

GALAXY

MEDICAL COLLEGE



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CONSUMER INFORMATION

HANDBOOK

2018-2019

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INSTITUTIONAL AND FINANCIAL ASSISTANCE INFORMATION

The following disclosures outline the different institutional and financial assistance available to all prospective and enrolled students at Galaxy Medical College.

CONTACT INFORMATION

GMC makes it a priority to assist all students and meet their needs accordingly. All prospective and enrolled students may contact the following individuals designated to assisted students in obtaining information pertaining to the institution, financial assistance availability, etc.

Office	Location	Hours of Operations	Contact Person	Phone Number	Email Address
Admissions Office	6400 Laurel Cyn Blvd Suite 115 N Hollywood, CA 91606	9am – 2pm 5pm – 8pm	Helen	(818) 509-9970 Ext 102	Galaxy_student_services@yahoo.com
Financial Aid Office	6400 Laurel Cyn Blvd Suite 115 N Hollywood, CA 91606	9am – 2pm 5pm – 8pm	Arpine	(818) 509-9970 Ext 105	alusikyan@aol.com
School Director	6400 Laurel Cyn Blvd Suite 115 N Hollywood, CA 91606	9am – 2pm 5pm – 9pm	Dr. Anna	(818) 509-9972	Galaxy_college@yahoo.com
Associate Director	6400 Laurel Cyn Blvd Suite 115 N Hollywood, CA 91606	9am – 2pm 5pm – 9pm	Helen	(818) 509-9970 Ext 103	helenlusikyan@yahoo.com
Student Services	6400 Laurel Cyn Blvd Suite 115 N Hollywood, CA 91606	9am – 2pm 5pm – 9pm	Lidia	(818) 509-9970 Ext 101	Galaxy_student_services@yahoo.com
Job Placement & Externship	6400 Laurel Cyn Blvd Suite 115 N Hollywood, CA 91606	9am – 2pm 5pm – 8pm	Ani	(818) 509-9970 Ext 104	Galaxy_student_services@yahoo.com
Library	6400 Laurel Cyn Blvd Suite 125 N Hollywood, CA 91606	2pm – 5pm	Hasmik	(818) 509-9972	Galaxy_student_services@yahoo.com

AVAILABILITY OF EMPLOYEES FOR INFORMATION DISSEMINATION

The School Director, Associate Director, and Admissions Director are available during normal business hours to provide students or prospective students information. Financial Aid information is available by contacting the Director of Financial Aid during normal business hours.

Institutional information such as completion and/or graduation rates, retention rates, institutional information, crime statistics and/or security policies can be provided by the School Director upon request.

STUDENT FINANCIAL AID INFORMATION

FEDERAL STUDENT AID PROGRAMS

Galaxy Medical College is authorized by the US Department of Education to participate in the Title IV, Higher Education Act, to provide Federal Student Aid to eligible applicants attending this institution.

If paying for your education is a concern for you, you're not alone. Many students at Galaxy Medical College require financial help in order to be able to attend school. Here at Galaxy, our financial aid team takes great pride in their ability to work with you personally to overcome any financial obstacle you may be facing. Galaxy Medical College participates in several of the U.S. Department of Education's Federal Financial Aid Programs, which are available to eligible applicants who qualify.

Our financial aid team is available to assist our students in completing the necessary applications and paperwork for various aid programs. All financial aid student consumer publications can be found online at www.studentaid.ed.gov. The Financial Aid Office at Galaxy Medical College directs all students to this helpful website where many different resources may be accessed. At this time, the publications found on the above mentioned website are the only financial aid student consumer publications being used by Galaxy Medical College.

Galaxy Medical College participates in the following Financial Aid Programs:

FEDERAL PELL GRANT

For many students, Pell Grants provide a foundation of financial aid to which other aid may be added. Unlike a loan, a Federal Pell Grant does not need to be repaid.

FEDERAL LOANS (SUBSIDIZED AND UNSUBSIDIZED)

Subsidized and Unsubsidized Loans are low-interest loans made by the U.S. Department of Education.

FEDERAL PLUS LOAN

PLUS loans enable parents to borrow to pay the education expenses for a dependent undergraduate student enrolled at least half-time. These low-interest loans are made with funds borrowed from banks, savings and loans, etc. Loan applications are available in the Financial Aid office.

INSTITUTIONAL FINANCING

Galaxy Medical College has set forth a financial plan in order to help better serve its students that do not qualify to receive Financial Aid under the Title IV program. Galaxy Medical College complies with the needs of the student and permits the student to pay the full amount of the tuition in payments, as long as the full amount is paid in full 1 month prior to graduation.

Upon entering Galaxy Medical College, the student must pay a \$100.00 Registration Fee; this fee covers the processing and assessment of the student's application. Once the student enrolls in a class and it is determined that they do not qualify for financial aid, the financial department will assess the student's tuition and will work with the student to establish a Payment Plan. A deposit payment of \$1000.00 is required at the time of enrollment. The student will be given dates to make each payment, usually the 20th to the 25th of each month. If the student fails to make a payment on the date assigned by the financial officer, the student will have to pay a \$25.00 late payment fee. Payments are accepted in cash, personal, business and credit card checks; no credit card payments are accepted.

EXAMPLE OF PAYMENT PLAN

ENROLLMENT DATE:	June 19, 2006
TOTAL TUITION COST:	\$10,000.00
DEPOSIT PAYMENT DUE:	\$1,000.00 on June 19, 2006
MONTHLY PAYMENTS DUE:	\$800.00 on 20 TH -25 TH of every month

PROCESS OF APPLYING FOR FINANCIAL AID

1. Submit the FAFSA at www.fafsa.gov. Galaxy Medical College's School Code is 041596
2. Submit necessary documentation for Verification procedure (if applicable).
3. Review your Award Letter. If you are eligible for financial aid, an award letter will be mailed to you.
4. Complete Entrance Counseling and sign all necessary documents at the financial aid office.

Students applying for financial aid need to start early since the determination of financial aid eligibility can be lengthy process.

TITLE IV ELIGIBILITY

EDUCATIONAL GOAL

To be eligible to receive financial aid, you must be enrolled as a regular student in an eligible training program. A regular student is defined as a person who enrolls for the purpose of obtaining a diploma or certificate. If you change your education goal and/or training program, you should make the changes in person at the Admissions Office and notify the Financial Aid office of the appropriate changes.

PRIOR EDUCATION

Students must have a high school diploma or GED to be apply to apply for admission to Galaxy Medical College and to be eligible for Title IV Federal financial aid.

SELECTIVE SERVICES

All males born after December 31, 1959 must register with the Selective Services in order to be able to receive financial aid. If you believe that you are not required to register, call the Selective Services or visit them at www.sss.gov for information regarding exemptions.

CONCURRENT ENROLLMENT

You are only eligible to receive financial aid at one college and/or university each enrollment period. If you are enrolled at more than one college and/or university, you should only receive financial aid from one of the institutions you are attending. If you receive financial aid from more than one college or university during the same enrollment period, you may be ineligible to receive funds. You may be required to pay back the money to at least on of the institutions and may be referred to the Department of Education for Fraud and Abuse.

FALSE INFORMATION

Financial Aid will be terminated if you fail to submit or knowingly provide false information on any documents required by Galaxy Medical College. These documents may include but are not limited to Admissions Application, the FAFSA, academic transcripts, financial aid appeals, or income tax returns or any other documentation submitted to Galaxy Medical College.

AWARDING TITLE IV AID

The award of federal financial aid under the Title IV program is determined by Galaxy Medical College's Financial Aid Office once the necessary steps have been completed by the student. The following polices and procedures outline the awarding of Federal Student Aid at Galaxy Medical College.

FAFSA

All students are required to complete a FAFSA in order to determine eligibility to receive financial aid. Once this application has been completed and processed, the awarding of federal student aid can be determined by the institution.

AWARDING OF AID

Once a student completes the FAFSA, they will receive a Student Aid Report (SAR) that summarizes the data from the FAFSA and determines the student's official Expected Family Contribution (EFC). Awarding of Financial Aid based upon the following factors:

- Student Aid Report (SAR)
- Estimated Family Contribution (EFC)
- Cost of Attendance (COA)
- Enrollment Status (full-time)
- Annual Loan limits and Pell Grant Award limits

COA
- EFC

This formula is used to determine the Award for Title IV Programs

NEED

Once the Financial Aid office has all the necessary information/documentation they can begin packaging an award for each individual applicant. Once the packing of aid has been determined, the Financial Aid Director will mail the applicant an award letter outlining the award package for the school year. The student must accept or decline their award; if accepted the processing of aid begins at the institution.

ENROLLMENT STATUS REQUIREMENTS The number of clock hours enrolled during an academic year affects the amount of Federal Student Aid (FSA) the student will receive. Students must be at least at half-time status to be eligible to receive aid. If a student does not meet the minimum enrollment status, FSA will not be disbursed.

To determine the enrollment status of students at our institution Galaxy Medical College utilizes the following formula:

Clock hours in payment period

20 hours per week (full time requirement)

The product of the calculation must be at least 12 to qualify for full time enrollment, 9 for $\frac{3}{4}$ time enrollment and 6 for $\frac{1}{2}$ time enrollment.

Please refer to the chart below for enrollment status classification

TRAINING PROGRAM	CLOCK HOURS IN TRAINING PROGRAM	CLOCK HOURS IN PAYMENT PERIOD	PRODUCT OF CALCULATION	ENROLLMENT STATUS
Health Claims Examiner	900	450	22.5	Full Time
Pharmacy Technician	900	450	22.5	Full Time
Medical Assistant	980	450	22.5	Full Time

AWARD YEAR REQUIREMENTS

Because Galaxy Medical College is identified as being a Clock-Hour school, the following policies apply. One full academic year is defined as being 900 hours in length; there are 26 weeks in an academic year. Because our programs vary in clock hours, FSA is awarded and disbursed based on proration of clock hours per program. Proration occurs when a student is enrolled in a program that is shorter than a full academic year and when a student is enrolled in a program that is one academic year or more in length but is in remaining period of study that is shorter than a full academic year. Proration occurs both for Pell Grant awards and Stafford Loan awards. Proration determines the maximum loan and grant amount that a student may receive or borrow for a program of study. Galaxy Medical College utilizes the following formula to prorate annual grant and loan limit:

Clock hours in Training Program

Clock Hours in Academic Year

OR

Weeks enrolled in Program

Weeks in Academic Year

Please refer to the chart below for enrollment status classifications.

TRAINING PROGRAM	ENROLLMENT STATUS	CLOCK HOURS IN TRAINING PROGRAM	CLOCK HOURS IN ACADEMIC YEAR	PRORATION PERCENTAGE
Health Claims Examiner	Full Time	900	900	100%
Pharmacy Technician	Full Time	900	900	100%
Medical Assistant	Full Time	980	900	108%

DISBURSING TITLE IV AID

Financial aid disbursements are calculated based on your Estimated Family Contribution (EFC), financial need and the availability of funds. Financial Aid Disbursements will be applied to cover mandatory charges on your student account.

Disbursements are made twice during the duration of the student's enrollment at Galaxy Medical College. The first disbursement is made at the beginning of the enrollment period and the second disbursement is made once the student reaches 50% of their prescribed hours of study.

STUDENT RESPONSIBILITIES

- Students applying for financial aid should plan ahead to have sufficient money available to cover costs of enrollment fees, tuition, parking fees, books, materials etc., in case they are determined ineligible or their file remains under review
- Students receiving financial aid are required to notify the Admissions Office of any changes in their demographical and financial information. Failure to do so may result in delay of financial aid etc.
- Students should report to the Financial Aid Office if their financial circumstances change significantly.
- Your financial aid application may be delayed or your file closed if you do not provide all required documentation.

STANDARDS FOR SAP

In order to comply with accreditation, state and federal regulations Galaxy Medical College must establish and apply reasonable standards of Satisfactory Academic Progress (SAP) for completion of training programs and eligibility of financial aid. In order to qualify for graduation and for eligible students to receive financial assistance under the programs authorized by Title IV of the Higher Education Act, students must meet SAP requirements for their enrollment period. Students who wish to be considered for financial aid must maintain satisfactory academic progress in their program of study as set forth in this policy. The following requirements must be met in order for students to achieve SAP and be awarded a Certificate of Completion or Diploma (non-degree granting) from Galaxy Medical College and remain eligible to receive Financial Aid under the FSA Title IV program.

A student must maintain satisfactory academic progress (SAP) in order to remain in training. SAP is cumulative and it includes all periods of attendance, which are counted towards the maximum timeframe allotted. SAP is applied to all students equally and measured throughout each course. In order to comply with the school's SAP, the student must:

1. Be enrolled in a program of study with a valid enrollment agreement.
2. Maintain a cumulative grade average of 70% or more (a "C" grade on a letter scale).
3. Complete his/her program within the maximum time allowed (150% of the normal program length).
4. Successfully pass the final exam
5. Maintain satisfactory attendance 95% and above (9 school days for long-term programs; 4 school days for short-term programs).

Please refer to the SAP Policy, which can be found in the School Catalog, for detailed information.

SERVICES AVAILABLE TO STUDENTS WITH DISABILITIES

Galaxy Medical College will make reasonable accommodations to individuals including auxiliary aids and services to those individuals with a bona-fide disability. GMC will not fundamentally alter the

nature of its programs, nor will it provide accommodations that are considered unreasonable and that would significantly alter the programs of study and services that GMC provides students. Requests for auxiliary aids and services to accommodate a disability should be submitted via a written request to the School Director prior to starting classes at GMC.

COST OF ATTENDANCE

2018-2019 Academic Year

Without Family

BUDGET		HEALTH CLAIMS EXAMINER	PHARMACY TECHNICIAN	MEDICAL ASSISTANT
TUITION		\$13,900.00	\$12,500.00	\$14,000.00
FEES/MATERIALS		\$525.00	\$525.00	\$675.00
REGISTRATION FEE		\$75.00	\$75.00	\$75.00
HOUSING		\$4668.00	\$4668.00	\$4668.00
OTHER EXPENSES		\$1608.00	\$1608.00	\$1608.00
TOTAL		\$20,776.00	\$19,376.00	\$21,026.00

With Family

BUDGET		HEALTH CLAIMS EXAMINER	PHARMACY TECHNICIAN	MEDICAL ASSISTANT
TUITION		\$13,900.00	\$12,500.00	\$14,000.00
FEES/MATERIALS		\$525.00	\$525.00	\$675.00
REGISTRATION FEE		\$75.00	\$75.00	\$75.00
HOUSING		\$0.00	\$0.00	\$0.00
OTHER EXPENSES		\$1341.00	\$1341.00	\$1428.00
TOTAL		\$15,841.00	\$14,441.00	\$16,178.00

Galaxy Medical College does not provide housing for its student's as we don't have any dormitories under our control. The pricing of housing and related personal expenses is outlined above for one academic school year. This institution has no responsibility to find or assist any student in finding housing.

REFUND, WITHDRAWAL & RETURN OF TITLE IV FUNDS

REFUND

TUITION REFUND POLICIES

The student has the right to cancel their enrollment/enrollment agreement and obtain a refund of charges paid through attendance at the first class session, or the seventh day after enrollment, whichever is later. Cancellation shall occur when you give written notice of cancellation at the address of the school shown on the top of the first page of the Enrollment Agreement. You can do this by mail, hand delivery or telegram. A written notice of cancellation sent by mail is only effective when deposited in the mail properly addressed and with the proper postage affixed. The school will provide you with two [2] Notice of Cancellation forms that will be attached to your Enrollment Agreement.

However, you do not necessarily have to use the written notice provided at the time of your enrollment, and may use any written notice that has your signature, as long as it shows that you no longer wish to be bound by this agreement starting on the date of the notice. If the school has given you any books or other printed materials, you must return them in good condition to the school within ten [10] days following the date of your Notice of Cancellation.

If you cancel this Agreement within five working days from the start date of your first class, the School will refund any money that you paid, less a \$100 registration fee and any deduction for damaged books or other printed materials not timely returned in good condition, within thirty [30] days after your Notice of Cancellation is received.

CANCELLATION POLICY

This institution, for all students, without penalty or obligation, shall refund 100 percent of the amount paid for institutional charges, less a reasonable deposit or application fee not to exceed \$100, if the notice of cancellation is made prior to or on the first day of instruction. If you cancel your enrollment agreement, please do so in writing. Deliver your notice to cancel to the school, and direct it to the attention of the school director.

REFUND POLICY

The student has a full refund of all charges except the amount of the registration fee listed in the fee schedule in the catalog (amount retained may not exceed \$100) if the student cancels this agreement prior or on the first day of instruction. Further, the student may withdraw from a course after instruction has started and receive a pro rata refund for the unused portion of the tuition and other refundable charges if the student has completed 60% or less of the instruction.

If the school cancels or discontinues a course or educational program, the school will refund all of the charges.

If you are entitled to a refund, the refund is to be made within 30 days of the date the school determines, or is notified, of your cancellation or withdrawal.

FEE SCHEDULE

Except for the Registration Fee of \$75.00 all other charges are refundable, per the terms of cancellation and refund policies specified in the catalog in effect at the time of your enrollment, as well as your enrollment agreement.

WITHDRAWAL

Should students find it necessary to discontinue their training, they should arrange to meet with the Associate Director to discuss their situation and submit written notification of their request. Their request will be granted after their meeting with the Associate Director.

Galaxy Medical College reserves the right to terminate any students enrollment at any time, if the student fails to:

- Meet minimum standards for academic progress,
- Meet minimum standards for attendance requirements,
- Meet the minimum conduct standards of the school, or
- Fulfill their financial obligations according to their agreement with the school.

Whether termination of enrollment is voluntary or involuntary, students should realize that they will remain obligated for the amount of tuition and fees due the school based on the refund policy. Students have the right to appeal dismissal decisions made by the school administration by submitting a written request to the School Director describing any mitigating circumstances or conditions, which warrant special consideration. If the appeal is accepted, the student may be reinstated according to special terms and conditions stipulated by the School Director.

AUTOMATIC WITHDRAWAL

A student will automatically be withdrawn from the program for the following reasons:

- Failure to return from an approved leave of absence on the scheduled return date.
- Failure to attend school for 4 consecutive class days of the program.
- Failure to maintain Satisfactory Academic Progress (SAP)
- Failure to fulfill financial agreements.
- Failing any program twice during one enrollment period.

OFFICIAL WITHDRAWAL

A student desiring to withdraw from the institution must contact and confer with the Associate Director and obtain an Official Withdrawal Form. A student may officially withdraw from any training program within 5 instructional days from the start of enrollment in the training program. The instructor for each course must indicate the last day of student attendance in respective courses and sign appropriate paperwork. Refunds are based on the last date of attendance indicated by the instructor. Withdrawals are processed through the Office of Admissions.

UNOFFICIAL WITHDRAWAL

If the student fails to attend school for more than 4 consecutive days or misses 16 hours of class work (without prior notification) the school will consider the student a drop and automatically withdraw him/her from the program. Therefore, if the student decides to leave the school without completing and submitting official withdrawal papers, he/she is considered unofficially withdrawn and is subject to receiving failing grades for the term.

APPEAL

Terminated students may appeal the school's decision in writing to the School Director. The School

must receive the appeal from the student within three business days of being notified of the dismissal. All appeals will be responded to within ten [10] business days of receipt by the school.

RETURN OF TITLE IV FUNDS

Students receiving financial aid who withdraw or stop attending will, in most cases, be required to return a portion of financial aid received. The Higher Education Act established the Return of Title IV Funds Policy.

These regulations outline the following policy. The concept behind the policy is that the school and the student are allowed to retain only the amount of Title IV federal aid that is earned. If a student withdraws or stops attending classes, whether any credits have been earned for the program or not, a portion of the aid received is considered to be unearned and must be returned to the Title IV programs from which it was received. For Title IV purposes, the last date of attendance is one of the following: the date the formal withdrawal process begins, the date the student gives official notice of intent to withdraw, the mid-point of the training program, or the last documented date of attendance. If a student attends through 60% of the training pay period, all Title IV aid is considered earned.

DEFINITIONS

RETURN TO TITLE IV (R2T4) CALCULATION:

A required calculation to determine the amount of aid earned by the student when the student does not attend all days scheduled to complete within a payment period.

OVERAWARD

A required recalculation of Pell Grant and other aid types due to student dropping or not attending hours required for the status of the award (full-time, half-time etc.). This is a required step at any point when information is received that changes student status. Reductions in aid will always be required for students whose status changes due to dropped courses or courses not attended beyond the course census date.

CLARIFICATION OF REGULATIONS

The school must be able to demonstrate that the student actually attended each class, including any class with a failing grade. Attendance must be “academic attendance” or “attendance at an academically related activity.” Documentation of attendance must be made by the school. A student’s self-certification of attendance is not acceptable unless supported by school’s documentation. Examples of attendance include:

- Physical class attendance where there is direct interaction between instructor and student
- Submission of academic assignment
- Examination or computer-assisted instruction
- Study group assigned by school

REQUIRED STEPS

1. The first step is a series of formulas to determine the amount of aid which must be returned. Following the determination of the last date of attendance, the school must calculate the

number of days attended and the total number of days the student was scheduled to complete within the payment period. Days attended are then divided by days in the payment period the student was scheduled to complete to calculate percentage completed. That percentage is multiplied by total aid for which the student is eligible to determine the amount of aid earned ($\% \text{ completed} \times \text{total aid} = \text{earned aid}$). $\text{Total aid} - \text{earned aid} = \text{unearned aid}$ (aid to be returned).

2. The next step is for the school to determine total institutional charges and multiply the figure by the percentage of unearned aid ($100\% - \% \text{ completed} = \% \text{ unearned}$). It makes no difference which type of resource actually paid the school; the law assumes that Title IV aid goes first to pay institutional charges. $\text{Institutional charges} \times \% \text{ unearned} = \text{amount returned to school}$.

The school must then return the amount of unearned aid, up to the maximum received, to each of the Title IV programs in the following order:

1. Unsubsidized Direct Stafford Loan
 2. Subsidized Direct Stafford Loan
 3. Direct PLUS Loan
 4. Federal Pell Grant
3. The school then calculates the amount for which the student is responsible by subtracting the amount returned by the school from the total amount which is unearned. That remaining amount is the student's share and is allocated in the same order as stated above. $\text{Total amount unearned} - \text{amount returned by the school} = \$\$$ for which student is responsible.

Once the school determines dollar amounts and which individual programs must be repaid, the student will be notified of any amounts he or she owes. Funds that must be returned by the student to the loan programs can be paid in full in accordance with normal loan repayment terms. For grant dollars that must be repaid, the amount due from a student is limited to the amount by which the original grant overpayment amount due from the student exceeds half of the Title IV grant funds received by the student. A student has 45 days to make repayment and does not have to repay a grant overpayment of \$50 or less. Unpaid balances will be reported on NSLDS and turned over to the Department of Education for collection. Until overpayments are repaid or satisfactory arrangements to repay have been made, the student will be ineligible for further Title IV aid at any institution.

This policy is separate from the institutional refund policy. Unpaid balances due to Galaxy Medical College that result from amounts returned to Title IV programs and other sources of aid will be charged back to the student. If a student does not begin attendance in the training program or ceases attendance during the 100% refund period, aid may have to be reduced to reflect appropriate status prior to recalculating Return of Title IV Funds.

Before withdrawing or stopping attendance in classes, the student should be aware of the [proper procedure for withdrawing from classes and the consequences of either withdrawing or stopping attendance. Official withdrawal is always the responsibility of the student.

Any questions on the Return of Title IV Funds may be addressed to the Financial Aid Director. Questions regarding withdrawal should be addressed to the Office of Admissions.

COPYRIGHT INFRINGEMENT

GMC utilizes a wide range of computer based software and programs for educational and administrative activities. Faculty, staff and students are all expected to comply with the policies that apply to the use of such resources. As a part of GMC's effort prevent the unauthorized distribution of copyrighted materials, this policy addresses the issue of illegal peer-to-peer file sharing. It is in the intention of GMC to strictly enforce a policy of zero tolerance for illegal file sharing and to comply with all applicable laws and regulations.

Copyright Violation

Peer-to-Peer file sharing is often used to distribute copyrighted work without the permission of the copyright owner. Such acts are illegal and subject the user to personal liability even if the user is unaware that he/she is violating the law.

Consequences

Illegal Peer-to-Peer sharing is a violation of GMC's policy and of the federal law. To protect both students and employees, GMC will disable access to the computer network for any device for which a copyright infringement complaint has been received.

Faculty and staff who violate this policy are subject to dismissal according to the policies set forth in the employment handbook. Students who violate this policy are subject to discipline pursuant to the copyright infringement policy. Additionally, GMC has the right to report such violations to the appropriate authorities for criminal or civil investigation/prosecution.

Civil and Criminal Penalties

A person or entity found to have committed a copyright violation may be civilly liable for up to \$150,000 for each separate act of infringement. Individuals may also be prosecuted criminally for copyright infringement. First offenses may result in prison sentence of up to five (5) years and fines of up to \$250,000.

ACADEMIC PROGRAMS OFFERED

ACADEMIC PROGRAM	INSTRUCTIONAL FACILITY	LABORATORY FACILITY
Medical Assistant	6400 Laurel Canyon Blvd Suite 115 N. Hollywood, CA 91606	6400 Laurel Canyon Blvd Suite 270 N. Hollywood, CA 91606
Health Claims Examiner	6400 Laurel Canyon Blvd Suite 115 N. Hollywood, CA 91606	6400 Laurel Canyon Blvd Suite 270 N. Hollywood, CA 91606
Pharmacy Technician	6400 Laurel Canyon Blvd Suite 115 N. Hollywood, CA 91606	6400 Laurel Canyon Blvd Suite 125 N. Hollywood, CA 91606

TRANSFER OF CREDIT POLICY

The transferability of credits you earn at Galaxy Medical College is at the complete discretion of an institution to which you may seek to transfer. Acceptance of the diploma or certificate you earn in our training programs is also at the complete discretion of the institution to which you may seek to transfer. If the credits/diploma/certificate you earn at this institution are not accepted at the institution to which you seek to transfer, you may be required to repeat some or all of your coursework at that institution. For this reason, you should make certain that your attendance at this institution will meet your educational goals. This may include contacting an institution to which you may seek to transfer after attending Galaxy Medical College to determine if your credits/diploma/certificate will transfer.

ARTICULATION AGREEMENT

Galaxy Medical College does not currently engage in articulation agreements with any other school, college or university.

APPROVALS AND ACCREDITATION

Galaxy Medical College is accredited by the Accrediting Bureau of Health Education Schools (ABHES). Accrediting Bureau of Health Education Schools (ABHES) is listed as a nationally recognized accrediting agency by the United States Department of Education and is recognized by the Council For Higher Education Accreditation. Galaxy Medical College's ABHES ID# is I-079.

Galaxy Medical College was granted institutional approval in 2003 from the Bureau for Private Postsecondary and Vocational Education (BPPVE), currently the Bureau for Private Postsecondary Education (BPPE) pursuant to California Education Code, Article 9, Section 94915. Galaxy Medical College's School Code is 4732699. The bureau's approval means that the institute and its operation comply with the required standards established under the law for occupational instruction by private post-secondary educational institutions. Galaxy Medical College is not a public institution. The school is a privately owned vocational school.

PENALTIES FOR DRUG VIOLATIONS

In accordance with the Drug-Free Workplace Act of 1988 (P.L. 100-690), the Drug-Free Schools and Communities Act of 1989 (P.L. 1010-226) and 34 Code of Federal Regulation, Part 85, Subpart F, this institution is committed to maintaining a drug-free workplace and a drug-free school. Drug and alcohol abuse can lead to liver, heart, and other chronic diseases, low birth weight, birth defects, and infant mortality in expectant mothers, and death. The unlawful manufacture, distribution, dispensing, possession or use of drugs, alcohol or other controlled substances at this institution is strictly prohibited. Students and employees are required, as a condition of enrollment and/or employment, to abide by this policy.

To the extent allowed by local state and federal laws, this institution will impose disciplinary action against students and employees for violating these standards of conduct. These actions may include suspension, expulsion, termination of employment, referral for prosecution and/or required completion of a drug or alcohol rehabilitation or similar program.

This institution, as required by federal regulation (34 CFR 85.635 and Appendix C), will report all employees and students convicted of a criminal drug offense occurring in the workplace to the U.S. Department of Education. Consistent with these same regulations, employees, as a condition of employment, are required to provide written notice to this institution of their conviction for a criminal drug offense occurring at the workplace within five (5) days after that conviction. In addition, students receiving Pell Grants who are convicted of a criminal drug offense during the period of enrollment for which the Pell Grant was awarded, are required by federal regulation to report that conviction in writing to the:

Director of Grants and Services
United States Department of Education
400 Maryland Avenue SW
Room 3124, GSA Regional Office Bldg., #3
Washington, DC 20202-1571

The report must be made within 10 days after the conviction. In addition to institutional sanctions, students and employees convicted of the unlawful possession or distribution of illicit drugs or alcohol could face local, state and federal legal penalties which include the loss of eligibility for federal financial aid, fines, imprisonment and the seizure of drug related assets.

VACCINATION POLICY

Galaxy Medical College recommends that all students protect themselves and their clients by receiving the immunizations listed below. Externship sites, volunteer opportunities, and student projects may require students to provide documentation of current immunizations.

- Tuberculosis
- Tetanus/diphtheria
- Polio
- Measles
- Rubella
- Chicken pox
- Hepatitis B

CAREER AND PLACEMENT SERVICES

To try to serve all our students better, Galaxy Medical College offers Student and Career Services. These services are set forth to make your career training experience as easy as possible and to ensure the quality and well being of all students. Some of the Student Services we offer include:

- ✓ Awards/Honors
- ✓ Carpooling
- ✓ Child Care Referrals
- ✓ Graduation Ceremony
- ✓ Orientation (a mandatory informative workshop for all new students)
- ✓ Parking Passes
- ✓ School Supplies
- ✓ School IDs

Alongside Student Services, Galaxy Medical College also assists each student in job placement. We work with a large range of professionals who are motivated to help our students with job placement assistance that is FREE of charge to current and graduate students. Despite the fact that employment cannot be guaranteed by any educational institution, in accordance with Californian law, our representatives guide our graduates to the best available jobs in the market. Students are assisted in the following areas:

- ✓ Career Counseling
- ✓ Career Planning
- ✓ Help with completing Job Applications
- ✓ Interviewing Skills Seminar
- ✓ Resume Preparation
- ✓ Volunteer Placement

Alongside Student Services, Galaxy Medical College also assists each student in job placement. We work with a large range of professionals who are motivated to help our students with job placement assistance that is free of charge. Despite the fact that employment cannot be guaranteed by this, or any educational institution, in accordance with Californian law, our representatives guide our graduates to the best available jobs in the market.

STUDENT ACTIVITIES OFFERED BY THE SCHOOL

In order for our students to have a vivid impression of the medical field and to better their communication and social skills, Galaxy Medical College provides extensive activities to ensure that all our students excel in their training.

- ✓ **School Field Trips**

Galaxy Medical College along with UCLA Medical Center has organized and developed an educational tour of different departments of both Mattel Children's Hospital and Ronald Regan Medical Center, both located at UCLA. This event is organized to better educate all students on the working environment of their chosen profession. This is a mandatory field trip for all students where they get to view the facilities, ask questions to working professionals and experience a hands on tour. The tour begins with an introductory orientation from working professionals who discuss the ups and downs of the industry. Following the orientation students take the tour of the hospitals and end the trip with a question/answer session and are offered an opportunity to volunteer at the hospital during their own time.

- ✓ **Guest Speakers**

Galaxy Medical College works with St. Josephs Hospital who provides guest speakers on a variety of subjects. These guest speakers are assigned for a 2 hour period where they educate enrolled students on many different subjects. A list of subjects are presented to the students and the subject is chosen based on popular demand from the student population. Subjects range from disease management to professionalism in the workplace. This allows the student to have a diverse view on certain issues discussed in the classroom

✓ **Graduate Motivation Workshop**

This is a non-mandatory workshop organized by Galaxy Medical College, where graduate students are invited to speak to current students about the benefits of the medical field, their personal experiences, and the benefits of being a graduate from Galaxy Medical College. This workshop is conducted outside of classroom hours.

✓ **HELP Events**

HELP is Health. Education. Life. Principles. This is a bi-weekly, non-mandatory event with food and fun activities organized by Galaxy Medical College's School Director in which all faculty and staff, and current students and their friends and family, outside of Galaxy Medical College, may attend. The event, which is free of charge, takes place at ARPI Restaurant where participants come to share questions, concerns, thoughts and ideas about health, education, life and principles; issues that class time does not allow for discussion. In many cases, guest speakers, from many walks of life and many different professions, are invited to volunteer their time and advise and help students in different areas. Participants of the event choose a topic every week (for the following week) which they want discussed. This event was set forth because we strongly believe that interaction and social communication help build a stronger foundation for many working professionals. This event has been taking place for about a year; in the beginning this was a temporary event but as time went on, we saw many improvements in the classroom so we continue to host this event bi-weekly with hopes of expanding into wider horizons.

✓ **Annual Spring Picnic**

Galaxy Medical College also organizes an annual picnic where faculty, staff and students are invited and have the opportunity to invite their family for fun in the sun. The picnic includes a barbeque, organized activities and prizes. This event allows for students to interact with each other and it gives the school the opportunity to be better acquainted with its students.

✓ **Constitution Day**

Constitution Day is a holiday recognized by Galaxy Medical College and its students. On this day, all students are organized to be in the conference room of the campus, where the School Director, Anna Khachatryan and the Financial Aid Director, Arpine Lusikyan speak to students about our nation, our constitution etc. They begin with a power point presentation, then go on to a Q & A session with all students. Then students must partake in a class activity such as making a Constitution Day poster, reciting a part of the Constitution or making pamphlets. Students are also given free Constitution Day Booklet, "The US Constitution & Fascinating Facts About It." Following these activities students write a one-page report about what they learned. This is a mandatory, annual event at Galaxy Medical College

STUDENT BODY DIVERSITY

For full-time students who graduated during the reporting
period of July 1, 2017 to June 30, 2018:

Gender	Percentage
Male	21%
Female	79%

The percentage full-time student aid recipients for the students graduated during the reporting period July 1, 2017 to June 30, 2018:

Student Aid	Percentage
Federal Pell Grant Recipients	94%
Federal Direct Subsidized Loan Recipients that did not receive Federal Pell	3%
Recipients of neither Federal Pell nor Federal Subsidized Loan	3%

NET PRICE CALCULATOR

Galaxy Medical College's Net Price Calculator can be found at the following web address:

<http://galaxymedicalcollege.edu/admissions/financial-aid/>

DISBURSEMENTS FOR BOOKS AND SUPPLIES

Disbursements for books and supplies are made according to the cost of books and supplies by program.

VOTER REGISTRATION

As a participant in Federal Title IV Student Aid Programs, Galaxy Medical College is required to advise you that voter registration forms are available in the Financial Aid Office. Electronic copies of voter registration forms can be found at the following web address:

<https://rtv.sos.ca.gov/elections/register-to-vote/>

CONSTITUTION DAY OBSERVANCE

Constitution Day is a holiday recognized by Galaxy Medical College and its students. On this day, all students are organized to be in the conference room of the campus, where the School Director, Associate Director and the Financial Aid Director speak to students about our nation, our constitution etc. They begin with a power point presentation, then go on to a Q & A session with all students. All students must partake in a class activity such as making a Constitution Day poster, reciting a part of the Constitution or making pamphlets. Students are also given free Constitution Day Booklet, "The US Constitution & Fascinating Facts About It." Following these activities students write a one-page report about what they learned. This is a mandatory, annual event at Galaxy Medical College.

DRUG AND ALCOHOL PREVENTION POLICY

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

GMC's policy regarding alcoholic beverages and illegal drugs is as follows:

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

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

SUBSTANCE ABUSE PREVENTION POLICY

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

CONFIDENTIAL NOTIFICATION

Any student who has reason to believe that a student is under the influence of drugs or alcohol while on campus may report this information to any employee of Galaxy Medical College anonymously. Under no circumstances shall employees of GMC disclose the identity of a student

who has made such a report to any other student, or to any person outside of GMC (except for law enforcement officers and fire & rescue officers, if necessary). Any record of such a report shall be kept in the strictest confidence, and all records of such reports (if any) shall be maintained in the Office of the School Director.

CONFRONTING SUSPECTED STUDENTS

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

INTERVIEWING SUSPECTED STUDENTS

The student shall be taken to a private office. No non-essential personnel shall be present during the interview. The interview shall be conducted by the School Director or the Associate Director. Any of these school officials may conduct the interview. One other employee of Galaxy Medical College shall be present as a witness.

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

STUDENT ADMITS TO USE OF DRUGS/ALCOHOL

If the student admits to being under the influence of drugs or alcohol, the interviewer shall remind the student that it is school policy to prohibit the possession, sale, or use of drugs and/or alcohol on campus. The student shall be informed that he or she shall not be permitted to return to class that day.

TRANSPORTING IMPAIRED STUDENT FROM CAMPUS

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

SAFETY CONCERNS VS PRIVATE CONCERNS

No employee of GMC shall transport a student suspected of being under the influence of drugs or alcohol without the prior permission of the School Director. In the event that GMC employees must transport a student home for his or her safety, two (2) employees of GMC will transport the student.

STUDENT DENIES TO USE OF DRUGS/ALCOHOL

In the event that the student denies being under the influence of drugs or alcohol, the School Director will make a determination as to whether the student shall be allowed to return to class. The School Director (with the assistance of the Associate Director, if he wishes) shall evaluate the student's physical condition, as well as any behaviors and/or symptoms that might lead a reasonable person to conclude that the student was in fact under the influence of drugs or alcohol.

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

DETERMINATION OF IMPAIRMENT – NEGATIVE

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

DETERMINATION OF IMPAIRMENT – POSITIVE

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

ASSISTANCE WITH OBTAINING TREATMENT

Any student who notifies any employee that he or she has a substance abuse problem shall be directed to the School Director. The student's admission of a substance abuse problem shall be kept in the strictest confidence. The student shall be encouraged to take full advantage of any reputable counseling and treatment services available. GMC shall assist a student with a

substance abuse problem as much as is possible, given the school's policies, resources and legal constraints.

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

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

COUNSELING

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

NO LEGAL CONFIDENTIALITY

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

LEGAL ADVICE

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

ANNOUNCEMENTS

All students and employees of GMC shall be provided with a written copy of the school's official policy regarding the possession, use, transfer, sale and distribution of alcoholic

beverages and illegal drugs. Students shall be provided this written policy statement upon enrollment. Employees shall be provided this written policy statement upon being hired. This policy shall be distributed to all employees (and to those students whose enrollments extend beyond one calendar year) annually.

INFORMATION ON THE LAW

All students and employees of GMC shall be informed in writing that unlawful possession of drugs is a crime in the State of California; punishable by a fine and/or imprisonment in the County Jail or the State Prison. The California Health and Safety Code §11350(a) defines the possession of certain types of drugs to be a felony, and lists the applicable punishments for violations. The California Health and Safety Code §11351 covers possession of certain illegal drugs for purposes of sale or distribution. Unlawful use and/or being under the influence of certain drugs are covered in §11550. Other statutes of the California Health and Safety Code and the Los Angeles Municipal Code also apply to the illegal possession, sale, distribution and use of illegal drugs. Many illegal drugs are covered under various Federal Criminal statutes.

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

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

HEALTH HAZARD AND CRIMINAL CONVICTION

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

- According to the Center for Disease Control, over 15,000 people die every year from overdoses of pain-killing drugs alone.
- There are over 100 fatal drug overdoses *per day* in the United States.
- Drug overdose rates in the United States have *tripled* since 1990.
- Alcohol is a factor in many drug overdose fatalities.
- People of any age, gender, ethnicity or socioeconomic status can and do become addicted to drugs and/or alcohol.
- Drug and Alcohol addiction can lead to physical ailments, long-term health problems (often serious), accidents due to impairment, increased likelihood of contracting a communicable disease, depression, suicidal thoughts, severe mood swings, alienation and even death.
- Nearly 50% of all persons incarcerated in Federal prisons are serving sentences for drug offenses.
- Nearly two-thirds of all inmates in California State prisons are serving time for drug offenses.
- People convicted of felony drug offenses in the State of California are required to register with the police as Drug Offenders.
- A criminal conviction for a drug offense can make it extremely difficult to find housing and employment.

- Drug and alcohol abuse affects people other than the addict: family, friends, employers and colleagues are all affected by your substance abuse.
- A criminal conviction for drug-related offenses can render a student ineligible for Title IV Federal Student Aid, even if the student has already qualified for and is presently receiving Title IV Federal Student Aid.

DEPENDENCY TREATMENT COUNSELING – OUTSIDE SERVICES

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

DEPENDENCY TREATMENT PROGRAMS AT GMC

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

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

ATTENDING CLASSES

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

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

Students who are not permitted to continue their programs of study because they are undergoing treatment for a substance abuse problem shall be placed on a Leave of Absence

not to exceed 180 calendar days. The reason for the Leave of Absence shall be recorded as “Medical.” No additional information shall be maintained in the student’s file or in the student’s computer file in the campus management system. Students will have until the expiration of the Leave of Absence to either (a.) complete their treatment program and present a letter from a licensed medical professional that they are fit to resume their studies, or (b.) obtain a letter from a licensed medical professional stating that they are fit to resume their studies while still in treatment.

CLEARANCE OF LOA

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

RE-ADMITTANCE FOR WITHDRAWN STUDENTS

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

GMC POLICY

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

CRIMES ON CAMPUS INVOLVING DRUGS OR ALCOHOL

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

REVIEW AND PREVENTION MEASURES

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

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

The bi-annual review shall be conducted by the School Director or the Associate Director. Any necessary changes to existing policies shall be completed and implemented as soon as possible.

CHANGES IN POLICY – APPROVAL AND IMPLEMENTATION

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

CHANGES IN POLICY – NOTIFICATION AND IMPLEMENTATION

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

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

DRUG ALCOHOL POLICY STATEMENT

In accordance with the Drug-Free Workplace Act of 1988 (P.L. 100-690), the Drug-Free Schools and Communities Act of 1989 (P.L. 1010-226) and 34 Code of Federal Regulation, Part 85, Subpart F, this institution is committed to maintaining a drug-free workplace and a drug-free school. Drug and alcohol abuse can lead to liver, heart, and other chronic diseases, low birth weight, birth defects, and infant mortality in expectant mothers, and death. The unlawful manufacture, distribution, dispensing, possession or use of drugs, alcohol or other controlled substances at this institution is strictly prohibited. Students and employees are required, as a condition of enrollment and/or employment, to abide by this policy.

To the extent allowed by local state and federal laws, this institution will impose disciplinary action against students and employees for violating these standards of conduct. These actions may include suspension, expulsion, termination of employment, referral for prosecution and/or required completion of a drug or alcohol rehabilitation or similar program.

This institution, as required by federal regulation (34 CFR 85.635 and Appendix C), will report all employees convicted of a criminal drug offense occurring in the workplace to the U.S. Department of Education. Consistent with these same regulations, employees, as a condition of employment, are required to provide written notice to this institution of their conviction for a criminal drug offense occurring at the workplace within five (5) days after that conviction. In addition, students receiving Pell Grants who are convicted of a criminal drug offense during the period of enrollment for which

the Pell Grant was awarded, are required by federal regulation to report that conviction in writing to the:

Director of Grants and Services
United States Department of Education
400 Maryland Avenue SW
Room 3124, GSA Regional Office Bldg., #3
Washington, DC 20202-1571

The report must be made within 10 days after the conviction.

In addition to institutional sanctions, students and employees convicted of the unlawful possession or distribution of illicit drugs or alcohol could face local, state and federal legal penalties which include the loss of eligibility for federal financial aid, fines, imprisonment and the seizure of drug related assets.

Drug awareness programs, counseling, treatment, rehabilitation and other related services are available on an ongoing basis to students and employees of this institution through:

- **LA County Health Services Alcohol & Drug** (323) 221-1746
- **So. CA Alcohol & Drug Program** (323) 780-4357
- **L.A. Center for Alcohol and Drug** (213) 626-6411
- **Nat'l Council on Alcoholism & Drug- L.A. County** (800) 622-2255

Students and employees seeking assistance in overcoming a drug or alcohol related problems are encouraged to contact this organization. This institution continues to make a good faith effort to provide a school and workplace free from the illicit use, possession, or distribution of drugs and alcohol.

CLERY ACT – CAMPUS SECURITY POLICIES & PROCEDURES

PURPOSE OF THIS POLICY

This policy shall establish all procedures for Galaxy Medical College for complying with the provisions of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (known henceforth in this Manual as the Clery Act). Such compliance is mandatory under federal law.

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

BACKGROUND

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

SECTION I

BASIC PROVISIONS AND COMPLIANCE REQUIREMENTS

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

- Collect, compile, classify and record all incidents of crimes that are covered by the Clery Statistics that take place on school grounds, or on property deemed by the Clery Act to be part of the school's "Campus Geography."
- Provide timely warnings ("Campus Alerts") to all students and employees of all incidents and/or situations that represent (or may represent) a threat to their safety.
- Issue "Emergency Notifications" upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to students and employees.
- Publish an annual Campus Security Report. The Campus Security Report shall contain safety and security-related policy statements and crime statistics, and shall be distributed to all current students and employees of the school.
- Inform all prospective students and prospective employees of the existence and availability of

this report.

- Maintain all crime statistics compiled under the Clery Act on campus for at least eight (8) years.
- Implement and disclose all emergency evacuation and notification procedures for the school.
- Implement a Program Participation Agreement (PPA) requirement concerning the disclosure of the results of any institutional disciplinary proceedings to the alleged victim of any crime of violence, or a non-forcible sex offense.

SPECIFIC REQUIREMENTS THAT DO NOT APPLY TO GMC

There are additional specific requirements of the Clery Act that do not apply to GMC because (a.) the school has no on-campus student housing, and (b.) the school has no Campus Police force or Campus Security personnel. These requirements include the establishment and maintenance of a Daily Campus Crime Log, establishing procedures for issuing alerts in the event of a missing student, fire safety procedures, etc. These other requirements may be reviewed in the U.S. Department of Education’s *Handbook for Campus Safety and Security Reporting* (2012 Edition). This *Handbook* is available in the Associate Directors Office.

GMC EMERGENCY PROCEDURES MANUAL

GMC has procedures for evacuating the campus in the event of a fire, earthquake or other emergency situation. These procedures are updated whenever necessary. These emergency procedures, as well as direct contact information for local law enforcement, fire, and rescue paramedics are contained in the school’s *Emergency Plan*. This manual is available in the Associate Director’s Office.

All students and employees of GMC should familiarize themselves with the procedures and information contained in the *Emergency Plan*. Any questions regarding these procedures shall be addressed to the Associate Director.

COMPLIANCE REQUIREMENTS – TIMEFRAMES

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

Clery Act Requirement	Timeframe for Compliance
Have procedures for Emergency Notifications and Evacuation of the school’s campus.	Employ the Emergency Notification procedure in all cases of an immediate threat to the health and/or safety of the students and employees.
Issuance of Timely Warnings.	Issue a Timely Warning in all cases of a threat that crime is ongoing and may be repeated.

Request Crime Statistics from local Law Enforcement agencies.	Request these statistics annually; preferably at the beginning of the calendar year.
Submit crime and fire statistics to the U.S. Department of Education via the Department's web-based collection facility.	Submit these statistics by or on October 1 of the year.
Publish an Annual Security Report	The Annual Security Report shall be completed and published by October 1. The Report shall be made available to all current students and employees.

REGULATORY AUDITS AND PENALTIES FOR NON-COMPLIANCE

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

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

SECTION II

CAMPUS GEOGRAPHY AND REQUIREMENTS OF THE CLERY ACT

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

**"ON-CAMPUS GEOGRAPHY" AND "PUBLIC PROPERTY GEOGRAPHY" –
DEFINED**

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

"On-Campus Geography" is defined as follows:

Any building or property owned or controlled by an institution (school) within the same reasonably

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

"Public Property Geography" is defined as follows:

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

Under this definition, GMC's "On-Campus Geography" and "Public Property Geography" covers the main campus.

GMC FACILITY

- All rooms, hallways and areas of the main campus on the first floor of 6400 Laurel Canyon Blvd Suite 115
- All elevators in the building at 6400 Laurel Canyon Blvd
- All stairwells in the building at 6400 Laurel Canyon Blvd
- All classrooms and offices of GMC at 6400 Laurel Canyon Blvd
- The lobby of 6400 Laurel Canyon Blvd
- The parking structure at 6400 Laurel Canyon Blvd

COMMON AREAS/PUBLIC PROPERTY GEOGRAPHY (ALL ARE OUTDOORS)

- The sidewalk on the east side of Victory Boulevard; directly in front of 6400 Laurel Canyon Blvd
- The sidewalk on the north side of Laurel Canyon Boulevard; directly in front of and adjacent to the entrance to 6400 Laurel Canyon Blvd
- The street surfaces of Victory Boulevard and Laurel Canyon Boulevard
- All sidewalks, driveways, alleyways, patios and other outdoor common areas within the building complex that is 6400 Laurel Canyon Blvd
- The parking structure (all levels) for 6400 Laurel Canyon Blvd, including all elevators, stairwells, and the front and rear driveways

CLERY ACT REQUIREMENTS FOR EXTERNSHIP SITES **REPORTING NOT REQUIRED**

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

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

CLERY ACT REQUIREMENTS FOR SPECIAL EVENTS SITES
REPORTING NOT REQUIRED

Unless GMC enters into a contract with the owner(s) of a site used for special events, and unless that contract gives GMC control of the physical space used for the duration of the event, then information regarding incidents of crimes or threats to health and/or safety will be reported.

SECTION III

CRIME STATISTICS AND CRIME CLASSIFICATIONS FOR CLERY ACT
REPORTING

Not all crimes must be reported or statistically collated for purposes of the Clery Act. The Clery Act requires that three (3) categories of crimes must be tracked and reported. These three categories do cover a considerable variety of crime classifications, but they are not comprehensive. All other classifications of crimes, and those specific offences that fall under those classifications, are exempt from the requirements of the Clery Act. It is important for employees of GMC that assist in preparing the annual report to know these categories, classifications and exemptions.

GMC POLICY FOR REPORTING CRIMES AND INCIDENTS NOT COVERED BY
THE CLERY ACT

Although many crimes are not covered by Clery Act reporting and recording requirements, it is the policy of GMC to report and record all incidents of crime that take place on school grounds, or in the common areas adjacent to those grounds. There are no exceptions to this requirement. All employees and students of GMC are required to report incidents of crime or threats to the health and/or safety of persons on school grounds immediately. The following procedures detail the responsibilities of students and employees for initial reporting of any incident of crime or threat to health and/or safety that occurs within the school's geographical area of responsibility.

REPORTING PROCEDURES – STUDENTS

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

- | | | |
|--------------------------|------------------|----------------------------------|
| • School Director | Anna Khachatryan | Telephone (818) 509-9972 |
| • Associate Director | Helen Ghalayan | Telephone (818) 509-9970 EXT 103 |
| • Financial Aid Director | Arpine Lusikyan | Telephone (818) 509-9970 EXT 105 |

This can be accomplished in any way that the student sees fit to do so: in person, by e-mail, by telephone, etc. Students shall be provided with current lists of all designated Campus Security Authorities. However, if need be, a student may report an incident of crime or threat to health and/or safety to any employee of GMC. It is essential that any such incidents of crime or

threats to health and/or safety be reported immediately. This policy shall not be construed to interfere with the prompt and efficient reporting of any incident of crime or threat to the health and/or safety of students, employees and visitors to the school.

Students may also report any crime directly to the local law enforcement agency. GMC's campus is within the jurisdiction of the Los Angeles Police Department's North Hollywood Station. They may call 911 if they believe it is an emergency, or they may call the LAPD's non-emergency telephone number at the North Hollywood Division station. The non-emergency telephone number is:

(818) 623-4016

(818) 756-9035 (TDD/TTY)

REPORTING PROCEDURES – EMPLOYEES

Any employee of GMC who becomes aware of, or is made aware of, a crime or threat to health and/or safety shall report the incident to the Associate Director immediately. This can be accomplished in any way that the employee sees fit to do so: in person, by e-mail, by telephone, etc. The School Director shall instruct the employee regarding what (if any) actions the employee is to take. The Campus Director shall, if necessary or warranted, contact law enforcement and inform them of the situation. The School Director shall also inform the Director of Operations and the School President. In the event that an employee cannot contact the School Director to report an incident of crime or threat to health and/or safety, the employee shall contact the most senior member of the school's administration and report the incident. The senior member of the school's administration shall assume the responsibility for notifying law enforcement, and for notifying the Director of Operations and the School President. Further information on internal policies for students' and employees' responsibilities in the event of an incident of crime or emergency is contained in the GMC's *Emergency Plan*.

PROTECTING THE CONFIDENTIALITY OF CRIME VICTIMS – GMC POLICY

It is the policy of GMC that the privacy and confidentiality of any victim of any crime committed on campus, or within the school's geographic boundaries, shall be protected from disclosure to the fullest extent of the law. No person who reports a crime to school personnel, or to any law enforcement agency, shall have their name(s) and/or personal information released. No personal or identifying information regarding the victim of any crime shall be released under any circumstances, except to law enforcement and/or fire & rescue personnel as required by law. Any student who violates this policy shall be withdrawn immediately and shall not be allowed to return or re-enroll at any time. Any employee who violates this policy shall be subject to disciplinary action; up to and including termination of employment with GMC.

CLASSIFICATIONS OF REPORTABLE CRIMES UNDER THE CLERY ACT

The Clery Act requires schools to compile statistical information, and report incidents of, any crimes that fall under any of the following three (3) categories:

- ***Criminal Offenses:*** This category includes all Criminal Homicides (Murder and Non-Negligent Manslaughter, Negligent Manslaughter), Sex Offenses (Forcible and Non-Forcible), Aggravated Assault, Arson, Robbery, Burglary, and Theft of a Motor Vehicle.
- ***Hate Crimes:*** Any of the already-mentioned criminal offenses, as well as any incidents of

Larceny (Theft), Simple Assault, Intimidation, or Destruction/Damage/Vandalism of Property that are motivated by bias/hate.

- **Arrests and Referrals for Disciplinary Action:** Any arrest and/or referral to a law enforcement agency, or incident that results in school disciplinary action that is also a violation of the law (even if no arrest was made or charges filed), for incidents involving the Unlawful Carrying/Possession/Exhibition of Weapons; any Drug Abuse violations, and any Liquor Law violations.

DETERMINING WHETHER A CRIMINAL INCIDENT IS REPORTABLE UNDER THE CLERY ACT

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

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

HANDLING FALSE REPORTS OF CRIMES

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

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

REVISING REPORTS – FALSE/UNFOUNDED CRIME REPORTS

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

HOW TO CLASSIFY SPECIFIC CRIMES FOR CLERY ACT REPORTING

Beyond the three (3) categories of reportable crimes previously addressed, there are specific procedures for classifying individual crimes reported under the Clery Act. The source for these classifications is the Federal Bureau of Investigation’s (the F.B.I.’s) *Uniform Crime Reporting* classification codes.

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

Referral” incidents are handled somewhat differently than are “Criminal Offenses” and “Hate Crimes.” The following two (2) rules must be followed when reporting “Arrest and Referral” incidents in the annual report:

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

HOW TO CLASSIFY CRIMES FOR CLERY ACT REPORTING REQUIREMENTS

The classification of crimes for purposes of complying with the reporting provisions of the Clery Act is somewhat complicated, and requires very specific methodologies for both counting and classifying incidents. The processes for completing these tasks are described in great detail in Chapter 3 of the U.S. Department of Education’s *Handbook for Campus Safety and Security*

Reporting. GMC personnel involved in preparing the annual report shall refer to the *Handbook* for specific guidance on classification and collating crime statistics.

WHAT MUST SCHOOLS DISCLOSE IN THEIR REPORTS?

Schools are required to disclose only reported offenses. Schools are not required to disclose the findings of courts, the Medical Examiner’s Office, the District Attorney’s Office or the City Attorney’s Office. In the event that the school comes into possession of these findings, or if the school is informed of these findings, this information shall not be included in the annual Clery Act report.

GMC POLICY – DISCLOSURE OF UNNECESSARY INFORMATION IS PROHIBITED

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

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

SECTION IV

OBTAINING INFORMATION FROM LOCAL LAW ENFORCEMENT AGENCIES

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

“CAMPUS SECURITY AUTHORITIES” UNDER THE CLERY ACT

The Clery Act is specific regarding who constitutes a “Campus Security Authority.” Obviously, Campus Police Department personnel (if the school has a Campus Police Department) and Campus Security Guards (if the school has such guards) would fall under this classification. While GMC has no Campus Police Department or Security Guards, certain employees do fall under the definition of “Campus Security Authorities.” The criteria for a Campus Security Authority under the Clery Act are as follows:

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

DUTIES OF THE CAMPUS SECURITY AUTHORITIES AT GMC

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

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

DUTIES OF THE CAMPUS SECURITY AUTHORITY COORDINATOR

The Campus Security Authority Coordinator shall be the Associate Director. The Duties of the Campus Security Authority Coordinator are as follows:

- To receive all reports of crimes and threats to health and/or safety within the designated Campus Geography as specified for Clery Act reporting requirements.
- To provide these reports to the School Director
- To ensure that all students are made aware of the existence of GMC crime reporting and emergency policies and procedures
- To provide written copies of these policies and procedures as requested
- To ensure that all designated Campus Security Authorities provide a written report of any reports of crimes or threats to health and/or safety that they received during the calendar year

TRAINING FOR CAMPUS SECURITY AUTHORITIES

The Associate Director shall provide any necessary training for employees of GMC regarding the duties of a Campus Security Authority. All training shall be based on the information contained in the U.S. Department of Education's *Handbook for Campus Safety and Security Reporting*. Record shall be kept of all personnel who undergo such training. This record shall be maintained in the Associate Directors Office.

SECURITY OF THE GMC CAMPUS

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

- All students are provided with an official photographic identification card. This identification card must be displayed at all times by all students while on the campus grounds.
- Students are required to wear a highly visible and recognizable student uniform while on campus.
- Employees of GMC maintain regular contact with the building's private security staff.

- The Los Angeles Police Department's North Hollywood Station is one mile from the campus.

RECORDS AND STATISTICS OF CAMPUS POLICE AND/OR SECURITY DEPARTMENTS

GMC has no Campus Police Department nor does it maintain a Security Department. The building security for 6400 Laurel canyon Blvd is not employed by GMC, nor is it responsible to the school's administration. Therefore, GMC has no obligation under the Clery Act to obtain crime records and statistics from such agencies.

RECORDS AND STATISTICS OF LOCAL LAW ENFORCEMENT AGENCIES

The Clery Act requires schools to obtain – or at least; to make a good-faith effort to obtain – relevant crime statistics from the law enforcement agency having jurisdiction over the school's campus. For GMC's current location the local law enforcement agency is the Los Angeles Police Department; North Hollywood Division.

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

OBTAINING CRIME STATISTICS INFORMATION – RESPONSIBILITY

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

REFUSAL TO PROVIDE CRIME STATISTICS INFORMATION

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

PAYMENT FOR CRIME STATISTICS INFORMATION

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

SCOPE AND CONTENT OF CRIME STATISTICS INFORMATION

The crime statistics requested of the police shall be no more than numerical statistics of crimes that occurred in the school's Campus Geography: number and type of crimes. No additional

information is required under the Clery Act, and no additional information (specifics of crimes reported, names of involved persons, adjudication of criminal investigations, etc.) shall be requested.

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

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

SECTION V

DAILY CRIME LOGS

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

Under the provisions of the Clery Act, the Building Security personnel for 6400 Laurel Canyon Boulevard do not constitute a Campus Security Department.

DAILY FIRE LOGS

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

GMC POLICY REGARDING FIRE RECORDS / CONTACT WITH FIRE & RESCUE OFFICIALS

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

SECTION VI

EMERGENCY NOTIFICATIONS AND TIMELY WARNINGS REQUIREMENTS

Emergency situations can occur at any time. Southern California is particularly vulnerable to such

things as earthquakes and wildfires, but numerous other emergency situations can threaten the health and safety of our students and employees: major accidents, structural damage caused by equipment failures such as gas leaks, major civil disturbances, etc. GMC has created an *Emergency Plan* that addresses specific elements of emergency situations such as earthquakes, fires, medical emergencies, etc. All employees of GMC shall familiarize themselves with the school's *Emergency Plan*.

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

EMERGENCY SITUATIONS

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

All employees shall familiarize themselves with the established evacuation plans contained in the *Emergency Plan*.

ORDER TO EVACUATE THE CAMPUS – COMPLIANCE REQUIRED

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

COMPLIANCE WITH ADMINISTRATIVE STAFF ORDERS IN AN EMERGENCY

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

COMPLIANCE WITH LAW ENFORCEMENT AND/OR FIRE AND RESCUE PERSONNEL ORDERS

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

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

Failure to comply with instructions from law enforcement and/or fire & rescue officers may

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

DISCLOSING THE SCHOOL'S EMERGENCY PROCEDURES – REQUIRED

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

NOTIFICATION OF AN EMERGENCY SITUATION ON CAMPUS – NOTIFYING STUDENTS AND STAFF

In the event that an Emergency Situation occurs on the campus, the School Director shall confirm the existence of the situation. Once confirmed, the School Director shall issue an Emergency Notification, or he may direct members of the school's staff to issue an Emergency Notification. The Campus Director shall also instruct members of the school's staff to go to each classroom, office and common area to ensure that all students and employees are notified of the Emergency Situation and of what they are to do.

The details for the school's Emergency Notification procedure are contained in the GMC *Emergency Plan*.

NOTIFYING OUTSIDE AGENCIES OF AN EMERGENCY SITUATION ON CAMPUS

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

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

CRITICAL INCIDENT – ALL EMPLOYEES AND STUDENTS SHALL MAKE IMMEDIATE NOTIFICATION

In the event of clear, severe and immediate threat to the safety of any employee or any student, in which any delay in notifying the proper emergency agencies would endanger the life or safety of an individual or group of individuals, that incident shall be considered a Critical Incident. In the event of a Critical Incident, all employees of GMC are authorized to telephone the

police and/or fire & rescue prior to notifying any senior member(s) of the school's administration. Employees of GMC must put the safety of any employee, student or visitor before compliance with administrative procedure. It is the policy of GMC that in the event of a Critical Incident, notifying emergency agencies and personnel is more important than adherence to the details of policy. No disciplinary, punitive or corrective action shall be taken against any student or employee of GMC who reasonably believes that the nature, immediacy and severity of an Emergency Situation qualifies that situation as a Critical Incident; requiring the immediate notification of law enforcement and/or fire & rescue agencies.

NOTIFYING THE BUILDING SECURITY OF AN EMERGENCY SITUATION ON CAMPUS

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

TESTING EMERGENCY PROCEDURES

The Clery Act requires schools to test their Emergency Situation procedures at least once per calendar year. Here at GMC, this requirement raises a number of problems, as the school does not own the buildings in which the campus is located; nor is GMC the only tenant in this building. Live rehearsal tests must be sanctioned by and coordinated with the building management. However, the Clery Act provides some flexibility in the manners in which a school may test its Emergency Situation procedures.

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

The Clery Act requires that tests conducted be classified as "announced" or "unannounced." "Table Top" simulations shall be documented as "announced," as this is the only way such a theoretical drill can be conducted. In the event that GMC holds an Emergency Situation drill involving students, and with the permission and cooperation of the buildings' owners, management and security personnel, the test shall be "unannounced." This will provide the best evidence of the effectiveness of the school's Emergency Situation response procedures.

PUBLICATION OF EMERGENCY PROCEDURES – STUDENTS

GMC shall create and distribute, free of charge, the school's *Emergency Plan*. This publication shall contain all information necessary for students in the event of an Emergency Situation on campus. All new starting cohorts shall be informed of the existence of these *Emergency Plan* at the "New Student Orientation" session that is held before each cohort start. The Associate Director shall ensure that all students are provided with a copy of these *Emergency Plan*, and he shall also ensure that any new students that do not attend the orientation are provided with this information before the end of the first week of their classes. A log shall be kept by the Associate Director that contains the name of each student, and acknowledgement that the requisite information was provided to the student.

Students shall be allowed to request a copy, free of charge, of the *Emergency Plan* at any time during their enrollment at GMC. Copies shall be made available by (and through) the Student Services. *The Emergency Plan* shall also be made available, free of charge, to parents of students enrolled at GMC.

TIMELY WARNINGS – DEFINED

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

- A crime falling under the designation of the Clery Act as a reportable crime occurs on or very near the campus
- An Emergency Situation occurs on or very near the campus
- The crime or emergency Situation is considered by the school to represent a serious and/or continuing threat to the health and/or safety of students and/or employees

TIMELY WARNINGS – WHEN THEY ARE REQUIRED

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

GMC POLICY – ISSUING TIMELY WARNINGS

GMC shall issue a Timely Warning in any situation involving a known, ongoing threat to the health and/or safety of students and employees. The Timely Warning shall be made as soon as the school’s senior administration determines that the dangerous situation exists, and has enough information to allow the students and employees to take preventive measures to avoid the dangerous situation. Every effort shall be made to ensure that all students and employees of GMC are quickly and immediately informed of any Timely Warning.

WHO SHALL ISSUE TIMELY WARNINGS?

After consultation with the School President and the Director of Operations, the School Director shall draft language for a Timely Warning. The School Director shall make the Timely Warning, or he shall instruct other employees to disseminate the information.

HOW SHALL TIMELY WARNINGS BE MADE

Once the language of the Timely Warning is approved by the School President and the Director of Operations, the Timely Warning shall be made to all employees and students of GMC. The

information contained in the Timely Warning shall be disseminated by several different means. Employees and students shall be notified by company e-mail, as well as in-person verbally. Written notifications shall be posted throughout the school's campus alerting students, employees and visitors of the dangerous situation, and they shall contain information that will help students, employees and visitors avoid the dangerous situation.

TIMELY WARNINGS – OFFICIAL RECORD

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

TIMELY WARNINGS AND FERPA COMPLIANCE

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

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

SECTION VII

SEX OFFENSE PREVENTION / SEX OFFENDERS

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

GMC POLICY – PREVENTION OF SEX OFFENSES

GMC is committed to providing a safe and welcome environment to all students, employees and visitors. It is the policy of this school that there is, and shall always be, zero tolerance for sexual harassment and inappropriate conduct of a sexual nature. This policy is contained in the School Catalog, and every student receives a copy of this Catalog. All employees of GMC are advised of the school's zero tolerance policy regarding sexual harassment and inappropriate conduct of a sexual nature.

PROCEDURE FOR DEALING WITH A REPORT OF SEXUAL HARASSMENT AND SEX OFFENSES

Any student or employee who is the victim of a criminal sexual offense is encouraged to report the

incident immediately. Ideally, students and employees shall report all criminal sex offenses to a Campus Security Authority; preferably the Associate Director. However, in order to avoid having such incidents go unreported; students and employees are permitted to report such incidents to any employee of GMC.

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

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

VICTIMS OF CRIMINAL SEX OFFENSES – ON-CAMPUS AND OFF-CAMPUS COUNSELING

GMC has no resources for, and therefore does not provide, any on-campus professional counseling services to victims of criminal sex offenses. GMC does not enter into contracts or agreements with, and therefore is unable to recommend, any specific off-campus counseling services for victims of a criminal sex offense. Victims of criminal sex offenses shall be encouraged to learn of such available services and resources from law enforcement and fire & rescue personnel, who will have such information and who can assist the victim in obtaining these services.

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

Los Angeles Police Department – North Hollywood Division
11640 Burbank Blvd
North Hollywood, CA 91601
(818) 623-4016
(818) 756-9035 (TDD/TTY)

NOTIFICATION TO LAW ENFORCEMENT OF AN ALLEGED CRIMINAL SEX OFFENSE

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

In the event that a victim and/or reporting person refuses to speak with law enforcement

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

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

IDENTIFYING POTENTIAL WITNESSES

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

Neither the School Director, nor any employee of GMC, shall attempt to conduct a criminal investigation of an alleged sex offense. GMC personnel do not possess the training and experience to do so, and doing so could compromise the official police investigation. All employees of GMC shall allow the police to conduct the official criminal investigation, and shall cooperate fully and immediately with all law enforcement personnel.

PRESERVATION OF EVIDENCE – EMPLOYEES' RESPONSIBILITIES

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

RENDERING ASSISTANCE TO VICTIMS AND WITNESSES

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

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

SEX OFFENSES ON CAMPUS – MEDIA RELATIONS

Employees of GMC shall not under any circumstances speak to media personnel regarding an

allegation of a criminal sex offense on campus. If an official statement is to be made by and on behalf of the school, it shall be made by the School President, or by the Director of Operations or the School Director at the request of the School President. No photographs shall be taken, or allowed to be taken, of the crime scene. Only law enforcement personnel shall be permitted to photograph the crime scene.

ACTIONS TO BE TAKEN IN THE AFTERMATH OF A CRIMINAL SEX OFFENSE ON CAMPUS

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

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

SCHOOL DISCIPLINARY ACTIONS IN CASES OF CRIMINAL SEX CRIMES

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

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

REGISTERED AND/OR CONVICTED SEX OFFENDERS

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

DISCIPLINARY INVESTIGATION REQUIRED

In the event that the alleged perpetrator is a student, and the student is not charged and convicted of the offense in a criminal court, GMC shall conduct an investigation to determine whether the accused student should be temporarily or permanently withdrawn from school, or whether the accused student should be allowed to remain in school. The investigation results shall be presented to an Administrative Panel for review and decision on the proper course of action. In the event the Administrative Panel determines that the accused student has committed misconduct, the Panel shall recommend to the School President that the student be involuntarily and permanently withdrawn from GMC.

Such investigations shall not be conducted until the conclusion of the criminal investigation conducted by law enforcement personnel; nor shall they be conducted before the conclusion of the accused student's criminal trial, if the student is charged and tried for the offense.

DISCIPLINARY INVESTIGATION – PANEL COMPOSITION

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

DISCIPLINARY INVESTIGATION – RIGHT TO CALL WITNESSES AND PRESENT EVIDENCE

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

Any student facing involuntary withdrawal shall not have the right to confront the alleged victim in the course of a Disciplinary Investigation. While this right exists for defendants in a court of law, a school Disciplinary Investigation is not a court of law. To subject the alleged victim of a criminal sex offense to questioning by the alleged perpetrator would place the alleged victim in a position that is clearly dangerous to his or her health and well-being. The Disciplinary Investigation Panel shall accept statements from both the alleged victim and the alleged perpetrator, at different times and in different locations.

FINDINGS AND DECISIONS OF THE DISCIPLINARY INVESTIGATION – DUTY TO NOTIFY

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

CRIMINAL SEXUAL OFFENSES COMMITTED BY GMC EMPLOYEES

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

OBTAINING INFORMATION ON REGISTERED SEX OFFENDERS IN THE AREA OF THE SCHOOL

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

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

Los Angeles Police Department – North Hollywood Division
11640 Burbank Blvd
North Hollywood, CA 91601
(818) 623-4016
(818) 756-9035 (TDD/TTY)

To obtain information on California registered sex offenders from the California Department of Justice’s website, go to:

<http://www.meganslaw.ca.gov>.

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

SECTION VIII

GMC POLICIES REGARDING ILLEGAL POSSESSION, DISTRIBUTION AND USE OF ALCOHOL AND DRUGS / SUBSTANCE ABUSE

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

Please refer to GMC’s Drug and Alcohol Prevention Policy for details.

SECTION IX

THE CLERY ACT ANNUAL SECURITY REPORT ANNUAL REPORT – REQUIRED

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

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

DISTRIBUTION OF THE ANNUAL REPORT – GMC POLICY

GMC believes that campus crime statistics and safety issues should be made available to any person who requests them. It is the policy of GMC that the Annual Report shall be distributed to all required persons, and shall be made available to any person who requests a copy. There shall be no charge for a copy of the Annual Report. A printed copy of the report may be obtained from the School Director during normal business hours.

DISTRIBUTION OF THE ANNUAL REPORT – METHODS

The Annual Report shall be posted on the school's website, which is available to any student, employee, prospective student, or to any person who views the school's website. Current students and employees shall be informed of the availability of the Annual Report by written announcement.

COMPLETION AND DISTRIBUTION OF THE ANNUAL REPORT – RESPONSIBILITIES

The School Director shall be responsible for preparing, distributing and submitting the Annual Report.

ANNUAL REPORT – RETENTION REQUIREMENTS

GMC shall maintain copies of all Annual Reports permanently. The Clery Act requires schools to maintain Annual Reports for three (3) years from the date of publication. The Annual Reports shall be retained in the Office of the Campus Director.

ANNUAL REPORT / CRIME STATISTICS – SUBMISSION TO THE U.S. DEPARTMENT OF EDUCATION

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

The School Director shall submit the required crime statistics to the U.S. Department of Education.

CONTENT OF THE ANNUAL REPORT

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

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

CONTRIBUTIONS TO THE ANNUAL REPORT – WHO MAY CONTRIBUTE INFORMATION?

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

ANNUAL CRIME REPORT

2017 – 2018

CRIMINAL OFFENSES ON CAMPUS	2016	2017	2018
Murder/Non-Negligent Manslaughter	0	0	0
Negligent Manslaughter	0	0	0
Sex Offenses – Forcible	0	0	0
Sex Offenses – Non Forcible (incest & statutory rape)	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	0	0	0
Motor Vehicle Theft	0	0	0
Arson	0	0	0

CRIMINAL OFFENSES – PUBLIC PROPERTY	2016	2017	2018
Murder/Non-Negligent Manslaughter	0	0	0
Negligent Manslaughter	0	0	0
Sex Offenses – Forcible	0	0	0
Sex Offenses – Non Forcible (incest & statutory rape)	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	0	0	0
Motor Vehicle Theft	0	0	0
Arson	0	0	0

CRIMINAL OFFENSES – REPORTED BY LOCAL POLICE	2016	2017	2018
Murder/Non-Negligent Manslaughter	0	0	0
Negligent Manslaughter	0	0	0
Sex Offenses – Forcible	0	0	0
Sex Offenses – Non Forcible (incest & statutory rape)	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	0	0	0
Motor Vehicle Theft	0	0	0
Arson	0	0	0

HATE CRIMES ON CAMPUS	TOTALS BY YEAR			CATEGORY OF BIAS CRIMES REPORTED IN 2016						CATEGORY OF BIAS CRIMES REPORTED IN 2017						CATEGORY OF BIAS CRIMES REPORTED IN 2018					
	2013	2014	2015	RACE	RELIGION	SEX. ORIENT.	GENDER	DISABILITY	ETHNICITY	RACE	RELIGION	SEX. ORIENT.	GENDER	DISABILITY	ETHNICITY	RACE	RELIGION	SEX. ORIENT.	GENDER	DISABILITY	ETHNICITY
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sex Offenses – Forcible	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sex Offenses – Non Forcible (incest & statutory rape)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Larceny Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Destruction/Damage/Vandalism of Property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

HATE CRIMES - PUBLIC PROPERTY	TOTALS BY YEAR			CATEGORY OF BIAS CRIMES REPORTED IN 2016						CATEGORY OF BIAS CRIMES REPORTED IN 2017						CATEGORY OF BIAS CRIMES REPORTED IN 2018					
	2013	2014	2015	RACE	RELIGION	SEX. ORIENT.	GENDER	DISABILITY	ETHNICITY	RACE	RELIGION	SEX. ORIENT.	GENDER	DISABILITY	ETHNICITY	RACE	RELIGION	SEX. ORIENT.	GENDER	DISABILITY	ETHNICITY
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sex Offenses – Forcible	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sex Offenses – Non Forcible (incest & statutory rape)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Larceny Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Destruction/Damage/ Vandalism of Property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

HATE CRIMES REPORTED BY LOCAL POLICE	TOTALS BY YEAR			CATEGORY OF BIAS CRIMES REPORTED IN 2016						CATEGORY OF BIAS CRIMES REPORTED IN 2017						CATEGORY OF BIAS CRIMES REPORTED IN 2018					
	2013	2014	2015	RACE	RELIGION	SEX. ORIENT.	GENDER	DISABILITY	ETHNICITY	RACE	RELIGION	SEX. ORIENT.	GENDER	DISABILITY	ETHNICITY	RACE	RELIGION	SEX. ORIENT.	GENDER	DISABILITY	ETHNICITY
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sex Offenses – Forcible	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sex Offenses – Non Forcible (incest & statutory rape)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Larceny Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Destruction/Damage/ Vandalism of Property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

ARRESTS ON CAMPUS	2016	2017	2018
Weapons: carrying, possessing, etc	0	0	0
Drug abuse violations	0	0	0
Liquor law violations	0	0	0

ARRESTS PUBLIC PROPERTY	2016	2017	2018
Weapons: carrying, possessing, etc	0	0	0
Drug abuse violations	0	0	0
Liquor law violations	0	0	0

ARRESTS REPORTED BY LOCAL POLICE	2016	2017	2018
Weapons: carrying, possessing, etc	0	0	0
Drug abuse violations	0	0	0
Liquor law violations	0	0	0

DISCIPLINARY ACTION ON CAMPUS	2016	2017	2018
Weapons: carrying, possessing, etc	0	0	0
Drug abuse violations	0	0	0
Liquor law violations	0	0	0

DISCIPLINARY ACTION PUBLIC PROPERTY	2016	2017	2018
Weapons: carrying, possessing, etc	0	0	0
Drug abuse violations	0	0	0
Liquor law violations	0	0	0

DISCIPLINARY ACTION REPORTED BY LOCAL POLICE	2016	2017	2018
Weapons: carrying, possessing, etc	0	0	0
Drug abuse violations	0	0	0
Liquor law violations	0	0	0

STUDENTS RIGHT TO KNOW

Please see the below information in compliance with the Student Right to Know Act

GRADUATION RATE

For full-time students who graduated during the reporting period of July 1, 2017 to June 30, 2018:

Program	Number of Completers	On-Time Graduates (100%)	Percentage On-Time Graduates (100%)	Graduates within (150%)	Percentage of Graduates (150%)
Medical Assistant	17	17	89%	0	0%
Health Claims Examiner	6	6	100%	0	0%
Pharmacy Technician	12	12	97%	0	0%

GRADUATES BY GENDER

For full-time students who graduated during the reporting period of July 1, 2017 to June 30, 2018:

Gender	Percentage
Male	21%
Female	79%

GRADUATES BY ETHNICITY

The ethnic background for full-time students who graduated during the reporting period of July 1, 2017 to June 30, 2018:

Hispanic Or Latino	White	Black/ African American	Asian	American Indian or Alaskan Native	Two Or More Races	Race Ethnicity Unknown
3%	81%	0%	5%	0%	11%	0%

GRADUATES RECEIVING STUDENT AID

The percentage full-time student aid recipients for the students graduated during the reporting period
July 1, 2017 to June 30, 2018:

Student Aid	Percentage
Federal Pell Grant Recipients	94%
Federal Direct Subsidized Loan Recipients that did not receive Federal Pell	3%
Recipients of neither Federal Pell nor Federal Subsidized Loan	3%

RETENTION RATE

The retention rate for full-time students for the reporting period of July 1, 2017 to June 30, 2018:

Institutional Retention Rate
95%

PLACEMENT RATE

The placement rate for full-time students for the reporting period of July 1, 2017 to June 30, 2018:

Program	Placement Rate
Medical Assistant	87%
Health Claims Examiner	83%
Pharmacy Technician	89%

FERPA

The Family Educational Rights and Privacy Act (FERPA) affords students certain rights with respect to their education records. These rights include:

- (1) The right to inspect and review the student's education records within 45 days of the day the School receives a request for access.

A student should submit to the registrar, dean, head of the academic department, or other appropriate official, a written request that identifies the record(s) the student wishes to inspect. The school official will make arrangements for access and notify the student of the time and place where the records may be inspected. If the records are not maintained by the school official to whom the request was submitted, that official shall advise the student of the correct official to whom the request should be addressed.

- (2) The right to request the amendment of the student's education records that the student believes are inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA.

A student who wishes to ask the School to amend a record should write the School official responsible for the record, clearly identify the part of the record the student wants changed, and specify why it should be changed.

If the school decides not to amend the record as requested, the school will notify the student in writing of the decision and the student's right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.

- (3) The right to provide written consent before the school discloses personally identifiable information from the student's education records, except to the extent that FERPA authorizes disclosure without consent.

The school discloses education records without a student's prior written consent under the FERPA exception for disclosure to school officials with legitimate educational interests. A school official is a person employed by the School in an administrative, supervisory, academic or research, or support staff position (including law enforcement unit personnel and health staff); a person or company with whom the School has contracted as its agent to provide a service instead of using School employees or officials (such as an attorney, auditor, or collection agent); a person serving on the Board of Trustees; or a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks.

A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for the School.

Upon request, the School also discloses education records without consent to officials of another school in which a student seeks or intends to enroll.

- (4) The right to file a complaint with the U.S. Department of Education concerning alleged failures by the School to comply with the requirements of FERPA. The name and address of the Office

that administers FERPA is:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-5901

SAFEGUARDING CUSTOMER INFORMATION

INTRODUCTION

The purpose of this policy is to ensure that all nonpublic personal customer information, obtained by various Galaxy Medical College's departments in the awarding of financial aid, is adequately safeguarded, protected, and is not shared with unauthorized individuals. The Associate Director is the designee responsible for coordination of the campus' information security under this policy and shall monitor compliance with this policy and update any changes or modifications to the procedures contained herein as changes dictate. It is the responsibility of the School Director to ensure that the policy is being maintained within the campus.

This policy applies to all employees and departments involved in the "making, acquiring, or servicing of financial aid." The departments covered under the policy are primarily the Financial Aid Office, Bursar's Office, and the Admissions Office. However, this policy also applies to any employees within a campus that may gather, transfer, or record nonpublic, personal customer information related to the making, acquiring, or servicing of a student loan.

DEFINITIONS

CUSTOMERS

This include students, faculty or staff or that individual's legal representative who obtains or has obtained a financial product or service (e.g., loan) from the school that is to be used primarily for personal, family, or household purposes.

Examples include:

- a. An individual who provides nonpublic personal information to a campus department in order to obtain a determination about whether he or she may qualify for a loan, regardless of whether the loan is extended.
- b. An individual who provides nonpublic personal information to a campus department in connection with obtaining or seeking to obtain financial counseling or other advisory services is a consumer, regardless of whether the school establishes a continuing advisory relationship.

CUSTOMER INFORMATION

- a. Personally identifiable nonpublic financial information; and
- b. Any list, description, or other grouping of consumers (and publicly available information pertaining to them) that is derived using any personally identifiable financial information that is not publicly available.

Examples include:

All printed material containing confidential, personal information related to business or financial transactions, including name, birth date, address, telephone number, social security number, personal photograph, amounts paid or charged or account number, documents maintained in Financial Aid and Admissions files, are to be safeguarded.

POLICY

Galaxy Medical College, its faculty, staff, and students will not engage in the practice of selling, transferring, or in any other way disclosing nonpublic personal information of its customers.

The Associate Director, as security coordinator of this policy, will hold a meeting no less than annually with the Business Administrators, Bursar, Financial Aid Processors, and Admissions Representatives to discuss potential risk areas associated with customer information. Assessment of risks and development of adequate compensating controls will be developed as needed and incorporated into employee training as required.

ELECTRONIC INFORMATION

Student information is securely maintained on a terminal server. Access to confidential information requires two separate usernames and passwords. Information stored on the terminal server is able to be viewed at the authorized employees' workstations. Selected documents may be viewed on screen or printed for review. When information is printed, the material is reviewed by the authorized personnel and kept in safekeeping or shredded if no longer needed.

HARD COPY INFORMATION

Student files in the Business Administrator's Office may also contain nonpublic personal information of Galaxy Medical College's customers that is subject to this policy. In addition, the Business Administrator's Office keeps a manual file on students receiving financial aid that is subject to this policy. All of these records shall be maintained in locked filing cabinets or secure office areas that have restricted access. Access to manual files is only permitted to the employees of these work areas.

THIRD PARTY SERVICER

Galaxy Medical College does not employ a third party servicer at this time.

TRAINING

All employees working in the Business Administrator's Office, Bursar's Office, Processing Center, and Admissions Office, will be trained on this policy and the security issues and risks associated with customer information. Employees of these areas will certify their understanding and compliance with this policy. Additionally, employees who have access to student data are required to comply with the Confidentiality and Access of Student Records policy.

MISREPRESENTATION DISCLOSURES

The following disclosures are made available to all prospective and enrolled students to ensure the accurate representation of programs, charges, employment etc. at Galaxy Medical College. All questions or concerns should be directed to the Associate Director.

NATURE OF EDUCATIONAL PROGRAMS

The following information is to be provided to all prospective and enrolled students to ensure the accurate representation of all training programs offered at this institution:

- Galaxy Medical College currently holds the following approval & accreditation:

ABHES	Institutional Accreditation	ABHES ID#: I-079
BPPE	State Approval to Operate	School Code: 14732699

- The transferability of credits you earn at Galaxy Medical College is at the complete discretion of an institution to which you may seek to transfer. Acceptance of the diploma or certificate you earn in our training programs is also at the complete discretion of the institution to which you may seek to transfer. If the credits/diploma/certificate you earn at this institution are not accepted at the institution to which you seek to transfer, you may be required to repeat some or all of your coursework at that institution. For this reason, you should make certain that your attendance at this institution will meet your educational goals. This may include contacting an institution to which you may seek to transfer after attending Galaxy Medical College to determine if your credits/diploma/certificate will transfer.
- Upon successful completion of the training program, the student will be awarded the appropriate Diploma or Certificate of Completion.
 - Pharmacy Technician graduates will qualify to apply for the CA Pharmacy Technician License
- The requirements for successfully completing the course of study or program and the circumstances that would constitute grounds for terminating the student's enrollment are detailed in the School Catalog, which is provided to all students.
- No training program at GMC is recommended or has been subject of unsolicited testimonials or endorsements by Vocational counselors, high schools, colleges, educational organizations, employment agencies, members of a particular industry, students, former students, or others; or Governmental officials for governmental employment.
- Information pertaining to GMC's campus, facility and its equipment are detailed in the School Catalog. GMC's main campus is located at the following address:
 - 6400 Laurel Canyon Blvd Suite 270 & 125
North Hollywood, CA 91606

- The availability, frequency, and appropriateness of GMC's courses and programs to the employment objectives that it states its programs are designed to meet are highlighted in the School Catalog.
- The nature, age, and availability of GMC's training devices or equipment and their appropriateness to the employment objectives that programs and courses are designed to meet are available upon request at the main campus.
- The number, availability, and qualifications, including the training and experience, of GMC's faculty and other personnel;
- All prerequisites for enrollment into any course are made available on the course syllabi and students are informed prior to enrollment.
- In addition to the appropriate credential awarded to graduating students, all students have access to obtain an Official or Unofficial transcript showing the subject matter, course content, grade earned and GPA for each student.
- Galaxy Medical College assists each student in job placement. Despite the fact that employment cannot be guaranteed by this, or any educational institution, in accordance with Californian law, our representatives guide our graduates to the best available jobs in the market.
- All the occupational programs at GMC have been approved by the California Bureau for Private Postsecondary Education (BPPE) and have been accredited by the Accrediting Bureau of Health Education Schools (ABHES).
- Tutoring and counseling services are available to all students upon request and at the designated times listed in the School catalog.
- Any matters required to be disclosed to prospective students under 668.42 and 668.43 are disclosed upon enrollment.

NATURE OF FINANCIAL CHARGES

The following information is to be provided to all prospective and enrolled students to ensure the accurate representation of all financial charges:

- GMC does not offer scholarships
- The cost of all training programs is listed in the School Catalog.
- The institutions refund policy is made available and signed by the prospective student at the time of enrollment and it is also a part of the School Catalog.
- The availability and nature of any and all financial assistance offered to students including a student's responsibility to repay any loans, regardless of whether the student is successful in completing the program and obtaining employment is made available in the School Catalog.

- The student has the right to reject any particular type of financial aid or other assistance.

EMPLOYABILITY OF GRADUATES

The following information is to be provided to all prospective and enrolled students to ensure the accurate representation of the employability of its graduates:

- GMC is not connected with any organization and is not an employment agency.
- GMC has always had, and plans to maintain its Job Placement Department and the job placement services offered for graduates. GMC assists its graduates in obtaining employment but does not guarantee employment.
- GMC's Job Placement Department maintains up to date industry knowledge about the current and future conditions, compensation, and employment opportunities in the industry for which students are being prepared. Students also receive and sign Labor Statistics for the program they enroll in, showing the demand of their chosen career.
- GMC makes available to all students the government job market statistics in relation to the potential placement of its graduates.
- GMC provides, in the School Catalog, occupational definitions which highlight the requirements generally needed to be employed in the fields for which the training is provided.

RELATIONSHIP WITH DEPARTMENT OF EDUCATION

The following information is to be provided to all prospective and enrolled students to ensure the accurate representation of Galaxy Medical College's relationship with the Department of Education:

- Galaxy Medical College is approved by the US Department of Education to participate in the Title IV, Higher Education Act, to provide Federal Student Aid to eligible applicants attending this institution. This does not mean, in any way, that the Department of Education endorses the institution and its programs.

STUDENT LOAN DISCLOSURES

Galaxy Medical College is approved by the US Department of Education to participate in the Title IV, Higher Education Act, to provide Federal Student Aid to eligible applicants attending this institution.

Our financial aid team is available to assist our students in completing the necessary applications and paperwork for various aid programs. All financial aid student consumer publications can be found online at www.studentaid.ed.gov. The Financial Aid Office at Galaxy Medical College directs all students to this helpful website where many different resources may be accessed. At this time, the publications found on the above mentioned website are the only financial aid student consumer publications being used by Galaxy Medical College.

Galaxy Medical College participates in the following Financial Aid Programs:

FEDERAL PELL GRANT

For many students, Pell Grants provide a foundation of financial aid to which other aid may be added. Unlike a loan, a Federal Pell Grant does not need to be repaid.

FEDERAL LOANS (SUBSIDIZED AND UNSUBSIDIZED)

Subsidized and Unsubsidized Loans are low-interest loans made by the U.S. Department of Education.

FEDERAL PLUS LOAN

PLUS loans enable parents to borrow to pay the education expenses for a dependent undergraduate student enrolled at least half-time. These low-interest loans are made with funds borrowed from banks, savings and loans, etc. Loan applications are available in the Financial Aid office.

STATE GRANT ASSISTANCE

At this time, Galaxy Medical College does not participate in any State Grant program. Currently this institution only participates in the Federal Student Aid programs mentioned above.

STUDENT LOAN PUBLICATIONS

Under the HEOA Section 488 (c) amended HEA Section 485 (d), all prospective student borrowers are provided information published by the U.S. Department of Education regarding loan availability. The publication includes information about rights and responsibilities of students and schools under Title IV, HEA loan programs and can be found at the Financial Aid Office.

NSLDS

Under the HEOA Section 489 (c) amended HEA Section 485B(d)(4), at anytime when Galaxy Medical College enter into an agreement with a potential student, student, or parent of a student regarding a Title IV, HEA loan, the financial aid staff inform the student or parent that the loan will be submitted to the National Student Loan Data System (NSLDS), and will be accessible by

guaranty agencies, lenders, and schools determined to be authorized users of the data system.

Galaxy Medical College submits updated information to the NSLDS regularly to ensure accurate reporting of enrollment.

ENTRANCE COUNSELING

In accordance with Federal Regulation 34 CFR 685.304(a), when a student is awarded a Federal Direct Loan, Galaxy Medical College provides the first-time borrower of a Federal Direct Loan (other than consolidated or Parent PLUS loans) comprehensive information on the terms and conditions of the loan and of the borrower's responsibilities, prior to making the first disbursement.

The information includes the following:

- The effect of the loan on the eligibility of the borrower for other forms of aid
- An explanation of the use of the Master Promissory Note
- The seriousness and importance of the students' repayment obligation
- Information on the accrual and capitalization of interest
- Borrowers of unsubsidized loans have the option of paying interest while in school
- Definition of half-time enrollment and the consequences of not maintaining half-time enrollment
- Importance of contacting appropriate offices if student withdraws prior to completion of program of study
- Sample monthly repayment amounts
- The obligation of the borrower to repay the full amount of the loan regardless of whether the borrower complete program or completes within regular time for completion, is unable to obtain employment upon completion, or is otherwise dissatisfied with or does not receive the educational or other services the borrower purchased from the school
- Consequences of default
- Information about the NSLDS and how the borrower can access the borrowers records
- Name and contact information for individual the borrower may contact with questions about the borrower's rights and responsibilities or the terms and conditions of the loan

EXIT COUNSELING

In accordance with Federal Regulation 34 CFR 685.304(b); 34 CFR 668.42; 34 CFR 674.42(b), shortly before the student borrower ceases at least half-time study at the school or is graduated, Galaxy Medical College provides counseling to borrowers of loans under the Federal Direct Loan, or Perkins Loan programs (other than consolidated or Parent PLUS loans).

The counseling provides information on the following:

- Average anticipated monthly repayment amount
- Repayment plan options
- Options to prepay or pay on shorter schedule
- Debt Management Strategies
- Use of Master Promissory Note
- The seriousness and importance of student's repayment obligation
- Terms and conditions for forgiveness or cancellation

- Copy of information provided by the U.S. Department of Education
- Terms and conditions for deferment or forbearance
- Consequences of default
- Options and consequences of loan consolidation
- Tax benefits available to borrowers
- The obligation of the borrower to repay the full amount of the loan regardless of whether the borrower completes program or completes within regular time for completion, is unable to obtain unemployment upon completion, or is otherwise dissatisfied with or did not receive the educational or other services the borrower purchased from the school
- Availability of the Student Loan Ombudsman's office
- Information about NSLDS. The U.S. Department of Education is required to provide a disclosure form for students and prospective students about NSLDS

PRIVATE EDUCATION LOANS

At this time Galaxy Medical College Does not offer Private Education Loans.

CODE OF CONDUCT

Galaxy Medical College is committed to managing all student financial aid according to the highest ethical, moral, and regulatory standards. All personnel assigned to Galaxy Medical College's Financial Aid Office shall conduct themselves in a professional and ethical manner at all times. Personnel assigned to the Financial Aid Office shall observe and uphold the recognized ethical practices of the Student Financial Aid profession. In order to ensure that the business of the Financial Aid Office is conducted according to the highest ethical standards of the profession, all personnel assigned to the Financial Aid Office shall adhere to the following rules of professional conduct:

- Be committed to removing financial barriers for those who wish to pursue postsecondary learning.
- Make every effort to assist students with financial need.
- Be aware of the issues affecting students and advocate their interests at the institutional, state, and federal levels.
- Support efforts to encourage students, as early as the elementary grades, to aspire to and plan for education beyond high school.
- Educate students and families through quality consumer information.
- Respect the dignity and protect the privacy of students, and ensure the confidentiality of student records and personal circumstances.
- Ensure equity by applying all need analysis formulas consistently across the institution's full population of student financial aid applicants.
- Provide services that do not discriminate on the basis of race, gender, ethnicity, sexual orientation, religion, disability, age, or economic status.
- Recognize the need for professional development and continuing education opportunities.
- Promote the free expression of ideas and opinions, and foster respect for diverse viewpoints within the profession.
- Commit to the highest level of ethical behavior and refrain from conflict of interest or the perception thereof.
- Maintain the highest level of professionalism, reflecting a commitment to the goals of the National Association of Student Financial Aid Administrators.

In addition, all personnel assigned to the Financial Aid Office shall observe the following institutional guidelines:

- Financial Aid Office personnel shall scrupulously abide by all laws pertaining to the application for, and processing of, all forms of student financial aid.
- Financial Aid Office personnel shall refrain from taking, assisting with or condoning any action intended to secure any personal benefit as a result of their official positions.
- Financial Aid Office personnel shall perform their duties in a manner that best serves the interests of the student or prospective student.
- Financial Aid Office personnel shall ensure that they provide accurate, factual and unbiased information regarding student financial aid to students, prospective students, parents and to any official agencies or organizations with whom the Financial Aid Office interacts in the course and scope of their duties.
- Financial Aid Office personnel shall refrain from accepting any gift, gratuity, favor or any other inducement from any person, agency or entity involved in the application for, processing of, awarding of or distribution of any form of student financial aid.

Galaxy Medical College's authorization to participate in various student financial aid programs depends upon strict adherence to all laws, regulations and policies. As a result, Galaxy Medical College maintains a zero-tolerance policy regarding violations of laws, regulations, ethical principles and institutional guidelines relating to student financial aid. Violation of these ethical principles and guidelines is grounds for termination of employment with Galaxy Medical College.

If you have any questions regarding any policy contained in this Code of Conduct or you are aware of any actual or potential breach, you should contact (818) 509-9970.

A copy of this policy is made available to all employees of Galaxy Medical College annually.

GAINFUL EMPLOYMENT DISCLOSURES

In accordance with the Code of Federal Regulations 34CFR 668.6(b); 34 CFR 668.6(b)(2)(iv) and the Department of Education’s Gainful Employment requirements, Galaxy Medical College must disclose the following information pertaining to the training programs offered at this institution:

MEDICAL ASSISTANT	
Title of Program	Medical Assistant
Degree Awarded	Diploma
Program Length – Hours	980 Hours
Program Length – Weeks	49 Weeks
Occupation	Medical Assistant
Standard Occupational Classification (SOC) Code	31-9092
Link to Occupational Profile	http://www.onetonline.org/link/summary/31-9092.00
Campus Housing	Not Offered
Program Tuition	\$14,000
Books	\$530
Equipment & Supplies	\$145
Registration Fee	\$75
Student Tuition Recovery Fund (STRF) Fee	\$0
Total program Cost	\$14,750
On-Time Graduation Completion Rate July 1, 2017 - June 30, 2018	89%
Job Placement Rate July 1, 2017 - June 30, 2018	87%
Median Federal Loan Debt	\$8,830
Median Private Loan Debt	\$0

HEALTH CLAIMS EXAMINER

Title of Program	Health Claims Examiner
Degree Awarded	Diploma
Program Length – Hours	720 Hours
Program Length – Weeks	36 Weeks
Occupation	Health Claims Examiner
Standard Occupational Classification (SOC) Code	29-2071
Link to Occupational Profile	http://www.onetonline.org/link/summary/29-2071.00
Campus Housing	Not Offered
Program Tuition	\$10900
Books	\$450
Equipment & Supplies	\$75
Registration Fee	\$75
Student Tuition Recovery Fund (STRF) Fee	\$0
Total program Cost	\$11,500
On-Time Graduation Completion Rate July 1, 2017 - June 30, 2018	100%
Job Placement Rate July 1, 2017 - June 30, 2018	83%
Median Federal Loan Debt	\$7,424
Median Private Loan Debt	\$0

PHARMACY TECHNICIAN

Title of Program	Pharmacy Technician
Degree Awarded	Diploma
Program Length – Hours	900 Hours
Program Length – Weeks	45 Weeks
Occupation	Pharmacy Technician
Standard Occupational Classification (SOC) Code	29-2052
Link to Occupational Profile	http://www.onetonline.org/link/summary/29-2052.00
Campus Housing	Not Offered
Program Tuition	\$12,500
Books	\$425
Equipment & Supplies	\$100
Registration Fee	\$75
Student Tuition Recovery Fund (STRF) Fee	\$0
Total program Cost	\$13,100
On-Time Graduation Completion Rate July 1, 2017 - June 30, 2018	97%
Job Placement Rate July 1, 2017 - June 30, 2018	89%
Median Federal Loan Debt	\$7180
Median Private Loan Debt	\$0

NOTICE OF DISCLOSURES

Galaxy Medical College (GMC) is required to annually notify students of how required disclosures and information may be obtained. The chart below describes the required disclosures and where the information can be located. A copy of all the disclosures can be provided upon request.

DISCLOSURE	DESCRIPTION	WHERE TO OBTAIN COPY
INSTITUTIONAL INFORMATION	Per Federal requirements, GMC is required to make available information about the institution	This information can be found in the Galaxy Medical College School Catalog.
		The School Catalog is located at: http://www.galaxymedicalcollege.edu/resources
		This information can be found in the Galaxy Medical College Consumer Disclosure Handbook.
		The School Catalog and the Consumer Disclosure Handbook contain the following information: <ul style="list-style-type: none"> ○ Cost of Attendance ○ Refund Policy ○ Withdrawal Policy ○ Academic Programs Offered ○ Description of Physical Facilities ○ Faculty, Staff and Advisory Board Members ○ Accreditation, Approval & Licensing
		A copy of the School Catalog or the Consumer Disclosure Handbook can be obtained form the reception desk at Galaxy Medical College.
FINANCIAL ASSISTANCE	Financial Assistance available to students enrolled at Galaxy Medical College	This information can be found in the Galaxy Medical College School Catalog.
		The School Catalog is located at: http://www.galaxymedicalcollege.edu/resources
		This information can be found in the Galaxy Medical College Consumer Disclosure Handbook.
		Prospective and enrolled students seeking additional information regarding financial assistance may visit the Financial Aid Office during business hours.
STUDENTS RIGHT TO	Describes GMC's	This information can be found on GMC's

KNOW	graduation rates and provides information about educational options available for graduates of Diploma granting programs.	website at: http://www.galaxymedicalcollege.edu/resources A hardcopy of this document can be obtained from the Admissions Office.
DRUG AND ALCOHOL PREVENTION POLICY	Contains GMC's policies pertaining to the prevention of drugs and alcohol.	This information can be found on GMC's website at: http://www.galaxymedicalcollege.edu/resources A hardcopy of this document can be obtained from the School Director.
CLERY CAMPUS SECURITY ACT & ANNUAL SECURITY REPORT	Contains GMC's policies pertaining to campus safety which includes crime statistics for the previous 3 years.	This information can be found on GMC's website at: http://www.galaxymedicalcollege.edu/resources A hardcopy of this document can be obtained from the School Director.
FERPA DISCLOSURES	Contains information pertaining to the student privacy rights under FERPA	This information can be found on GMC's website at: http://www.galaxymedicalcollege.edu/resources A hardcopy of this document can be obtained from the Financial Aid Office.
SAFEGUARDING CONSUMER INFORMATION	Contains information pertaining to the safeguarding of all consumer information.	This information can be found on GMC's website at: http://www.galaxymedicalcollege.edu/resources A hardcopy of this document can be obtained from the Associate Director.
MISREPRESENTATION DISCLOSURE	Contains information pertaining to the accurate representation of the institution and its programs.	This information can be found in the Galaxy Medical College Consumer Disclosure Handbook which is available on campus and can be obtained from the Associate Director.
STUDENT LOAN DISCLOSURES	Contains information pertaining to student loans	This information can be found in the Galaxy Medical College Consumer Disclosure Handbook which is available on campus and can be obtained from the Financial Aid Office.

GAINFUL EMPLOYMENT DISCLOSURES	Contains information pertaining to the Gainful Employment Requirements.	This information can be found on GMC's website at: http://www.galaxymedicalcollege.edu/programs <hr/> A hardcopy of this document can be obtained from the Admissions Office.
SCHOOL PERFORMANCE FACT SHEET	Contains program specific information pertaining to completion rates, placement rates, salary and wage information and program length.	This information can be found on GMC's website at: http://www.galaxymedicalcollege.edu/resources <hr/> A hardcopy of this document can be obtained from the Admissions Office.
SCHOOL CATALOG	Contains all important information about the institution	This information can be found on GMC's website at: http://www.galaxymedicalcollege.edu/resources <hr/> A hardcopy of this document can be obtained from the Admissions Office.