TITLE IX – SEX DISCRIMINATION, SEX-BASED HARASSMENT, AND SEXUAL MISCONDUCT POLICY

Policy Statement

Meridian Institute of Surgical Assisting ("Meridian Institute" or "Institute") is committed to maintaining an educational and employment environment free from sex discrimination, including sex-based harassment and sexual misconduct.

Meridian Institute prohibits discrimination on the basis of sex in its education programs and activities, including admissions and employment, in accordance with Title IX of the Education Amendments of 1972 and its implementing regulations (34 C.F.R. Part 106). Inquiries regarding Title IX may also be directed to the U.S. Department of Education, Office for Civil Rights.

This Policy applies to all students, employees, and other individuals participating in or attempting to participate in Meridian Institute's education programs or activities.

Scope and Jurisdiction

This Policy applies to conduct occurring within Meridian Institute's education programs or activities, including on-campus activities, off-campus conduct over which the Institute exercises disciplinary authority, and conduct that contributes to or creates a hostile environment within Institute programs or activities.

This Policy applies to students, employees, applicants, and third parties participating in or attempting to participate in Institute programs.

Title IX Coordinator

The Title IX Coordinator is responsible for coordinating Meridian Institute's compliance with Title IX.

Reports may be made in person, by mail, by telephone, or by email at any time, including outside of business hours.

Title IX Coordinator:

Celia White, Director of Regulation and Compliance, (615) 678-8196 ext 19, celia.white@meridian-institute.edu

Definitions

Abuse: intentionally or recklessly causing or attempting to cause bodily injury or placing another person in reasonable apprehension of imminent serious bodily injury to himself or herself, or another.

Bystander Intervention: someone who intervenes as an outsider at the time of the occurrence.

Complainant: an individual who files a Sexual Misconduct complaint with Meridian Institute's officials against a current student or employee.

Consent: clear, knowing, and voluntary approval given by words or demonstrated positive actions to engage in sexual activity. This decision must be made voluntarily and actively by all participants in a positive manner which is mutually agreed upon sexual activity.

Consent cannot be given when a person is incapacitated. A person cannot consent if he or she is unconscious or coming in and out of consciousness. A person cannot consent if he or she is under the threat of violence, bodily injury or other forms of coercion. A person cannot consent if his/her understanding of the act is affected by a physical or mental impairment.

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

Employee: includes faculty and staff that are part-time or full-time employees who work on Meridian Institute's campus. Contract employees are not considered under "employee".

Hostile Environment Harassment: Unwelcome sex-based conduct that is sufficiently severe or pervasive based on the totality of the circumstances, to limit or deny a person's ability to participate in or benefit from Meridian Institute's education programs or activities.

Incapacitation: is defined as the physical and/or mental inability to make informed, rational judgements. States of incapacitation include, but are not limited to, unconsciousness, sleep, and blackouts. Where alcohol, drugs or other medications are involved, incapacitation is defined with respect to how the alcohol or other drugs consumed affects a person's decision-making capacity, awareness of consequences, ability to make fully informed judgments, and

inability to communicate. Being intoxicated by drugs, alcohol or other medications does not absolve one's responsibility to obtain consent. The factors to be considered when determining whether consent was given include whether the accused knew, or whether a reasonable person should have known, that the complainant was incapacitated.

Prevention: Intervention to stop the behavior.

Respondent: a "Respondent" is an individual who has been accused of committing sexual misconduct by the report or filing of a formal or informal complaint.

Result: the final determination by the school or judge, due to the findings between the respondent and complainant. Risk Reduction: actively taking steps to reduce the likelihood a behavior will happen.

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

Sexual Exploitation: non-consensual abuse or exploitation of another person's sexuality for the purpose of sexual gratification, financial gain, personal benefit or advantage, or any other improper purpose.

Sex Discrimination: Sex discrimination includes discrimination based on sex, sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity.

Sex-based harassment: is unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal or physical conduct of a sexual nature such as the unwelcome touching of a person's body. Forms can include stalking, engaging in a course

of conduct directed at a specific person that would cause a reasonable person to fear for their safety or the safety of others. Sex-based harassment also includes sexual jokes and/or innuendos of a sexual nature.

Sex-based harassment may occur in hierarchical relationships, between peers, or between individuals of the same sex or opposite sex. To determine whether the reported conduct constitutes sex-based harassment, consideration shall be given to the record of the conduct as a whole and to the totality of the circumstances, including the context in which the conduct occurred.

Sexual Misconduct: a broad term including, but not limited to, committing a Sexual Act without Consent, Sexual Exhibitionism, Sexual Exploitation, or sex-based harassment. This may include sexually based violence that may be physical, emotional, financial and/or abusive. Sexual Misconduct can occur between strangers or acquaintances, including people involved in an intimate or on-going sexual relationship. Sexual Misconduct can be committed by men or women, and it can occur between people of the same or different sex.

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

Student: a current student who is actively enrolled at Meridian Institute.

Prevention and Risk Reduction, and Institutional Commitment

Meridian Institute of Surgical Assisting recognizes that sexual misconduct is a serious concern within higher education environments and is committed to maintaining a campus climate that promotes safety, accountability, and respect.

Prevention efforts focus on deterring misconduct through education, awareness, and clear enforcement of institutional standards. Prevention includes promoting lawful behavior, reinforcing consent standards, and encouraging bystander intervention when potentially harmful conduct is observed.

Risk reduction strategies refer to actions that may reduce exposure to harm; however, Meridian Institute affirms that responsibility for sexual misconduct rests solely with the perpetrator. No individual's attire, behavior, alcohol consumption, or social setting constitutes consent or excuses misconduct.

Meridian Institute maintains policies, procedures, and reporting mechanisms designed to address allegations promptly and equitably in compliance with Title IX and applicable federal regulations.

Prevention, Education, and Training

Meridian Institute disseminates this Policy to all current students and employees by making it publicly available through the Institute's website.

Educational resources are made available upon request to all students and employees. Meridian Institute conducts an in-house training for employees to ensure awareness of institutional obligations, reporting requirements, and procedural responsibilities under Title IX.

Training provided to Title IX personnel is conducted in accordance with 34 C.F.R. Part 106 and applicable regulatory requirements.

Title IX Training Materials

Meridian Institute will maintain, for a minimum of seven (7) years, records of all materials used to train Title IX personnel, including:

- Title IX Coordinators;
- Investigators;
- Decision-makers; and
- Informal resolution facilitators

Training materials may include, but are not limited to:

- Presentations;
- Handouts;
- Webinars;
- Videos;
- Manuals;
- Case studies;
- Written guidance; and
- Assessment materials.

These training materials are retained in accordance with 34 C.F.R. Part 106 and are publicly available on the Institute's website.

Title IX Personnel Training

Meridian Institute ensures that Title IX personnel receive training appropriate to their respective roles and responsibilities.

The Title IX Coordinator and Investigators receive training on:

- The definition of sex discrimination and sex-based harassment;
- The scope of the Institute's education programs and activities;
- How to conduct investigations and grievance processes;
- The Institute's grievance procedures, including appeals and informal resolution processes, as applicable; and
- How to serve impartially by avoiding prejudgment of the facts, conflicts of interest, and bias.

Decision-makers receive training on:

- The definition of sex-based harassment;
- The grievance process and determination procedures;
- The evaluation of relevant evidence; and
- Issues of relevance, including appropriate application of evidentiary standards.

Informal resolution facilitators receive training on:

- The requirements and procedures governing the informal resolution process; and
- Maintaining neutrality and voluntariness.

In accordance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act ("Clery Act") and the Violence Against Women Reauthorization Act of 2013 ("VAWA"), Meridian Institute provides primary prevention and awareness programs addressing Sexual Assault, Dating Violence, Domestic Violence, and Stalking.

Gender Identity, Gender Expression, or Sexual Orientation Discrimination

Harassment that is not sexual in nature but is based on gender, gender identity, gender expression, sex- or gender-stereotyping, or sexual orientation also is prohibited by Meridian Institute. This type of harassment may limit or deny a person's ability to participate in or benefit from Meridian Institute's educational programs, employment, or services. While discrimination based on these factors may be distinguished from sex-based harassment, this kind of harassment may contribute to the creation of a hostile work or academic environment. Thus, in determining whether a hostile environment due to sex-based harassment exists, Meridian Institute may take into account acts of discrimination based on gender, gender identity, gender expression, sex- or gender stereotyping, or sexual orientation.

Pregnancy and Related Conditions

Meridian Institute prohibits discrimination based on pregnancy or related conditions, including childbirth, termination of pregnancy, lactation, and recovery.

The Institute will not require supporting medical documentation to provide reasonable modifications for pregnancy or related conditions unless such documentation is necessary to determine appropriate adjustments under the circumstances.

Students and employees are entitled to:

- Reasonable modifications;
- Voluntary leave of absence;
- Access to a clean and private lactation space (not a bathroom); and
- Comparable treatment to other temporary medical conditions.

The Title IX Coordinator oversees pregnancy-related accommodations.

Reporting

Any person may report sex discrimination or sex-based harassment to the Title IX Coordinator at any time.

Employees with supervisory or administrative responsibility must promptly report known incidents to the Title IX Coordinator.

There is no time limitation for filing a report or complaint under this Policy. However, individuals are strongly encouraged to report incidents as soon as possible so that Meridian Institute may respond promptly, preserve evidence, and conduct a thorough investigation. Delays in reporting may affect the availability of evidence or the Institute's ability to investigate effectively, particularly if the complainant or respondent is no longer enrolled or employed at the time of the report.

Supportive Measures

Upon receiving a report, the Title IX Coordinator will promptly contact the complainant to:

- Discuss the availability of supportive measures;
- Explain the process for filing a complaint; and
- Provide a copy of this Policy.

Supportive measures are non-disciplinary, non-punitive, reasonably available, and designed to restore or preserve equal access to Meridian Institute's education programs or activities.

Examples may include schedule modifications, academic adjustments, no-contact directives, reassignment, administrative leave, or increased monitoring.

Emergency Removal

Meridian Institute may remove a respondent on an emergency basis following an individualized safety and risk analysis determining an immediate threat to health or safety.

The respondent will receive notice and an opportunity to challenge the removal.

Protective Measures

If, at any point during the complaint, investigative, or disciplinary process, the Title IX Coordinator reasonably determines that a respondent:

1. Poses a substantial threat of harm to any student or employee;
2. Threatens or endangers Meridian Institute; or
3. Disrupts the stability and continuation of normal Institute operations;

the Title IX Coordinator may implement appropriate protective measures.

For Student Respondents:
• Separation from the complainant during lab activities, including assignment to separate workstations and, where applicable, separate lodging arrangements;
• Rescheduling of lab participation, if necessary.

For Employee Respondents:
• Restriction of communication with the complainant;
• Reassignment or placement on administrative leave.

Complaint Resolution Process

A formal complaint may be filed by:

• The alleged victim (Complainant); or
• The Title IX Coordinator, when necessary to ensure institutional compliance.

Informal resolution may be offered after written notice of the allegations has been provided and both parties voluntarily consent in writing.

Prior to engaging in informal resolution, the parties will receive written notice of the allegations and a written explanation of the potential consequences of participating. Either party may withdraw from informal resolution at any time prior to reaching a final agreement.

Informal resolution is not available when an employee is alleged to have harassed a student.

Procedures for Claims

Meridian Institute utilizes a prompt, equitable, and impartial grievance process.

The grievance process will be conducted within reasonably prompt time frames, consistent with federal law and the complexity of the matter. If delays occur due to the unavailability of parties, witnesses, or other unforeseen circumstances, the Title IX Coordinator may extend applicable time frames. Any extensions will be communicated simultaneously to both parties.

Working days are defined as days on which Meridian Institute offices are open for business.

All notices, determinations, and appeal decisions will be provided simultaneously and in writing to the complainant and respondent.

A. Basic Requirements

The grievance process includes:

Written notice of allegations;
A presumption that the respondent is not responsible;
Equal opportunity to present evidence;
Objective evaluation of relevant evidence;
Trained and unbiased decision-makers;
A written determination with findings and rationale; and
An opportunity to appeal.

The investigator and decision-maker will not be the same person
The Institute will objectively evaluate all relevant evidence and will not use, rely on, or seek disclosure of information protected under a legally recognized privilege unless the individual holding such privilege has voluntarily waived it in writing.

Live hearings are not required under the 2024 Title IX regulations. However, Meridian Institute may conduct separate meetings with parties, as necessary, to assess credibility.

B. Investigation

If a complaint is not resolved through informal procedures, a formal investigation will be conducted.

The Title IX Coordinator will appoint an investigator or investigative team that:

Is trained and impartial;
Is free from conflicts of interest or bias; and
Will conduct interviews and gather relevant evidence.
Any perceived conflict of interest must be disclosed in writing within three (3) days of appointment.

The investigator will:

Conduct interviews;
Gather relevant evidence;
Provide parties equal opportunity to review relevant evidence; and
Prepare a written investigative summary.
Both parties may have an advisor or support person present during meetings or hearings. Advisors may privately consult with the party but may not address decision-makers, question witnesses, or otherwise participate directly.

C. Acknowledgment of Responsibility

At any time prior to a final determination, the respondent may acknowledge responsibility.

If both parties agree to proposed sanctions, the matter may be resolved without further proceedings. If either party objects, appropriate decision-makers will determine sanctions.

D. Determination and Outcome

Following the investigation, a trained decision-maker, separate from the investigator, will:

Review the investigative record;
Evaluate relevant evidence objectively; and

Issue a written determination that includes findings of fact, conclusions regarding policy violations, rationale, sanctions (if applicable), remedies (if applicable), and appeal rights.

Both parties will be notified simultaneously and in writing of the determination, sanctions, remedies, and appeal rights.

Sanctions

Sanctions will be determined based on:

The nature and gravity of the misconduct;
Any prior disciplinary history; and
The need to end the violation, prevent recurrence, and remedy its effects.
Sanctions may include reassignment, suspension, or termination (for employees); probation, suspension, or expulsion (for students); or mandated counseling or educational sanctions, as appropriate.

Appeal Process

Either party may appeal on the following grounds:

Procedural irregularity affecting the outcome;
New evidence not reasonably available at the time of determination; or
Conflict of interest or bias.
Appeals must be submitted in writing within fifteen (15) calendar days of the written determination.

An appeal decision-maker will issue a written decision simultaneously to both parties.

Appeals must be submitted through Meridian Institute's Grievance Policy, sub-policy "Appeal Routes," consistent with applicable law.

False Reports

Any individual who knowingly files a false complaint, knowingly provides false information, or intentionally misleads Institute officials involved in the investigation or resolution of a complaint may be subject to disciplinary action.

Duty to Cooperate

All students and employees are required to cooperate in investigations and disciplinary processes conducted under this Policy.

Individuals accused of misconduct are entitled to identify witnesses and provide relevant information in formal proceedings. When necessary, adjustments may be made to academic or employment obligations.

Prohibition on Retaliation

Retaliation against any individual for filing a complaint, providing information, or participating in a sexual misconduct investigation in good faith is strictly prohibited.

Retaliation includes harassment, intimidation, threats, coercion, or any materially adverse action that would dissuade a reasonable student or employee from filing a complaint or participating in an investigation.

Individuals who believe they have experienced retaliation should report it to the Title IX Coordinator.

Disability and Language Access

Reasonable modifications for disabilities and language assistance for individuals with limited English proficiency will be provided throughout the grievance process.

Confidentiality

Meridian Institute will maintain the privacy of parties consistent with applicable law. Information will be shared only as necessary to investigate, respond, or comply with legal obligations.

Recordkeeping

Meridian Institute will retain, for at least seven (7) years:

Records of each Title IX grievance process;
Any appeal and its result;
Informal resolution documentation;
Supportive measures provided; and
All materials used to train Title IX personnel.
Documentation related to terminations, expulsions, or permanent sanctions may be retained indefinitely.

Dissemination

This Policy is posted on Meridian Institute's website in conjunction with crime and safety information and is available to students, prospective students, employees, and new hires.

Medical Assistance and Treatment

In the event medical assistance and/or treatment is needed, local options for medical care include the St. Thomas Hospital listed below. For safety and well-being, immediate medical attention is encouraged. If an evidence collection kit needs to be completed, it is important to be examined as soon as possible, ideally within 72 hours. The hospital will arrange for a specific medical examination at no charge. In order to best preserve evidence, it is recommended that the complainant not bathe, shower, douche, eat, drink, smoke, brush teeth, urinate, defecate or change clothes before that exam. Even if any of these actions have taken place, the complainant is still encouraged to have prompt medical care as evidence may still be recoverable.

Obtain Emotional Support

Nashville Sexual Assault Center can provide emotional response. If a student has returned to a different city, it is recommended that he or she contact Meridian Institute or the National Domestic Violence Hotline assist in finding a nearby counseling location. Local and National resources:

St. Thomas West Hospital

4220 Harding Pike

Nashville, TN 37205

Local Law Enforcement Agencies can be reached by calling 911. Nashville Sexual Assault Center 1-800-879-1999

http://www.sacenter.org/

National Sexual Assault Hotline 800-656-4673 National Domestic Violence Hotline 800-799-7233

Registered Sex Offender Information

In accordance with the Campus Sex Crimes Prevention Act and **34 CFR 668.46(b)(12)**, information regarding registered sex offenders may be obtained from the Tennessee Bureau of Investigation (TBI) Sex Offender Registry and the National Sex Offender Public Website.
For individuals seeking information regarding registered sex offenders in the Nashville area and throughout Tennessee, information is available through:
https://sor.tbi.tn.gov/home
Information regarding registered sex offenders nationwide is available through:
https://www.nsopw.gov/
These websites provide public access to information concerning individuals required to register under applicable state and federal sex offender registration laws. Students, employees, and visitors are encouraged to utilize these resources to obtain current information regarding registered sex offenders in their communities.
Meridian Institute of Surgical Assisting does not maintain on-campus housing. Information regarding registered sex offenders is available through the resources listed above and is not maintained by the institution.

Meridian Institute of Surgical Assisting SEXUAL MISCONDUCT REPORT FORM

COMPLAINANT'S INFORMATION (if different from reporter):	
Complainant's Name:	**Complainant's Affiliation to MISA (student, faculty, staff, unaffiliated)**:
Complainant's Contact Information (if available): Telephone:	Email:

OFFENDER(S) INFORMATION:	
Offender's Name (if known):	**Offender's Affiliation to MISA (student, faculty, staff, unaffiliated)**:

INCIDENT INFORMATION:	
Date and Time of Incident:	**Location of Incident**:
Brief Description of Incident (nature of misconduct, context or circumstances, such as off campus party):	

REPORTER'S INFORMATION (required):	
Reporter's Name:	**Date of Report**:
Reporter's Affiliation to BU (student, faculty, staff, unaffiliated):	**Reporter's Contact Information**: Telephone Email

CAMPUS SECURITY, CRIME AWARENESS, AND DRUG-FREE WORKPLACE POLICY

(Clery Act Compliant)

Annual Security Report (ASR) Notice

Meridian Institute of Surgical Assisting is committed to providing students and employees with a safe environment in which to learn and work. In accordance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (20 U.S.C. §1092(f); 34 C.F.R. §668.46), Meridian Institute prepares and distributes an Annual Security Report (ASR).

The ASR includes:

- The most recent three (3) calendar years of campus crime statistics;
- Required Clery Act policy statements; and
- Institutional policies regarding campus security, crime prevention, and drug-free workplace compliance.

Annual written notice of the ASR's availability is provided to all current students and employees. Prospective students and employees are informed of the report's availability and how to obtain a copy. The ASR is available on Meridian Institute's website and may be obtained upon request.

Campus Definition (Clery Geography)

For Clery reporting purposes, "campus" is defined as any building or property owned or controlled by the institution within the same contiguous geographic area and used in direct support of, or related to, its educational purposes.

Meridian Institute's campus includes:

1507 County Hospital Road
Nashville, Tennessee 37218

There are no:

- On-campus student housing facilities;
- Non-campus properties owned or controlled by recognized student organizations; or
- Off-campus housing facilities.

Campus Security Authorities (CSAs)

Campus Security Authorities (CSAs) include:

- The Campus Administrator;
- The Title IX Coordinator; and
- Any official of the institution who has significant responsibility for student and campus activities.

CSAs are required to report Clery-reportable crimes to the Campus Administrator for inclusion in annual crime statistics and for evaluation of timely warning obligations.

Reporting Criminal Offenses

All students and employees are encouraged to report immediately any known criminal offense or emergency occurring on campus to the school administration office and to appropriate local law enforcement authorities.

The Campus Administrator will report known criminal offenses to local law enforcement authorities upon receiving a report or obtaining knowledge of such offense.

All students and employees are encouraged to be responsible for their own safety and the safety of others.

Timely Warning

Meridian Institute will provide timely warnings to the campus community of Clery-reportable crimes that are reported to campus administration or local law enforcement and that are considered to represent a serious or continuing threat to students and/or employees.

Emergency Response and Evacuation Procedures

In the event of a confirmed significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus, Meridian Institute will, without delay and taking into account the safety of the community:

1. Confirm the existence of the emergency;
2. Determine the content of the notification; and
3. Initiate appropriate emergency notification procedures.

The Campus Administrator is responsible for confirming emergencies and issuing notifications. Please refer to onsite plan for additional information.

Emergency response and evacuation procedures are reviewed annually.

Daily Crime Log

Meridian Institute does not maintain a campus police or security department and therefore is not required to maintain a daily crime log under 34 C.F.R. §668.46(f).

Monitoring of Off-Campus Criminal Activity

Meridian Institute does not maintain student housing facilities or recognized student organizations with off-campus property. Criminal activity occurring at institution-sponsored off-campus events will be monitored and reported to local law enforcement authorities as appropriate.

Campus Access and Security Procedures

No student will have access to campus facilities, other than designated parking areas, unless supervised by a staff member. Off-campus events sponsored by the school are supervised by campus employees.

The campus does not employ campus security officials. Campus security is the direct responsibility of each employee and the Campus Administrator. These individuals do not have authority to make arrests.

Crime Prevention and Security Awareness Programs

Meridian Institute provides crime prevention and security awareness information during student orientation and employee onboarding. Topics include:

- Campus security procedures;
- Emergency response procedures;
- Reporting mechanisms;
- Prevention of sexual assault, dating violence, domestic violence, and stalking; and
- Bystander intervention awareness.

Crime Statistics

Statistics concerning the number of reported crimes and arrests for the most recent three calendar years are included in this report.

Reportable offenses include:

- Murder and Non-negligent Manslaughter
- Sex Offenses (Forcible and Non-forcible)

- Sexual Assault
- Domestic Violence
- Dating Violence
- Stalking
- Robbery
- Aggravated Assault
- Burglary
- Motor Vehicle Theft
- Weapons Law Violations
- Liquor Law Violations
- Drug Abuse Violations

Hate crimes, including those motivated by bias based on race, religion, sexual orientation, gender identity, ethnicity, national origin, or disability, are also reported in accordance with federal law.

For calendar years 2022, 2023, 2024, and 2025, the number of occurrences and arrests for each category listed above was zero (0).

There were no crimes of murder, forcible rape, or aggravated assault that showed evidence of prejudice based on race, religion, sexual orientation, or ethnicity, as prescribed by the Hate Crimes Statistics Act (28 U.S.C. §534).

Sexual Offense Procedures (VAWA Requirements)

In the event a sex offense occurs on campus, the accuser has the option to:

- Report the offense to the Title IX Coordinator or any faculty or staff member;
- Preserve evidence necessary to prove criminal sexual assault;
- Request assistance from school administration in reporting the crime to local law enforcement;
- Report the crime directly to local law enforcement;
- Review Meridian Institute's Sexual Misconduct Policy; and
- Contact appropriate community agencies for counseling or other needed services.

The school does not provide on-campus housing. If requested and reasonably available, the school will change a victim's academic situation following an alleged sex offense.

In cases involving allegations of sexual assault, dating violence, domestic violence, or stalking:

- Both the accuser and the accused may have others present during disciplinary proceedings;
- Both parties will be informed simultaneously and in writing of the final determination and any sanctions imposed; and

- Proceedings will be conducted by officials who receive annual training on issues related to these offenses and on conducting investigations and hearings that protect victim safety and promote accountability.

Possible sanctions may include expulsion (for students) or termination (for employees), depending upon the circumstances.

Drug-Free Workplace and Drug-Free Schools Act Compliance

Drug abuse is prohibited at all times by students and employees on school property or as part of institutional activities.

Drug abuse is defined as the unlawful manufacture, distribution, possession, or use of illicit controlled substances, including alcohol.

Meridian Institute prohibits the possession, use, and sale of alcoholic beverages and enforces state underage drinking laws and state and federal drug laws.

Legal Sanctions

Federal and state laws prohibit the unlawful manufacture, distribution, possession, or use of controlled substances and alcohol. Violations may result in criminal penalties, including fines and imprisonment.

Health Risks

Health risks associated with drug and alcohol abuse include addiction, impaired judgment, organ damage, respiratory failure, overdose, and increased risk of injury or death.

Off-Campus Resources

Meridian Institute does not provide on-campus drug or alcohol counseling. Off-campus resources include:

- Substance Abuse, David Lawrence Center: 239-455-8500
- Depression Counseling, Elizabeth Steinman: 239-298-1638
- National Domestic Violence Hotline: 1-800-799-SAFE (7233)
- National Institute on Drug Abuse Hotline: 1-800-622-HELP
- Nashville Sexual Assault Center: 1-800-879-1999
- National Sexual Assault Hotline: 800-656-4673

Institutional Sanctions

Penalties for drug abuse violations may include:

- Notification to proper authorities;
- Leave of absence during which the individual must address substance dependency;
- Expulsion (for students); or
- Termination (for employees).

Meridian Institute will notify the U.S. Department of Education within thirty (30) days of any employee or student criminal drug statute conviction occurring in the workplace.

Emergency Response and Evacuation Testing Procedures

The regulation requires institutions to include procedures for testing emergency response and evacuation procedures at least annually, including:

- Announced or unannounced tests
- Publicizing emergency response and evacuation procedures in conjunction with at least one test each calendar year
- Documenting the description, date, time, and whether the test was announced or unannounced

For Meridian Institute of Surgical Assisting, which does not maintain on-campus housing and operates primarily through distance education with administrative and lab facilities, the following policy statement may be included in the Annual Security Report:

Emergency Response and Evacuation Testing Procedures

Meridian Institute of Surgical Assisting (MISA) is committed to maintaining a safe environment for students, faculty, staff, and visitors. In accordance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act and 34 CFR 668.46(g)(6), the institution conducts periodic testing of its emergency response and evacuation procedures to evaluate the effectiveness of emergency plans and preparedness efforts.

Annual Testing

At least once each calendar year, MISA will conduct an emergency response or evacuation exercise. Tests may be announced or unannounced and may include, but are not limited to:

- Fire evacuation drills
- Severe weather response exercises
- Active threat or lockdown tabletop exercises
- Emergency communication system tests
- Continuity of operations exercises
- Remote learning emergency notification tests

Publicizing Emergency Procedures

In conjunction with at least one annual test, MISA will publicize emergency response on the institute's website.

Emergency procedures will be reviewed during the residential lab and will include information regarding reporting emergencies, evacuation routes when applicable, shelter-in-place guidance, and emergency contact information.

Documentation of Tests

For each emergency response or evacuation test conducted, MISA will maintain documentation that includes:

- A description of the exercise or test conducted
- The date of the test
- The time of the test
- Whether the test was announced or unannounced
- Any lessons learned or corrective actions identified

Documentation will be maintained by the Compliance Department and retained in accordance with institutional record retention practices.

Responsible Officials

The following institutional officials are responsible for coordinating emergency response testing and documentation:

- President/Executive President
- Director of Compliance
- Designated Emergency Response Team Members

The institution will review emergency response procedures following each test and implement improvements when necessary to enhance the safety and preparedness of the campus community.

Meridian Institute of Surgical Assisting

Emergency Response and Evacuation Test Documentation Form

(34 CFR 668.46(g)(6) Compliance Record)

General Information

Test Title: Lab Trial Emergency Notice Run through

Type of Test:

■ Fire Evacuation Drill
☐ Severe Weather Drill
☐ Shelter-in-Place Exercise
☐ Active Threat/Lockdown Exercise
■ Emergency Notification Test
☐ Tabletop Exercise
☐ Business Continuity Exercise
☐ Other: _____

Date of Test: 12/15/2025

Time of Test: 7:00am

Location: Meridian Institute of Surgical Assisting

Announced or Unannounced:

■ Announced
☐ Unannounced

Conducted By: Lance Stover

Participating Departments/Groups:

Lab staff, Lab students, academic offices and administrative offices

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Description of Test

Provide a brief description of the emergency scenario and objectives of the test.

Scenario:

Tested the notification of the campus in case of emergency. Utilized designated staff, Lance,Trey, Angee, Celia, Candice and Payton to notify students and staff, and lead to nearest exits. Reviewed, active shooter stituation

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Objectives:

☐ Verify emergency notification procedures
■ Verify evacuation procedures
☐ Verify shelter-in-place procedures
■ Verify employee response procedures
☐ Verify communication systems
☐ Verify continuity of operations procedures
☐ Other: _____

Publicization of Emergency Procedures

As required by 34 CFR 668.46(g)(6), emergency response and evacuation procedures must be publicized in conjunction with at least one annual test.

Method(s) Used to Publicize Procedures:

☐ Employee Email
☐ Student Email
☐ LMS Announcement
☐ Staff Meeting
☐ Student Orientation
☐ Annual Security Report
■ Institutional Website
☐ Other: _____

Date Publicized: 01/01/2026

Evidence Maintained:

☐ Email Copy
☐ Screenshot
☐ Meeting Agenda
■ Website Posting
☐ LMS Announcement
☐ Other: _____

Test Results

Emergency Notification System

Was the emergency notification system activated?

☐ Yes
■ No

If yes, method used:

☐ Email
☐ Text Message
☐ Phone Call
☐ LMS Announcement
☐ Teams Message
☐ Other: _____

Time Notification Sent: _____

Performance Evaluation

What Worked Well?
Evacuation in case of a fire drill. Lab staff was able to direct Lab students to the nearest exit.

Areas for Improvement

Systems need to be in place for designated staff in charge of the safety of the other staff to know who and when people are in office.

Issues Identified

May need additional safety officers, who are concerned with clearing areas, vs, clear people (staff or students).

Corrective Actions

Action Needed	Responsible Person	Due Date	Completed Date
	Celia White	12/01/2026	

Test Summary

Was the test successful?

☐ Yes
☐ No
■ Partially

Recommendations for Future Testing

~~Designate additional staff to be able to clear areas, verse people~~

Required Clery Documentation

The institution certifies that the following information has been documented:

■ Description of exercise
■ Date of exercise
■ Time of exercise
■ Whether announced or unannounced
■ Publicization of emergency procedures
■ Results reviewed by administration

Approvals

Prepared By: Celia White
Title: Director of Compliance
Date: 12/22/2025

Reviewed By: Dennis Stover

Title: President

Date: 01/01/2026

Annual Clery Testing Log

Date	Type of Test	Announced/Unannounced	Publicized?	Documentation Completed
			☐ Yes ☐ No	■ Yes ☐ No
			☐ Yes ☐ No	■ Yes ☐ No
			☐ Yes ☐ No	■ Yes ☐ No

Record Retention: Maintain completed forms and supporting documentation with the Annual Security Report records for a minimum of seven years. This form satisfies the documentation requirements of **34 CFR 668.46(g)(6)** for emergency response and evacuation testing.