



**BROWN
AVEDA INSTITUTE**

**BROWN AVEDA INSTITUTE
ANNUAL SAFETY AND SECURITY REPORT
Including Clery Act Disclosures of Campus Security Policy and Crime Statistics
Mentor and Strongsville Campus Reporting
Including Calendar Year 2020, 2021 and 2022 Crime Statistics
Published October 1, 2023 (Revision September 20, 2022)**

To maintain compliance with Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (“Clery Act”), Higher Education Act (“HEA”) requirements, and related statutes and regulations, and in an effort to continuously promote and improve safety and security measures on campus, the Brown Aveda Institute (“Institute”) collects and publishes information regarding the Institute’s security policies, services and crime statistics. Once collected, the information is presented annually in this Annual Safety and Security Report (“Report”) to prospective and current students, faculty and staff and to the public by the Institute’s Campus Security Survey Administrator. Any questions about this report should be directed to Barb Bader, Corp. Director Student Services, who serves as the Campus Security Survey Administrator at (440) 255-9494 ext. 122 / bbader@brownaveda.com.

I. COMPLETION AND DISSEMINATION OF THE REPORT

Prior to October 1 of each year, the Institute compiles this Report based on crime, arrest and referral information obtained from local law enforcement agencies and as reported to the Institute’s designated campus security authorities (including Campus Security Survey Administrator, School Director and Title IX Coordinator). All crime statistics contained in this Report are for Clery Act reportable crimes occurring on the Institute’s campus, as defined by 34 C.F.R. § 668.46(a), and on public property, including thoroughfares, streets, sidewalks, and parking facilities, within the campus or immediately adjacent to or accessible from the campus. The Report also includes the Institute’s current policies required pursuant to 34 C.F.R. § 668.46 and the Violence Against Women Reauthorization Act of 2013 (VAWA), Pub. Law 113-4.

Institute administrators prepare this Report, which includes reported campus crime, arrest and referral statistics, to local law enforcement agencies and designated campus officials. Additionally, the Institute reviews crime reports from local law enforcement agencies whenever published and maintains incident reports. Both of these sources of information are utilized in the review process regarding the annual report, and this information is retained by Barbara J Bader, Corporate Director of Student Services.

The Institute distributes this Report to all enrolled students and current employees via a notice by U.S. Postal Service, campus mail and/or electronic mail or text notifying them that the current version of the Report has been posted to the Institute’s web site at <https://www.brownaveda.com/security-report/> and that a paper copy of the Report will be provided upon request by contacting the Administrative Offices of the Mentor Campus at (440) 255-9494, ext. 122 and Strongsville Campus at (440) 255-9494, ext. 403. The Admissions Department provides written notice to all prospective students prior to enrollment regarding the availability and location of the Report. The Human Resources Department provides all prospective employees with information regarding the availability and location of the Report. All prospective employees may receive a copy of the Report by calling the Human Resource Office at (440)255-9494, ext.

453. In addition, a copy of the current Report is made available to the public on the Institute's website at <https://www.brownaveda.com/security-report>.

The crime statistics contained in this Report, as reported annually to the U.S. Secretary of Education, can also be viewed by searching the Institute's name at <http://nces.ed.gov/collegenavigator/>

II. GEOGRAPHICAL AREA: DESCRIPTION OF THE CAMPUS

The Clery Act requires each institution to disclose crime statistics that occur on three types of property: campus, non-campus buildings or property, and public property areas.

"Campus" is defined in 34 CFR 668.46(a) as any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to the institution's educational purposes. It also includes any building or property in that contiguous area owned by the institution but controlled by another person, if that property is used by students and supports institutional purposes (e.g. a food or retail vendor).

"Public property" is defined in 34 CFR 668.46(a) as public property that is located within the same reasonably contiguous geographic areas of the campus, like a sidewalk, street, or public parking lot, that is adjacent to a facility owned or controlled by the institution for purposes related to the institution's educational purposes. Crimes occurring on "public property" must also be reported in the crime statistics. In order for this definition to apply, the property in question must satisfy all three conditions: (1) public (e.g., publicly owned); (2) within or immediately adjacent to campus; and (3) accessible from campus. This definition excludes any private property.

A "non-campus building or property" is defined in 34 CFR 668.46(a) as any building or property owned or controlled by a school recognized student organization, or one that is owned or controlled by the institution and used by students or by the institution for education-related purposes and that is not within the same reasonably contiguous geographic area of the campus. Crimes occurring on "non-campus property" must be reported. However, incidents occurring on public property adjacent to "non-campus buildings or property" do not have to be included. The Institute does not have any non-campus property.

III. POLICIES FOR REPORTING AND RESPONDING TO CRIMES AND EMERGENCIES

Community members, students, faculty, staff, and guests are encouraged to report all crimes and public safety related incidents in an accurate and prompt manner.

Students and staff are encouraged to report all criminal offenses and emergencies to one of the individuals who is a Campus Security Authority (CSA). Anyone designated as a CSA will be able to assist a victim in filing a police report. The information will also be included in the campus crime statistics. At that time, the Institute will also determine whether there is a need for a timely warning to the entire campus or, in the case of an emergency, the Institute will determine whether an emergency notification should be issued.

The following individuals are defined according to the Clery Act as campus security authorities for the institute.

Campus	Name/Title	Contact Information
Mentor Campus	Barbara Bader, Corporate Director of Student Services	(440) 255-9494, Ext. 122, bbader@brownaveda.com
Strongsville Campus	Maggie Dauenhauer, Manager of Admissions & Placement	(440) 255-9494 ext. 402 www.brownaveda.com

A. STUDENT, FACULTY AND STAFF REPORTING PROCEDURES

1. Reporting Emergencies

“Emergency” includes any dangerous situation involving immediate threat to the health or safety of students, faculty, staff or guests occurring on or near the campus, including fire.

Upon observing or involvement in any type of emergency, students, faculty, staff and guests should immediately call **911**.

If possible, information about the emergency should also be communicated immediately to the School Director or other available Institute staff for purposes of expediting the Institute’s activation of its Emergency Response and Evaluation Procedures as set forth in Section II.B.3.

2. Reporting Crimes

Crimes that should be reported to the School Director or other CSA by students, faculty and staff include: murder and non-negligent manslaughter, manslaughter by negligence, rape, fondling, incest, statutory rape, dating violence, domestic violence, stalking, sexual assault, robbery, aggravated assault, burglary, motor vehicle theft, arson, drug and alcohol violations, illegal weapons possession and hate crimes of larceny-theft, simple assault, intimidation, and destruction/damage/vandalism of property. Where there is any question about whether an incident is a crime, a report should be made to the School Director or other CSA for assistance in determining the nature of the incident. Witnesses or victims of crimes may report crimes on a confidential basis for inclusion in the Institute’s annual crime statistics reporting.

Upon observing or involvement in any type of crime on campus or on public property, including thoroughfares, streets, sidewalks, and parking facilities, within the campus or immediately adjacent to or accessible from the campus:

- ***A student should immediately notify the School Director, other CSA or the nearest available Institute faculty or staff. All Institute faculty and staff are trained to notify the Campus Security Survey Administrator or School Director (or his/her on-site designee) immediately of all crimes reported to them by students.***
- ***Faculty and staff should immediately notify the School Director (or his/her on-site designee) or other CSA.***
 - ***School Director – Mentor Campus: Monica Camp (440) 255-9494, Ext. 145; email @ monica.sanders@brownaveda.edu***
 - ***School Director – Strongsville Campus: Rachel Carr (440) 255-9494, Ext. 404; email @ <mailto:rcarr@brownaveda.com>***

The Institute strongly encourages individuals to report all crimes in an accurate and timely manner to local law enforcement agencies. Upon written request, the Institute will disclose to the alleged victim of a crime of violence (as that term is defined in section 16 of title 18, United States Code), or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by the Institute against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

B. INSTITUTIONAL RESPONSE PROCEDURES

1. Response to Reports of Crime or Emergency

Upon receipt of a report of a crime or emergency, the School Director or his/her designee will:

- Immediately assess, based on his/her own judgment or after consultation with other Institute employees, whether the situation warrants contacting 911 and/or following the emergency response and evacuation procedures contained in Section II.B.3.
- Immediately assess, based on his/her own judgment and/or after consultation with other Institute employees or the local police, whether a “timely warning” to the campus community should be issued pursuant to the Timely Warning policy in Section II.B.2.
- With regard to a reported incident that is or may be a sex offense, immediately contact the Institute’s Title IX Coordinator who has authority to evaluate and respond to the reported sex offense in accordance with the Institute’s Sexual Harassment and Sex Offenses Policies and Procedures contained in Section X.
- For all reported crimes, the School Director will contact the Campus Security Survey Administrator within 24 hours of the incident to provide all available and relevant information including the date, time, location, and description of the incident.
- The School Director will cooperate with the Campus Security Survey Administrator and/or Title IX Coordinator to investigate and gather any additional information necessary to determine whether the incident must be reported in the crime statistics contained in this Report.

2. Timely Warning of Reported Crime

In the event that a situation arises, either on or off campus, that, in the judgment of the School Director, constitutes an ongoing or continuing threat to students and employees, including with regard to any crime reportable pursuant to the Clery Act, a campus wide “timely warning” will be issued. Depending on the particular circumstances of the crime, especially in all situations that could pose an immediate threat to the students and employees, the Institute will post a warning via one or more of the following means of communication: local television station or other appropriate local media, email or text message and/or verbal or written notice.

The intent of a timely warning is to provide adequate information necessary to enable the campus community to protect themselves when a significant emergency or dangerous situation occurs. The content of the timely warning will not disclose information that may compromise law enforcement

efforts. **Anyone with information warranting a timely warning should report the circumstances to the School Director or his/her on-campus designee by phone at 440-255-9494 or in person.**

3. Emergency Response and Evacuation Procedures

In the case of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students, employees, or clients occurring on campus or on public property, including thoroughfares, streets, sidewalks, and parking facilities, within the campus or immediately adjacent to or accessible from the campus, as confirmed by the School Director or their on-campus designee after consultation with others as appropriate, such that it is deemed necessary to close, evacuate or lock down all or portions of the Institute's buildings, the following procedures are implemented:

- **The emergent situation will be assessed by the School Director, or in his absence, his/her on-site designee, in cooperation with other individuals or law enforcement as appropriate. Should the determination be made that the situation justifies total or partial closure, evacuation or lockdown of the school, a call will immediately be made to 911. A determination will be made relative to characteristics of emergency as to what segment of the campus community must be notified and what portions of the campus will be evacuated or locked down.**
- In the event the building needs to be evacuated or locked down for any reason, maps of the evacuation route have been posted in each office, common areas, clinic and classroom.
- The Institution will, without delay, and taking into account the safety of the students, staff, faculty, guests and the community, determine the appropriate content of the notification and initiate the emergency notification system to the appropriate segment or segments of the campus community, unless the notification will, in the professional judgment of responsible authorities, compromise efforts to assist victims or to contain, respond to, or otherwise mitigate the emergency.
- The emergency notification will be disseminated to the campus community by one or more of the following: verbal on-site announcement, activation of a fire alarm, email, text or other means appropriate to quickly notify the relevant segment of the campus community. The School Director or his/her designee will notify the local police, fire or other appropriate first responder to assist with the emergency.
- The procedure for disseminating emergency information to the larger community includes notice to the local police and or fire department, and, where appropriate, the local media.
- Depending on the situation, additional alerts will be disseminated as information becomes available

Evacuations to safe locations will be implemented when necessary and proceed in an organized manner per policy and procedure. This policy and procedure can be obtained from the Operations Manual located in the Administrative Office. in the Operations Manual. All students are required to comply with the plan and the directions given to them by campus safety staff, faculty, or public emergency response teams or law enforcement agencies during actual emergencies and drills for their personal safety. At no time during an actual campus emergency or drill shall students be permitted to leave the campus unless directed to do so.

The Institute tests its emergency response and evacuation procedures at least once annually on an announced or unannounced basis. When tests are conducted, the Institute publicizes its emergency response and evaluation procedures to students, faculty, and staff, including making available a copy of this policy. The Institute maintains documentation of each test exercise including date and time performed and whether announced or unannounced will be completed immediately following testing.

IV. SCHOOL CLOSURES – NON-EMERGENCY

Upon a decision by the School Director, after consultation with other Institute officials as appropriate, to close a campus for any reason, including for weather related reasons, the Institute will use email, text message and local television news stations as the primary means to communicate this information to faculty, staff and students as soon as possible after the closure decision is made.

V. POLICY STATEMENT ADDRESSING COUNSELORS AND COUNSELING SERVICES

There are no Pastoral or Professional Counselors on Campus. Crisis, Mental Health and Victim Resource Hotline numbers are posted at the Mentor and Strongsville Campuses in the student lunch rooms as well as listed in the Student Manual should students need to contact these agencies. Section X of this policy addresses the Institute's policies with respect to support services and confidentiality of victims of sexual violence.

VI. ACCESS POLICY, SECURITY OF CAMPUS FACILITIES, AND SECURITY CONSIDERATIONS USED IN THE MAINTENANCE OF CAMPUS FACILITIES

The Institute does not maintain residential housing facilities and does not have any officially recognized student organizations with noncampus locations. Campus Buildings are open to staff, faculty and/or students during business hours Monday 5:30pm - 9:45pm, Tuesday – Thursday 9:00am to 9:45pm; Friday 9:00am – 4:30pm, Saturday 8:15am to 5:00pm. During non-business hours access to each Campus is by key fob and a security code only or by admittance via a designated staff member for the purpose of staff use, maintenance or cleaning. Security cameras are posted in main areas and doorways for monitoring purposes.

VII. CAMPUS LAW ENFORCEMENT AND RELATED POLICIES

The Institute does not employ security personnel or campus police. Institute employees have no authority to arrest or detain any individual. The Institute will assist in notifying appropriate law enforcement authorities if a student requests assistance in contacting police. Students, faculty, and staff are encouraged to accurately and promptly report all crimes and public safety related incidents to the Institute and to notify local police.

If you are a victim of or witness to a crime and do not want to pursue action through the Institute's procedures or the criminal justice system, the Institute encourages you to consider reporting the incident to the School Director (or his/her designee) or other CSA for the limited purpose of permitting the Institute to include the incident in its crime statistic reporting without revealing your identity. With such information, the Institute can keep an accurate record of the number of similar incidents, determine where there is a pattern of crime with regard to a particular location, method, or assailant, and alert the campus community to potential danger. The Institute will make best efforts, to the extent permitted by law, to maintain the privacy of that information and to comply with the Family Educational Rights and Privacy Act of 1974 (FERPA). Police reports are public records under state law, the Institute cannot hold

reports of crime obtained from police records in confidence. Policies with respect to victims of sexual violence are contained in Section X.

VIII. SECURITY AWARENESS AND CRIME PREVENTION PROGRAMS

During new student and new employee (faculty and staff) orientations, individuals are informed of the Institute's current security and crime prevention policies and practices as well as the protection of personal safety and prevention of crime. Such orientations may include a Power Point presentation and/or review of the policies contained in this Report and the Student Manual. The presentations include training required by Title IX of the Higher Education Act regarding preventing and responding to sexual harassment, among other topics as contained in Section X. Should time be of the essence regarding security awareness, information may be released to the Campus community through the timely warning procedures contained in this Report.

The Institute encourages all students, faculty and staff to observe and practice common safety precautions.

IX. ORDERS OF PROTECTION

The Institute abides by Orders of Protection (Restraining Orders). Orders of protection are generally issued by a domestic relations or municipal court to protect a person or entity, and the general public, in a situation involving alleged assault, domestic violence, harassment, stalking or sexual assault. In the State of Ohio,
https://www.supremecourt.ohio.gov/JCS/domesticViolence/protection_forms/DVForms/default.asp.

Implementation of Order of Protection- The Court Order is given to the Title IX Coordinator:

Mentor Campus: Barbara Bader, Corporate Director of Student Services, 8816 Mentor Ave., Mentor, OH 44060 (440) 255-9494, Ext. 122, bbader@brownaveda.com

Strongsville Campus: Rachel Carr, Institute Director, 17901 Southpark Center, Space 160, Strongsville, OH 44136 (440) 255-9494, Ext. 109, rcarr@brownaveda.com

The Title IX Coordinator is required to provide the picture of the subject to all Experience Area Staff members, the Educational Staff and the Administrative office personal.

X. POLICY ON POSSESSION, USE AND SALE OF ALCOHOLIC BEVERAGES AND ILLEGAL DRUGS

All Institute property has been designated drug and alcohol free and the Institute is committed to full compliance with the Drug Free Workplace Act and the Drug-Free Schools and Communities Act regulations as contained in 34 C.F.R. Part 86.

Students and employees are prohibited from the unlawful manufacture, distribution, dispensing, sale, purchase, possession or use of illegal drugs and alcohol anywhere on the Institute's property including grounds, parking areas, anywhere within the building, or while participating in any of the Institute's officially sponsored or related activities. Students and employees are also prohibited from being under the influence of alcohol, illegal drugs or any other substance that could adversely affect the health, safety, or welfare of the students and employees on the Institute's property or at any of its officially sponsored activities. This includes all forms of marijuana.

Disciplinary Sanctions: Illegal possession or use of drugs or alcohol can have penalties, including loss of Title IV eligibility, community service, suspension, participation in a substance abuse rehabilitation program, jail time, and fines. The Institute will impose disciplinary sanctions on students and employees consistent with federal, state, local laws and ordinances. Students who violate the Institute’s prohibitions against drug and alcohol are subject to disciplinary actions up to and including termination of their enrollment at the institute. Employees who violate the prohibitions against drugs and alcohol are subject to disciplinary action up to and including immediate termination of their employment. Federal, state and location violations will be properly adjudicated by the appropriate government agency.

As a condition of enrollment or employment, students and employees must abide by the standards contained in this policy or the Institute will take one or more of the following actions with respect to any student or employee who violates this standard:

- reporting the violation to law enforcement officials;
- taking appropriate disciplinary action against such student or employee, up to and including expulsion or termination of employment; and
- requiring such student or employee to participate in a substance abuse rehabilitation program approved for such purposes by a federal, state, local health, law enforcement or other appropriate agency.

Reporting of Violations to Local and/or State Law Enforcement: The Institute may report to local and/or state law enforcement, as may be required by federal and state drug laws, any student who is found in possession of, using, or selling illegal drugs on campus as well as anyone who is found to have broken the state laws regarding underage drinking.

Drug and Alcohol Laws: The possession, sale, or the furnishing of alcohol and/or illegal drugs on the Institute’s campus or during Institute sponsored activities is also governed by state and federal laws. The unauthorized possession, sale, manufacture, or distribution of any controlled substance is illegal under both state and federal laws. The possession of alcohol by anyone under 21 years of age in a public place or a place open to the public is illegal under state law. The enforcement of federal and state alcohol/illegal drugs laws on-campus is the primary responsibility of the local police department and violators may be subject to arrest, criminal prosecution, fine and/or imprisonment.

In accordance with federal regulations, the Institute reviews at least biennially to determine the effectiveness of this policy to ensure consistent enforcement of applicable drug and alcohol related statutes, ordinances, and institutional policies against students and employees found to be in violation. Annual Review reports and supporting documents will be maintained by the Institute and made available upon request. Students or employees with any questions concerning this policy should contact: Barbara J Bader, Corporate Director of Student Services; 8816 Mentor Ave., Mentor, OH 44060 (440) 255-9494, Ext. 122, bbader@brownaveda.com

XI. ALCOHOL AND SUBSTANCE ABUSE EDUCATION

At least on an annual basis, students, faculty and staff are provided with a copy of the Institute’s Policy on Possession, Use and Sale of Alcoholic Beverages and Illegal Drugs, in Section VIII, the Institute’s alcohol and substance abuse programs, described in Section IX, health and safety concerns with drug abuse, and counseling and assistance resource information. New students, faculty and staff are provided this information during orientation. In addition, annually students are provided this information by means of the current Student Manual, publication of this Report and material posted on campus. Current faculty and staff are provided this information during their annual review and through publication of this Report.

The Institute may also refer students, faculty or staff in violation of the Institute’s policy to substance abuse education or rehabilitation programs as a condition of continued enrollment or employment.

XII. Title IX POLICY

Brown Aveda Institute (the “Institute”) is committed to providing a work and educational environment free of unlawful harassment, discrimination, and retaliation. In accordance with Title IX of the Education Amendments of 1972, the Institute does not discriminate on the basis of sex in its education programs or activities, which extends to admission and employment. The Institute also prohibits Sexual Harassment (as defined below) committed against persons in the United States as part of its education programs or activities. If you believe that you have experienced or witnessed other incidents of sexual misconduct or discrimination, please follow the procedures outlined in the Institute’s Code of Conduct Policy.

The Institute reserves the right to make changes to this policy as necessary, and once those changes are posted online, they are in effect. If government laws, regulations or court decisions change requirements in a way that affects this policy, the policy will be construed to comply with the most recent government regulations or holdings.

Title IX Coordinator

The Title IX Coordinator coordinates the Institute’s efforts to comply with its Title IX responsibilities.

Title IX Coordinator:

Mentor Campus: Barbara Bader, Corporate Director of Student Services, 8816 Mentor Ave., Mentor, OH 44060 (440) 255-9494, Ext. 122, bbader@brownaveda.com

Strongsville Campus: Rachel Carr, Institute Director, 17901 Southpark Center, Space 160, Strongsville, OH 44136 (440) 255-9494, Ext. 109, rcarr@brownaveda.com

The Title IX Coordinator is responsible for implementing the Institute’s Title IX policy, intaking reports and Formal Complaints of Sexual Harassment, providing supportive measures and maintaining accurate Clery Act crime statistics.

Any person can report sex discrimination, including Sexual Harassment (whether or not the person reporting is the alleged victim) in person, by mail, telephone, or e-mail, using the contact information listed above for the Title IX Coordinator. A report can be made at any time, including during non-business hours. However, responses to reports made outside of business hours, including during weekends and holidays, may be delayed.

Key Definitions

Sexual Harassment: Conduct on the basis of sex that satisfies one or more of the following:

1. An employee of the Institute conditioning educational benefits or participation on an individual’s participation in unwelcome sexual conduct (i.e. quid pro quo);
2. Unwelcome conduct that a reasonable person would determine is so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the Institute’s education Program or Activity; or

3. Sexual Assault (as defined in the Clery Act), or Dating Violence, Domestic Violence or Stalking as defined in the Violence Against Women Act (VAWA) (collectively referred to as “Sexual Violence”)*:

- **Sexual Assault:** As defined in 20 U.S.C. 1092(f)(6)(A)(v), means an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation¹.
- **Dating Violence:** As defined in 34 U.S.C. 12291(a)(10), means violence committed by a person (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: the length of the relationship; the type of relationship; and the frequency of interaction between the persons involved in the relationship.
- **Domestic Violence:** As defined in 34 U.S.C. 12291(a)(8), includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.
- **Stalking:** As defined in 34 U.S.C. 12291(a)(30), means engaging in a course of conduct directed at a specific person that would cause a reasonable person to: (A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress.

* Please note: In accordance with the Violence Against Women Reauthorization Act of 2013 (“VAWA”), state definitions for Sexual Assault, Dating Violence, Domestic Violence, Stalking and Consent are contained in the Institute’s Annual Safety and Security Report (“ASR”). VAWA crimes are reported in the ASR based on the definitions above.

Complainant: An individual who is alleged to be the victim of conduct that could constitute Sexual Harassment, regardless of whether a Formal Complaint has been filed. A Complainant must be the alleged victim unless a parent or legal guardian has a legal right to act on the alleged victim’s behalf.

Respondent: An individual who has been reported to be the perpetrator of conduct that could constitute Sexual Harassment.

Parties: include the Complainant(s) and Respondents(s) collectively.

Advisor: An individual chosen by a party to accompany the party to meetings related to the resolution process, to advise the party on that process and to conduct cross-examination for the party at any hearing,

¹ The FBI’s Uniform Crime Reporting Program (FBI UCR) includes forcible and nonforcible sex offenses such as rape, fondling, and statutory rape, which contain elements of “without the consent of the victim.”

if any. If a party does not have an Advisor at the hearing portion of the Grievance Process, the Institute will appoint an advisor.

Formal Complaint: A document (hardcopy or electronic) filed by a Complainant or signed by the Title IX Coordinator alleging Sexual Harassment against a Respondent and requesting that the Institute investigate. A Formal Complaint must be signed (physical or digital) by the Complainant, the Title IX Coordinator, or otherwise indicate that the Complainant is the person filing the Formal Complaint. At the time of filing a Formal Complaint, the Complainant must be participating in or attempting to participate in the Institute's education Program or Activity with which the Formal Complaint is filed.

Program or Activity: On or off campus locations, events, or circumstances over which the Institute exercises substantial control over both the Respondent and the context in which the Sexual Harassment occurred.

Mandatory Reporter: Designated Institute employees who must share knowledge, notice and/or reports of Sexual Harassment, discrimination and/or retaliation with the Title IX Coordinator.

Discretionary Reporter: Designated Institute employees who may, with the Complainant's consent, report instances to the Title IX Coordinator.

Clery Act: Meaning the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (20 U.S.C. Section 1092(f); 34 C.F.R. Part 668.46). In accordance with the Clery Act, the Institute publishes required crime statistics and policy statements in its Annual Safety and Security Report (ASR) on or before October 1st of each year. The Institute's most recent ASR is located:

<https://www.brownaveda.com/security-report>

Clery Geography: As defined in the Clery Act, includes (A) buildings and property that are part of a the Institute 's campus; (B) the Institute 's noncampus buildings and property; and (C) public property within or immediately adjacent to and accessible from the campus.

VAWA: Meaning the Violence Against Women Act (34 CFR Part 668).

Procedure for Reporting

If you believe that you have experienced or witnessed Sexual Harassment, discrimination or retaliation, the Institute encourages you to notify the Title IX Coordinator as soon as possible after the incident. A report may be made to either or both the police and the Title IX Coordinator. The criminal process is separate from the Institute's Title IX Grievance Process.

In order to make informed choices, it is important to be aware of confidentiality and reporting requirements when consulting Institute resources.

Institute Directors and the Director of Admissions have been designated by the Institute as Mandatory Reporters who will share knowledge, notice and/or reports of Sexual Harassment, discrimination and/or retaliation with the Title IX Coordinator.

Educators and the Student Services department have been designated by the Institute as Discretionary Reporters and will only report instances of Sexual Harassment, discrimination, or retaliation to the Title IX Coordinator with the Complainant's consent.

An individual who seeks completely confidential assistance may do so by speaking with professionals who have legally protected confidentiality. The Institute does not have confidential reporting resources, such as pastoral or professional counselors on campus. Crisis, mental health, and victim resource hotline information is available from Student Service Coordinators or within the Course Catalog / Student Manual.

The Institute will keep confidential the identity of the Complainant, Respondent, and witnesses, except as may be permitted by FERPA, as required by law, or as necessary to carry out the Title IX Grievance Process.

There is no time limitation on providing notice/complaints to the Title IX Coordinator. However, if the Respondent is no longer subject to the Institute's jurisdiction and/or significant time has passed, the ability to investigate, respond, and provide remedies may be more limited or impossible. Acting on notice/complaints significantly impacted by the passage of time (including, but not limited to, the rescission or revision of policy) is at the discretion of the Title IX Coordinator, who may document allegations for future reference, offer supportive measures and/or remedies, and/or engage in informal or formal action, as appropriate.

Supportive Measures

The Title IX Coordinator will provide Supportive Measures, as necessary. Supportive Measures are individualized services reasonably available to ensure equal educational access, protect safety or deter prohibited conduct. Supportive Measures are available, as appropriate, to either or both the Complainant and Respondent and are non-punitive, non-disciplinary and not unreasonably burdensome to the other party. Examples include counseling, extensions of time or other course-related adjustments, modifications to work or class schedules, campus escort services, restrictions on contact between the Parties, leave of absence, increased security and monitoring of certain areas on campus, and other similar accommodation.

Supportive Measures are individualized and appropriate based on the information gathered by the Title IX Coordinator. The Supportive Measures needed by the Complainant and/or Respondent may change over time, and the Title IX Coordinator will communicate with each party to ensure that any Supportive Measures are necessary and effective based on evolving needs.

Once the Title IX Coordinator receives a report, the Title IX Coordinator will promptly contact the Complainant confidentially to discuss the availability of Supportive Measures (available with or without filing a Formal Complaint) and explain the process for filing a Formal Complaint and provide a copy of this policy. The Title IX Coordinator will consider the Complainant's wishes with respect to Supportive Measures.

The Institute will maintain the privacy of the Supportive Measures, provided that privacy does not impair the Institute's ability to provide the Supportive Measures.

Dismissal of a Formal Complaint

Dismissal of a Formal Complaint may occur under several circumstances. The Institute must dismiss a Formal Complaint if the allegations do not meet the definition of Sexual Harassment, did not occur in the Institute's education Program or Activity, or did not occur against a person in the United States.

The Institute may dismiss a Formal Complaint if the Complainant informs the Title IX Coordinator, in writing, that he, she, or they withdraw the Formal Complaint or allegations therein; the Respondent is no

longer enrolled or employed by the Institute; or if specific circumstances prevent the Institute from gathering sufficient evidence to reach a determination.

If a Formal Complaint is dismissed, the Parties will be provided written notice of the dismissal outlining the reason(s) for dismissal. A dismissal does not preclude action by the Institute under Code of Conduct Policy.

Grievance Process

The Institute utilizes a prompt, equitable and impartial Grievance Process to evaluate Formal Complaints. Title IX personnel (Title IX Coordinator, Investigators, Decision-Makers, individuals who facilitate Informal Resolution process) will be free from conflicts of interest or bias for or against Complainants or Respondents. Title IX personnel will objectively evaluate all relevant evidence and avoid credibility determinations based on a person's status as a Complainant, Respondent, or witness.

Both Parties will receive equal opportunity to provide information, witness statements, evidence, and other information that may be necessary to fully evaluate the alleged offense. Both Parties will be afforded equitable rights and access during the Grievance Process. The Respondent is presumed not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the Grievance Process.

Generally, the Grievance Process consists of a Formal Complaint, investigation, Live Hearing, determination, Disciplinary Actions, Remedies, and appeal (if applicable). The Grievance Process, barring extenuating circumstance, will conclude within 90 days from the date a Formal Complaint is filed.

Advisor

A party may be accompanied by an Advisor of their choice during the Grievance Process. The Parties may choose Advisors from inside or outside the Institute community. If the Complainant or Respondent does not have an Advisor present at the Live Hearing, the Institute will select and provide an Advisor, without fee or charge, to conduct cross-examination of witnesses on behalf of that party. A party may reject an Institute appointed Advisor and choose their own Advisor, but they may not proceed without an Advisor. The Complainant and Respondent may not conduct cross-examination.

Choosing an Advisor who is a witness in the Grievance Process creates potential for bias and conflict of interest. A party who chooses an Advisor who is also a witness can anticipate that issues of potential bias will be explored by the Decision-Maker.

The Parties are expected to ask and respond to questions on their own behalf throughout the investigation phase of the Grievance Process. Advisors are expected to advise without disrupting proceedings. For example, advisors should not address Institute officials in a meeting or interview unless invited to. An Advisor may not make a presentation during any meeting or proceeding and may not speak on behalf of the party to the investigation or other Decision-Maker except during a Live Hearing, during cross-examination. If an Advisor is disruptive or otherwise fails to respect the limits of the Advisor role, the meeting or interview may be ended.

Advisors are expected to maintain the privacy of the records shared with them. These records may not be shared with third Parties, disclosed publicly, or used for purposes not explicitly authorized by the Institute. The Institute may seek to restrict the role of any Advisor who does not respect the sensitive nature of the process or who fails to abide by the Institute's privacy expectations.

Investigation of Formal Complaints

The Institute will investigate Sexual Harassment allegations in a Formal Complaint filed by a Complainant or signed by the Title IX Coordinator. The Title IX Coordinator will respect the Complainant's wishes as to whether the Institute investigates an allegation of Sexual Harassment unless the Title IX Coordinator determines that not investigating would be deliberately indifferent or harmful to the Institute community. The Institute may consolidate Formal Complaints where the allegations arise out of the same facts.

Upon receipt of a Formal Complaint, written notice will be sent to the Parties. The Notice of Investigation will include: details of the allegations (including identities of the Parties involved, specific section of the policy alleged to have been violated, the conduct that would be considered Sexual Harassment, the date of the incident(s) and the location of the incident(s)); a statement that the Respondent is presumed to be not responsible for the alleged conduct until a determination is made according to the Institute's Grievance Process; a statement that the Parties may have an Advisor of their choice; and a reminder of the expectation of truthfulness including consequences for submitting false information. The Parties will also be provided with separate written notice of any investigative interview, meeting, or hearing. Interview/meeting notices will include the date, time, location, participants and purpose of the investigative interview or meeting.

Formal Complaints involving employees will also be referred to Human Resources and simultaneously evaluated under employee conduct policies and procedures.

During the investigation, the Title IX Coordinator or his/her designee ("Investigator") will conduct interviews and gather evidence. No unauthorized audio or video recording of any kind is permitted during investigation interviews/meetings. The Parties will be provided an equal opportunity to present fact and expert witnesses or other evidence. The Parties (and their Advisors) will be provided with evidence directly related to the allegations, in electronic format or hardcopy, with at least 10 days for the Parties to inspect, review, and respond to the evidence. The Investigator will consider the responses received from the Parties before issuing the investigative report.

Once the investigation has concluded, the Investigator will draft an investigative report (hardcopy or electronic) that fairly summarizes relevant evidence. The investigative report will be sent to the Parties (and their Advisors) at least 10 days prior to a Live Hearing. The Parties may provide a written response to the investigative report.

Informal Resolution

If the Complainant and Respondent voluntarily consent in writing, Formal Complaints can be resolved through Informal Resolution, such as mediation. The Title IX Coordinator will facilitate an appropriate Informal Resolution process depending on the nature of the allegations, the Parties involved, and the overall circumstances. Informal Resolution will be conducted by a facilitator, who may or may not be the Title IX Coordinator. It is not necessary to pursue Informal Resolution first in order to pursue the Institute's Grievance Process. At 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. Informal Resolution is unavailable to resolve allegations that an employee sexually harassed a student.

Live Hearing

If a Formal Complaint is not or cannot be resolved through Informal Resolution, the Institute will conduct a Live Hearing. Live Hearings are facilitated by designated Decision-Maker, separate from the Title IX Coordinator or Investigator. The Decision Maker will be selected by the Title IX Coordinator.

Live Hearings will be conducted directly, orally, and in real time by the party's Advisor and not by a party personally. The Decision-Maker will permit each party's Advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility. 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 must first determine whether the question is relevant and explain to the party's Advisor asking cross-examination questions any decision to exclude a question as not relevant.

Rape shield protections are applied to Complainants, deeming irrelevant questions and evidence about a Complainant's prior sexual behavior unless offered to prove that someone other than the Respondent committed the alleged Sexual Harassment or offered to prove consent.

If a party or witness does not submit to cross-examination at the Live Hearing, the Decision-Maker will not rely on any statement of that party or witness in reaching a determination regarding responsibility. The Decision-Maker will not draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the Live Hearing or refusal to answer cross-examination or other questions.

At the request of either party, the Institute will provide for the entire Live Hearing (including cross-examination) to occur with the Parties located in separate rooms with technology enabling the Parties to see and hear each other. Live Hearings may be conducted with all Parties physically present in the same geographic location or, at the Institute's discretion, any or all Parties, witnesses, and other participants may appear at the Live Hearing virtually. An audio or audiovisual recording, or transcript, of any Live Hearing will be created and maintained for seven (7) years.

During the Grievance Process, the Institute will not use, rely on, or seek disclosure of information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege. The Institute will not access or use a party's medical, psychological, and similar treatment records unless the party provides voluntary, written consent.

Standard of Evidence

For all Formal Complaints of Sexual Harassment (including where employees are Respondents), the Institute utilizes the preponderance of the evidence standard, meaning the Institute will evaluate whether it is "more likely than not" that the alleged conduct occurred.

Disciplinary Actions and Remedies

Disciplinary Actions against the Respondent will not be imposed before completion of the Institute's Grievance Process. Following a determination of responsibility, appropriate corrective action will be taken, and the Institute will take steps to prevent recurrence. Disciplinary Actions taken will be determined on a case-by-case basis. Factors considered when determining Disciplinary Action may include but are not limited to: Nature, severity of, and circumstances surrounding the violation(s); Respondent's disciplinary history; Previous allegations or allegations involving similar conduct; Need for

disciplinary action to bring an end/prevent future reoccurrence of the violation; Need for disciplinary action to remedy the effects on the Complainant and the Institute community; Impact on the parties; Any other information deemed relevant by the Decision-Maker.

Any employee determined by the Institute to be responsible for an act of Sexual Harassment will be subject to appropriate Disciplinary Action, up to and including termination. Employees are also subject to processes and discipline determined by the Human Resources Department. The HR process is separate and apart from the Title IX process and not constrained by the outcome of the Title IX process. Disciplinary Action for student-related claims may include, but are not limited to, additional training, a restriction on contact, warning, suspension, or termination.

Failure to abide by imposed Disciplinary Actions (whether by refusal, neglect, or any other reason), may result in additional Disciplinary Action, including suspension or termination.

Remedies are provided to a Complainant whenever a Respondent is found responsible. Remedies are implemented by the Title IX Coordinator and may be disciplinary and punitive. Student Remedies are designed to maintain the Complainant's equal access to education. Remedies will be determined on a case-by-case basis and may include supportive measures.

Individuals who make a materially false statement in bad faith in the course of a Title IX Grievance Process will be subject to the Institute's Code of Conduct Policy.

Written Determination

The Decision-Maker will issue a Written Determination regarding responsibility with findings of fact, conclusions about whether the alleged conduct occurred, rationale for the result as to each allegation, a description of the procedure from Formal Complaint through the Live Hearing, Disciplinary Actions imposed on the Respondent and whether Remedies will be provided to the Complainant. The determination will be sent simultaneously to the Parties along with information on how to file an appeal.

Appeal

Both Parties have the right to appeal a determination regarding responsibility, the Institute's dismissal of a Formal Complaint or any allegations therein if: (1) procedural irregularity affected the outcome of the matter; (2) there is newly discovered evidence that could affect the outcome of the matter; and/or (3) Title IX personnel had a conflict of interest or bias, that affected the outcome of the matter.

An appeal must be submitted in writing to the Title IX Coordinator within 10 days of the delivery of the Written Determination.

Retaliation Prohibited

Retaliation (including intimidation, threats, coercion, or discrimination) against an individual for raising an allegation of Sexual Harassment, for cooperating in the Grievance Process is prohibited.

If you believe you have been retaliated against, you should notify the Title IX Coordinator.

Training

The Institute ensures that its Title IX personnel have adequate training. The Title IX Coordinator and Investigators are trained on the definition of Sexual Harassment, the scope of the Institute's Education

Program or Activity, how to conduct an investigation, the Institute's Grievance Process (including Live Hearings, appeals, and Informal Resolution processes, as applicable) and how to serve impartially by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. Decision-Makers are trained on the definition of Sexual Harassment, the Live Hearing process, technology to be used in Live Hearings, and issues of relevance (including how to apply the rape shield protections provided for Complainants). Informal Resolution facilitators are trained on the Informal Resolution process.

Materials used to train Title IX personnel are posted on the Institute's website:

<https://www.brownaveda.com/title-ix-training>

In accordance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act ("Clery Act") and the Violence Against Women Reauthorization Act of 2013 ("VAWA"), the Institute will provide primary prevention and awareness programs to prevent Sexual Assault, Dating Violence, Domestic Violence and Stalking to incoming students (during new student orientation) and new employees (upon hire) and generally every year thereafter.

Bias/Conflict of Interest

To raise any concern involving bias or conflict of interest by the Title IX Coordinator, contact:

**Ed Brown, Owner, 7009 Center Street, Mentor OH 44060, (440)255-9494 Ext 112,
ebrown@brownaved.com.**

Concerns of bias or potential conflict of interest by any other Title IX personnel should be raised with the Title IX Coordinator.

Clery Act Reporting

Institute administrators will issue timely warnings for incidents reported that pose a substantial threat of bodily harm or danger to other members of the campus community. The Institute 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. The Institute reserves the right to notify parents/guardians of dependent students regarding any health or safety risk, or a change in student status.

Personally, identifiable information for victims of Sexual Assault, Dating Violence, Domestic Violence and Stalking will not be included in any publicly available recordkeeping, including Clery Act Reporting and disclosures such as the ASR.

Emergency Removal

The Institute can remove a Respondent entirely or partially from the Education Program or Activities on an emergency basis when an individualized safety and risk analysis has determined that an immediate threat to the physical or safety of any student or other individual justifies removal. The risk analysis is performed by the Title IX Coordinator in conjunction with Institute Director.

In cases in which an emergency removal is imposed, the Respondent will be given notice of the action and the option to request to meet with the Title IX Coordinator prior to such action/removal being imposed, or as soon thereafter as reasonably possible, to show cause why the action/removal should not be implemented or should be modified. This meeting is not a hearing on the merits of the allegation(s), but

rather is an administrative process intended to determine solely whether the emergency removal is appropriate. When this meeting is not requested in a timely manner, objections to the emergency removal will be deemed waived.

The Title IX Coordinator has sole discretion under this policy to implement or stay an emergency removal and to determine the conditions and duration. Violation of an emergency removal under this policy will be grounds for discipline, which may include expulsion or termination.

The Institute will implement the least restrictive emergency actions possible in light of the circumstances and safety concerns. As determined by the Title IX Coordinator, these actions could include, but are not limited to: temporarily re-assigning an employee, restricting a student's or employee's access to the campus, allowing a student to withdraw or take grades of incomplete without financial penalty, and authorizing an administrative leave.

Disability Accommodations

The Institute is committed to providing reasonable accommodations and support to qualified students, employees, or others with disabilities to ensure equal access to the Institute's Grievance Process. Anyone needing an accommodation should contact the ADA Compliance Coordinator (contact information below) to request an accommodation:

Mentor Campus: **Barb Bader, Corp. Student Service Coordinator**
 8816 Mentor Ave., Mentor, OH 44060
 (440) 255-9494, ext. 122 bbader@brownaveda.com

Strongsville Campus: **Maggie Dauenhauer- Manager of Admissions & Placement**
 17901 Southpark Center, Space 160, Strongsville, OH 44136
 (440) 255-9494, ext. 408 mdauenhauer@brownaveda.com

Additional Information

Students and employees may contact the Title IX Coordinator with any questions related to this policy. In addition, 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 <http://www.hhs.gov/ocr/>. To the extent that an employee or contract worker is not satisfied with the Institute's handling of a complaint, he or she may also contact the appropriate state or federal enforcement agency for legal relief.

Recordkeeping and Privacy

The Institute will create and maintain records in accordance with state and federal law. Privacy of records specific to an investigation are maintained in accordance with state law and the federal FERPA statute. Information about Complainants is maintained privately in accordance with Title IX and FERPA.

Sexual Violence- Immediate Care and Preservation of Evidence

If a student experiences Sexual Violence, some or all of these safety suggestions may guide them after an incident has occurred:

1. Go to a safe place. If there is any immediate danger, contact the Director of Security if on campus or call 911 if you are off campus.

2. Consider securing immediate professional support (e.g., counseling, victim advocacy, medical services, etc.)

3. For safety and well-being, immediate medical attention is encouraged. Further, being examined (through a forensic examination) as soon as possible, ideally within 120 hours, is important in the case of rape or Sexual Violence. Completing a forensic examination does not require someone to file a police report. To find a location near you that performs free forensic examinations, call the National Sexual Assault Hotline at (800) 656-4673. Resources are also available through the Rape Abuse & Incest National Network (RAINN); www.RAINN.org.

- To preserve evidence, it is recommended not to bathe, shower, douche, eat, drink, smoke, brush teeth, urinate, defecate, or change clothes before receiving medical attention. Even if any of these actions were taken, students are still encouraged to have prompt medical care, and evidence may still be recoverable.
- Typically, if police are involved or will be involved, they will obtain evidence from the scene, and it is best to leave things undisturbed until their arrival. They will gather bedding, linens or unlaundered clothing, and any other pertinent items that may be used for evidence. It is best to allow police to secure items in evidence containers, but if involved in transmission of items of evidence, such as to the hospital, secure them in a clean paper bag or clean bedsheet to avoid contamination.
- If physical injuries, photograph or have them photographed, with a date stamp on the photo.
- Record the names of any witnesses and their contact information. This information may be helpful as proof of a crime, to obtain an order of protection, or to offer proof of an Institute policy violation.
- Try to memorize details (e.g., physical description, names, license plate number, car description, etc.), or even better, write notes to remind you of details, if time and the ability to do so.

Prevention and Education

In accordance with the Clery Act and VAWA, The Institute offers a range of campaigns, strategies, and initiatives to promote awareness, education, risk reduction, and prevention in an effort to reduce the frequency of sex or gender-based discrimination, harassment, and violence amongst members of the campus community.

The Institute offers programming to identify and prevent Sexual Assault, Dating Violence, Domestic Violence (including stranger and known offender assaults), and stalking each year. Educational programs are offered to raise awareness for all incoming students and employees and are often conducted during new student and new employee orientation.

Programs and other campaigns offered throughout the year to students and employees include information regarding awareness and primary prevention (including normative messaging, environmental management, and bystander intervention), and discuss the Institute's policies. Programs also offer information on risk reduction that strives to empower individuals who experience these incidents, how to recognize warning signs, and how to avoid potential attacks, and do so without biased approaches.

Bystander engagement is encouraged through safe and positive intervention techniques and by empowering third-party intervention and prevention such as calling for help, using intervention-based apps, identifying allies, and/or creating distractions. Bystander empowerment training highlights the need for those who intervene to ensure their own safety in the intervention techniques they choose and motivates them to intervene as stakeholders in the safety of the Institute community when others might choose to be bystanders.

XIII. POLICY STATEMENT ADDRESSING SEX OFFENDER REGISTRATION INFORMATION.

In accordance with the Campus Sex Crimes Prevention Act of 2000, the Clery Act and the Family Educational Rights and Privacy Act of 1974, the local Police Department provides a link to the Ohio State Police Sex Offender Registry. The Institute is required to inform students and employees about where law enforcement information provided by a State concerning registered sex offenders may be obtained. The law also requires sex offenders already required to register in a State to provide notice of each institution of higher education in that State at which the person is employed, carries a vocation, or is a student. In the State of Ohio, convicted sex offenders must register with the Sex Offender and Crimes Against Minors Registry maintained by the Department of State Police. The Ohio State Police is responsible for maintaining this registry. Follow the link below to access the registry: <http://www.drc.ohio.gov/OffenderSearch/Search.aspx>

The National Registry of Sex Offenders is available at the following web address:
<https://www.nationalsexoffenderregistry.com>

XIV. CLERY ACT CRIME REPORT STATISTICS

OFFENSE	PROPERTY	2020	2021	2022
BROWN AVEDA INSTITUTE – MENTOR CAMPUS (Institute does not have noncampus property)				
Murder / Non-Negligent Manslaughter	On-Campus Property	0	0	0
	Public Property	0	0	0
Manslaughter By Negligence	On-Campus Property	0	0	0
	Public Property	0	0	0
Rape	On-Campus Property	0	0	0
	Public Property	0	0	0
Fondling	On-Campus Property	0	0	0
	Public Property	0	0	0
Incest	On-Campus Property	0	0	0
	Public Property	0	0	0
Statutory Rape	On-Campus Property	0	0	0
	Public Property	0	0	0
Robbery	On-Campus Property	0	0	0
	Public Property	0	0	0
Aggravated Assault	On-Campus Property	0	0	0
	Public Property	0	0	0
Burglary	On-Campus Property	0	0	0
	Public Property	0	0	0
Motor Vehicle Theft	On-Campus Property	0	0	0
	Public Property	0	0	0
Arson	On-Campus Property	0	0	0
	Public Property	0	0	0
VAWA Offense: Domestic Violence	On-Campus Property	0	0	0
	Public Property	0	0	0
VAWA Offense: Dating Violence	On-Campus Property	0	0	0
	Public Property	0	0	0
VAWA Offense: Stalking	On-Campus Property	0	0	0
	Public Property	0	0	0

OFFENSE	PROPERTY	2020	2021	2022
BROWN AVEDA INSTITUTE – MENTOR CAMPUS (Institute does not have noncampus property)				
Hate Crimes: Related to any of the above listed crimes, and Hate Crimes involving simple assault, larceny-theft, intimidation and destruction/damage/vandalism of property	On-Campus Property	0	0	0
	Public Property	0	0	0
Arrests: Weapons: Carrying, Possessing, etc.	On-Campus Property	0	0	0
	Public Property	0	0	0
Disciplinary Referrals: Weapons: Carrying, Possessing, etc.	On-Campus Property	0	0	0
	Public Property	0	0	0
Arrests: Drug Abuse Violations	On-Campus Property	0	0	0
	Public Property	1	0	0
Disciplinary Referrals: Drug Abuse Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Arrests: Liquor Law Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Disciplinary Referrals: Liquor Law Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Unfounded Crimes	On-Campus Property + Public Property	0	0	0

OFFENSE	PROPERTY	2020	2021	2022
BROWN AVEDA INSTITUTE – STRONGSVILLE CAMPUS (Institute does not have noncampus property)				
Murder / Non-Negligent Manslaughter	On-Campus Property	0	0	0
	Public Property	0	0	0
Manslaughter By Negligence	On-Campus Property	0	0	0
	Public Property	0	0	0
Rape	On-Campus Property	0	0	0
	Public Property	0	0	0
Fondling	On-Campus Property	0	0	0
	Public Property	0	0	0
Incest	On-Campus Property	0	0	0
	Public Property	0	0	0
Statutory Rape	On-Campus Property	0	0	0
	Public Property	0	0	0
Robbery	On-Campus Property	0	0	0
	Public Property	0	0	0
Aggravated Assault	On-Campus Property	0	0	0
	Public Property	0	0	0
Burglary	On-Campus Property	0	0	0
	Public Property	0	0	0
Motor Vehicle Theft	On-Campus Property	0	0	0
	Public Property	0	0	0
Arson	On-Campus Property	0	0	0
	Public Property	0	0	0
VAWA Offense: Domestic Violence	On-Campus Property	0	0	0
	Public Property	0	0	0
VAWA Offense: Dating Violence	On-Campus Property	0	0	0
	Public Property	0	0	0
VAWA Offense: Stalking	On-Campus Property	0	0	0
	Public Property	0	0	0
Hate Crimes: Related to any of the above listed crimes, and Hate Crimes involving simple assault, larceny-theft, intimidation and destruction/damage/vandalism of property	On-Campus Property	0	0	0
	Public Property	0	0	0
Arrests: Weapons: Carrying, Possessing, etc.	On-Campus Property	0	0	0
	Public Property	0	0	0

OFFENSE	PROPERTY	2020	2021	2022
BROWN AVEDA INSTITUTE – STRONGSVILLE CAMPUS (Institute does not have noncampus property)				
Disciplinary Referrals: Weapons: Carrying, Possessing, etc.	On-Campus Property	0	0	0
	Public Property	0	0	0
Arrests: Drug Abuse Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Disciplinary Referrals: Drug Abuse Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Arrests: Liquor Law Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Disciplinary Referrals: Liquor Law Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Unfounded Crimes	On-Campus Property + Public Property	0	0	0