging party and the substance of the complaint be revealed to the person charged with the alleged harassment. The preponderance of the evidence standard will apply to investigations, meaning Capitol Beauty School will evaluate whether it is more likely than not that the alleged conduct occurred. Both parties will receive written notice of the outcome of the complaint. During the investigation, the school will provide interim measures, as necessary, to protect the safety and wellbeing of employees/students involved. Reasonable academic accommodations will be provided during and after the alleged Title IX or VAWA offense.

If the school determines that unlawful harassment or sexual violence has occurred, immediate appropriate corrective action will be taken in accordance with the circumstances involved and the school will take steps to prevent the recurrence of any harassment or discrimination. Any employee or student determined by the school to be responsible for unlawful harassment or discrimination will be subject to appropriate disciplinary action, up to and including termination. To initiate a criminal investigation, reports of sexual violence should be made to "911" or local law enforcement. The criminal process is separate from the school's disciplinary process. To the extent that an employee or contract worker is not satisfied with the school's handling of a harassment or discrimination complaint, he or she may also contact the appropriate state or federal enforcement

agency for legal relief.

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

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

HEARINGS

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

DETERMINATION REGARDING RESPONSIBILITY

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

The written determination will include:

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

APEALS

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

1. Procedural irregularity that affected the outcome of the matter.

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

INFORMAL RESOLUTION

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

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

RECORDKEEPING

Capitol Beauty School will maintain for a period of seven years records of:

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

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

RETALIATION PROHIBITED

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

RESPONSE TO SEXUAL HARASSMENT

A recipient with actual knowledge of sexual harassment in an education program or activity of the school against a person in the United States, must respond promptly in a manner that is not deliberately indifferent. A recipient is deliberately indifferent only if its response to sexual harassment is clearly unreasonable in light of the known circumstances. Education program or activity includes locations, events, or circumstances over which the school exercised substantial control over both the respondent and the context in which the sexual harassment occurs, and includes any building owned or controlled by a student organization that is officially recognized by a postsecondary institution. The school will treat complainants and respondents equitably. The Title IX Coordinator must promptly contact the complainant to discuss the availability of supportive measures, consider the complainant's wishes with respect to supportive measures, inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the complainant the process for filing a formal complaint.

REPORTING REQUIREMENTS

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

RESPONSE TO A FORMAL COMPLAINT

In response to a formal complaint, Capitol Beauty School will follow a grievance process that complies with § 106.45. With or without a formal complaint. Emergency removal. The school may remove a respondent from the education program or activity on an emergency basis, provided that the school undertakes an individualized safety and risk analysis, determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal, and provides the respondent with notice and an opportunity to challenge the decision immediately following the removal. Administrative leave. A non-student employee respondent may be placed on administrative leave during the pendency of a grievance process.

ADDITIONAL INFORMATION

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

GRIEVANCE POLICY AND PROCEDURE

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

Procedural Items:

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

Composition: The Board of Grievances shall be comprised of three or more people from Capitol Beauty School's Administration and Educators. If for any reason the written grievance is filed against or regarding actions of an educator or administrative member that serves on the Board of Grievances, then that member shall be replaced by another educator or administrative member chosen by the School Director. Hearings Conducted by the Board of Grievances: The Board of Grievances shall conduct a hearing on the documents submitted and testimony of any relevant party. The student who filed the written grievance shall present his/her case first. Thereafter, the Board of Grievances shall permit the opposing party an opportunity to be heard. If a grievance is filed against the administration or an educator, a member of the administration or an educator appointed by the School Director may present the case on behalf of Capitol Beauty School. Both student and opposing party shall only be permitted one (1) hour to present his/her case, including all testimony. Thereafter, the Board of Grievances shall discuss the matter without the presence of the student or any opposing party until each member of the Board has made an independent decision. The Board of Grievances' decision shall be by majority rule and shall be the final decision made by Capitol Beauty School regarding the matter.

Arbitration: In the event any grievance is pursued beyond the Board of Grievances decision, student agrees and acknowledges that any matter concerning the Enrollment Agreement or Student Catalog must be submitted to a single arbitrator assigned by the American Arbitration Act ("AAA"). Any matter to be submitted to the AAA must be filed within five (5) days of the Board of Grievances decision. However, prior to pursuing binding arbitration, student must exhaust all means available through the Board of Grievances. The cost of any such arbitration shall be paid by the party pursuing such arbitration. The results of the arbitration shall be binding on the parties and shall preclude parties from seeking further litigation. The parties agree to make all reasonable efforts to ensure that any dispute going to arbitration shall be resolved within sixty (60) days of filing arbitration documents.

REQUIREMENTS FOR A GRIEVANCE PROCESS

1. Treat complainants and respondents equitably.
2. Require an objective evaluation of all relevant evidence.
3. Require that any individual designated by Capitol Beauty School as a Title IX Coordinator, investigator, decision-maker, or any person designated to facilitate an informal resolution process, not have a conflict of interest or bias. Title IX Coordinators, et. al. must receive proper training.
4. Include a presumption that the respondent is not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the grievance process.

5. Include reasonably prompt time frames for conclusion of the grievance process.
6. Describe the range of possible disciplinary sanctions and remedies that the school may implement following any determination of responsibility.
7. State the standard of evidence to be used to determine responsibility (preponderance of the evidence or clear and convincing evidence).
8. Include the procedures and permissible bases for the complainant and respondent to appeal.
9. Describe the range of supportive measures available to complainants and respondents; and not require, allow, rely upon, or otherwise use questions or evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege.

NOTICE OF ALLEGATIONS UPON RECEIPT OF FORMAL COMPLAINT

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

DIMISSAL OF FORMAL COMPLAINT

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

In the event that a grievance may not be resolved at the institutional level, a formal grievance may be filed with the National Accreditation Commission of Career Arts and Sciences (NACCAS) or Nebraska State Board of Cosmetology.

NACCAS	Nebraska State Board of Cosmetology
3015 Colvin Street, Alexandria, VA 22314	301 Centennial Mall South, Lincoln, NE 68508
703.600.7600	402.471.2399
www.naccas.org	https://dhhs.ne.gov/licensure/Pages/Cosmetology-and-Esthetics.aspx

INFORMATION ON RISK REDUCTION

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

STALKING

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

- Trust your instincts. If something doesn't feel right, tell someone (preferably Title IX Coordinator and/or law enforcement).
- Remove or don't post any personal contact information on social media and other websites.
- Don't give your passwords or log in information to anyone including your significant other.
- If someone tells you they don't want to communicate with you, or if they stop responding, take the hint and stop contacting them.
- Change your routes and routines. Be aware of your surroundings when walking to your vehicle.

SEXUAL ASSAULT

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

fault if you are sexually assaulted.

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

UNDERSTANDING AND OBTAINING CONSENT

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

SEXUAL HARRASSMENT

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

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

BYSTANDER INTERVENTION

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

1. Recognize signs that an act of sexual violence may occur or is occurring.
2. Identify that the potential victim is at risk and that intervention is appropriate.
3. Decide whether or not to take responsibility to intervene.
4. Decide the most appropriate and safest way to intervene.
5. Implement the decision to intervene safely to diffuse the situation.

STUDENT RECORDS & RIGHT OF ACCESS AND PRIVACY

Capitol Beauty School respects the privacy and security of your personal information and your educational records. Capitol Beauty School does not publish private student information; however, Section 99.37 of FERPA permits Capitol Beauty School to disclose, upon request, directory information (student's name, address, telephone number, date and place of birth, field of study, dates of attendance) without the student's consent unless the student has otherwise directed Capitol Beauty School, in writing. The school provides and permits access to student and other school records as required by the Arizona Board of Cosmetology. Student records are maintained for a minimum of three (3) years. Student records/files are only available to restricted staff, COE and certain government agencies may gain access to all students' files at any time.

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

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

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

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

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

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

STUDENTS RIGHTS: Capitol Beauty School guarantees each student (or parent/guardian of dependent minors) the right to access their records and to consent to or withhold the disclosure of Personally Identifiable Information (PII). Capitol Beauty School does not currently produce a student directory; however, should a directory be published in the future you will have the right to withhold PII from it. Such a request should be made in writing to the School Director. You have the right to inspect and review your educational records. Requests must be made in writing and will be complied to within 45 days of the request. During a review of your educational records, if you find an item(s) you feel to be inaccurate, misleading, or otherwise in violation of your privacy rights under FERPA, you may submit a written request, including any supporting documentation that proves the information is incorrect, to the Director of Student Services to amend the information. A written response explaining the outcome of the request will be provided. If you feel Capitol Beauty School has failed to comply with the requirements of FERPA, you have the right to file a written complaint with the U.S. Department of Education concerning the alleged failures. Written complaints should be mailed to: Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Avenue, SW, Washington, DC 20202.

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

COPYRIGHT INFRINGEMENT

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

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

PREVENTION OF UNAUTHORIZED DISTRIBUTION OF COPYRIGHTED MATERIAL

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

SANCTIONS

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

ANNUAL DISCLOSURE

Capitol Beauty School's Copyright Infringement policy is included in the Student Catalog. The Student Catalog is distributed to the student upon enrollment. This information is also accessible on the Capitol Beauty School website under Compliance.

ALTERNATIVES TO ILLEGAL FILE SHARING

Capitol Beauty School does not block access from campus to all legitimate sources of copyrighted material. Although we cannot maintain an up-to-date list of alternatives, we point students to the Educause list at www.educause.edu.

MAINTENANCE OF PLAN

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

STATEMENT OF NON-DISCRIMINATION AND ACCOMMODATION

Capitol Beauty School does not discriminate on the basis of disability in its admissions practices or other policies. The licensing requirements and physical expectations for courses offered at the school may restrict some applicants. Questions regarding licensing requirements and the physical expectations of the industry may be answered by the School Director and/or Director of Education. Capitol Beauty School is committed to providing accommodations for enrolled students who have documented disabilities and are entitled to a reasonable accommodation to ensure that they have full and equal access to the educational resources at Capitol Beauty School under Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) ("Section 504") and the Americans with Disabilities Act of 1990 (42

U.S.C. § 12182) ("ADA") and their related statutes and regulations. Section 504 prohibits discrimination on the basis of disability in any program or activity receiving federal financial assistance. The ADA prohibits a place of public accommodation from discriminating on the basis of disability. The applicable law and regulations may be examined in the office of the ADA Compliance Coordinator, who has been designated to coordinate the efforts of the Institute to comply with Section 504 and ADA. It is the responsibility of the student to seek available assistance at Capitol Beauty School and to request reasonable accommodations prior to the first day of the program. Additionally, Capitol Beauty School is not obligated to provide accommodations that fundamentally alter any of the school's programs. In a case where the request is unreasonable, the coordinator will promptly search for an equally effective alternative for the student that would not alter the program fundamentally and offer this accommodation to the student.

ADA Compliance Coordinator:

Kelly Meduna, Director of Student Services

10803 John Galt Blvd, Omaha NE 68137

402.333.3329 ext 777

kelly@capitolomaha.com or compliance@capitolomaha.com**HANDICAPPED ACCESS**

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

REQUESTS FOR ACCOMMODATION

Individuals with disabilities wishing to request a reasonable accommodation must contact the ADA Compliance Coordinator. A disclosure of a disability or a request for an accommodation made to a faculty or staff member, other than the ADA Compliance Coordinator, will not be treated as a request for an accommodation. However, if a student discloses a disability to faculty or staff member, he or she is required to direct the student to the ADA Compliance Coordinator. The ADA Compliance Coordinator will provide a student or applicant with a Request for Reasonable Accommodations form. Reasonable accommodations are available for students and applicants who provide the appropriate documentation of a disability. Such documentation should specify that a student has a physical or mental impairment, how that impairment substantially limits one or more major life activities and how the disability affects the student's functions in a learning environment (academic*, attendance or both). In general, the supporting documentation must be dated less than three years from the date a student requests reasonable accommodation (may be waived upon Director of Student Services approval) and must be completed by a qualified professional in the area of the student's disability as enumerated in the following table:

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

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

Capitol Beauty School may request additional documentation as needed and may, at its discretion, waive the requirement for medical documentation to support accommodation requests that relate to obvious impairments and/or are minimal in nature. Requested accommodations which compromise the essential elements of the course of study, may not be reasonable. Students must seek assistance prior to the start of the course of study. Prospective students who fail to seek reasonable accommodations at the beginning of the course of study may find that the scope of available accommodations becomes limited. After the ADA Compliance Coordinator receives the Request Form and the required documentation, he/she will engage the student or applicant in an interactive process to determine what available accommodations may be reasonable. If the student or applicant is denied the requested accommodation, he/she may file a grievance using the Grievance Process below or he/she may file a complaint with the U.S. Department of Education's Office for Civil Rights or a similar state entity. Capitol Beauty School will make appropriate arrangements to ensure that disabled persons are provided other accommodations, if needed, to participate in this grievance process. The ADA Compliance Coordinator will be responsible for such arrangements.

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

TITLE VI POLICY

Title VI of the Civil Rights Act of 1964 is a federal law that prohibits discrimination on the basis of race, color or national origin in any program and activity that receives federal funding or other federal financial assistance. Title VI States that: No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial Assistance. The policy of Capitol Beauty School is to comply with Title VI of the Civil Rights Act of 1964 and its regulations that prohibit unlawful discrimination based on race, color, sex, age, disability, and national origin. The Title VI Compliance Officer is the School Director at Capitol Beauty School, who has been appointed to coordinate the efforts to comply with the law. Any person who believes that he or she has been subjected to discrimination or retaliation based on their race, color, sex, age, disability, or national origin may file a Title VI complaint. Complaints may be filed directly to the School Director. Complaints must be filed within 180 days of the date of the alleged discriminatory act.

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

COMPLAINT PROCEDURE

Notify the School Director as soon as possible after the incident.

Kylie Rader msrader@capitolomaha.com or compliance@capitolomaha.com 10803 John Galt Blvd Omaha NE 68137 402.333.3329 x 999

STUDENT RESOURCES/ HELP LIST

A student can obtain a hard copy in the Student Services office.

ORGANIZATION	PHONE	WEBSITE
Nebraska Self Help Organization	See Website	https://www.legalaidofnebraska.org/how-we-help/resources/
Omaha Crime Stoppers	402.444.7867	http://www.omahacrimestoppers.org/
Nebraska Coalition to End Sexual and Domestic Violence	402.476.6256	https://www.nebraskacoalition.org/
Child Abuse Hotline	800.422.4453	childhelp.org
Alcoholics Anonymous	See Website	www.aa.org
Narcotics Anonymous	818.773.9999 x 133	www.na.org
Marijuana Anonymous	800.766.6779	www.marijuana-anonymous.org
Gamblers Anonymous	402.235.9979	www.gamblersanonymous.org
Suicide Prevention Lifeline	800.273.8255	suicidepreventionlifeline.org
Mental Health Assoc. of Nebraska	402.441.4371	https://mha-ne.org/
Eating Disorder Treatment CCA Omaha	402.932.2296	https://www.ccaomaha.com
Overeaters Anonymous	505.891.2664	www.oa.org
Homeless Shelter Sienna Francis House	402.341.1821	https://sienafrancis.org/
Apply for Food stamps	800.221.5689	https://dhhs.ne.gov/Pages/SNAP.aspx
Veterans Crisis Line	800.273.8255	www.veteranscrisisline.net

EMERGENCY PROCEDURES

In the event of emergency, fire, inclement weather, evacuation or shelter in place, students and employees are alerted by verbal announcement from Capitol's Leadership Team and/or Faculty member.

- In the event of fire or other emergency requiring evacuation of the facility, all students, staff, faculty, and guests shall evacuate immediately by direction of a leadership team member.
- In the event of an emergency, faculty, staff, students, and clients shall evacuate by means of the nearest available marked exit.
- Portable fire extinguishers are provided in the school for employee use. In the event of fire, any employee may use extinguishers to attempt to extinguish the fire before evacuating. Extinguishers are in the front lobby, spa and salon clinic, salon dispense, hot storage room, student lounge and staff lounge (under the sinks).
- In the event of an emergency, the following employees are to remain in the school to shut down or monitor critical operations before they evacuate: School Director, Director of Education, and the Director of Student Services.
- After an emergency evacuation, students and employees are to gather in the northeast corner of Capitol's parking lot (corner of 108th and John Galt, closest to the large Capitol sign).
- After an emergency evacuation, the procedure for accounting for all students and employees is that all employees will check-in with their direct supervisor, all students will check-in with their educator they were assigned to when they evacuated the building.
- In the event of an emergency, leadership team member is responsible and will immediately call 9-1-1.
- First aid kits are available in each classroom, student salon, student spa and are replenished periodically by the Operations Department. If you have hurt yourself or witnessed an accident, immediately notify a staff member and submit an incident report to the Compliance Coordinator.
- Tornado Warnings: Faculty, students, and clients are to move to the basement via the doors nearest the West exit of the building near the Esthetics area restrooms.

SHELTER IN PLACE PROCEDURE

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

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

LOCKDOWN

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

- Faculty, staff, students, and clients will be notified by the leadership team and/or faculty that we are in "lock down mode". This message will be communicated via the public address system, stating "Lockdown".
- Leadership team member is responsible and will immediately dial 9-1-1.
- In the event of a lockdown, faculty, staff, students, and clients will be instructed to secure themselves in the room they are in and not leave until the situation has been curtailed.
- All faculty, staff, students, and clients in classrooms should remain there and close all doors.
- Faculty will perform roll call to account for all students, all employees will check-in with their direct supervisor.
- All entrances and exits to the school will be locked by a member of the leadership team.
- When it is safe, a member of the leadership team will perform a "walk-through" to notify students, staff, faculty, and clients that the threat is gone, and the doors will be unlocked.

Leadership Team Members

CEO
School Director
Student Services Director
Director of Admissions
Financial Aid Manager
Director of Esthetics
Cosmetology Education Directors

TIMELY WARNING POLICY

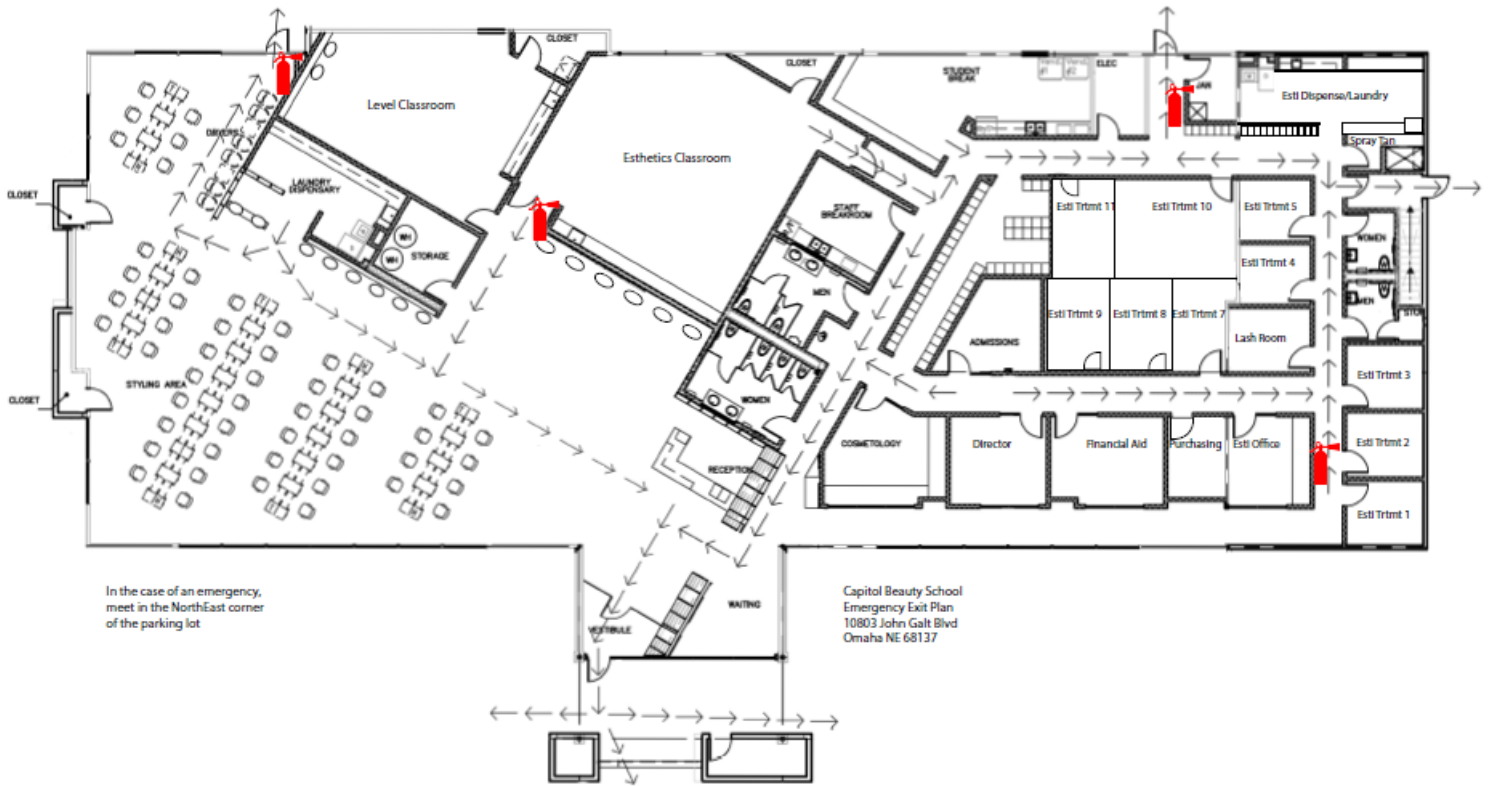
The Timely Warning Alarm differs from the notification of a 'emergency', the catalyst differs from crime, such as violent crime against a person or substantial crime against property, rather than an immediate threat to health and safety of students and employees such as a weather emergency or power failure.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

SAFETY AND SECURITY MEASURES

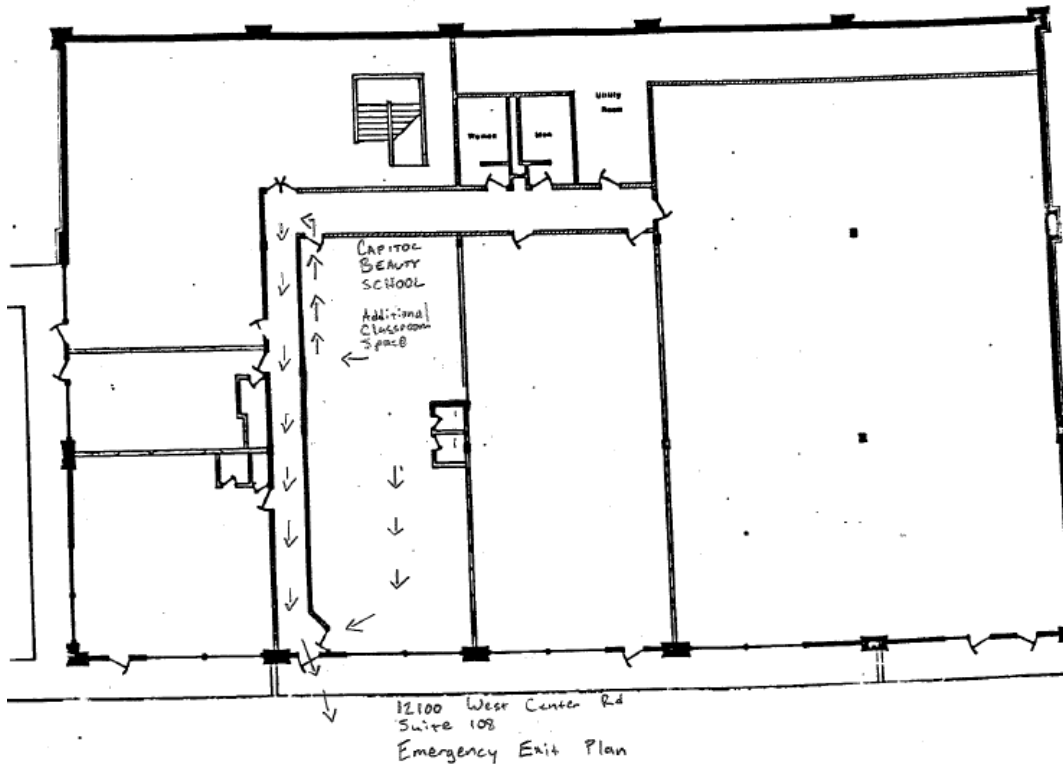
- **Fire Alarms, Lockdown and Shelter in Place Drills** - Practice drill, announced and unannounced, are held periodically throughout the year to practice proper evacuation procedures and where to gather in the case of an emergency, these drills are scheduled and led by the Student Services Department.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

FIRE SAFETY REPORT: Since opening at its current location May 2010, Capitol Beauty School has zero fire related incidents causing injury to a person or property. Please refer to Emergency Evacuation diagram on the following page.

Emergency Evacuation Plan
 Capitol Beauty School
 10803 John Galt Blvd, Omaha, NE 68137



Additional Classroom Space
 BelAir Plaza – 12100 West Center Road, Suite 108, Omaha NE 68144



Campus Safety and Security Survey Completion Certificate

The Campus Safety and Security data for
Capitol Beauty School

(365693)

were completed and locked on **September 29, 2023**.

Thank you for your participation in the 2023 data collection.

This certificate was prepared on **September 29, 2023**