

2019 ANNUAL SECURITY REPORT



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INTRODUCTION

MISSION STATEMENT

The mission of Milwaukee Career College is to improve the lives of our students. We accomplish this by providing career-focused training that develops and enhances the student's marketable skills in the most efficient manner that we can make possible. Our total focus is to provide high quality career education, to enable our graduates to have the career skills necessary to succeed in today's dynamic employment marketplace.

HISTORY OF MILWAUKEE CAREER COLLEGE

Milwaukee Career College (MCC) has been changing the lives of our students through our career training programs since 2002. In 2006, MCC received national accreditation through the Accrediting Bureau of Health Education Schools (ABHES). In 2007, MCC received Title IV funding approval. In 2010, ABHES awarded MCC a 5-year accreditation re-certification. In 2013, Milwaukee Career College implemented a Veterinary Assistant diploma program and Veterinary Technician Associate Degree program as well as a Dental Assistant diploma program to complement the current Medical Assistant diploma program. In 2015, our Surgical Technology Associate Degree program was started. In 2018, MCC added a Pharmacy Technician program.

CRIME PREVENTION

Milwaukee Career College takes safety awareness and crime prevention seriously and is dedicated to supporting the safety and wellbeing of all students, faculty, associates, prospective students, and visitors. Maintaining individual awareness of your surroundings and keeping in mind the following safety measures can help keep you and the Milwaukee Career College and our community safe:

- Always be alert to what is going on around you
- Lock cars and personal vehicles at all time and keep your keys on your person
- Do not leave valuable items in your car such as purses, phones, backpacks, or other desirable equipment/items
- Do not park in isolated areas
- Do not walk or park your car in poorly-lit areas
- Do not leave personal items unattended
- Label all personal items used on campus with your name
- Keep all valuable items with you and close to your body
- If you suspect you are being followed, do not ignore your intuition, go to a public area or group
- If you feel unsafe or threatened, notify a Campus Security Authority or call 911.

CAMPUS SAFETY & REPORTING

BACKGROUND

Milwaukee Career College prepares the Annual Security Report and Campus Crime Statistics in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (Clery Act) which amended the Higher Education Act (HEA) of 1965 (additionally amended in 1992, 1998, and 2000). On August 14, 2008 the Higher Education Opportunity Act (HEOA) expanded the HEA of 1965 and Clery Act in conjunction with the Violence Against Women Act of 2013.

REPORT PREPARATION & DISCLOSURE

The Annual Security Report and Campus Crime Statistics are prepared and published annually by Milwaukee Career College's Management Team in conjunction with the Compliance Specialist. Crime Statistics include each of the three previous calendar years. The report is distributed to current students and employees by October 1st of each year. A printed copy of the report is available upon request. The report is also published online at <https://mkecc.edu/consumer-information/>.

Milwaukee Career College's Office maintains a daily campus crime log. The log records the incident report number, date the crime was reported, the date and time of the alleged crime or occurrence, the nature of the crime, the general location of such crime or occurrence, and the disposition of any criminal complaint, if it is known.

All reported crimes/incidents will be included in Milwaukee Career College's annual disclosure of Crime Statistics. Milwaukee Career College will have the discretion to report such crimes and reveal the name of the person reporting such crime to appropriate law enforcement personnel when necessary to ensure the safety and wellbeing of any student or associate. Milwaukee Career College also makes a good-faith effort to obtain statistics from local law enforcement authorities such as the local police department on crime statistics.

The Clery Geography is used for the purposes of collecting statistics on crime for submission to the U. S. Department of Education and inclusion on the Annual Security Report. Clery geography includes:

- **Campus:** buildings or property owned or controlled by the institution within the same reasonably contiguous geographic area and used by the College in direct support of, or in manner related to, its educational purpose. Any such building or property that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as food or other retail vendors),
- **Non-campus building or property:** building or property owned or controlled by a school recognized student organization, or owned and controlled by the College and used by students or by the institution for education-related purposes and that is within the same reasonably continuous geographic area of the campus.
- **Public property:** All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.

PROCEDURE FOR REPORTING INCIDENTS

Students that witness or are involved in criminal activity or emergencies should report the event to their instructor, program chair, or supervisor as soon and as accurately as possible. If instructors, program chair, or supervisors are unavailable student's incidents can be reported to any individual designated below who will then report it to the Associate Director or President. The Associate Director, President, or his/her designee will then enact the Emergency Preparedness Plan as appropriate. Victims and witnesses are encouraged to report all crimes and other suspicious incidences either verbally or in writing.

Milwaukee Career College Main Line 414-257-2939

Program Chair - Medical Assistant Program 414-389-8953

Program Chair - Dental Assistant Program 414-257-2939 Ext 137

Program Chair - Veterinary Assistant / Technician 414-389-8955

Program Chair - Surgical Technology Program 414-389-8945

Program Chair – Pharmacy Technician Program 414-257-2939

Associate Director 414-389-8969

Milwaukee Career College President/Title IX Coordinator Office 414-389-8950

In the event the individuals designated above are not available at the time of the incident, you should report the matter to any available Milwaukee Career College associate or faculty member. In emergency situations, or where an associate is not available, you may report the incident to the local police department by dialing 911.

CONFIDENTIAL REPORTING

All reported crimes/incidents will be included in Milwaukee Career College's Crime Statistics. In the event that a witness or victim wishes to report an incident on a confidential basis, they should call the President's Office or Associate Director as indicated above with the concern. Incidents reported on a confidential basis will still be included in the annual reporting of Crime Statistics. Milwaukee Career College will have the discretion to report such crimes and reveal the name of the person reporting such crime to appropriate law enforcement personnel when necessary to ensure the safety and wellbeing of any student or associate.

CAMPUS SECURITY AUTHORITY

Milwaukee Career College does not have a privately-owned security department. Milwaukee Career College utilizes uniformed private security guards. The Title IX Coordinator, President Jack Takahashi, serves as a Campus Security Authority along with the Associate Director, Maria Torres, the Career Services Manager, Paul Syvock, and the Program Chairs for each program.

SECURITY AND ACCESS TO CAMPUS FACILITIES

Students and associates are permitted access to the main building and parking area during normal business hours. Students and associates are provided a swipe card with a bar code, for use with an internal security system. To obtain access to the campus, the cardholder must use his or her swipe card. Individuals not possessing a swipe card may enter the building only after being given electronic access by the Front Desk or Security Guard.

Students and new employees are informed about campus security procedures during orientation and are reminded of best safety practices and procedures during their time at the school. Milwaukee Career College's programs to inform students about campus safety and security procedures and encourage them to be responsible for their own safety are individual programs between the instructor and students or employees and supervisors. Milwaukee Career College instructors and supervisors continuously remind students /employees of steps to take to increase safety and to become responsible for security of others.

MCC facility access is limited only to MCC associates, students, vendors, and others having legitimate business to transact with MCC. Parents, relatives, or friends who are prospective students are allowed to visit the school; however, they must first register at Milwaukee Career College's Front Desk upon arrival. It is the policy of Milwaukee Career College not to permit students to bring young children to school with them at any time during school hours. Young children are not allowed in the classroom under any circumstances.

Should any emergency or disturbance occur, please report it immediately to an MCC Associate. Employees and students are to be responsible for their own security and personal items. Theft of personal or school items should be reported to the Career Services Manager or the Front Desk. Any disturbance or theft will also be reported to the City of Wauwatosa Police Department. MCC is not responsible for theft, loss and/or damage for personal items belonging to students.

Milwaukee Career College does not have any officially recognized off-campus student organizations. Milwaukee Career College also does not have any student housing.

EMERGENCY PREPAREDNESS PLAN

During student/employee orientation, students and employees are instructed on Milwaukee Career College's Emergency Preparedness Plan. The plan is also available for reference at the Front Desk and a copy has been placed in each classroom. This plan includes reporting, emergency response procedures, information regarding the mass notification system, evacuation procedures, and lockdown procedures. The President, Associate Director, and MCC Management Team are responsible for managing the Emergency Preparedness Plan and for carrying out the plan in the event of emergency.

One scheduled fire drill is conducted each year to test MCC's emergency response. The drill requires evacuation of the building. It also tests and evaluates the total response to the fire alarm and helps train students and associates on evacuation procedures. In addition, one scheduled lockdown drill will be performed each year to help train students and associates on lockdown

procedures. Associates will be notified of the scheduled drill prior to the drill being performed and will notify students of an impending drill to ensure students are aware that it is a drill and not an actual event. Fire drills are performed during the last week of May or first week of June. Lockdown drills are performed during the last week of October or first week of November.

EVACUATION PROCEDURES

The Emergency Preparedness Plan contains Milwaukee Career College's evacuation procedures. In the event that President, Associate Director or Management Team deems evacuation procedures to be necessary the plan and its procedures will be enacted. Students and Employees are given copies of Emergency Preparedness Plan including evacuation procedures at orientation. Evacuation procedures are tested at least on an annual basis as specified in the plan.

LOCKDOWN PROCEDURES

The Emergency Preparedness Plan contains Milwaukee Career College's lockdown procedures. In the event that President, Associate Director or Management Team deems lockdown procedures to be necessary the plan and its procedures will be enacted. Students and Employees are given copies of Emergency Preparedness Plan including lockdown procedures at orientation. Lockdown procedures are tested at least on an annual basis as specified in the plan.

CAMPUS NOTIFICATION SYSTEM

Milwaukee Career College participates in a mass notification system. Students are encouraged to sign up for this notification system. To enroll in this notification system students must visit the Admissions Office and speak with one of Milwaukee Career College Admissions Representatives. Through this system Milwaukee Career College will attempt to notify students and associates of events on campus that present a clear safety risk. The Campus President or appropriate authorized personnel will notify students, faculty, and staff of such events by sending a message through the College notification system. The notification will be sent only to those mobile phone numbers registered with the notification system.

Students, faculty, and staff may register or adjust their notification preferences by contacting the Admissions Department. If students want to receive text notifications, they will need to log in to enter or verify your mobile phone number and provider. Otherwise, students will be notified of emergency situations only via your College e-mail. Note that the mobile phone provider may charge per text message fee for the delivery of emergency notifications to a phone.

This mass notification system is only used for critical, timely emergency notifications including weather related campus closings and other significant events. All students, staff, faculty and contracted employees must have their MCC e-mail addresses and cell phones automatically enrolled. If an emergency or dangerous situation is confirmed (with the assistance of campus administrators, local first responders and/or the National Weather Service), and that situation presents an immediate threat to the health and/or safety of some or all members of the MCC community, the management team will determine the content of the emergency notifications used to communicate the threat to the campus. Initiation, scope and content of the notification is the responsibility of the President or his designated representative(s).

In addition, one scheduled fire drill is conducted each year. The drill requires evacuation of the building. It also tests and evaluates the total response to the fire alarm. There are two general categories of response to emergencies. One is “evacuation”, and the other is “shelter in place”. In the event of a significant emergency or dangerous situation involving an immediate threat to the health or safety of student, associates, or visitors to campus, the university community will be given instructions on the safest response to the situation. The notification may be in the form of verbal instructions given in person, utilizing walkie talkies, activating fire alarms, and/or sending a message via the campus notification system.

TIMELY WARNING

Information will be disseminated in the most timely and appropriate manner during and immediately following the incident. Timely warnings will be issued for any reported Clery Act Crimes. Milwaukee Career College will without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the judgment of the first responders (MCC, Milwaukee Police Department, Milwaukee Fire Department, etc.), compromise the efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

FERPA & TIMELY WARNING

According to the Department of Education’s FERPA regulations (34 CFR 99.36), in appropriate circumstances, Milwaukee Career College may be allowed to include personally identifiable information in a timely warning. Although this information is generally protected from disclosure under FERPA, in the event of an emergency situation it is allowed to be released if necessary. Milwaukee Career College’s President or Associate Director will determine if the information should be disclosed.

COMMUNITY DISCLOSURES

In the event that it is necessary to disclose emergency information to individuals outside of the MCC Campus Community, Milwaukee Career College will use phone/email/ and news organizations to disseminate the information. The President is responsible for determining whether emergency information will need to be disseminated to the larger community.

CAMPUS LAW ENFORCEMENT

Law enforcement at Milwaukee Career College is conducted by local law enforcement agencies. There is no written memorandum of understanding between Milwaukee Career College and local law enforcement agency. Milwaukee Career College encourages accurate and prompt reporting of all crimes to local police and law enforcement agencies when the victim elects to, or is unable to, make such a report.

ADDITIONAL INFORMATION ON EMERGENCY RESPONSE PROCEDURES

The Emergency Preparedness Plan contains Milwaukee Career College's detailed response plan for emergency incidents in the event they occur. For ease of reference, below are several procedures to follow (as specified in the Emergency Preparedness Plan) should the following situations occurring:

ACTIVE / ARMED SHOOTER AND WEAPONS

If you witness any armed individual shooting at people on campus or hear gunshots:

1. Immediately contact the Milwaukee Police Department by calling 911. Provide the 911 operator with as much information as you can. Do not hang up unless told to do so. Include the following information:
 - Your name
 - Employer (Milwaukee Career College)
 - Male or female
 - Type of weapon and location (3077 N. Mayfair Road)
2. Notify an MCC Associate who will initiate lockdown procedures by contacting the FRONT DESK at Ext. 105.
3. Front Desk will page "CODE G" and location
4. Floor captains will alert instructors
5. Police officers will likely be the first responders on the scene. As they move into an area or facility, rescue efforts will be delayed until the shooter is located and stopped.
6. To assist police, please stay calm and patient during this time. If you know the location of the suspect, provide the police with the location and/or description of the suspect.
7. If you encounter police, keep your hands empty and in plain view at all times. Do not speak to the officers until they speak to you. Listen to their instructions and do exactly what they say.
8. If you are evacuating, leave everything behind and do not carry anything that could be mistaken for a weapon.
9. Rescue teams will follow shortly after the first responding officers enter the building. They will attend to the injured and remove everyone safely from the area or building.

If the shooter is outside the building:

1. Proceed to a room that can be locked. Turn off all the lights. Close and lock all windows and doors.
2. Get all occupants on the floor and out of the line of gunfire. Also, ensure that no one is visible from outside the room.
3. One person in the room should call 911 and advise the 911 operator of the situation, including location.
4. Unfamiliar voices may belong to the shooter who is attempting to lure victims from their safe space; do not respond to any voice commands until you can verify with certainty that they are being issued by a police officer.
5. Remain in place until law enforcement, emergency management and/or university officials give an all clear notification.

If the shooter is inside the building:

1. Lock the room if possible, or if you can, safely leave the building.
2. If your room cannot be locked, determine if there is a nearby location that can be reached safely and locked.
3. Lie on the floor or under a desk and remain silent.
4. If it is possible to escape the area safely and avoid danger, do so by the nearest exit or window. Leave books, backpacks, purses, etc. in the room. As you exit the building, keep your hands above your head and listen for instructions that may be given by police officers on the outside. If you receive no instructions, proceed to an evacuation assembly point that is out of the danger area.
5. Contact 911. Report your name and location.
6. Remain calm, keep your hands up above your head and follow instructions. If an officer points a firearm at you, please try to remain calm. Make no movement that may cause the officer to mistake your actions for a threat. Remember, the officer does not know if you are involved in the incident or are a suspect at this point.
7. If you witness anything, tell the responding officers as much about what you know about the situation.
8. Wait for the police to come find you.

If the shooter(s) enters your class or office:

1. Call 911 if possible, and alert the 911 operator to the shooter's location. If you can't speak, leave the phone open so the dispatcher can listen to what is taking place.
2. If there is no opportunity for escape or hiding, it might be possible to negotiate with the shooter. After all other options have been exhausted, and as a very last resort, attempt to overcome the shooter with force if necessary.
3. If the shooter leaves your area and you are able to escape, proceed immediately to a safer place. Do not touch anything that is in the vicinity of the shooter.

If you must move to another location:

1. If you decide to flee during an active shooting situation, make sure you have an escape route and plan in mind.
2. Move quickly, keep your hands visible, and follow the instructions of any police officers you may encounter. Do not attempt to carry anything while fleeing.
3. Leave the wounded victims where they are and notify authorities of their location. Do not attempt to remove any injured persons.

Assisting police officers – Police officers responding to an active shooter are trained to advance immediately to the area in which the shots were last heard. The first responding officers will normally be in teams. They may be dressed in regular patrol uniforms or they may be wearing external bulletproof vests, Kevlar helmets and other tactical equipment. They may be armed with rifles, shotguns or handguns, and might be using pepper spray or tear gas to control the situation.

1. Remain calm, do as the officers tell you, and do not be afraid of them.
2. Put down any bags or packages and keep your hands visible at all times.
3. If you know where the shooter is, tell the officers.
4. The first officers will not stop to help people as their primary purpose at this point is to locate and neutralize the threat. Rescue teams with medical personnel will follow later.

5. Until you are released, remain at whatever assembly point authorities designate. Be aware that police will usually not let anyone leave until the situation is fully under control and all witnesses have been identified and questioned.

Weapons, combustible items, firearms, explosives, incendiary devices or any instrument which is capable of causing death, physical or property damage:

If you observe or suspect any of the aforementioned items on campus property, stay calm and immediately call 911. Then, inform a Milwaukee Career College Associate.

1. Name and description of individual in possession of weapon or device, if known.
2. Location of the weapon.
3. Whether the individual in possession of weapon or device has threatened anyone.
4. Any other details that may assist law enforcement in locating this individual.

BIOLOGICAL OR CHEMICAL ACCIDENT / HAZARDOUS MATERIAL

1. Call 414-257-2939 from non-campus phone. If the type and location of hazardous material are known, report that information to MCC.
2. Evacuate to a designated area (use the fire evacuation plan).
3. If confronted by MCC Associate, Police or Fire officials, follow their directives.

Suspicious Package – If you notice a suspicious package on campus property:

2. Handle with care. Don't shake or bump.
3. Isolate letter or package immediately!
3. Don't open, smell, touch or taste.
4. If you suspect the mail or package contains a bomb or radiological, biological, or chemical threat contact 911 and use the fire evacuation plan.

FIRE

Firefighting equipment, alarm systems, and procedures are provided for the protection of life and property in compliance with the health regulations of the City of Milwaukee. To help ensure safety, periodic fire drills are scheduled each year. The fire alarm system is also tested periodically. If the fire alarm is being tested, the beeping will be intermittent. However, a real fire alarm will be continuous. In the event of a fire or smoke from a fire:

1. Pull fire alarm and call 414-257-2939 from a non-campus phone.
2. Evacuate students and associates according to fire evacuation procedure.
3. Keep streets, fire lanes, hydrant areas, and walkways clear for emergency vehicles and personnel.
4. Be aware of arrival of emergency responders. An MCC Associate or designee will meet the fire department personnel and provide the location of the fire.
5. Take note of and report anyone missing.
6. Report missing persons to an MCC Associate. If trapped by fire, notify the fire department by calling 911.
7. Appropriate college officials may move students, faculty or staff to a relocation site if weather is inclement or building is damaged.

- Do not reenter buildings until they are declared safe by law enforcement, fire department and/or university officials.

FIRE EVACUATION PLAN
EVACUATION TEAM FLOOR CAPTAINS

AREA	CAPTAIN/ALTERNATE
Second Floor	Captain: Career Services Manager Alternate: Program Chairs/Instructors
Third Floor	Captain: President Alternate: Associate Director /Senior Accountant

SECOND FLOOR EVACUATION ROUTE

Career Services Manager (200) Classroom 200A Classroom 203A Classroom 203B	Exit – A (Outside of 203B – Middle of building) Alternative Exit – B
VA/VT program (205) – Instructors and students must evacuate all animals according to Veterinary Evacuation Procedures. Education Department (207) Classroom 206A/206B/206C	Exit – B (West - Rear of building) Alternative Exit – A

THIRD FLOOR EVACUATION ROUTE

Admissions Department (301) Administrative Department (300) Financial Aid Department (303) Classroom 300A/300B	Exit – A (Near 300A – Middle of building) Exit B (West - Rear of Building)
Classroom 300C/300D Classroom 303A/303B	Exit – B (West - Rear of building) Alternative Exit – A

EVACUATION PROCEDURES

- Close all doors when exiting the classroom and office areas. **DO NOT USE THE ELEVATOR.**
- Instructors bring the attendance roster so that you can perform roll call to account for your students once you reassemble at the staging area.
- Floor Captains please check all classrooms and restrooms before exiting. It is required by law that all persons exit during a fire alarm.
- All associates, visitors, students and animals reassemble near the railroad tracks in Alioto’s parking lot.
- Instructors perform roll call to account for your students. The floor captain will check with all instructors to make sure all the students are accounted for.
- All managers perform roll call to account for your associates once you reassemble at the staging area.

7. The President, or his/her designee, will check with all managers to make sure all associates, visitors, students, and animals are accounted for.
8. If confronted, follow directives by Public Safety, Police or Fire Department.
9. Do not re-enter buildings until they are declared safe by Police, Fire Department, and/or college officials.

MEDICAL EMERGENCY

Serious injury or illness:

1. Call 414-257-2939, Milwaukee Career College will notify the fire department.
2. Give full attention to the victim(s).
3. Do not attempt to move a person who is ill or injured unless he/she is in immediate danger of further injury.
4. If possible, isolate the affected student/employee member. Disperse onlookers and keep others from congregating in the area.
5. Check for vital signs. Initiate first aid and/or CPR, if you are trained.
6. Check breathing. Is the airway clear? Is the victim in a position to facilitate breathing?
7. Apply pressure on wound or elevate wound to help stop or slow bleeding.
8. Protect yourself from body fluids. Use gloves if available.

TORNADO OR SEVERE THUNDERSTORM

During severe weather conditions, the Administrator or Designee will monitor radio broadcasts and page the following Codes:

CODE GREY: Tornado Watch – Conditions are right for a tornado

- Be aware of severe weather/tornado conditions
- Carry on with regular duties

CODE BLACK: Tornado Warning – Tornado has been sighted in our County

- Return to your department
- Close window blinds
- Be alert to possible evacuation

CODE GREEN: TORNADO EVACUATION – Tornado in IMMEDIATE VICINITY

EVACUATION TEAM FLOOR CAPTAINS

AREA	CAPTAIN/ALTERNATE
Second Floor	Career Services Manager/Program Chairs/Instructors
Third Floor	President/Associate Director/Senior Accountant

SECOND FLOOR DESIGNATED SHELTER AREAS

- 200A, 203A, 203B, and 206A evacuate to the **Stairwell** located outside of room 203B (Exit A – Middle of building)
- 206B and 206C evacuate into the **Restrooms**
- 205 and 207 evacuate to the **Stairwell** on west side near the Education Department (Exit B – Rear of building)

THIRD FLOOR DESIGNATED SHELTER AREAS

- Admissions, Administration Area, and Financial Aid evacuate to the **Restrooms**
- 300A, 300B and 303A evacuate to the **Stairwell** outside of 300A (Exit A – Middle of building)
- 300C, 300D and 303B evacuate to the **Stairwell** on west side (Exit B – Rear of building)

PROCEDURE

1. The Floor Captains or Alternate will inform all classroom instructors of the codes. **DO NOT USE THE ELEVATOR**
2. Close all doors when evacuating and immediately evacuate to the designated tornado shelter area. If you unable to get to the designated tornado shelter area try to get to the lowest level possible, ideally in an interior hallway (away from windows and avoiding long span roofs).
3. Department personnel, classroom instructors, etc. should make certain everyone vacates the office or classroom. Take note of and report anyone missing. Close office, classroom door, etc.
4. Remain in the designated tornado shelter area until an “all clear” notification is given by a school’s official.

BOMB THREAT

Milwaukee Career College may receive bomb threats in an attempt to disrupt normal operations or to harass Associates/students.

The purpose of this procedure is to minimize disruption and to provide for the safety to associates, visitors and students in the event of a bomb threat.

1. If you receive a bomb threat, try to alert a co-worker. Co-worker contact 911 and page CODE B.
2. Floor Captains will alert all classroom instructors and associates of the CODE B.
3. Begin to evacuate (use fire evacuation plan)
4. Attempt to keep the caller on the line. Using the Bomb Threat Phone Call Form, get as much information as you can from and about the caller.
5. If you are unable to alert a co-worker, contact 911 and page CODE B.
6. Take the Phone Call Form, evacuate your area, and meet the Police outside of the building.
7. Close all doors when exiting the classrooms and office areas.
8. Instructors bring the attendance roster and perform roll call to account for your students once you reassemble at the staging area.
9. Floor Captains before exiting check all classrooms, the student lounge and the restrooms.
10. All MCC associates, students, visitors and animals reassemble near the railroad tracks in Alioto’s parking lot. The floor captains will check with all instructors to make sure all the students are accounted for.
11. All managers perform roll call to account for your associates once you reassemble at the staging area.
12. Program Chair or Instructor(s) in Veterinary Technician/Assistant program will be accountable for the animals.

13. The President will check with all managers to make sure all the associates, students, visitors and animals are accounted for

SUICIDE OR THREAT OF SUICIDE

1. Call MCC's main line 414-257-2939
2. Consider any student reference to suicide as serious.
3. If it is safe for you to do so, do not leave the individual alone. Stay with the individual until help arrives.
4. Try to calm the individual.
5. Isolate the individual or the area, if possible.
6. Initiate first aid if necessary.

SUSPICIOUS INDIVIDUAL OR VEHICLE

1. Call MCC's main line 414-257-2939
2. Note the individual's features, clothing, vehicle, where he/she is located in the building, whether he/she is carrying a weapon or package, etc. Give a full description of the individual.

STUDENT CONDUCT

STUDENT CODE OF CONDUCT GUIDELINES

In order to ensure the success of all students attending MCC, all applicants must be mentally and physically able to perform the work required by the course for which they are applying.

In addition, MCC requires all of its students to conduct themselves in a business-like manner. The school administration reserves the right to sanction (up to and including dismissal) any student who violates this conduct on grounds, including but not limited to:

- The submission of coursework, as well as assisting in the submission of coursework, other than the student's own.
- The improper care and treatment of school facilities and equipment.
- Behavior that disrupts the tenants, learning environment or interrupts any student's ability to learn.
- Behavior or actions that subject other MCC students, faculty, and staff to imminent danger
- Noncompliance with MCC published Drug Free Policy or other policies.
- Failure to maintain Satisfactory Academic Progress.
- Failure to provide documented evidence of compliance with any/all Admissions Requirements.
- Failure to make MCC payments when due.

A student who has been dismissed may appeal and seek reinstatement. Any appeal must be received by President, Associate Director or his/her designee in writing within 10 days of the dismissal decision. Dismissals will be documented on the student's record. If reinstatement is deemed appropriate, it shall be in accordance with the procedures set forth in the Reinstatement section of Milwaukee Career College's catalog.

NON-HARRASSMENT

It is Milwaukee Career College's policy to prohibit intentional and unintentional harassment of any individual by another person on the basis of any protected classification including, but not limited to, race, color, national origin, disability, religion, marital status, sexual orientation or age.

If you feel that you have been subjected to conduct which violates this policy, you should immediately report the matter to your Program Chair or Associate Director. If you are unable for any reason to contact these individuals, or if you have not received a satisfactory response after reporting any incident of what you perceive to be harassment, please contact the President or any other member of management with whom you feel comfortable. Every report of perceived harassment will be fully investigated and corrective action will be taken where appropriate.

Violation of this policy will result in disciplinary action, up to and including dismissal. All complaints will be kept confidential to the fullest extent possible, but confidentiality cannot be guaranteed. In addition, Milwaukee Career College will not allow any form of retaliation against individuals who report unwelcome conduct to Milwaukee Career College associates or who cooperate in the investigations of such reports in accordance with this policy. Violation of said policy will be grounds for disciplinary action, up to and including dismissal. Students who make complaints in bad faith will be subject to disciplinary action, up to and including dismissal.

MCC BULLYING/THREAT POLICY

MCC has a zero-tolerance policy regarding any kind of violence on campus. Violence is any behavior, act, or statement that would be interpreted by a reasonable person to be aggressive, intimidating, harassing, or which carries an expressed or implied intent to cause harm to a person or property. Where appropriate, violators may be subject to criminal prosecution.

MCC is committed to maintaining and ensuring a safe environment free from any and all types of bullying/threats. Bullying/threats are deliberate or intentional behavior using words or actions intended to cause fear, humiliation, intimidation, harm, or social exclusion.

Bullying/threatening behavior by a student or an associate is prohibited on MCC property. Bullying/threats are also prohibited when perpetuated through the use of data or computer software that is accessed through a computer, computer system, computer network, or other electronic means of communication. No person shall suffer retaliation for reporting bullying/threats on the MCC campus.

Every MCC student is responsible for reporting any instances of violence or bullying/threats. Reports of violence or bullying/threats will be promptly and thoroughly investigated.

DRESS CODE

MCC requires its students to dress properly while attending MCC in preparation for vocations that generally will require conformity to a standard business dress code. MCC experience in business training has provided us with the knowledge of what type of employee the industry wants from the standpoint of skills, attitude, and personal appearance.

Certainly there are exceptions to this general “image”, but by far, the greatest number of graduates meets the standard. While we know it is impossible for every student to fit that image when entering school, it is our mission to guide students in that direction. Because we take our role as trainer very seriously, we want to be able to openly suggest ways to improve that image in conjunction with a student’s skills and attitude. Styles are ever changing. A long list of do’s and don’ts becomes obsolete shortly after it is written. MCC, therefore, requires students to be well groomed and hygienically clean at all times, and requires that students dress in a manner that is appropriate to the MCC environment. Students are required to wear uniforms procured by MCC. These uniforms will be available before their first hands-on course.

PARKING

Students and staff are encouraged to avoid parking near the main entrance of the building. This will allow elderly patients and those who are physically challenged to park nearest the elevator for easier access to appointments.

SMOKING

Milwaukee Career College is committed to providing a safe and healthy environment in addition to promoting the health and wellbeing of its students, faculty, staff and visitors. Furthermore, MCC students are training to be healthcare professionals and many healthcare facilities have made it known to us that they will not hire candidates who smoke. We want MCC students to be aware of the new standards in the workplace and assimilate now as much as possible to ensure their future employability.

For purposes of this policy, “smoking” will be defined by the inhalation, exhalation, burning, or carrying of any lighted or heated cigar, cigarette, pipe, or any other lighted or heated tobacco/plant product intended for inhalation, whether natural or synthetic, in any manner or in any form. Individuals that wish to smoke MUST do so inside of their vehicle. Smoking will not be tolerated anywhere else on MCC grounds or on Alioto’s property. This policy applies to all students, faculty, staff, and other persons on campus, regardless of the purpose for their visit.

The success of this policy will depend on the thoughtfulness, consideration, and cooperation of smokers and nonsmokers alike. Students, faculty, and staff share in the responsibility for adhering to and enforcing this policy. Individuals on campus who are caught smoking outside of their vehicle or anywhere on MCC grounds will be reminded that they must comply with our Smoke-Free Policy and will receive a written notice. A copy of the written notice will be placed in their file, and should an individual receive three written notices, they will be terminated from their program at Milwaukee Career College.

FOOD & DRINK POLICY

Food/drink is not allowed in any computer lab at MCC and should be limited only to authorized areas within MCC facilities.

COMPLAINT/GRIEVANCE POLICY

MCC has established the following policy for the purpose of considering complaints/grievances from students, employees, and other interested parties.

Wherever and whenever possible, the complainant should approach the involved party directly for purposes of discussion and/or resolution of the complaint/grievance at an “informal” level. Staff members should be available for any assistance at this level.

The complainant should discuss the issue(s) with the Program Chair or the Associate Director for the purposes of evaluation, and/or generation of possible suggestions or solutions.

The complainant should document the complaint/grievance in a detailed and objective manner. Said document should be provided to the Program Chair or the Associate Director and include, but not be limited to, a description of the incident(s), date(s), location(s), statement(s) made, and the name(s) of those involved. Also, the complainant should provide the Program Chair or the Associate Director with any other relevant information and/or documentation. MCC reserves the right to protect the confidentiality and integrity of any individuals involved in this process while evaluating the validity of the complaint/grievance and while pursuing potential solutions.

Depending on the nature of the complaint/grievance, the Program Chair or the Associate Director will consult with the appropriate parties and forward to his/her attention any/all documentation and supporting relevant information for the purpose of resolving the matter at this stage or for determining whether it is appropriate to proceed any further in the matter. The Program Chair’s or Associate Director’s decision not to proceed further in the matter may take into consideration the safety and/or welfare of MCC, its students, staff, and the individuals involved in this procedure.

If the Program Chair or Associate Director determines that the matter should be pursued further, a settlement team may be formed. Depending on the nature of the complaint/grievance, the team may consist of any/all of the following: President, Director, Program Chair(s), Instructor(s) or other designee. The complaint and the parties involved will meet with the team to determine the final resolution or disposition of the matter. Again, MCC reserves the right to maintain any level of confidentiality that it deems appropriate. The decision of the team will be final.

If after exhausting all the procedures outlined hereinabove, complaint/grievance has not been satisfactorily resolved, the complainant may file the above written complaint, in the above format to the Wisconsin Educational Approval Program at:

**Department of Safety and Professional Services
Educational Approval Program
P.O. Box 8366, 4822 Madison Yards Way, Madison, WI 53705
www.dsps.wi.gov; dspseap@wisconsin.gov; (608) 266-1996**

All stages of this Grievance Policy are to be expeditiously carried and fully documented.

DRUG & ALCOHOL POLICIES

Milwaukee Career College has established a Drug-Free Policy for MCC in order to:

Ensure the health and safety of MCC students and staff;
Continue providing high quality services to the general public; and
Comply with Federal laws/regulations for a uniform, nationwide, drug-free effort.

The current MCC policy is based on the Drug-Free Schools and Communities Act Amendments of 1989 (P.L.101-226). This statute requires any recipient of Federal funds to certify they will provide drug-free schools as a precondition of receiving funds from any Federal agency.

I. MCC Alcohol and Other Drug Policy

MCC prohibits the use, distribution, or possession of alcohol or illegal drugs as stated in the Drug-Free Schools and Communities Act of 1989. This prohibition applies to actions on school property or as part of a school activity.

The school reserves the right to take appropriate action should it have reasonable suspicion relating to alcohol and/or drug use, possession, sale, distribution, delivery, and/or manufacture.

MCC reserves the right to subject students to disciplinary sanctions up to and including suspension and/or dismissal.

“Reasonable suspicion” of alcohol or drug use or possession means a good faith belief which can be described by, based on objective facts and reasonable inference drawn from the facts including, but not limited to, unusual/irregular behavior, red bloodshot eyes, odor of alcohol or other drug use and slurred speech. Reasonable suspicion may lead MCC to request that a person undergo a drug and/or alcohol test.

II. Institutional Procedures

First Occasion - The person is confronted with reasonable suspicion. If he/she admits to using, he/she is sent home. If he/she states no usage, the school will request a drug/alcohol screening. If he/she refuses the screening he/she is sent home. In all cases, a letter of warning is sent to the person and placed in his/her file.

Second Occasion - The person is again confronted with reasonable suspicion. If reasonable suspicion is confirmed through admission of usage or drug screening of person, he/she is terminated. If the results prove the person is not using, he/she maintains status at MCC. If the person refuses to take the test, he/she is dismissed. As in all previous situations, the school will document all cases and place a copy in the student file. With positive or no results, a follow-up letter is sent to the person.

The Program Chair or Career Services Manager is available to hear concerns and offer referrals, advice, and information on drug and alcohol education and services in the community. Any student who suspects that he/she or someone else may be at risk is invited to seek these services.

MCC strives to ensure healthy and safe conditions for students and staff. We advise our student population of professional standards and expectations. We consider this to be part of our educational mission.

III. Applicable Legal Sanctions

Students/employees can request additional information about legal sanctions from the MCC President.

IV. Health Effects of Drug and Alcohol

Students/employees can request additional information about the health effects of drugs and alcohol the MCC President or Associate Director.

V. Biennial Review

Every two years, MCC will review the effectiveness of this policy and modify it, if necessary. It will also ensure that sanctions are consistently being enforced.

VI. Drug and Alcohol Abuse Prevention Programs

Milwaukee Career College will annually distribute in writing to each student and employee, standards of conduct, legal sanctions applicable, health risks, sanctions for violation of standards of conduct, and a description of counseling, treatment, rehabilitation or re-entry programs for drug and alcohol abuse.

In addition, students and associates may refer to the following websites for free information and educational videos on alcohol and drug abuse topics.

- www.justthinktwice.com
- www.getsmartaboutdrugs.com
- Alcohol Anonymous contact information – www.aa.org or local telephone directory
- Al-Anon Family Groups (888)4AL-ANON (425-2666) or www.al-anon.org
- American Council on Alcoholism and Drug Dependence, Inc. (800) NCA-Call (622-2255 or
- www.ncadd.org
- National Institute on Drug Abuse (800)662-HELP (662-4357) or www.drugabuse.gov

MCC Firearms Policy

In order to ensure the safety of students and staff at Milwaukee Career College, firearms are not permitted on the campus. Milwaukee Career College is committed to maintaining an institution that is free of violence.

While on the campus for classes or activities, students are prohibited from introducing, possessing, using, buying or selling weapons, firearms, ammunition, explosives, or items deemed by the school administration to be dangerous.

Any student who becomes aware of a violation of this policy is required to immediately notify an MCC Staff member. The school administration reserves the right to dismiss any student who violates the firearm policy.

SEXUAL CODE OF CONDUCT

SEXUAL MISCONDUCT POLICY

This policy describes Milwaukee Career College's position, policies, and procedures regarding incidents of sexual misconduct affecting students and employees. Language used may be explicit and some people may find it uncomfortable. However, it is important to properly define certain terms so that the meaning is clear and safe learning and working environment can be established.

Milwaukee Career College is dedicated to promoting a learning environment where students and employees feel safe and respected. Sexual misconduct in any form is strictly prohibited. Sexual conduct includes sexual assault, harassment, stalking, exploitation, dating violence, domestic violence among other things. Milwaukee Career College prohibits any conduct that may violate local, federal, and/or State laws and supports all laws governing sexual misconduct. All reports of sexual misconduct are taken seriously and the college will promptly and fairly respond to all reports of misconduct. All proceedings conducted in regard to alleged violations of this policy will be done so in a fair and timely manner that provides adequate notice and a meaningful opportunity for all parties to be heard.

This policy intends to address conduct prohibited under federal laws, including Title IX, the Clery Act, and the Violence Against Women Act of 2013, as well as under State law. The policy applies to all members of the Milwaukee Career College community which includes students, staff, faculty and any independent contractors which interact with the college. Members of the College community who commit acts of sexual misconduct will be disciplined appropriately and pursuant to College policy. This policy describes protections for victims of sexual misconduct as well as disciplinary procedures for individuals that commit sexual misconduct. Milwaukee Career College is committed to cooperate with and assist in law enforcement investigations whenever appropriate and requested to do so.

TITLE IX

It is the policy of Milwaukee Career College to comply with Title IX of the Education Amendments of 1972 and its regulations, which prohibit discrimination on the basis of sex. This requirement not to discriminate extends not only to students but also to applicants to Milwaukee Career College. Moreover, this policy of nondiscrimination includes a prohibition on sexual harassment and sexual violence. Individuals with questions, concerns or who wish to file a complaint related to sex discrimination, sexual harassment, or sexual violence may contact the schools Title IX Coordinator or one of Milwaukee Career College's Management or Program Chair Team Member(s).

A list of the Title IX Coordinator, Milwaukee Career College Management Team, and Program Chair(s) Members is listed below:

Wanda Hoover, Program Chair of the Medical Assistant Program

Dr. Allison Kiser, Program Chair of the Veterinary Assistant / Technician Programs

Maria Rodriguez, Program Chair of the Dental Assistant Program

Jennifer Potter, Program Chair of the Surgical Technology Program
Bruce Woodford, Program Chair of the Pharmacy Technician Program
Paul Syvock, Career Services Manager
Maria Torres, Associate Director
Jack Takahashi, Title IX Coordinator & President

SEXUAL VIOLENCE PREVENTION & AWARENESS PROGRAMS

Milwaukee Career College seeks to offer all students and employees educational programming regarding increasing awareness and overall prevention of dating violence, domestic violence, sexual assault, and stalking. The program informs students of their rights and process for reporting crimes to appropriate authorities and resources available to victims among other things. Program information is disclosed to the student upon enrollment. Milwaukee Career College also ensures that ongoing prevention and awareness campaigns are performed for students and employees. Faculties discuss issues and services with their classes throughout the year and additional information is shared with students via email and social media.

Additionally, employees and students that wish to learn more and be provided additional professional development in these areas should contact the Title IX Coordinator, jackt@mkecc.edu to coordinate additional training.

CLERY ACT REPORTABLE CRIMES

The Clery Act requires Milwaukee Career College to include four general categories for crime statistics as follows:

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

CLERY ACT TERMINOLOGY & DEFINITIONS

Definitions within this section contain very graphic language and may be disturbing to some individuals. Terminology and definitions are derived from the Department of Education's Handbook for Campus Safety & Security Reporting, the Federal Bureau of Investigation's Uniform Crime Reporting Handbook, and the Violence Against Women Act of 2013.

Murder/Non-Negligent Manslaughter: the willful (non-negligent) killing of one human being by another

Manslaughter by Negligence: the killing of another person through gross negligence

Sexual Assault: Actual or attempted sexual contact with another person without their consent. Sexual Assault includes but is not limited to the following:

- **Rape** - The penetration, no matter how slight, of a person's vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
- **Sexual coercion** - Using verbal pressure to compel another person to engage in sexual activity that he/she would otherwise not consent to, including but not limited to telling lies, threatening to spread rumors, and engaging in verbal abuse.
- **Fondling-** Touching the private body parts of another person, without that person's consent, for the purpose of sexual gratification.
- **Incest** - Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- **Statutory rape-** Sexual intercourse with a person who is under the legal age of consent.

Robbery: The taking or attempting to take anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.

Aggravated Assault: Unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm

Burglary: Unlawful entry of a structure to commit a felony or a theft.

Motor Vehicle Theft: The theft or attempted theft of a motor vehicle

Arson: Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc

Hate Crime: A criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. For the purposes of this policy, the categories of bias include the victim's (actual or perceived): race, religion, gender, gender identity, sexual orientation, ethnicity, national origin, or disability.

Larceny-Theft: The unlawful taking, carrying, leading or riding away of property from the possession or constructive possession of another. (Larceny and theft mean the same thing in the UCR.)

Simple Assault: Unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

Intimidation: To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.

Destruction/Damage/ Vandalism of Property: To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

Dating Violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. For the purposes of this definition dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence.

Domestic Violence: A felony or misdemeanor crime of violence committed

- By a current or former spouse or intimate partner of the victim;
- By a person with whom the victim shares a child in common;
- By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
- By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred;
- By any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred

Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for his/her safety or the safety of others, or would cause a reasonable person to suffer substantial emotional distress.

ADDITIONAL TERMINOLOGY AND DEFINITIONS

Retaliation: Taking adverse action against an individual for making a good faith report of prohibited behavior, for participating in any investigation or proceeding into such behavior, and/or otherwise cooperating with the College's efforts to prevent and remediate sexual misconduct in its community, including but not limited to engaging in intimidation, threats, coercion, and/or adverse actions regarding education or employment.

- Retaliation does not exist where an individual pursue actions in good faith in response to a report of prohibited behavior, such as an accused individual offering evidence in his/her own defense.
- Retaliation may be committed by an accused individual, a reporting individual, or any other person or group of persons.
- Retaliation may exist event where an underlying report that was made in good faith was found to be unsubstantiated by evidence and/or the accused individual was determined to be 'not responsible'.

Consent: In assessing whether alleged sexual activity was consensual, Milwaukee Career College will require that the consent be affirmative to consider it consensual. Affirmative consent is the knowing, voluntary, and mutual decision among all participants to engage in sexual activity. Consent can be given by words or actions, as long as those words or actions create clear permission regarding willingness to engage in the sexual activity. Silence or lack of

resistance, in and of itself, does not demonstrate consent. The definition of consent does not vary based upon a participant's sex, sexual orientation, gender identity, or gender expression.

- Consent to any sexual act or prior consensual sexual activity between or with any party does not necessarily constitute consent to any other sexual act.
- Consent is required regardless of whether either person involved in the act is under the influence of drugs and/or alcohol.
- Consent may be initially given but withdrawn at any time.
- Consent cannot be given when a person is incapacitated, which occurs when an individual lacks the ability to knowingly choose to participate in sexual activity. Incapacitation may be caused by the lack of consciousness or being asleep, being involuntarily restrained, or if an individual otherwise cannot consent. Depending on the degree of intoxication, someone who is under the influence of alcohol, drugs, or other intoxicants may be incapacitated and therefore unable to consent.
- Consent cannot be given when it is the result of any coercion, intimidation, force, or threat of harm.
- When consent is withdrawn or can no longer be given, sexual activity must stop.

Privacy: Privacy can be offered by a College associate who is unable to offer confidentiality due to their legal obligation to report known incidents of sexual assault or other crimes. Even College associates who cannot guarantee confidentiality will maintain your privacy to the greatest extent possible. The information you provide to a non-confidential resource will be relayed only as necessary to investigate and/or seek a resolution. Any College associate who is not considered a confidential resource, is considered a College associate who will guarantee privacy.

Accused: A person accused of sexual misconduct or another violation of this policy.

Bystander: Bystander includes any person who witnesses or learns about sexual misconduct or another violation of this policy who is not themselves the victim or person subjected to the sexual misconduct. Bystanders are welcome and encouraged to report incidents of sexual misconduct that they have witnessed or learned about. If a bystander intervenes they should also intervene in a safe manner. Safe and positive options for bystanders include calling for help, identifying allies to assist you/the victim, and creating distractions.

Reporting Individual: Reporting individual includes any person who is a victim, survivor, complainant, and other individuals who were subjected to sexual misconduct, and then report it.

VICTIMS RIGHTS

Milwaukee Career College takes victim's rights seriously and encourages all victims of sexual misconduct to report incidents to appropriate law enforcement officials. If requested, Milwaukee Career College will help victims in reporting incidents to appropriate law enforcement agencies and help victims understand the criminal justice system. MCC supports victim's rights however to decline assistance from the campus authorizes and law enforcement. Milwaukee Career College will also, when reasonably appropriate accommodate victims and initiate protective measures such as "no contact" orders, restraining orders, or similar lawful orders upon request. Moreover, Milwaukee Career College strongly encourages victims of sexual misconduct to

preserve evidence that may assist in proving that the alleged criminal offense occurred or may be helpful in obtaining a protection order.

PROCESS FOR REPORTING INCIDENTS OF SEXUAL MISCONDUCT

In any instance of sexual misconduct, a student has the right to report the incident to the College, to campus security, to local law enforcement, to the State police, to any combination of these authorities, or to not report the incident at all.

Students at Milwaukee Career College might wish to disclose incidents of sexual misconduct but do not know yet if they wish official action to be taken against the offender. Students can disclose the incident without having to file a report. Milwaukee Career College asserts that victims/students have the right to be protected from retaliation and receive assistance whether or not the student chooses to file a formal report. Victims/students also have the right to request confidentiality and Milwaukee Career College will protect the identity of the reporting individual or other involved parties, including omitting personally identifying information about the party, as long as it does not interfere with accommodations or protective measures. MCC will complete all publically available recordkeeping including Clery Act reporting without the inclusion of any identifying information regarding the victim in such cases.

When a student or employee reports to Milwaukee Career College that the student or employee has been a victim of dating violence, domestic violence, sexual assault or stalking, whether the offense occurred on or off campus, Milwaukee Career College will provide the student or employee a written explanation of the student's or employee's rights and options as well as the resources available to them.

Reporting Individuals

MCC's Management Team Members or Program Chairs are the people with whom a student would file a formal report regarding sexual misconduct, if the student wishes to do so. Formal reports may be filed in person, by phone, by email, or by written letter. Upon receiving a formal report, Milwaukee Career College begins an investigation into the incident and commences the student disciplinary process against the individual who committed the alleged sexual misconduct, if that individual is a student of the College (or, if the individual is not a student, takes other appropriate action).

Formal reports can be made to the Management Team by:

- Making a report in-person, or, via email:
 - jackt@mkecc.edu – Milwaukee Career College President
 - mtorres@mkecc.edu – Associate Director
 - psyvock@mkecc.edu – Career Services Manager
 - whoover@mkecc.edu – Program Chair – Medical Assistant Program
 - akiser@mkecc.edu – Program Chair – Veterinary Assistant/Technician Programs
 - mrodriguez@mkecc.edu – Program Chair – Dental Assistant Program
 - jpotter@mkecc.edu – Program Chair – Surgical Technology Program
 - bwoodford@mkecc.edu – Program Chair – Pharmacy Technician Program

Disclosing to Someone Other than the Management Team, or, Program Chair(s)

Incidents can also be disclosed to associates other than the Management Team or Program Chair(s), if the student prefers to do so. Some College associates are required to notify the Management Team and Program Chair(s) when an incident of sexual misconduct is disclosed to them, in order to protect the safety of other people on campus and so that the Management Team / Program Chair(s) can reach out to the student to offer help, support, and information about filing a formal report if the student desires. While these associates cannot offer true confidentiality, they promise not to disclose more information to the Management Team or Program Chair(s) than necessary. The information disclosed will be limited to only the information needed to conduct an investigation (if the student permits) and to ensure student safety.

You can find local rape crisis centers and other community resources in the Career Services and Associate Director's Offices. These types of non-College officials provide confidentiality and can offer support and referrals to helpful services and resources. These persons are not affiliated with the College and have no obligation to notify Milwaukee Career College about the incident.

Confidential and/or Anonymous Reports

Students can also make a formal report to Milwaukee Career College Management Team even if they do not want an investigation to occur. This is considered a "confidential report" in that the Management Team will first ask the student's permission before beginning an investigation and commencing the student disciplinary process. If the student declines to give permission, the Management Team will honor the student's decision and will not investigate the report, except in circumstances where failing to investigate would prevent the College from providing a safe and non-discriminatory environment for all members of the College community. In those cases, the student would not be obligated to participate in the investigation or the disciplinary process. Whatever the student decides, the Management Team will still offer the student assistance and resources. If the student request helps with notifying local law enforcement officials, Milwaukee Career College will help the student notify said parties and will defer to law enforcement officials until they have completed their process.

Students that report instances of sexual misconduct whether a victim or bystander, can make the report confidential or anonymous if they want to do so however, due to the nature or the schools responsibilities Milwaukee Career College may need to disclose items of the case with law enforcement agencies. If the College determines that it cannot maintain a victim/bystander's confidentiality and that an investigation is necessary in order to provide a safe and nondiscriminatory environment for the MCC Community, the student who reported the incident will be notified by the President, Associate Director, or his/her designee in writing, prior to the start of an investigation and will, to the extent possible, only share information with the people responsible for handling the College's response. Milwaukee Career College endeavors to be mindful of victims' rights as previously stated and will take steps to ensure the victim is protected from retaliation. Retaliation against victims, reporting individuals, or bystanders will not be tolerated by Milwaukee Career College.

Anonymous reports can be made by not including your name or email address when submitting the report. Individuals should keep in mind that by making the report anonymously, it may hinder the College's ability to conduct a full investigation. However, regardless of how a student makes a report, the College may not require a victim to participate in any investigation or disciplinary proceeding.

In the event that sexual misconduct has been committed by a non-member of the College community (including an unknown person or stranger), students may still report the incident to the College and receive support and protection. For a list of on-campus and off-campus resources and support services near your campus, please visit the Associate Director's Office.

Resources for Reporting to Law Enforcement

Students also have the option to make a report to law enforcement, either in addition to or as an alternative to making a report to the College. In addition to calling 911, you may make a report to law enforcement by contacting the following resources in your State or local area.

- Milwaukee County Criminal Division: 414-278-4538.

Amnesty Policy for Alcohol and/or Drug Use

Students should not be afraid to report an incident of sexual misconduct merely because they were drinking alcohol or using drugs at the time of the incident, whether they were a victim, witness, or bystander. Milwaukee Career College has adopted an amnesty policy for alcohol and/or drug use in regard to incidents of sexual misconduct. The health and safety of every student at Milwaukee Career College is of utmost importance. Milwaukee Career College recognizes that students who have been drinking and/or using drugs (whether such use is voluntary or involuntary) at the time that violence, including but not limited to domestic violence, dating violence, stalking, or sexual assault occurs may be hesitant to report such incidents due to fear of potential consequences for their own conduct. Milwaukee Career College strongly encourages students to report domestic violence, dating violence, stalking, or sexual assault to College associates. A bystander acting in good faith or a reporting individual acting in good faith that discloses any incident of domestic violence, dating violence, stalking, or sexual assault to the College associates or law enforcement will not be subject to the College's code of conduct action for violations of alcohol and/or drug use policies occurring at or near the time of the commission of the domestic violence, dating violence, stalking, or sexual assault.

RESOURCES, SUPPORT SERVICES, & PROTECTION FOR VICTIMS

Milwaukee Career College is committed to supporting victims and survivors of sexual misconduct and sexual violence, regardless of when, where, or who committed the acts in question. Resources provided for victims and survivors can be found in the following pages of this report. If there are other resources that you or a friend might need, the College encourages you to reach out to your Program Chair, Career Services Manager, or Associate Director, who can help obtain those resources. If you aren't sure who your campus Associate Director, Career

Services Manager, or Program Chair is, please visit Milwaukee Career College's Front Desk. If you are in immediate danger at any point, call 911!

Obtaining Immediate Medical Attention

If you have been the victim of rape, sexual assault, domestic violence, or dating violence and are in need of immediate medical attention, please call 911 and/or consider visiting a hospital, urgent care center, or medical provider. Below is a list of emergency medical facilities and other medical providers in the area. Some State law requires that all hospitals in the State offer forensic rape examinations (sometimes also called 'forensic sexual assault examinations' or simply 'rape kits'). Some states require hospitals to notify the victim/survivor that they can choose to have the forensic rape exam and its related charges billed to the Victim Services at no cost to the victim/survivor. After the exam, you might receive other medical services or counseling services for which the hospital might charge you or bill your health insurance; if your insurance plan is through someone else (such as your parent), you are encouraged to tell hospital staff if you do not want your insurance policyholder to be notified about your access to these services.

Especially in incidents of rape or sexual assault, it may be important to receive a forensic examination as soon as possible in order to preserve evidence and/or to receive protection from sexually transmitted infections and pregnancy. To best preserve evidence, you should avoid showering, washing, changing clothes, discarding clothes, combing hair, or otherwise altering your physical appearance until the exam is complete, and you should seek an exam as soon as possible. Even if you don't want evidence to be collected, it is still recommended that you get examined by a doctor in order to address physical injuries, potential pregnancy, and possible exposure to sexually transmitted infections. For more information about what to do after an assault, visit the National Sexual Violence Resource Center website at www.nsvrc.org or the local resources listed in the following sections.

On-Campus and Off-Campus Resources and Support Services

Individuals who have been subjected to sexual misconduct also often need other types of support. Even if you think you are okay and that you don't need help, the College encourages you to reach out to someone. The College's on-campus resource is the Associate Director and Career Services Manager. In addition, there are various off-campus resources that you can use if you prefer not to seek help from on-campus resources. Below is a list of on-campus and off campus resources for each Milwaukee Career College, including counselors, advocates, and community resources. If you have any questions or aren't sure where to go, the Associate Director, Career Services Manager, or Program Chair can help point you in the right direction.

Victims also need to seek support from loved ones and from community organizations. Such organizations help victims understand their feelings, rights and the law. The Rape Hotline available in which Milwaukee Career College campus is located is listed below:

Milwaukee/Wauwatosa: Sexual Assault and Treatment Center: 414-219-5555

Additional information is available in the campus's Career/Student Service Office. The above is only a brief listing of the resources available to you. You can find many more resources by dialing 2-1-1 for free, confidential help finding an extensive list of resources, including law enforcement & public safety assistance, legal services, hospitals that conduct sexual assault forensic exams, confidential counseling services, and more. 2-1-1 is available 24/7, and many of the resources to which they can refer you also are available 24/7, are confidential, and are low-cost or free of charge.

Additional Resources for Victims of Sexual Assault:

- www.rainn.org
- www.thehotline.org
- www.loveisrespect.org
- www.notalone.gov
- www.ovw.usdo.gov

DISCIPLINARY PROCESS

Milwaukee Career College desires to ensure that all investigations and the disciplinary process is fair, prompt, thorough, and impartial. The victim, witness, or bystander and the individual accused of misconduct will have the same opportunities to present their account during any investigatory or disciplinary procedure.

All students that are alleged to have committed sexual misconduct will face student conduct charges and be subjected to Milwaukee Career College's disciplinary process. Investigations will take place no later than five working days following the report of an incident. All accused students are entitled to a presumption of 'not responsible' (not guilty) and burden of proof will be on the College to establish the violation of policy that was committed by the student. The standard of evidence required in both the Student Conduct Hearing and in the Appeal Hearing, if one is sought, is a preponderance of evidence. 'Preponderance of evidence' means that the relevant Code of Conduct or Student Action Accountability committee must decide in favor of the party that, as a whole, has the stronger evidence that the violation was or was not committed, however slight the edge over the other party's evidence may be. 'Preponderance of evidence' is sometimes described as 'more likely than not' or '51% probability'. The evidence should be sufficient to incline a fair and impartial mind to one side of the issue over the other, but it is not necessary for that mind to be completely free from all reasonable doubt. 'Preponderance of evidence' is a different and lesser standard of evidence than that used in criminal proceedings; rather, it is the standard of evidence often used in civil court proceedings.

Milwaukee Career College's Disciplinary Process is As Follows:

- Assignment and Preliminary Review of the Incident –The Reviewing Officer is the President, Associate Director, or his/her designee. Preliminary Review of the Incident will always be performed be conducted by officials who, at a minimum, receive annual training on the issues related to dating violence, domestic violence, sexual assault and stalking and on how to conduct an investigation and hearing process that protects the safety of the victims and promotes accountability. The reviewing officer will review the

allegations and if the matter can be resolved between the victim/reporting party and the accused individual in a matter that is satisfactory to the officer the matter will be dismissed and there shall be no further proceedings. The understanding of resolution will be documented and signed by all parties involved.

- Notification of Disciplinary Actions, Rights, and Further Proceedings – If the matter cannot be resolved by the aforementioned agreement between the parties and the officers, then the reporting individual and the accused individual will be notified in writing of the investigation into the matter. Any conduct violations will be noted and the individual will be notified of the requirements that the accused person will need to present in a disciplinary hearing. Accused individuals will need to provide the officer with a written response, documents, evidence, and witness information. They will be notified that they may be subject to discipline including dismissal. They will also be notified that they will have the same opportunity to present during a disciplinary hearing as the individual that reported the incident. The accused individual and the reporting individual will also be notified that they will be allowed have others present during any institutional disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding by an advisor of their choice. The notification will also include notification of their rights to have the College's student conduct process run concurrently with a criminal justice investigation and proceeding, except where law enforcement requests a temporary delay in order to gather evidence; to review and present relevant available evidence in the case file or otherwise in the possession or control of the College; to exclude their own prior sexual history with persons other than the other party in the student conduct process and/or their own mental health diagnosis and treatment from admittance in the stage of the College's proceedings where responsibility is determined. Both the accuser and accused will be notified in writing of the results of any disciplinary procedure that occurs and when the results become final. They will also be notified of methods of at least one level of appeal of a determination before a panel that is fair and impartial and does not include individuals with a conflict of interest.
- Investigation – The Reviewing Officer or his/her designee will conduct an investigation prior to the hearing.
- Hearing – The Reviewing Officer will schedule a date for the hearing and provide all parties with a notice including the date, time and location of the hearing. At the time of the hearing the Reviewing Officer will go over the facets of the incident and all information will be presented.
- Decision – When the reviewing officer reaches a decision regarding the case, they will notify, in writing, the decision of the officer, any sanctions that will be imposed, and the process for appeal.
- Sanctions – The campus will as necessary impose sanctions including to, but not limited to imposing additional related work assignments, suspension, dismissal, revocation of admission/degree, and withholding degree.

DISCLOSURE OF DISCIPLINARY PROCEDURES

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

APPEAL PROCESS

A student who has been dismissed may appeal and seek reinstatement. Any appeal must be received by the Associate Director in writing within 10 days of the dismissal decision. Dismissals will be documented on the student's record. If reinstatement is deemed appropriate, it shall be in accordance with the procedures set forth in the Reinstatement section of the Milwaukee Career College Catalog.

RETALIATION POLICY

Any attempt by a student, faculty, or staff member to retaliation, intimidate, threaten, coerce, or otherwise discriminate against a person who makes a report of or who is otherwise involved in reporting, an investigation of, or a hearing for alleged violations of the College's conduct policy, is prohibited. Persons who believe that they have been retaliated against for making a complaint/report or for cooperating in an investigation or hearing should immediately contact the College's Management Team. Any person who retaliates against a person who has cooperated in an investigation and/or hearing is in violation of College policy and will be subject to disciplinary action.

"CAMPUS SEX CRIMES PREVENTION ACT"

The "Campus Sex Crimes Prevention Act" (CSCPA), is a federal law that calls for the tracking of convicted sex offenders enrolled at or employed by institutions of higher education. States are required to maintain programs requiring sex offenders to provide notice to any educational institutions where they are employed or enrolled as a student. The CSCPA also requires States to adopt programs requiring offenders to provide notice of change in employment or enrollment status on college campuses. Moreover, the CSCPA requires sex offenders already required to register in a state to provide notice, as required under state law, to each institution of higher education in that state in which the person is employed, carries on a vocation, or is a student. The law requires that these sex offenders also provide notice of each change in their enrollment or employment status. Under the Act, states are then required to ensure that such information is promptly made available to the law enforcement agency that has jurisdiction where the institution of higher education is located.

The Act also amends the Federal Family Education Rights and Privacy Act of 1974 (FERPA) to clarify that nothing in FERPA should be construed to prohibit an educational institution from disclosing information provided to the institution concerning registered sex offenders. Finally,

the CSCPA requires institutions of higher education to issue a statement to their campus communities where law enforcement agency information provided by a state under the sex offender notification requirements may be obtained. In compliance with this requirement, the following state agencies are where this information can be obtained.

Wisconsin - Milwaukee County Criminal Division: 414-278-4538.

SUMMARY

Milwaukee Career College is continually working to ensure the safety of all persons within the campus community. All Milwaukee Career College community members have important roles in preventing and reporting crime. Prompt reporting of incidents, personal awareness, and practicing crime prevention strategies are most important in reducing crime and staying safe. Fire safety is also very important to the college. All students, faculty and staff should be aware of policies, equipment and evacuation procedures to insure the safety of the entire community of Milwaukee Career College.

Milwaukee Career College reserves the right to change, without notification, any of the information published in the Annual Security Report.

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