



**O'BRIENS  
AVEDA INSTITUTE**

**Published: April 5, 2021**

Welcome to our Institute! This catalog is made available to each prospective student before enrolling and to each employee at the time of hiring.

O'Brien's Aveda Institute is conveniently located at **400 Cornerstone Drive Suite 220, Williston, VT 05495**, right off of Route 2. Our first floor at O'Brien's Aveda Institute includes: Reception area, working clinic, waxing/facial room, mani-pedi areas and a classroom. Our ground level includes: 2 large classrooms, offices, and a student break area.

## **Aveda Mission Statement**

“Our Mission at Aveda is to care for the world we live in, from the products we make to the ways in which we give back to society. At Aveda, we strive to set an example for environmental leadership and responsibility, not just in the world of beauty but around the world”

-Horst Rechelbacher, Founder

## **O'Brien's Aveda Institute Mission Statement**

*O'Brien's Aveda Institute was founded to create the most successful entrepreneurs in hair, skin, nails, makeup, massage and total body wellness. Our students are educated by accomplished professionals, using innovative curriculums that blend industry standard techniques with business-building and retail skills. O'Brien's Aveda Institute emphasizes personal well-being as well as environmental responsibility. Using Aveda pure flower plant essences and plant-based products, we affirm the relationship between person, beauty, wellness and the environment.*

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We are committed to reviewing our guidelines regularly and determining the training programs and student services needed to train individuals in cosmetology and beauty while respecting the environment and meeting the demands of the community.

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O'Brien's Aveda Institute is accredited by **the National Accrediting Commission of Career Arts and Sciences, 3015 Colvin Street, Alexandria, VA, 22314. 1-703-600-7600** with the current status of: **Accredited** . We have been nationally accredited at this location since 2015. "The National Accrediting Commission of Career Arts and Sciences is recognized by the United States Department of Education as a national accrediting agency for post-secondary schools and programs of cosmetology arts and sciences. We are licensed by the Vermont State Board of Barbering and Cosmetology, Office of

Professional Regulation, 89 Main St., 3<sup>rd</sup> floor, Montpelier, VT, 05602-3402, 1-802-828-2465. We are approved by the Vermont State Board of Health. **O'Brien's Aveda Institute is owned by William H. O'Brien, Jr. and Timothy P. O'Brien.**

## **Admissions Requirements** (effective 01/11/2016)

The first step in the enrollment process is touring the institute and meeting with the Admissions Director for a personal interview. This gives Admissions an opportunity to evaluate the applicant. During the interview/tour, the applicant will receive a pre-enrollment packet. The second interview will be scheduled at this time. Our catalog is on-line at [www.obriensavedainstitute.org](http://www.obriensavedainstitute.org).

If the Admissions Director determines that the applicant is a suitable candidate for enrollment (based on successful submission of paperwork and personal interviews, s/he will send a written notice of acceptance or rejection. If financial aid eligibility is still pending, s/he will send a 'conditional' notice.

The catalog and enrollment agreement constitute a binding contract between the student and Institute. Please read all Pre-Enrollment information carefully prior to signing the enrollment agreement. You will receive a copy of the signed enrollment agreement for your records.

As an accepted candidate, you must:

- Complete an application and pay a \$50 application fee; \$150 enrollment fee is due before start date
- Submit proof of high school completion, GED, or equivalent
- Submit a copy of your driver's license or other photo ID
- Submit proof of MMR vaccine
- Submit a copy of your passport or social security card or birth certificate
- Read and understand this catalog and assume responsibility for following the rules and regulations set forth by the Vermont State Board of Barbering and Cosmetology, the Vermont Board of Health, and O'Brien's Aveda Institute
- Contact our Financial Aid Office to get financial aid in place or to set up a payment plan
- Complete enrollment paperwork

## **Re-Entry**

We will consider the re-entry of former students who have not graduated, although re-entry is not guaranteed. Candidates for re-entry must contact the Admissions Director in writing. We will consider the request and send the applicant an approval or denial within 30 days; this decision will be based on the student's previous enrollment records. Decisions are final. Former students who have withdrawn or were terminated may not apply for re-entry for a period of 3 months after their drop date and must have

no unfulfilled financial obligations to the school. If accepted, re-enter applicants will be subject to minimum monthly attendance and/or academic evaluations. Re-entry students will begin their new enrollments with the same SAP status as they left within their previous enrollment and must reach satisfactory progress by the next evaluation point.

Re-enter applicants who have withdrawn or have been terminated twice will not be considered. We will accept all, part or none of the previous enrollment hours. Hourly tuition rates current at the time of enrollment will apply. Re-enter students will be charged a \$50 application fee and a \$150 enrollment fee upon re-enrollment. Re-entry students are responsible for supplementing needed kit materials at their own expense. If contracting for more than 50% of the course, re-entry students must have the required textbooks or purchase them from us. Re-entry students must adhere to policies and procedures in place at the time of re-enrollment.

### **Transfer-In Policy**

We use Aveda's curriculum, in addition to Pivot Point curriculum depending on the program. Anyone wishing to transfer into the Institute from another accredited post-secondary school must first present a valid affidavit from that school, verifying your hours spent there. The transfer student will be evaluated practically and in theory.

Hours transferred in are determined on a case-by-case basis. Some or no hours will be accepted at the school's discretion. We do not accept vocational hours. Transfers may be asked to purchase additional items/tools. The transfer student must also fulfill all of our enrollment checklist items and admission criteria. Anyone wishing to transfer out of O'Brien's Aveda Institute will not receive an affidavit of hours until all financial obligations are met.

It is our policy to provide information about our facility at career and college fairs for the purpose of recruitment. We do not recruit students already enrolled or attending another program of study that is similar. We do, however, assist students seeking us out for the purpose of transferring from a similar program. The already enrolled or attending student must initiate the contact with us.

### **Non-Discrimination Policy**

We do not discriminate on the basis of sex, race, religion, ethnic origin, color, marital status, national/ethnic origin, disability or age. The fields of cosmetology, barbering, spa therapy, esthetics, nail technology and massage therapy require manual dexterity and the ability to stand and move around.

### **Policy Changes**

We reserve the right to change programs, start dates, tuition or to cancel programs; we also reserve the right to change/update any policy at any time. Students will be given notice of updated policies.

## **Financial Aid**

O'Brien's Aveda Institute is approved by the U.S. Department of Education to offer Title IV funding which includes Pell Grants, SEOG Grants, and Federal Direct Student Loans (for those who qualify) and are enrolled as a regular student at least half- time. Before enrollment you must complete a FAFSA on-line at [www.fafsa.ed.gov](http://www.fafsa.ed.gov) using our school code (008658-02). We also suggest applying for the Vermont State Grant online at [www.vsac.org](http://www.vsac.org) to determine eligibility.

All aid is disbursed directly to the Institute and will be applied to your account according to federal guidelines. Each payment period must be paid in full BEFORE any monies will be disbursed to you for living expenses. We have 14 days to release Title IV credit balances to you. Please follow the guidance of our Financial Aid team so your funds come through in a timely manner. Ultimately, you are responsible for your financial aid. If you are a current student and do not submit required enrollment and/or financial aid paperwork as needed, you may take a personal leave of absence until you are able to submit them.

Please visit our website [www.obriensavedainstitute.org](http://www.obriensavedainstitute.org) for more details on the financial aid process. If you have any questions regarding financial aid, please contact [financial.aid@obriensavedainstitute.org](mailto:financial.aid@obriensavedainstitute.org).

# Student Support Services

## Employment Assistance Policy

We would be happy to assist you in finding placement through advising and employment leads. We also include professionalism, resume development, interview preparation and job search skills in our courses. We provide area job postings as well; they are located in our job opportunity books in our Admissions Dept. Employers are also welcome to post on our Facebook page. We **cannot guarantee placement** prior to or after a student's graduation date.

## FERPA Policy

You are entitled access to your own records, upon written request, or by appointment with the supervision of a staff member. FERPA is the federal law designed to protect the privacy of a student's education records. The law applies to all schools which receive funds under an applicable program from the US Department of Education. FERPA gives certain rights to parents regarding their children's records. These rights transfer to the student or former student who has reached the age of 18. Students and parents of dependent minors have the right to inspect and review all of the student's education records maintained by the school. Schools are not required to provide copies of materials unless it's impossible for students and parents of dependent minors to inspect the records personally. The school may charge a fee for the copies. Students and parents of dependent minors have the right to request that a school correct records believed to be inaccurate or misleading. If the school refuses, students and parents of dependent minors have the right to request a formal hearing. If the school still refuses, students and parents of dependent minors may place a statement in the records commenting on the contested information. The law does allow the school to disclose records, without consent, to the following: our staff, a school to which the student may be transferring, parents when a student over the age of 18 is still dependent, certain government officials in order to carry out lawful functions, appropriate parties in connection to financial aid of the student, organizations doing statistical studies for the school, NACCAS, individuals who have obtained court orders or subpoenas, persons who need to know in cases of health and safety emergencies, state and local authorities to whom disclosure is required by state laws. FERPA does allow schools to release directory-type information unless the student or parent of dependent minor requests that the school not disclose the information.

You are welcome and encouraged to schedule appointments with staff members for academic, financial, career, or individual advising. The school maintains a list of agencies that may be able to further assist you when a problem is beyond our scope of expertise.

Our curriculum is designed so that you will learn all aspects of your course. If you miss time, that progression will be interrupted and the quality of your education may be affected. We do not recommend taking leaves of absence during the introductory phase of your program. Please be sure to consult your supervising instructor to create a plan for any makeup work.

## Student Transcripts/Affidavits of Hours

After graduation you may need information from your student file; please contact the admissions department directly. Information will not be released to any party on your behalf unless we have specific written information and consent from you. No student transcripts will be released if you still have financial obligations to the school. Please allow us 14 days to fulfill your request. We store student files for a minimum of 6 years, per Standard III Criterion 13 of the NACCAS Handbook. Our transcript fee is \$25.

## Academic Calendar (effective 7/1/2017)

O'Brien's Aveda Institute accepts beginner cosmetology students in various months throughout the year, please check our website for updated class start dates. Our day begins at 8:06 AM at roll call (or as otherwise announced). Class size is limited to enable us to give each student personal attention. Class minimum is 4.

All programs are held 3 days/week, 10 hours per day. Hours are 8:00 AM to 6:30 PM. We give a 30-minute lunch break, with two 15-minute breaks each day. You may not leave the premises if you are not on your break or lunch. You must be clocked out if you leave the premises.

We observe the following holidays:

- New Year's Day (Jan 1st)
- Labor Day (1st Monday in Sept.)
- Memorial Day (4th Monday in May)
- Thanksgiving Day
- Fourth of July (July 4th)
- Christmas Day

School closures will be updated regularly, and students will be given prior notice of planned closures. We may also have un-planned closures due to our inclement Vermont weather! We occasionally hold In-Service days for our educators to allow for their continuing educational requirements; we will give prior notice of these days.

## Required Level of Achievement

We use the following Grading Scale for written tests. Practical tests are pass/fail.

90-100	A - Excellent
80-89	B - Very Good
70-79	C - Satisfactory
Below 70	F - Failing

## **Evaluation Procedure**

Theory tests are administered at the end of corresponding chapters. We incorporate both oral and written testing. Tests are either developed by our instructional staff or we use commercially produced tests. Grades are recorded and given to students in a timely manner. If a student is having difficulties academically, a special advising session is scheduled.

Re-takes are given only if the student fails a written test. All tests are given at a scheduled time. Cosmetology practical exams are given at approximately each third of the course; all other course mocks are given twice. Educators giving these exams will meet with students to discuss strong and weak areas so that improvements may be made. A copy of each evaluation's front page, test results, and some goals are given to each student. We also score our students on a daily basis in areas such as dress code compliance, attitude, and professionalism and in practical skills. We meet with our students for Student Status meetings periodically as well.

## **Attendance/Tardiness** (effective 01/09/2017)

We begin school at 8:06 AM. 9:00 AM is the last punch of the day. Three (3) late punches/no calls/no shows will result in a one-day suspension unless prior schedule arrangements are made. Students planning to leave early for the day must let us know before 10:00 am; disregard of this rule will result in a write-up. If you must be absent, it is your responsibility to call to report your absence by 8:00 am. Please call (802) 876-7044 to let us know your status.

You must maintain a 79% attendance rate. If you exceed the maximum completion time, you could be placed on monitoring or be dropped (at the discretion of the Director), as indicated on our Satisfactory Progress policy. Please make every effort to not miss time, especially in the first third of the course; it is extremely difficult to make up the missed theory classes and material missed. We discourage leaves of absence during the intro portion of your course.

Late arrivals, absences and other interruptions in your training have a significant effect on your achievement just as they would if you were an employee in a salon or other professional environment.

We monitor student hours and you will receive notice of your hours at the beginning of each week in your student mailbox. If you do not agree with the total, please let the business office know as soon as possible.

You are given 5% of your contracted hours to be used for personal or medical time---these hours will be deducted at the end of your course. Overtime charges are currently \$11.00 per hour. We do not accept any medical notes to excuse time. Exceptions to this are contagious conditions (such as pink eye) and court-mandated appointments (such as jury duty). Any medical exception **MUST** be accompanied by a detailed doctor's note. All excused time is at the sole discretion of a school director. If you are absent for more than 14 days and you do not notify us, you will be terminated from enrollment.



## **Leave of Absence (LOA)** (effective 09/19/2017)

A student may be granted more than one leave of absence in any 12-month period, but the total combined leave time may not exceed 180 days. A Request for Leave of Absence form must be completed by the student and include the reason for the leave. Leaves will be approved or denied by a School Director and the student will be notified within three days of the decision. All requests for leaves of absence must be submitted in advance in writing, include the reason for the student's request, and include the student's signature unless unforeseen circumstances prevent the student from doing so. For example, if a student were injured in a car accident and needed a few weeks to recover before returning to the institution, the student would not have been able to request the LOA in advance. The institution may grant an LOA to the student who did not provide a LOA request prior to the LOA due to unforeseen circumstances if the institution documents the reason for this decision and collects the request from the student at a later date. For example, the beginning date of the approved LOA would be determined by the institution to be the first date the student was unable to attend the institution because of the accident.

Students who have specific emergencies covered under the Family and Medical Leave Act of 1993 are eligible for an approved leave of absence for up to 180 calendar days. Following are some situations that qualify:

- serious health condition of student (doctor's documentation)
- care of an immediate family member with a serious health condition (doctor's documentation required)
- birth/adoption of a child and care for that child
- death of an immediate family member
- jury duty
- military service

A student granted a Leave of Absence that meets these criteria is not considered to have withdrawn, and no refund calculation is required at that time. There must be a reasonable expectation that the student will return from the LOA.

The student must also meet with our Financial Aid Officer to discuss the consequences of not returning (to include how that affects Direct Loan grace period/repayment). No financial aid will be drawn on the student's behalf during a leave of absence; the student will not be charged any additional fees during this time. Upon the student's return to school, his/her level will remain the same as when s/he left for the leave. The student's projected graduation date will be adjusted by the same number of days taken during the LOA. Changes to the Enrollment Agreement will be initiated by all parties. After his/her return, the student must meet with a supervising educator to determine missed material to be made up. Failure to return from the leave of absence will result in the student being dropped from enrollment. The withdrawal date will be the last day of attendance, for the purpose of calculating a refund. The student will be withdrawn if the student takes an unapproved LOA or does not return by the expiration of an approved LOA, and that:

a) (as this institution is required to take attendance) the student's withdrawal date for the purposes of calculating a refund will be the student's last date of attendance.

## **Termination** (effective 7/28/2016)

Unprofessional conduct which discredits the individual or our institutes will be subject to termination. Students must conduct themselves so they do not interfere with other students or educators. We reserve the right to terminate a student on any of the following grounds:

- entering while under the influence or effects of alcohol, drugs, or narcotics
- carrying a concealed or potentially dangerous weapon
- theft within or on school premises
- being out without notice for more than 14 days
- \* not maintaining Satisfactory Progress academically or in attendance
- cheating on a test/exam or falsifying records
- failure to return from a leave of absence
- disrespecting others or inappropriate/unprofessional conduct
- harassment of any kind, including intimidating or discrimination
- creating a safety hazard
- non- compliance with our rules and regulations

You will be notified in writing of your termination. If you are still currently enrolled and, on the premises, a formal meeting will be called. A School Director and another staff member will be present. You will be informed of the decision and given an opportunity to state your views. Financial obligations will be indicated in the written notice. All other termination paperwork will be completed. Termination fee is \$150.

## **Suspension** (effective 3/11/2015)

We will suspend students for the following reasons:

- inappropriate behavior
- theft within or on school premises
- refusal to cooperate with supervising instructors and/or other staff members
- total disregard of the rules/regulations
- disrespect demonstrated toward an educator or administrator
- repeated tardiness or no-showing/calling out on scheduled clinic days
- leaving the premises without permission during school hours

Reasons for suspension will be stated and documented and both parties will have an opportunity to discuss what has transpired. The suspension will be waived or put into effect (number of suspended days will be 1 – 5, at our discretion) and an incident report will be written. Suspended days are considered unexcused.

## **Withdrawal**

It is our policy to handle withdrawal procedures as efficiently as possible. We ask for a written letter of withdrawal or a phone call stating your reasons. If you miss 14 calendar days without notifying us of your intent, you will automatically be dropped from our enrollment. A Withdrawal

Checklist will be completed and our Financial Aid Department will submit a Refund to Title IV form if/what needs to be returned to the Department of Education on your behalf. They will then determine if state grant funds need to be returned to VSAC, if applicable. Lastly, they will complete an Institutional Refund form to determine your final balance with the institute. If you've taken out federal loans, you must Exit Counseling at [studentloans.gov](http://studentloans.gov). You are still responsible for repaying these loans.

Any student who withdraws from school before any financial aid has been disbursed will be responsible for all tuition owed. Regardless of the reason why student aid has been terminated or hasn't been disbursed, the financial obligation is the responsibility of the student.

## **Institutional Refund Policy**

Enrollment time is defined as the time elapsed between the actual starting date and the date of the student's last day of physical attendance in the school.

An applicant not accepted for training by the school shall be entitled to a refund of all monies paid, with the exception to the \$50 non-refundable application fee.

The refund policy applies to all terminations for any reason, by either party, including student decision, expulsion, course or program cancellation, or school closure.

If a student or legal guardian cancels the contract and demands his/her money back in writing within 3 business days of its signing, regardless of whether the student has actually started training, all monies paid to the school are refunded, less a non-refundable \$50 application fee. For official cancellations or withdrawals, the cancellation date will be determined by the postmark on written notification, or the date said information is delivered to the school in person.

If a student cancels after 3 business days, but prior to entering classes, s/he shall be entitled to a refund of all monies paid to the school, less a non-refundable \$50 application fee. For official cancellations or withdrawals, the cancellation date will be determined by the postmark on written notification, or the date said information is delivered to the school in person.

In official cancellations or withdrawals, the cancellation date will be determined by either the postmark on the written notification by the student (or, in the case of a minor, a parent or guardian) or the date said information is delivered to the school administration.

All requests for refunds must be made in writing, even if these requests are made in person.

In the event of withdrawal by the student or by contract termination by the Institute, any unearned monies paid after the withdrawal date will be returned within 45 days. For official cancellations or withdrawals, the cancellation date will be determined by the postmark on written notification, or the date said information is delivered to the school in person.

Official cancellation or withdrawal shall occur on the earlier of the dates that a student notifies the institution of his/her withdrawal or if the student is terminated by the school. Unofficial withdrawals are determined by the Institute's monitoring clock attendance; we take daily

attendance at roll call. It is considered an unofficial withdrawal if a student misses 14 consecutive days.

Any monies due a student who withdraws from the institution (officially or unofficially) shall be refunded within 45 days of written cancellation or termination by the school, which shall occur no more than 45 days from the last date of physical attendance, or in the case of a leave of absence, the documented date of return.

If a student on an approved leave of absence notifies the school that s/he will not be returning, the date of withdrawal determination shall be the earlier of the scheduled date of return from the leave of absence or the date the student notifies the institution that the student will not be returning. For official cancellations or withdrawals, the cancellation date will be determined by the postmark on written notification, or the date said information is delivered to the school in person.

The portion of the enrollment period for which the student will be charged is determined by dividing the number of clock hours completed as of the last day attended by the number in the total course/program.

Unofficial withdrawals for clock hour students are determined by the school through monitoring clock hour attendance at least every 30 days.

The percentage of enrollment time will be rounded up to the nearest 10%. Any unpaid charges owed by the student will be subtracted. Students who withdraw or are terminated prior to course completion are charged a termination fee of \$150. The required date of the refund is determined by counting from the date the withdrawal was determined. However, the refund is calculated based on the student's last date of attendance. All fees are identified in the catalog and enrollment agreement.

Returns are credited in the following order:

- 1.) Direct Subsidized Loan
- 2.) Direct Unsubsidized Loan
- 3.) Federal PLUS Loan
- 4.) Federal Pell Grant
- 5.) FSEOG
- 6.) State grant funds are refunded to the state agency according to the agency's refund policy.

The following institutional adjustment policy (subject to change), **measured in Actual Clock Hours**, applies if a student withdraws or otherwise fails to complete the course:

<u>Percentage of Actual Clock Hours Completed in Course</u>	<u>Percentage of Total Tuition School</u>
0.01% to 10.0%	10%
10.1% to 14.9%	40%
15.0% to 25.0%	45%
25.1% to 50.0%	70%
50.1% and over	100%

Individuals who fail to register, do not attend classes, withdraw or otherwise fail to complete the period of enrollment for which the assistance was provided are eligible for refunds. This policy covers unearned tuition, fees, and the book/material fees.

When situations of mitigating circumstances are in evidence, the school may provide a student refund that exceeds this policy.

Withdrawn students have the option of returning books or kit items that are considered by the school to be re-issuable. This will be determined by the Technical Director. Items must be returned within ten days of withdrawal. Books and Online learning costs are non-refundable. The cost of the items will be included in the institutional refund calculation. Any kits or books left behind by a student after ten days will not be the responsibility of the school.

If a course and/or program is canceled or the school closes permanently subsequent to a student's enrollment, and before instruction in the course and/or program has begun, the school shall at its option: 1.) provide a full refund of all monies paid; or 2.) provide completion of the course and/or program.

If the school cancels a course and/or program and ceases to offer instruction after students have enrolled and instruction has begun, the school shall at its option: 1.) provide a pro rata refund for all students transferring to another school based on the hours accepted by the receiving school; or 2.) provide completion of the course and/or program; or 3.) participate in a Teach-Out agreement; or 4.) provide a full refund of all monies paid.

If a school closes permanently and ceases to offer instruction after students have enrolled, and instruction has begun, the school must make arrangements for students. The school has at its option: 1.) Provide Pro-rata refund 2.) Provide completion of the course and/or program or: 3.) Participate in a Teach out program.

## **RETURN TO TITLE IV (R2T4)**

### **(TREATMENT OF TITLE IV AID WHEN A STUDENT WITHDRAWS)**

The law specifies how O'Brien's Aveda Institute (herein after known as O'Brien's Aveda Institute) must determine the amount of Title IV program assistance that a student earns if s/he withdraws from school. The Title IV programs that are covered by this law are Federal Pell Grants, Iraq and Afghanistan Service Grants, TEACH Grants, Direct Loans, Direct PLUS Loans, Federal Supplemental Educational Opportunity Grants (FSEOGs), and Federal Perkins Loans.

Though student aid is posted to the students account at the start of each period, students earn the funds as they complete the period. If s/he withdraws during the payment period, the amount of Title IV program assistance that the student has earned up to that point is determined by a specific formula. If the student (or O'Brien's Aveda Institute, or the student's parent received on the students behalf) less assistance than the amount that s/he earned, the student may be able to receive those additional funds. If the student received more assistance than s/he earned, the excess funds must be returned by O'Brien's Aveda Institute and/or the student.

The amount of assistance that the student has earned is determined on a pro rata basis. For example, if s/he completed 30% of the payment period, the student earned 30% of the assistance s/he was originally scheduled to receive. Once the student has completed more than 60% of the payment period, s/he earns all the assistance that the student was scheduled to receive for that period.

If s/he did not receive all of the funds that the student earned, the student may be due a post-withdrawal disbursement. If the student's post-withdrawal disbursement includes loan funds, O'Brien's Aveda Institute must get the student's permission before we can disperse them. The student may choose to decline some or all of the loan funds so that s/he doesn't incur additional debt. O'Brien's Aveda Institute may automatically use all or a portion of the student's post-withdrawal disbursement of grant funds for tuition, fees, books and kit charges. O'Brien's Aveda Institute needs the student's permission to use the post-withdrawal grant disbursement for all other school charges. If the student does not give permission (O'Brien's Aveda Institute may ask for this upon enrollment), the student will be offered the funds. However, it may be in the student's best interest to allow the school to keep the funds to reduce his/her debt to O'Brien's Aveda Institute.

There may have been some Title IV funds the student was scheduled to receive that could not be disbursed to the student once s/he withdrew because of other eligibility requirements. For example, if the student was a first-time, first-year undergraduate student and s/he had not completed the first 30 days of their program before s/he withdrew, the student will not receive any Direct Loan funds that the student would have received had s/he remained enrolled past the 30th day.

If the student receives (or O'Brien's Aveda Institute, or the student's parent on the student's behalf) excess Title IV program funds that must be returned, O'Brien's Aveda Institute must return a portion of the excess equal to the lesser of:

1. The students institutional charges multiplied by the unearned percentage of the student's funds, or
2. The entire amount of excess funds

O'Brien's Aveda Institute must return this amount even if O'Brien's Aveda Institute didn't keep this amount of the student's Title IV program funds. If O'Brien's Aveda Institute is not required to return all of the excess funds, the student must return the remaining amount.

Any loan funds that the student must return, s/he (or the student parent for a Direct PLUS Loan) repay in accordance with the terms of the promissory note. That is, the student makes scheduled payments to the holder of the loan over a period of time.

Any amount of unearned grant funds that the student must return is called an overpayment. The maximum amount of a grant overpayment that a student must repay is half of the grant funds the student received or was scheduled to receive. S/he does not have to repay a grant overpayment if the original amount of the overpayment is \$50 or less. The student must make arrangements with O'Brien's Aveda Institute or the Department of Education to return the unearned grant funds.

The requirements for Title IV program funds when students withdraw are separate from the Institutional Refund Policy that O'Brien's Aveda Institute has. Therefore, the student may still owe funds to O'Brien's Aveda Institute to cover unpaid institutional charges. O'Brien's Aveda Institute will also charge the student for any Title IV program funds that the institute was required to return. Please refer to our Institutional Refund Policy.

You will be given a minimum of 30-days notice if the school is to be closed permanently for any reason. A list of all students who were enrolled at the time of the school closure, including the amount of each pro-rata refund, will be submitted to our accrediting agency.

**COLLECTION POLICY:** Our collection policy reflects good taste and sound, ethical practices. . Collection/correspondence regarding cancellation and settlement from our institution, banks, collection agencies, lawyers, or any other third parties representing the institution clearly acknowledges the existence of the Withdrawal and Settlement Policy. If promissory notes or contracts for tuition are sold or discounted to third parties, the third party must comply with the cancellation and settlement policy of our institution. None of the institutions' accreditors' names will be used in refund policy or collection efforts.

## **Dress Code** (effective 5/1/2018)

We want you to have every advantage when you finish your training at our Institute. That's why we have guidelines regarding the way you dress when you're in training. This is an appearance oriented industry, and your clients' impression of you is part of your success. If you look neat and professional, people will have a better impression of you and your work.

- Professional black pants only (no pinstripes or patterns). No sweatpants. No denim\*. Yoga pants or leggings are allowed if you wear a long shirt to cover your backside. Pants must be professional. Skirts or dresses may be worn but must be knee-length. Capri pants are permitted.
- Black shirts without writing (unless it's an approved shirt such as O'Brien's Aveda Institute shirts). Shirts must cover your underarms, waist area, and lower back. No exposed torso skin. Complete coverage of cleavage, bare waist, stomach and back while raising your arms or bending over. No hoodies or

sweatshirts (unless it's an approved shirt). No pilled, tattered cut or worn-out tops. Please wear appropriate undergarments.

- A lab coat or Aveda apron must be worn at all times. Please keep these in good condition and laundered. Please wear your ID lanyard at all times. There is a \$5 replacement fee for your ID and a \$5 fee for your lanyard.
- \*Jeans may be worn on Monday and Friday if you donate \$5 to the monthly charity. Must be dark wash, have no holes and be ankle length or longer.
- Footwear must be professional in appearance. No work boots, winter boots, slippers or athletic shoes. Sneakers must be all black including the sole with no other colors present. If sneakers are required for medical reasons, a doctor's note is required. Sandals are allowed but must have a back on them. No flip flops or 'Uggs'. All shoes must be in good repair, clean and polished. No baseball caps.
- Headphones are not allowed in the clinic, classroom, bathrooms or hallways unless authorized by your supervising educator. We prefer that you use them in the lunchroom or outside of the building.
- Synthetic perfumes are not allowed. Pay close attention to your scent. Be aware that certain foods, smoking, personal hygiene and your health affect your scent. You will all work in close proximity to guests so please be conscious of your breath. If you're a smoker, please wash your hands and sanitize them before doing services. Mints are also suggested. Also remember that the student dress code is different from the staff dress code. Educators may wear black, white or gray tops; students are limited to black tops.

## **Physical Demands/Safety**

We feel that students interested in a career in cosmetology or a related field should consider all aspects of the decision. Persons wanting to become professionals in this field must:

- have finger dexterity and a sense of form and artistry
- enjoy dealing with the public and be able to follow directions
- keep abreast of the latest fashions and beauty techniques
- work long hours while building a personal clientele in order to earn the desired income
- make a strong commitment to the educational process and complete training
- be aware of the danger of sharp implements, such as shears and razors, and the dangers of hot implements, such as curling irons. You are dealing with the public and are responsible for your clients' safety.

In addition, applicants and students should be aware that:

- The work can be physically demanding because of long hours standing with hands at shoulder level or sitting over a nail station or esthetician's chair.
- A personal investment may be required for advertising and promotions if you're a salon owner.
- There will be exposure to various chemicals and fumes that may cause allergic reactions.



The practice of safety and sanitation is essential for effective and successful performance within the industry. Methods of compensation vary and may include straight salary, salary plus commission, straight commission, sliding scale commission, retail commission, or independent contracting.

## Course Descriptions

Each of these subjects will be covered in theory and practical work; we follow our written curriculums and the guidelines suggested by the Vermont State Board of Barbering and Cosmetology. Massage hours are based on guidelines suggested by the National Certification Board for Therapeutic Massage and Bodyworks. At this time, the State of Vermont does not require a license for massage. ***All courses are taught primarily in English.***

### Student Body Diversity (July 1, 2017 – June 30, 2018):

#### Ethnicity:

0% American Indian or Alaska Native  
2% Asian/Native/Hawaiian/Pacific Islander  
2% Black or African American  
3% Hispanic Latino  
87% White  
2% Two or more races  
4% Race/Ethnicity Unknown

#### Gender:

Female: 88%  
Male: 12%

#### Receive Pell: 63%

## **Cosmetology, 1000 Clock Hours**

This course of study is a full 1000-clock hour cosmetology course, currently offered Full-time, 30hrs/week schedule required to complete. We use Pivot Point Salon Fundamentals curriculum as well as the Aveda curriculum, which include chapters on the history of cosmetology, life skills, your professional image, infection control, anatomy and physiology, chemistry and electricity, properties of the hair/ scalp, principles of hair design, shampooing/ rinsing/conditioning, haircutting, hairstyling, braiding, wigs, chemical texture services, histology of the skin, hair removal, facials/facial makeup, how to provide a manicure and pedicure, salon business, seeking employment, and on the job.

We also offer a series of Career Development classes and guest speakers. Our cosmetology course covers units in both practical and theory application.

Shampooing and related chemistry	15 hours
Waxing (superfluous hair)	15 hours
Permanent Waving, hair straightening	100 hours
Basic facials	25 hours
Finger waving, pin curls, roller formation	40 hours
Hair analysis & scalp treatments	75 hours
Manicuring (nail technical practice)	150 hours
Hair lightening & coloring, incl. temporary, semi permanent & permanent	250 hours
Haircutting, clipper cutting, hairstyling, hair shaping	250 hours
Equipment sanitation & sterilization techniques applicable to supplies, general and specific chemical waste and storage	30 hours
Anatomy, personal health, hygiene and sanitation	40 hours
Laws, Rules, & Professional Ethics	10 hours

**By obtaining your license in Cosmetology, you may be qualified to be an Entry Level Stylist, Hair Color Technician, Instructor, Theatre Arts Specialist and more.**

## **Barbering, 750 clock hours**

This course of study is a full 750-clock hour barbering course, currently offered Full-time, 30hrs/week schedule required to complete. We use Pivot Point curriculum along with an Aveda Curriculum supplement. Including chapters on study skills, history of barbering, professional image, bacteriology, infection control, implements/tools, equipment, anatomy/physiology, chemistry, electricity/ light therapy, properties and disorders of the skin, properties and disorders of the scalp, treatment of the hair/ scalp, men's facial massage and treatments, shaving and facial hair design, men's haircutting and styling, men's hair pieces, women's haircutting and styling, chemical texture services, hair coloring and lightening, nails and manicuring, barbershop management, job search, state board preparation and licensing laws. We also offer a series of Career Development classes and guest speakers. Our barbering course covers units in both practical and theory application.

Shampooing, Blow-dry, & hot tool styling	40 hours
Haircutting, styling, shaping (tapered, clipper, thinning, blending, scissor-over-comb)Facial (beard) Hair styling and trimming	425 hours
Hair lightening & coloring	75 hours
Chemical texture services	50 hours
Straight razor shaves	75 hours
Scalp, facial massage, basic men's facial, facial waxing	25 hours
Safety, sanitation and infection control	50 hours
History of Barbering	10 hours

**By obtaining your license in Barbering, you may be qualified to be an Entry Level Barber, Facial Shaving Expert, Barber Artist, and more.**

## **Esthetics, 600 clock hours**

This course of study is a full 600-clock hour Esthetics course, currently offered Full-time, 30hrs/week schedule required to complete. We use Pivot Point curriculums, in addition to the Aveda curriculum, which includes chapters on basic facials, facial massage, facial machines, makeup, business skills, professional ethics, etc. We also offer a series of Career Development classes and guest speakers.

Facials, practical work and related categories	280 hours
Microdermabrasion, chemical peels, exfoliation, mask therapy, chemicals	20 hours
Electrical machines used in Esthetics	20 hours
Eyebrow arching, hair removal, & makeup techniques/services	20 hours
Sanitary personal health and hygiene understanding	20 hours
Sanitation, sterilization for all equipment, supplies, general and specific chemical and waste storage areas, hazardous	20 hours
Safe chemical storage, use, and disposing of hazardous material requirements	20 hours
Sanitation, sterilization, hazardous substances, hygiene, anatomy, laws, rules regulations and professional ethics	200 hours

**Graduates from our Esthetics program may take the Vermont Esthetics exam and obtain an Esthetics license; You may be qualified to be an Esthetician, Esthetics educator or other related fields.**

## Standard Occupational Classifications

The U.S. Department of Labor's Standard Occupational Classification (SOC) codes for programs offered at the Institutes

**Cosmetology:** 39.5012

**Esthetics:** 39.5094

**Barbering:** 39.5011

Links to these occupational profiles may be found on the U.S. Department of Labor's O\*NET website at <http://www.onetonline.org>

## Classification of Instructional Programs

The purpose of the Classification of Instructional Programs (CIP) is to provide a taxonomic scheme that will support the accurate tracking, assessment, and reporting of fields of study and program completions activity. CIP was originally developed by the U.S. Department of Education's National Center for Education Statistics.

**Your Program CIP numbers are below:**

**Cosmetology:** 12.0401

**Esthetics:** 12.0408

**Barbering:** 12.042

## Level of Education for our programs:

**Undergraduate Certificate Definition:** A program that generally prepares individuals to cut, trim and style scalp, facial and body hair, apply cosmetic preparations, perform manicures and pedicures, massage the head and extremities, and prepare for practice as a licensed professional in specialized or full-service salons. This includes instruction in haircutting and styling, manicuring, pedicuring, facial treatments, shampooing, chemical applications, esthetics, shop management, sanitation and safety, customer service, and applicable professional and labor laws and regulations.

## Graduation Requirements (effective 04/14/2015)

We will grant a diploma of graduation and official transcript of hours for the applicable course when the student has:

- Successfully completed the required hours of training
- Completed all written assignments
- Successfully passed final written and practical exams

- Made satisfactory arrangements for payments of all debts to the school
- Cosmetology students must fulfill a minimum of 6 Saturdays at 6 hours per Saturday, unless other arrangements have been made.

You will then qualify to apply for the Vermont State Board exam. During your exit interview we will give you all the information you need to apply for the exam. Applications are at [www.pcshq.com](http://www.pcshq.com). You will need to follow the steps to create an on-line account. Remember your login email and password!

Upon graduation you will receive a complimentary service voucher to be used at any time following your graduation date. This service voucher is good for 1 free chemical service or 2 non-chemical services, not to exceed a 4-hour time period. This voucher is non-transferrable.

### **Graduation/Completion Rates 2018 Data**

Our NACCAS Annual Report overall rates for 2019 (2018 data) were:

Graduation: 75.68% Placement: 69.64% Licensure: 97.73%

### **Job Opportunities**

By obtaining your license in cosmetology, barbering, or esthetics you may be qualified to be a stylist, hair color technician, instructor, theatre arts specialist, spa owner, sales consultant or more! This industry continues to be a job-seeker's market

The average starting wage for a new stylist in Vermont is \$15.00 - \$20.00 per hour; your income will depend on your employer's compensation package. According to the U.S. Bureau of Labor Statistics, the median compensation for these programs are:

**Cosmetologist:** \$11.21 Hourly, \$23,330 Annually

**Barber:** \$11.61 Hourly, \$24,160 Annually

**Estheticians:** \$13.74 Hourly, \$28,580 Annually

The salon industry is about abundance. If you're interested in fashion, you can work on photo shoots, runway shows, movies and more. If you prefer a salon environment, the industry is exploding. The average full-time salon salary across the US can be as high as \$50,000 per year. The price of a hair cut in an Aveda salon is twice the industry standard. That means you can earn well over the national average. The career paths are vast and our staff will help you get started.

## **Tuition & Fee Information**

### **Cosmetology:**

Application Fee \$50

Enrollment Fee \$150

Books/Materials \$1,400

Kit/Materials \$1,575

Tuition (0-500 hours) \$6,500

Tuition (501-1000 hours) \$6,500

**TOTAL \$16,175**

### **Barbering:**

Application Fee \$50

Enrollment Fee \$150

Books \$1,400

Kit/Materials \$1,550

Tuition (0-500 hours) \$4,875

Tuition (501-750 hours) \$4,875

**TOTAL \$12,900**

### **Esthetics:**

Application Fee \$50

Enrollment Fee \$150

Books \$1,000

Kit/Materials \$1,250

Tuition (0-300 hours) \$3,900

Tuition (301-600 hours) \$3,900

**TOTAL \$10,250**

THESE PRICES DO NOT INCLUDE ANY OVERTIME CHARGES THAT YOU MAY INCUR.

## **Payment Plans**

You must choose a payment plan or apply for financial aid prior to or at the time of enrollment. We can make no claims regarding your eligibility for financial aid. If financial aid doesn't cover the cost of your course you must choose an alternate payment plan before you complete 100 hours of schooling. If we don't receive this information you will be suspended in good standing until confirmation is received. You may make financial arrangements with the business office regarding payments. We also accept Cash, MasterCard, Visa or bank checks. Application and Enrollment fees are to be paid up front.

## **For Cash Pay Students**

Payments plans for cash paying students can be set up to cover a portion or all of the cost of attendance. The institute requires a 20% down payment to be paid prior to enrollment, and either monthly or quarterly payments to cover the balance within the projected graduation time frame. The institute understands that some cash pay students might not be able to meet these requirements, therefore the Financial Aid Office holds the right to alter these requirements based on the students current financial situation.



## **ADDITIONAL SCHOOL RULES AND GUIDELINES**

### **Advising**

We are not counselors but are more than happy to guide our students in the right direction. If you have a personal problem, please approach one of your educators. If you need something beyond our scope of expertise, we will find you the professional help you need. You will find a listing of agencies on our bulletin boards. Any student meetings will be documented and put into your file.

### **Announcements**

Announcements follow roll call each morning.

### **Anti-Bullying Policy (effective 12/8/13)**

We believe that all students have a right to a safe and healthy school environment. The school has an obligation to promote mutual respect, tolerance, and acceptance. O'Brien's Aveda Institute will not tolerate behavior that infringes on the safety of any students or deters from the learning environment.

A student shall not intimidate, harass, or bully another student through words or actions. Examples of such behavior includes: direct physical contact, such as hitting or shoving; verbal assaults, such as teasing or name calling; and social isolation or manipulation. It also includes indirect contact such as cyber-bullying, e-bullying, and texting. Bullying can take many forms and can cause stress and have an emotional impact.

Each complaint of bullying will be promptly investigated. This policy applies to students on school grounds, while traveling to and from school or a school-sponsored activity, and during breaks and the lunch period. Any student who engages in bullying may be subject to disciplinary action including termination.

### **Bad Weather (effective 1/2/13)**

We will try to inform students in advance of any school closings, but that may be impossible in the case of bad weather. If the decision to close the school is not made in advance, please go to our Facebook page for any updates. If schools are closed in your area (or an area that you are travelling through) your time will be excused if you give us printed documentation of closure (such as from a radio or school website) on the day that you return to school.

### **Bingo**

We hold review games occasionally. Questions will be asked on anatomy, state laws, nails terms, etc. Prizes will be given to the winners. This is a fun activity and students have an opportunity to review their theory questions on a regular basis.

### **Breaks**

It is our policy to give two 15-min. breaks per day and 30 minutes for lunch. Breaks are generally given at 10:00 AM and at 2:00 PM, but this is strictly up to your supervising educator and your schedule. Breaks are to be taken in the student break room or outside. You must not leave the premises during breaks unless you get permission and clock out. If you do not return from break on time, your supervising educator has the right to clock you out for the day.

**Break room**

We provide break rooms for our students. The break room is supplied with tables, chairs, a hot drink machine, a microwave, a refrigerator, a sink, and lockers. Please be responsible for cleaning up after yourself when you are through eating. Garbage receptacles and recycle bins are provided. As Aveda Institutes we encourage recycling.

**Bulletin Boards**

It is our policy to provide bulletin boards so students may retrieve pertinent information. Our bulletin boards contain health information and referral center information, class schedules, cleaning assignments, and other important info.

**Cell Phones (effective 09/18/2015)**

We understand that some students and educators have children and other responsibilities. However, cell phones are extremely disruptive to our learning environment. You may carry your phone, but please adjust the tones to silent. Wait until your break or lunch period to return your calls. *Please refrain from texting.* You may not answer your phone during class or clinic unless it is an emergency. You will be asked to turn them over in front of you during testing. If you repeatedly abuse the cell phone rule, you will be asked to leave your cell phone elsewhere or an educator/supervisor will hold it until the end of your day. This applies to both students and staff members.

**Children/Pets**

Children and pets are not to be brought to school by students during instructional time. If you cannot get daycare, please stay home with your children or make other arrangements. NEVER leave your pet in your car here while you are at school or authorities will be called.

**Class Progression (effective 3/11/2015)**

All of our programs are 'clock hour' programs. That means that you will record your time here, using our time clock. If you miss time and fall behind your classmates in clock hours, you are also missing valuable information. When this happens to the point where we feel you will benefit more by being placed in a class with similar hours as you have...you will most likely be placed in a new group and it may be necessary to adjust your scheduled days.

**Clinic Services--for Students**

We offer services to our students during non-instructional hours at a discounted rate. Students receive a 40% discount on all regularly- priced services during non-instructional hours. Specials are not included or combined.

**Conduct (created 01/11/2016)**

Students are required to act in a manner that will reflect positively of themselves, the institute and the beauty industry. Professional standards must be maintained at all times; lack of professionalism

will not be tolerated. Students are required to comply with all school rules and regulations as outlined in this catalog. Failure to do so may result in one or more of the following: Sent Home/Clocked Out: Being dismissed for the day. Suspension: Temporary removal of the student from the institute. Termination: Permanent removal of the student from the institute.

### **Voter Registration**

Voter registration forms are available upon request in the administrative office. For voter registration information, please visit: <https://sos.vermont.gov/elections/voters/registration/>

### **Constitution Day**

Each week on or about September 17, we celebrate Constitution Day in our institutes.

### **Continuing Education**

We encourage students to attend local hair shows and events. This is an excellent way to improve your skills and be motivated. We are unable to give you school hours for these events; missed time must still be made up. However, if you bring us the ticket stub (upon your return), we will excuse the hours.

### **Course Outline**

Our course outlines reflect guidelines for each course offered. They are available to all prospective students as part of our Pre-Enrollment packet.

### **Daily Evaluation Criteria**

Students are evaluated on a daily basis by their supervising educators and clinic coordinators. Evaluations will be based on absenteeism, tardiness, dress code compliance, (also done at roll call) being prepared, attitude, time spent constructively, (done on your daily journal) and cleanup (done on check off sheet at end of day).

### **Daily Maintenance**

We are proud of our institute and it is our policy to keep it neat and clean. Appearance is very important to us. At the end of your day there will be a cleanup period. Please do your share. It doesn't take long if everyone pitches in!

### **Down Time (updated 01/11/2016)**

Each student must adhere to scheduled assignments. If a student refuses to comply with this policy, s/he may be asked to punch out for the day. If you are not with a client, please work on your Hair Square assignments. Students are not allowed to sit in the front clinic at all. Our educators work as a team so please consider every floor educator your educator. Please remain in your assigned area unless you are given special permission from your educator to leave the floor.

### **Drinking Facilities**

It is our policy to provide drinking water for our staff, students, and clients. We have water filters

on the taps on both floors of the institute.

## **Drinking/Eating**

It is our policy to designate certain areas as 'No Eating' areas. Students may eat in the student break room and in the picnic area provided outside. Eating is not allowed in the classrooms or clinics without special permission. You may bring beverages to class or clinic if they have a closed top. No open beverages. Clinic students must store their beverages below their station, not on top.

## **Drug/Alcohol Abuse Prevention (effective 07/01/2015)**

It is the policy of O'Brien's Aveda Institute to enforce its Drug Prevention Program Certification. No student or staff member will be allowed to attend under the influence of drugs and/or alcohol. Anyone who does not adhere to this policy will be subject to expulsion or termination of employment.

All students and staff members will be asked to sign the Anti-Drug Abuse Act Certification form upon enrollment or hire. During the enrollment process, each student will be asked to sign an Anti-Drug Abuse Act Certification Statement. Students are encouraged to set up a confidential appointment with a director if they feel there is a problem they would like to discuss. We have a list of drug and alcohol referral programs available.

If a student is under the influence of drugs/alcohol on school premises, s/he will be asked to leave immediately (via a cab or another mode of transportation). S/he will not be allowed to attend school before a follow-up meeting, to include the Institute Director. The student may be asked to submit documentation of prescribed medications, etc. or negative drug tests. The student may be suspended or terminated, depending on the circumstances. The student may petition for re-entry into the program with proof of counseling. If the student is receiving Title IV funding, all payments will cease and the Department of Education will be notified. When/if the student has successfully gained re-entry, that student will receive assistance from the Director in petitioning the Department of Education for the reinstatement of financial aid.

If a student is arrested and charged with an offense that falls within the guidelines set forth by the Anti-Drug Abuse Certification that the student signed, s/he will be suspended in good standing until found innocent or guilty by the judicial system. If guilty, there will be an additional suspension (30 days) to repeat the process. The student may appeal this decision in writing.

Drug abuse is the utilization of natural and/or synthetic chemical substances for medical reasons. It can affect a person's physical and emotional health and social life. Alcohol is the most abused drug in the United States. Drugs can be highly addictive and injurious to the body, as well as to one's self. People tend to lose their sense of responsibility and coordination. Restlessness, irritability, anxiety, paranoia, depression, acting slow-moving inattentiveness, loss of appetite, sexual indifference, comas, convulsions, or even death can result from the overuse or abuse of drugs. Not only does the person using the drug subject himself to all sorts of health risks, drug use can and does cause grief and discomfort to innocent people. A drug-dulled brain affects the wide range of skills needed for safe driving. Reflexes are slowed, making it hard for drivers to respond to sudden, unexpected events. Alcohol-related deaths are the top killer of 15 – 24 year old people.

Dependency on drugs can only lead to a life of misery and misfortune. The illegal use or abuse of drugs has a very high impact on our society and the types of crimes committed. To support a drug habit, people must resort to many things that can only lead to a life of horror and, in some instances, death. The dollar costs can range from \$200 to \$3000 per week to support a habit. The drug habit impacts a person's family and lifestyle, as well as one's physical well-being and self respect. Treatment is available and may be expensive. A typical live-in program lasting 4 weeks

can cost from \$5000 to \$15000. Out-patient programs cost from \$1000 to \$5000. It has been proven that an individual hooked on drugs or alcohol can't stop—it requires professional help.

There are classic danger signs that could indicate the first sign of drug use. The primary ones that could call attention to one's use of drugs are: abrupt changes in mood or attitude, continuing slump at work/school, continuing resistance to discipline, inability to get along with others, unusual flare ups, increase in borrowing money, and a completely new set of friends.

We recommend that any person observing any of the above changes in students to notify an educator. Caution must be observed in accusing a person. If an individual is in immediate danger of harming either him/herself or others, local authorities will be called in. Students are reminded that as a precondition to accepting financial aid they sign a statement saying they will not engage in the lawful manufacture, distribution, dispensation, possession or use of a controlled substance during the period covered by the funds. Alcohol and drug abuse programs provide information, counseling, and treatment services to individuals so that problems stemming from the use of alcohol and drugs can be prevented or reduced. **For any specific questions, you may call Champlain Drug and Alcohol Services at 862-5243 or Howard Mental Health at 658-0400.**

### **Employment Follow-Up Policy**

It is our policy to send out Employment Follow-Ups for each graduate. This is to determine whether you are working in this field, which areas of our curriculum need improving, and to ask employers what they expect from their employees.

### **Exposure Control Policy**

We use 'universal precautions' to prevent the spread of blood-borne pathogens. The means that all clients will be treated as though they carry some form of infectious disease. All body fluids are considered to potentially contain infectious germs. The term body fluids includes: blood, semen, drainage from cuts/scraps, feces/urine, vomit, respiratory secretions and saliva. When body fluids are exposed, **DO NOT ATTEMPT TO CLEAN UP WITHOUT TAKING THE NECESSARY PRECAUTIONS. NEVER BLOT BLOOD WITH YOUR BARE HANDS.** If an individual is bleeding, the supervising educator should immediately call another educator for assistance and:

1. Clear the area of exposure
2. Hand the injured person a towel to control the bleeding
3. Escort the individual to an upstairs office if it's a minor injury. If it's serious, call 911.  
    -Use the first aid kit if it's minor. -Use the blood spill kit if it's more serious.
4. Spray down the infected room area with a disinfectant solution and wipe down with paper towels (you should be wearing gloves). Put all soiled materials in a plastic bag, along with your gloves, and then inside another plastic bag---and tie it. Discard it in an outside dumpster.
5. Wash your hands vigorously with a disinfectant under running water for 10 minutes.
6. If you used a mop for the cleanup, soak it in disinfectant. Rinse thoroughly and run it through the washer by itself in a hot water cycle.
7. Place all infected tools in a germicidal cleaner.
8. Write up an incident report and submit to the Director.

## **Fire Drills**

We hold random fire drills throughout the year. The alarm will sound and every person must file out in an orderly fashion. Please follow the correct floor Emergency Evacuation charts that are posted on each floor of the building or follow the exit signs to get out of the building safely.

## **Fire Drill Procedure**

1. When the fire alarm goes off, students evacuate the building in an orderly manner following first and second floor Emergency Evacuation charts, or the blinking Exit signs.
2. Educators need to turn off classroom lights and follow the students out.
3. MSDS book located in the Dispensary (if accessible) is to be brought out at the time of the evacuation of the building.
4. Roll Call Book located in the educators' office (if accessible) needs to be brought out at the time of evacuation of the building.
5. All students, staff and clients are to meet in the designated parking lot.
6. Roll call will be taken.
7. People may enter the building when the fire drill is completed, or when the Supervising Educator says the building may be entered.
8. The Supervising Educator will record the date and time it took to evacuate the building.

## **Foul/Inappropriate Language or Behavior**

Foul language will not be tolerated. If you cannot control your behavior you will be asked to punch out for the day. There are to be no raised voices, especially to your educators. Any heated discussions must be taken out of the clinic areas and into a private setting.

Please keep your conversations appropriate in nature; we want a professional environment.

## **Graduate Follow-Up Policy**

It is our policy to send out Graduate Follow-Ups to each graduate. Several months after graduation you will be called, emailed, messaged or mailed a form. Please help us by responding and/or completing this form and returning it promptly for our records.

## **Graduation Celebration! (updated 6/30/2015)**

On your graduation day you may 'Dress for Success'. We will have a brief ceremony after roll call. You will be presented with a graduation medal and Aveda rain nut necklace. You may even be read a special poem! You will be asked to write a testimonial (your option) and your graduation photo will be posted on our Facebook page (your option). You may return to school AFTER you have done all of your hours—for a free service (maximum of 4 hours) for 1 chemical service or a combination of other services. Alumni students are eligible for a 25% discount on services; no discount on retail products.

### **Graduation Paperwork (effective 01/11/2016)**

At the completion of your hours you will meet with someone from the Business Office to do graduation paperwork, unless you still have a balance due to our Institute. If you have a balance due, a bank check will be required. If you cannot produce a bank check, please speak with administration staff for potential alternative ways to pay your balance.

Prior to leaving school as a graduate, each student will complete an exit interview so s/he is able to give us feedback, suggestions, etc. on how to improve the student experience. The student is given the option of completing a Student Testimonial for our Facebook page.

We recommend that you waste no time in applying for the upcoming state board exam---there is a deadline for the exams. Practical exams are given on a monthly basis in Vermont. The written portion of the exam is administered at a computer site in the area; you will get those results immediately after taking the exam!

### **Grievance Policy (effective 01/27/2017)**

It is our policy to follow an internal complaint procedure at the local level. All students are informed of the policy during the enrollment process and forms are made available to students via the admissions office. A student with a complaint must exhaust the Institute's internal complaint process before submitting a complaint to other agencies. All complaints should be in writing and should outline the allegation or nature of the complaint. A school representative shall meet with the complainant within 10 days of the written complaint. If the problem cannot be resolved, the complainant should be referred to the school's complaint committee. All meetings regarding the complaint will be documented. The complainant should be given a copy of the record at the time of the meetings. The complaint committee will meet within 21 calendar days of receipt of the complaint to review the allegations. If it is determined that more information is needed from the complainant, a letter should be written outlining the additional information. If no further information is needed, the complaint committee will act on the allegations and a letter will be sent to the complainant within 15 calendar days stating the steps taken or information showing that the allegations weren't warranted.

If the complainant is not satisfied with the decision made by the complainant committee and wishes to pursue the matter further, a complaint form is available through the VT Board of Barbering and Cosmetology, 89 Main St., 3rd Floor, Montpelier, VT 05602, (802) 828-2465 ([www.vtprofessionals.org](http://www.vtprofessionals.org)) or NACCAS, 3015 Colvin Street, Alexandria, VA 22314, (703) 600 7600 ([www.naccas.org](http://www.naccas.org)).

All records will be kept in accordance with the institution's record keeping policy and for review by the NACCAS on-site visit team. The complainant is encouraged to resolve problems using the school's internal complaint procedures prior to filing a complaint with these agencies.

### **Gum-chewing**

Gum chewing will not be tolerated during clinic or classroom time, but breath mints are highly encouraged, especially if you are a smoker.

### **Hair Squares (effective 10/30/2014)**

Hair Squares are services to be performed on your mannequin. You will receive a hair squares packet before you go onto the clinic floor. Please ask your educator to initial each service as it is



completed. A completed sheet will result in a complimentary service for you. This comp service is non-transferrable—it is for your use only. Our goal is to prepare you for graduation; please strive to complete all of your assigned hair squares before you graduate.

### **Heat/AC**

We keep the temperature of the buildings at a reasonable setting so that the staff and students may work comfortably. **Please, do not adjust the settings.** Clinic temps shouldn't be set over 70. Windows are to be kept closed. If you are uncomfortable, please let your educator know and s/he will notify the maintenance department.

### **Immunizations**

It is an admissions requirement that all prospective students submit proof of the MMR vaccine. Measles is a highly contagious illness caused by the measles virus. Measles can be prevented with a measles-containing vaccine, usually as a combination measles-mumps-rubella vaccine. Students in colleges or universities without measles immunity need two doses of MMR vaccine, with the second dose administered no earlier than 28 days after the first dose. People who are born during or after 1957 who do not have evidence of immunity against measles should get at least one dose of MMR vaccine. If you cannot provide proof of the MMR vaccine, please contact your doctor or a health clinic; there is a blood test that can be done to verify this. There is a post-secondary immunization exemption form available; Vermont's Immunization Regulations apply to students enrolled in post-secondary schools unless they claim a medical, religious, or philosophic exemption. If this applies, please complete an exemption form and submit to our admissions department.

### **Jeans Day (effective 1/25/ 2014)**

Occasionally, we allow our students to participate in Jeans Days . If you wish to wear jeans on either/both of those days, please have your \$5 contribution ready for collection at roll call. These funds are given to our Aveda rep regularly; she puts them into our Aveda Earth fund, which is a fund that supports our various causes (such as the Lake Champlain Committee). This is an optional activity—it is your choice to participate or not—but if you do, you must submit your payment at roll call.

### **Job Search**

We include in our curriculum material helpful in obtaining employment. This includes mock interviews, resume tips, etc. You will have access to a computer to write your own professional resume. Please refer to the 'Help Wanted' book in the business office for job postings. Salon owners often call us seeking employees.

### **Kits**

It is our policy to distribute the equipment and supplies necessary to perform clinic and practical services to our students. Books and lab coats are usually distributed during week 1. Partial kits may be distributed during week 1 as well. The timeframe in which a student receives their kit materials will be at the discretion of the Technical Director. A kit list will be given out and you are asked to

check off items as you receive them. We recommend marking your items with a permanent marker or engraving pen. If you would like to add anything to your kit, please see the Technical Director first. Please do not bring in any items to display on the cutting stations (such as plastic drawers)—they are not allowed.

We are not responsible for your lost, stolen, or damaged items. Please take personal items home each night and lock them up during the day. Many students leave items in their locked cars. Please purchase a padlock for your kit to prevent unnecessary theft. Please take your kit home with you at the end of your day.

Your complete kit including books and iPad is to be with you at school every day. You must be prepared to do all aspects of the course at any given time. Schedules may change on occasion, so please don't rely on the written schedule. Any student who is not prepared for class or clinic will be asked to leave until they are prepared.

### **Licensing Requirements**

After graduating from the Institute, you are entitled to apply for the Vermont State Licensing Exam. There are 2 parts to the exam: Theory and Practical. Exams are scheduled through the testing agencies. We will give you the most up to date information for registering, however each student is responsible for registering on their own. You will get your written results immediately! The practical portion will be done at another time and you will be notified by the testing agency of the time/date. When you pass all parts of the exam, you will receive your license. The fees charged for testing and licensing are determined and paid directly to the State of Vermont and the Testing Agency. These fees are not included in your tuition at O'Brien's Aveda Institute.

### **Lockers**

We have lockers available in the break room. You may sign out a locker through admissions and use a small padlock. The school is not responsible for belongings in the lockers and may cut the padlocks without notice, as lockers are property of the school.

### **Loitering**

Our campus is intended for the use of staff, students and clients of the institute. Loitering is prohibited and violators will be asked to leave. Educators must take the responsibility of enforcing this rule.

### **Lunch**

Students bring their lunch or order out to local delis and restaurants. We provide 2 refrigerators, microwave and toaster for student use. You may eat in the student lounge or outside on the side lawn picnic tables. All students who are in attendance for more than 6 hours must take a lunch break. Lunches are 30 minutes long. Please pick up your garbage and dispose of it. Do not adjust your lunch period in the book; your supervising educator will do that. Lunches are generally from 12:00 noon to 12:30; this may vary. Lunches over or under 30 minutes are not permitted without prior authorization from your supervising educator. If you leave the building to get lunch, please know that your travel time is included in your 30 minutes.

## Major Standard Violation

Major standard violations include using controlled substances, defacing or destroying property, stealing, falsifying documents, committing fraud, or causing harm to others. Violation of a major standard will result in termination.

## Makeup Hours

Opportunities to make up hours are limited so please attend class regularly. When making up hours you are assigned to the student clinic to complete the hours. Arrangements to make up hours must be approved in advance by the clinic coordinator; makeup hours are permitted as a courtesy to the student and the institute is not obligated to make arrangements with the student to complete makeup hours prior to the end of the course. Makeup hours are not permitted until the student has completed one-third of the course. Make up privileges can be revoked due to attendance, grades and/or disciplinary action.

## Mocks (effective 1/30/2018)

It is our policy to evaluate our students every third of the course.

Satisfactory Progress in academics is done during the mock board exams. 'Mocks' were created to simulate the VT State Board Exam. Students are assigned numbers (usually written on the mirror in front of you while you're taking the practical exam) and the 'proctor' (the instructor administering the exam) will give you specific directions on what to do. Listen closely; you may not ask questions at Mocks or during your real exam. You will also take 2 written exams (theory and state law). If you fail any part of the Mock, you will have an opportunity to retake that section. Your evaluation will determine your capability and will show you what you need to improve. Don't be discouraged if you fail use it to your advantage. It's much better to fail Mocks than the real exam. You have 3 opportunities to pass your Mocks. If you fail the third time you will be advised and may be terminated from the program.

You must appear as scheduled for your Mocks. Do not be tardy. Interruptions will not be permitted. If you cannot be present, kindly let your supervising instructor know in advance. **If you do not show up or refuse to take your scheduled Mock Exam, you will incur a \$50 charge for that day and will not be allowed to stay at school.** Please bring your own writing utensils for the written exam. You must bring your complete kit or you will not be examined. A complete kit includes all necessary materials, tools and supplies needed to take your state board exam. Respond only to your examiner when asked an oral question. NO chewing gum. At no time will you approach your examiner, always let him/her come to you. Safety, chemical precautions, sanitation, and professional attitude will be considered highly. Your examiners will tell you which categories you will be tested on and when to begin and go on to other sections. All examinees must be in dress code. Borrowing will not be permitted. Know your social security number you will need it during the exam and won't be allowed to go look it up.

**Practical Exam tips:**

1. Be sure you have clean hands
2. Wear a clean and pressed uniform and look professional
3. Be sure all your implements are clean and sanitized
4. Please know your sanitation procedures; follow them closely
5. Keep implements out of your pockets
6. Don't wear any jewelry that may get in your way
7. Wear comfortable shoes!
8. Be sure your kit is complete and clean Common mistakes made:
9. No protective cream or cotton
10. No color bottle containing product for application
11. No perm bottle
12. No water bottle
13. No razor
14. Not enough towels for draping
15. No bag for soiled combs or brushes
16. Not paying attention to Chemical Relaxing section directions of exam (apply relaxer to dry hair, not wet. )

Have a proper mental attitude. Remember that exams aren't given to see you fail. Be calm and keep a sensible attitude. Don't be nervous! If you've been studying and reviewing and listening to your instructors, there's nothing to fear. Your reviews in your book are so important-- keep re-reading them. Be well rested that day so you can function efficiently. Try to avoid any hurry, worry, or excitement the night before. Make a checklist, gather your supplies, and check them off as you pack them. Lay out your clothes the night before. Go to bed early! Re-read the most important notes on color, perming, and chemistry.

**Written Exam tips:**

1. Be sure you have a pen, pencil, and watch
2. Listen carefully to the instructions. Many students fail because they don't listen carefully and do the wrong thing
3. If you can't answer a question, flag it and move onto the next one. Come back to it later. Sometimes other questions trigger the one you don't know
4. If you aren't sure your answer is correct, put a check next to it and go back

**Name Policy**

It is our policy to have students address their instructors as "Mr.", "Mrs.", or "Ms." Please do not address them by their first names---or by nicknames or endearing terms. Please give them the respect that they deserve.

## **Orientation Day (Hello Aveda) (updated 5/1/2018)**

Our Orientation takes place on Day #1 of your program. We will review pertinent policies and procedures, all of which you have been given access to prior to this day. We will get to know each other, see a special Power Point presentation, do some activities, see some Aveda videos, do a personality test and personal essay, complete final enrollment paperwork, meet with your Financial Aid Director, and receive some of your student kit items. You will have an Orientation Period for the first 30 days at the institute. The habits you put in place now will stay with you throughout the course. If you do not have good attendance during this orientation period, we will counsel you about your continuing with the course; we reserve the right to expel you if we feel it is in our/your best interest.

## **Overtime (Extra Instructional Charges) (effective 01/30/2018)**

**It is vitally important to your education here that your attendance be EXCELLENT.** The more time you miss, the more material you miss. The information cannot possibly be learned in the same manner in which it is first presented. If it is determined that you are greatly behind your class, you may be asked to join another group. You must maintain a 79% attendance rate. We provide 5% of your contracted time in 'free hours' that may be used however you wish---for doctors' appointments, personal days, sick days, religious holidays that we are open, etc. When they have been used you must pay close attention to your overtime hours—if you do not make the expected hours you will begin to have a negative balance. At the end of your course—if you have overtime hours—you will owe the Institute that number of hours x \$11.00/hour. Do not pay more for your education than you have to.

## **Participation in Customer Services**

All cosmetology and barbering students who are performing services on paying clients must have a minimum of 500 hours; Esthetics Students must have at minimum 100 hours before they may perform services on paying clients. Massage is not regulated in Vermont, but Massage students must have 100 hours before they can perform services for paying clinic customers. Nail Technician students must have a minimum 50 hours before they may perform services on paying customers.

## **Photocopies**

Copies must be related to student studies and conform to copyright laws. Please ask permission to use the copier.

## **Photographic Release**

It is our policy to request that students sign a release form allowing us to use photos taken of them during school hours to be used on the Institute's website or for recruiting purposes. Videotaping may occur occasionally. Release forms will be placed in student files.

## **Policies**

It is our policy to review all school policies, rules, regulations, and all other information we think needs reviewing BEFORE you begin this course. A checklist will be distributed and we would like you to check off items as they are reviewed. This minimizes misunderstandings and we then know that you acknowledge this information and agree to abide by it all. If you have a problem with a policy, please let us know as soon as possible so we can do policy changes as soon as they are made; we reserve the right to change policies WHENEVER NECESSARY.

## **Post-Grad Instruction**

It is our policy to invite all graduates back for a maximum of 16 hours of review. This is intended to give you additional time in preparation for the VT State Board Exam. This time must be scheduled at least a week in advance.

## **Privacy**

We respect the privacy of our students. However, we must take reasonable measures to maintain security. We reserve the right to inspect and search any person entering or leaving Institute property. This includes briefcases, purses, lunch bags, lockers, vehicles, packages, backpacks, etc. Kit searches may be done randomly at any time. Any stolen items, drugs, weapons, or other contraband found in a search may lead to discipline, up to and including immediate termination. Students and staff are advised to keep their personal belongings locked and secure when they cannot be supervised.

## **Questions?**

If you have any questions regarding your hours or time clock issues, please see Linda in the business office (or another business office staff member). For financial aid questions please see our Financial Aid Director. Any other questions may be directed to your educators, who will lead you in the right direction.

## **Receipt Policy**

It is our policy to give a student a receipt each time a payment is applied to an account. If financial aid funds arrive and are applied to your account, you will receive a receipt telling you what was applied, where it came from, the amount, and your balance.

## **Roll Call**

- Roll call is taken each morning at approximately 8:06 am.
- Please have all of the items you need for the day. Have your makeup and hair done BEFORE roll call. Do not eat your breakfast during roll call.
- Your name will be called for attendance. Please stand and say, "Good Morning" to your educators and peers.
- Please be in dress code. If you are not in dress code, you will be asked to see an educator afterwards. You must have your lab coat on and your student lanyard on. Remember to remove your coat and boots for roll call.
- Your daily sheet will be checked off, indicating that you are in attendance. Do not leave roll call until you are dismissed.

## **Saturday Hours (effective 1/31/2018)**

We do not include Saturdays as part of your regular schedule, with the understanding that you will choose which Saturdays you will attend during your last 1000 hours. Please plan accordingly; do not wait until your last few hundred hours to attend Saturdays. If you sign up for a Saturday, please follow through on that commitment. **No Call or No Show for a signed-up Saturday will result in a one-day suspension in addition to losing your Saturday privilege to sign up for 3 weeks.** Saturdays typically will help you make up missed hours and are a great way to get more salon experience. Saturday hours are 9:00 AM to 3:00 PM.

## **Smoking**

We maintain a smoke-free workplace. As permitted by complex management you may only smoke in the back of the building. Receptacles are provided. Smoking should be done on breaks or at lunchtime.

## **Social Media Policy (effective 01/11/2016)**

Social Media is a part of today's communications, both for personal and professional reasons. This policy is intended to define acceptable use of social media for our students and staff members.

No student or staff member may, under any circumstances, engage in, request, or encourage: posts that are harassing, discriminatory, threatening, bullying or intimidating to other students, staff, guests, the institutes or other constituents. Posts that devalue or demean another person or our institutes will not be tolerated. Any student or staff member who violates this Social Media policy shall be subject to disciplinary action, up to and including termination.

We have a strict policy prohibiting fraternization between employees and students; staff members are not permitted to engage in social media relationships/connections with our enrolled students. This policy is intended to maintain professional boundaries between employees and students, creating a better student experience for all.

## **Staff Meetings and Continuing Education**

As part of their on-going continuing education, our instructors will take no fewer than 12 hours per year of professional education, with no fewer than 6 hours dedicated to teaching methodology. We include educational segments during our In-Service Days. We hold staff In-Service Days to discuss ways to improve our programs at least once a year and evaluate our educators annually at a minimum.

## **Student Discount/Other Discounts (effective 7/10/2015)**

We offer students a 40% student discount on all retail items sold at O'Brien's Aveda Institute. Items purchased by students are to be purchased directly from the desk coordinator. Please do not make change yourself. The discount is to be taken from the regular price. If items are on sale, you may either take your 40% discount or the sale price, not both. The discount may be used at the O'Brien's Aveda Salons with proof of student ID--this pertains to retail only, not services or gift certificates. Family members are welcome to a 40% discount on services; no family discount for retail. Alums and OB employees are welcome to a 25% discount on services; no discount for retail. We do not accept O'Brien's Salons gift cards at O'Brien's Aveda Institute. No complimentary services are to be given without a Director's approval.

## **Student File Release**

Please contact us in writing to request student file information. We will release the information directly to you. FERPA is a federal law designed to protect the privacy of a student's educational records. All students will sign a FERPA acknowledgement policy upon enrollment.

## **Student Lanyards**

It is the policy of our Institute to issue ID cards to its students. These cards may be used at beauty supply stores that require identification. The cards will be issued within the first few weeks of classes. If you lose it, please let us know---you must wear a lanyard/ID.

## **Student Vouchers**

Student vouchers are earned by students by completing their assigned 'Hair Squares' in the clinic. When a Hair Square sheet is complete and initialed by an educator, the student may request a hair service. Student vouchers are booked at the educators' discretion, clients come first. No more than two (2) students will be booked with vouchers in one day. more than 3 hours will be booked off per student.

## **Organizational Chart (updated 2/3/2020)**

Lines of authority within our Institute are established for management supervision, instruction, and associated with staff functions. O'Brien's Aveda Institute is owned by O'Brien's Aveda Institute, Inc. which is owned by William O'Brien and Timothy O'Brien.

Institute Director

Program Director

Financial Aid Officer

Admissions Director/Marketing Director

Administrative Assistant

Educators



## **COURSE OUTLINES**

### **COURSE OUTLINE**

#### **NAME OF COURSE: COSMETOLOGY, 1000 HOURS**

##### **DESCRIPTION**

The course of study offered at O'Brien's Aveda Institute is a full 1000 clock-hour cosmetology course. It is designed to train the student in the basic manipulative skills, safety judgments, proper work habits, business skills, and desirable attitudes necessary to obtain licensure and for competency in job entry level positions in Cosmetology or a related career field. It offers every subject suggested by the Vermont State Board of Barbering and Cosmetology. Included in the curriculum is a series of Career Development courses such as effective communication, product knowledge, retail salesmanship, teambuilding, etc. We also offer special classes in Aveda 'rituals', telephone etiquette, resume writing and employment skills to prepare our students for the job search process.

We use curriculum from Pivot Point, along with Aveda, which include chapters on study skills, history of cosmetology, professional image, bacteriology, infection control, implements/tools, equipment, anatomy/physiology, chemistry, electricity/light therapy, properties and disorders of the skin, properties and disorders of the scalp, treatment of the hair/scalp, facial massage and treatments, haircutting and styling, chemical texture services, hair coloring and lightening, nails and manicuring, salon management, job search, state board preparation and licensing laws.

In the event that a student is having difficulty progressing successfully in the course, a 120 hour performance evaluation will be done. After reviewing test scores, the instructors who have been assigned to the student will meet to discuss the possibility of removing the student from the program. Students must achieve a score of 70 on all written tests; if a student is unable to pass at least 60% of all written tests by 120 clock hours, we will seriously consider removing the student from the enrollment—it would not be in the student's best interest to proceed.

##### **INSTRUCTIONAL METHODS USED**

The clock hour education is provided through a sequential set of learning steps which address specific tasks necessary to prepare for the Vermont State Board exams in the pertinent field (with the exception of massage) and in graduation and job entry level skills. Our equipment, implements and products are comparable to the performance of useful, creative and productive career-oriented activities. The course is presented through comprehensive lesson plans, some of which have been developed by our staff. Subjects presented by means of interactive lecture, demos, cooperative learning, student salon activities and student participation. Audio-visual aids, guest speakers, projects, activities and other learning methods are used in this course.

## **COURSE/PROGRAM OBJECTIVES**

Upon completion of the course requirements, the determined graduate will be able to:

- Project a positive attitude and a sense of personal integrity and self-confidence
- Project professionalism, visual poise and proper grooming
- Communicate effectively and interact appropriately with colleagues, supervisors and clients
- Respect the need to deliver worthy service for value received in an employment environment
- Perform the basic manipulative skills in the area of hair styling, hair shaping, hair coloring, texture services, scalp and hair conditioning, skin and makeup, and nail care
- Perform the basic analytical skills to advise clients in the total look concept
- Apply academic learning, technical information and related matter to assure sound judgments, decisions, and procedures

To ensure continued career success, the graduate will continue to learn new and current information related to skills, trends and methods for career development in cosmetology and related fields.

### **Measurable Performance Evaluations (Mock Evaluations) at 500 hours**

- Complete all assigned Pivot Point and Aveda chapters.
- Complete the assigned Pivot Point Workbook chapters, along with assigned Aveda worksheets and modules
- Complete a lower leg wax in 45 minutes
- Complete a lip wax in 10 minutes
- Complete a brow wax in 15 minutes
- Complete a basic manicure in 45 minutes
- Complete a basic facial in 60 minutes
- Complete perm-winding an average head of hair in 45 minutes
- Know basics about on-base, ½ off base and spiral curl using a curling iron
- Know the fundamentals of hair color
- Accomplish all required Aveda haircuts—no time limit
- Know the basic razor and clipper methods
- Successfully pass the 500-hour Mock Board Exam

### **Measurable Performance Evaluations (Mock Evaluations) at 750 hours**

- Successfully execute haircuts with a razor and clippers
- Complete a full shampoo/set (including comb out) in 60 minutes
- Perm-wind an average head of hair in 30 minutes
- Complete a perm on an average head of hair (including cut/style) in 2 hours
- Complete a sculptured nail within 30 minutes
- Accomplish all that is required in the 500 hour objectives list (above)
- Successfully pass the 1000 hour Mock Board Exam

### **Measurable Performance Evaluations (Mock Evaluations) at 1000 hours**

- Successfully pass the 1000 hour Mock Board Exam
- Complete a basic layer haircut in less than 30 minute

## UNITS OF INSTRUCTION

Theory classes are generally held in the morning for students under 500 hours, with practical instruction in the afternoon. Cosmetology students may begin working in the paying clinic after successfully passing their 500- hour Mock Board Exam. The student reviews theory in weekly review games (such as Bingo) and when scheduled for Mock Board Testing Reviews prior to these exams.

Each of these subjects will be covered in theory and practical work during the 1000 hour course. These approximate breakdowns are suggested by the Vermont State Board of Barbering and Cosmetology and are used as guidelines.

Shampooing and related chemistry	15 hours
Waxing (superfluous hair)	15 hours
Permanent Waving, hair straightening	100 hours
Basic facials	25 hours
Finger waving, pin curls, roller formation	40 hours
Hair analysis & scalp treatments	75 hours
Manicuring (nail technical practice)	150 hours
Hair lightening & coloring, incl. temporary, semi permanent & permanent	250 hours
Haircutting, clipper cutting, hairstyling, hair shaping	250 hours
Equipment sanitation & sterilization techniques applicable to supplies, general and specific chemical waste and storage	30 hours
Anatomy, personal health, hygiene and sanitation	40 hours
Laws, Rules, & Professional Ethics	10 hours

## EVALUATIONS

Theory tests are administered at the end of corresponding chapters. We incorporate both oral and written testing. Tests are developed by our instructional staff. We also use some commercially-prepared tests. Grades are given to students in a timely manner and if a student is having difficulty academically, a special advising session will be scheduled. If a student passes a written test, that grade will be recorded. Retakes are given only if a student fails the test. All tests are to be given at a scheduled time. Practical exams are given at approximately each third of the course. There are practical mock exams and written mock exams. Educators giving these exams will meet afterwards with students to discuss strong/weak areas so that improvements may be made. A copy of each evaluation's front page, test results, and goals are given to each student.

## REFERENCES

A comprehensive library of references, periodicals, texts, audio/visual tapes and web-based materials are available to support this program of study. These materials may be borrowed/checked at no charge to our students/staff.

### EXAMPLES OF DVDs USED

- Jim Spina
- Michael Cole
- Jim Jones
- Natural Motion
- Aveda DVDs
- YouTube (Aveda)

We use audio visual aids and extensive practical training to give a fully rounded education.

### EXAMPLES OF TEXTS USED

- Pivot Point Fundamentals of Cosmetology
- Aveda Textbook of Cosmetology
- Connect Aveda
- Art/Science of Men's Hair—Aveda Art/Science of Color/Texture--Aveda
- Never Say Dye
- Consumer Dictionary of Cosmetic Ingredients

Ipads are used to access all digital curriculum.

### EXAMPLES OF ADDITIONAL HANDOUTS USED

- Head sheets to diagram cutting
- Connect Aveda manual
- Student Catalog
- VT State Laws
- NIC Candidate Handbook

## GRADING PROCEDURES

The qualitative element used in determining academic progress is a reasonable system of grades as determined by assigned academic learning. Students are assigned academic learning and practical experiences. Academic learning is evaluated after each unit of study. Practical assignments are evaluated as completed when rated as PASS/FAIL. At least 2 comprehensive practical skills evaluations will be conducted during the course of study. Students must maintain a written grade average of 70% and pass a FINAL written and practical exam prior to graduation. Students must make up missed tests and incomplete assignments. Numerical grades are considered according to the following scale:

90 – 100	A	Excellent
80– 89	B	Good
70 – 79	C	Satisfactory
Below 70	F	Failing

## COURSE OUTLINE

### **NAME OF COURSE: BARBERING, 750 HOURS**

#### **DESCRIPTION**

This course of study offered is a full 750 clock-hour barbering course. It is designed to train the student in the basic manipulative skills, safety judgments, proper work habits, business skills, and desirable attitudes necessary to obtain licensure and for competency in job entry-level positions in Barbering or a related career field. It offers every subject suggested by the Vermont State Board of Barbering and Cosmetology. Included in the curriculum is a series of Career Development courses such as effective communication, product knowledge, retail salesmanship, team-building, etc. We also offer special classes in Aveda `rituals', telephone etiquette, resume writing and employment skills to prepare our students for the job search process.

We use the Pivot Point Fundamentals of Barbering curriculum, along with the Aveda curriculum, which include chapters on study skills, history of barbering, professional image, bacteriology, infection control, implements/tools, equipment, anatomy/physiology, chemistry, electricity/light therapy, properties and disorders of the skin, properties and disorders of the scalp, treatment of the hair/scalp, men's facial massage and treatments, shaving and facial hair design, men's haircutting and styling, men's hairpieces, women's haircutting and styling, chemical texture services, hair coloring and lightening, nails and manicuring, barbershop management, job search, state board preparation and licensing laws.

In the event that a student is having difficulty progressing successfully in the course, a 120 hour performance evaluation will be done. After reviewing test scores, the instructors who have been assigned to the student will meet to discuss the possibility of removing the student from the program. Students must achieve a score of 70 on all written tests; if a student is unable to pass at least 60% of all written tests by 120 clock hours, we will seriously consider removing the student from the enrollment—it would not be in the student's best interest to proceed.

#### **INSTRUCTIONAL METHODS USED**

The clock hour education is provided through a sequential set of learning steps which address specific tasks necessary to prepare for the Vermont State Board exams in the pertinent field (with the exception of massage) and in graduation and job entry level skills. Our equipment, implements and products are comparable to the performance of useful, creative and productive career-oriented activities. The course is presented through comprehensive lesson plans, some of which have been developed by our staff. Subjects presented by means of interactive lecture, demos, cooperative learning, student salon activities and student participation. Audio-visual aids, guest speakers, projects, activities and other learning methods are used in this course.

## **COURSE/PROGRAM OBJECTIVES**

Upon completion of the course requirements, the determined graduate will be able to:

- Project a positive attitude and a sense of personal integrity and self-confidence
- Project professionalism, visual poise and proper grooming
- Communicate effectively and interact appropriately with colleagues, supervisors and clients
- Respect the need to deliver worthy service for value received in an employment environment
- Perform the basic manipulative skills in the area of hair styling, hair shaping, hair coloring, texture services, scalp and hair conditioning, basic skin and nail care
- Perform the basic analytical skills to advise clients in the total look concept
- Apply academic learning, technical information and related matter to assure sound judgments, decisions, and procedures

To ensure continued career success, the graduate will continue to learn new and current information related to skills, trends and methods for career development in barbering and related fields.

### **Measurable Performance Evaluations (Mock Evaluations) at 400 hours**

- Complete the assigned Pivot Point Textbook and Aveda chapters
- Complete the Pivot Point Workbook and other assigned Aveda worksheets and modules
- Know basic scalp manipulations and know how to give a scalp treatment
- Know basic facial massage and complete a basic facial in 60 minutes
- Blow-dry style an average head of hair in 30 minutes
- Complete perm-winding an average head of hair in 60 minutes
- Know the fundamentals of hair color and how to apply lightener and color
- Know how to apply a no-base virgin relaxer and relaxer retouch—no time limit
- Understand the fundamentals of haircutting
- Accomplish a tapered haircut using clippers and a scissor—no time limit
- Understand how to safely use a straight razor on the hair and face
- Successfully pass the 400 hour mock board exam
- Successfully execute haircuts with a razor and clippers
- Accomplish different haircutting techniques including fingers/shear, scissor over comb, shear-point tapering, arching, and blending
- Successfully shave a face and the outline area on a mannequin

### **Measurable Performance Evaluations (Mock Evaluations) at 750 hours**

- Successfully pass the 750 hour mock board
- Complete a men's tapered haircut in 30 minutes using both clippers and shears

## UNITS OF INSTRUCTION

Theory classes are two days remote and practical instruction will be held one day in person until completing 350 hours. Barbering students will be working in the paying clinic after completing 350 clock hours and passing their first Mock exam. The student reviews theory in weekly review and will do Mock Board Testing Reviews prior to these exams.

Each of these subjects will be covered in theory and practical work during the 750 hour barbering course. These approximate breakdowns are suggested by the Vermont State Board of Barbering and Cosmetology and used as guidelines.

Shampooing, Blow-dry, & hot tool styling	40 hours
Haircutting, styling, shaping (tapered, clipper, thinning, blending, scissor-over-comb) Facial (beard) Hair styling and trimming	425 hours
Hair lightening & coloring	75 hours
Chemical texture services	50 hours
Straight razor shaves	75 hours
Scalp, facial massage, basic men's facial, facial waxing	25 hours
Safety, sanitation and infection control	50 hours
History of Barbering	10 hours

## EVALUATIONS

Theory tests are administered at the end of corresponding chapters. We incorporate both oral and written testing. Tests are developed by our instructional staff. We also use some commercially-prepared tests.

Grades are given to students in a timely manner and if a student is having difficulty academically, a special advising session will be scheduled. If a student passes a written test, that grade will be recorded. Retakes are given only if a student fails the test. All tests are to be given at a scheduled time. Practical exams are given at approximately each third of the course. There are practical mock exams and written mock exams. Educators giving these exams will meet afterwards with students to discuss strong/weak areas so that improvements may be made. A copy of each evaluation's front page, test results, and goals are given to each student

## REFERENCES

A comprehensive library of references, periodicals, texts, audio/visual tapes and web-based materials are available to support this program of study. These materials may be borrowed/checked at no charge to our students/staff.

### EXAMPLES OF DVDs USED

- Jim Spina
- Michael Cole
- Jim Jones
- Natural Motion
- Aveda DVDs
- YouTube (Aveda)

We use audio visual aids and extensive practical training to give a fully rounded education.

### EXAMPLES OF TEXTS USED

- Pivot Point Fundamentals of Barbering
- Aveda's Men's Haircutting Curriculum
- Connect Aveda
- Art/Science of Men's Hair—Aveda
- Art/Science of Color/Texture--Aveda

Ipads are used to access all digital curriculum.

### EXAMPLES OF ADDITIONAL HANDOUTS USED

- Head sheets to diagram cutting
- Connect Aveda manual
- Student Catalog
- VT State Laws
- NIC Candidate Handbook

## GRADING PROCEDURES

The qualitative element used in determining academic progress is a reasonable system of grades as determined by assigned academic learning. Students are assigned academic learning and practical experiences. Academic learning is evaluated after each unit of study. Practical assignments are evaluated as completed when rated as PASS/FAIL. At least 2 comprehensive practical skills evaluations will be conducted over the course of study. Students must maintain a written grade average of 70% and pass a FINAL written and practical exam prior to graduation. Students must make up missed tests and incomplete assignments. Numerical grades are considered according to the following scale:

90 – 100	A	Excellent
80 - 89	B	Good
70 - 79	C	Satisfactory
Below 70	F	Failing



## COURSE OUTLINE

### NAME OF COURSE: ESTHETICS, 600 Hours

#### **DESCRIPTION**

The course of study offered is a full 600 clock-hour Esthetics Course.

It offers every subject suggested by the Vermont State Board of Barbering and Cosmetology. Included in the curriculum is a series of Career Development courses such as effective communication, product knowledge, retail salesmanship, team-building, etc. We also offer special classes in Aveda 'rituals', telephone etiquette, resume writing and employment skills to prepare our students for the job search process.

We use the Pivot Point Salon Fundamentals: Esthetics curriculum, along with some Aveda curriculum, which include chapters on study skills, history of esthetics and massage, professional image, bacteriology, infection control, implements/tools, equipment, anatomy/physiology, chemistry, electricity/light therapy, properties and disorders of the skin, facial massage and treatments, salon management, job search, state board preparation and licensing laws.

In the event that a student is having difficulty progressing successfully in the course, a 120 hour performance evaluation will be done. After reviewing test scores, the instructors who have been assigned to the student will meet to discuss the possibility of removing the student from the program. Students must achieve a score of 70 on all written tests; if a student is unable to pass at least 60% of all written tests by 120 clock hours, we will seriously consider removing the student from the enrollment—it would not be in the student's best interest to proceed.

#### **INSTRUCTIONAL METHODS USED**

The clock hour education is provided through a sequential set of learning steps which address specific tasks necessary to prepare for the Vermont State Board exams in the pertinent field and in graduation and job entry level skills. Our equipment, implements and products are comparable to the performance of useful, creative and productive career-oriented activities. The course is presented through comprehensive lesson plans, some of which have been developed by our staff. Subjects presented by means of interactive lecture, demos, cooperative learning, student salon activities and student participation. Audio-visual aids, guest speakers, projects, activities and other learning methods are used in this course.

#### **COURSE/PROGRAM OBJECTIVES**

Upon completion of the course requirements, the determined graduate will be able to:

- Project a positive attitude and a sense of personal integrity and self-confidence
- Project professionalism, visual poise and proper grooming
- Communicate effectively and interact appropriately with colleagues, supervisors and clients
- Respect the need to deliver worthy service for value received in an employment environment
- Perform the basic manipulative skills in the area of esthetics
- Perform the basic analytical skills to advise clients in wellness
- Apply academic learning, technical information and related matter to assure sound judgments, decisions, and procedures

To ensure continued career success, the graduate will continue to learn new and current information related to skills, trends and methods for career development in esthetics and related fields.

We use audio visual aids and extensive practical training to give a fully rounded education.

### **EXAMPLES OF TEXTS USED**

- Pivot Point Salon Fundamentals: Esthetics Curriculum
- Aveda Textbook of Esthetics
- Connect Aveda
- Consumer Dictionary of Cosmetic Ingredients

Ipads are used to access all digital curriculum.

### **EXAMPLES OF ADDITIONAL HANDOUTS USED**

- Head sheets to diagram manipulations
- Connect Aveda manual
- Student Catalog
- VT State Laws
- NIC Candidate Handbook

### **EXAMPLES OF DVDs USED**

- Aveda DVDs
- Gigi Waxing
- YouTube (Aveda)

### **Measurable Performance Evaluations (Mock Evaluations) at 300 hours**

- ★ Complete the assigned Pivot Point and Aveda chapters.
- ★ Complete the Pivot Point Workbooks, along with Aveda worksheets and modules that are assigned
- ★ Understand the fundamentals of facials
- ★ Successfully pass the 300-hour Mock Board Exam

### **Measurable Performance Evaluations (Mock Evaluations) at 600 hours**

- Successfully pass the 600-hour Mock Board Exams

## UNITS OF INSTRUCTION

Theory classes are generally held in the morning, with practical instruction in the afternoon. Students may begin working in the paying clinic after 300 hours and successfully passing their 300-hour Mock Board Exam. The student reviews theory in weekly review games (such as Bingo) and when scheduled for Mock Board Testing Reviews prior to these exams.

Each of these subjects will be covered in theory and practical work during the 600 hour course. These approximate breakdowns are suggested by the Vermont State Board of Barbering and Cosmetology and are used as guidelines.

Facials, practical work and related categories	280 hours
Microdermabrasion, chemical peels, exfoliation, mask therapy, chemicals	20 hours
Electrical machines used in Esthetics	20 hours
Eyebrow arching, hair removal, & makeup techniques/services	20 hours
Sanitary personal health and hygiene understanding	20 hours
Sanitation, sterilization for all equipment, supplies, general and specific chemical and waste storage areas, hazardous	20 hours
Safe chemical storage, use, and disposing of hazardous material requirements	20 hours
Sanitation, sterilization, hazardous substances, hygiene, anatomy, laws, rules regulations and professional ethics	200 hours

## EVALUATIONS

Theory tests are administered at the end of corresponding chapters. We incorporate both oral and written testing. Tests are developed by our instructional staff. We also use some commercially prepared tests. Grades are given to students in a timely manner and if a student is having difficulty academically, a special advising session will be scheduled. If a student passes a written test, that grade will be recorded. Retakes are given only if a student fails the test. All tests are to be given at a scheduled time. Practical exams are given at approximately each third of the course. There are practical mock exams and written mock exams. Educators giving these exams will meet afterwards with students to discuss strong/weak areas so that improvements may be made. A copy of each evaluation's front page, test results, and goals are given to each student.

## REFERENCES

A comprehensive library of references, periodicals, texts, audio/visual tapes and web-based materials are available to support this program of study. These materials may be borrowed/checked at no charge to our students/staff.

## GRADING PROCEDURES

The qualitative element used in determining academic progress is a reasonable system of grades as determined by assigned academic learning. Students are assigned academic learning and practical experiences. Academic learning is evaluated after each unit of study. Practical assignments are evaluated as completed when rated as PASS/FAIL. At least 2 comprehensive practical skills evaluations will be conducted during the course of study. Students must maintain a written grade average of 70% and pass a FINAL written and practical exam prior to graduation. Students must make up missed tests and incomplete assignments. Numerical grades are considered according to the following scale:

90 – 100	A	Excellent
80 - 89	B	Good
70 - 79	C	Satisfactory
Below 70	F	Failing

## Campus Safety and Security Report

To assist students and prospective students to be aware of crime on our campus, the US Department of Education requires that we furnish you with the following policies and statistics for the most recent 3 years: January 1, 2017 - December 31, 2020.

We encourage you to use all of the precautions below to keep our campus safe. Each of us plays an important role in following the safety guidelines, such as securing your personal property and reporting criminal activity right away. Any person witnessing some form of criminal action or emergency should report it to the Institute Director or Educator in charge. The person in charge will investigate the incident and report it to the Williston police for O'Brien's Aveda Institute at (802) 878-6611. The person in charge will prepare a written memorandum regarding the incident.

All facilities are locked during non-business hours. During non-business hours, only authorized personnel are permitted. The Institute does not employ private security personnel. Therefore, all incidents of a criminal or emergency nature are to be reported to the police.

In the event of an emergency, staff members will be notified by text message. All staff members are responsible for updating their cell phone numbers with the Institute Director. If confronted by an armed intruder do NOT resist. Follow their instructions. If 911 has not been contacted, call 911 immediately and inform them: what is going on, the location of the incident, what type of weapon is involved, and how many people are involved. If the scene is not safe, stay out of the danger area until the police arrive. If 911 has been called and the scene is safe, evacuate everyone and complete a detailed incident report. Forward report to the Institute Director. All bomb threats should be treated as though they are real. Initiate an emergency evacuation and call 911 to report the bomb threat.

Familiarize yourself with the evacuation procedures for the building. Notice the fire extinguishers' locations. Evacuate when you hear the sound of an alarm in the building—this includes fire drills. Exit the building quickly and safely and close the doors behind you. Wear your shoes out. Never use the elevator—always use the stairs. Help others to evacuate—knock on doors and check bathrooms. Before opening doors—feel the door to see if it's hot. Exit the building carefully. Go directly to the back of the parking lot where attendance will be taken.

During orientation, institute meetings and staff meetings, students and employees are informed about the importance of secure premises. Students and staff are encouraged to walk together when walking to their cars at the end of the day. More than one person should be left in the building to close up.

Missing Persons: if you believe someone might be missing, notify your supervising educator immediately.

Weapons: all weapons are prohibited from our campus. A weapon should be understood to include firearms, paintball guns, BB guns, slingshots, bows, arrows, swords, various kinds of knives and devices that could be used to cause harm.

Personal Responsibility: students and staff members should assume responsibility for their own personal safety and security of their belongings. Please lock your items in your car or a locker and do not leave purses unattended at any time. We will not be responsible for missing/stolen/damaged items. Report any suspicious activity to your supervising educator.

We have a Sexual Harassment Policy in place. We will conduct trainings to promote the awareness of rape and other forcible and non-forcible sex offenses. If such an offense takes place, it will be the student's option to report it to school authorities and law enforcement. We will assist the student in notifying them if requested. The accuser and accused are entitled to the same opportunities to have others present during a disciplinary proceeding and both must be informed of the outcome of any disciplinary proceeding that is brought alleging a sex offense. These disciplinary hearings shall be conducted by the Institute Director who will receive annual training on issues related to sexual misconduct, a hearing that protects the safety of victims and promotes accountability.

Whenever an arrest is made for these violations—liquor violations, drug abuse violations, weapons possessions—we will record the incident and report the statistics to students and employees. The sale and use of alcohol and illegal drugs are not permitted in this school or its adjacent parking area. Anyone observed using illegal drugs and/or alcohol will be referred to the local authorities.

We keep an updated annual report containing crime statistics and important safety policies. This allows us all to be informed about criminal activity occurring within and immediately surrounding geological boundaries. We keep a Fire Log and collect fire statistics, which include unintentional, intentional, and undetermined fire incidents, number of deaths/injuries related to the fire, and the damage related to the fire.

This is a summary listing the required statistics for our Campus Security Reports during the years January 1, 2017 - December 31, 2020:

The following incidents were on file: 0 murders, 0 rapes, 0 robberies, 0 aggravated assaults, 0 motor vehicle thefts, and 0 indecent exposures. There were no arrests for the following crimes on campus: liquor law violation, drug abuse violation, weapons violation, or sex offenses. There have been no major violations within the three years previous to this report. A paper is available upon request. Data may be reviewed on the Department's website at: <http://ope.ed.gov/campussafety>.

## **Sexual Misconduct Policy**

### Introduction

Our institute is committed to providing a comfortable and encouraging learning environment for all students, faculty and staff that is free from sex discrimination, including sexual misconduct. We support tolerance and respect; disrespect is not welcome here. Offensive interactions will not be tolerated. Unwanted sexual attention, whether it be serious or in a joking manner, is one form of disrespectful behavior. Such behavior is prohibited by state and federal laws.

Sexual harassment is a form of discrimination, according to state and federal laws. It is defined as 'unwelcome sexual advances, requests for sex, and other verbal or physical contact of sexual nature if they occur as a condition for employment or advancement, or if such conduct has the purpose or effect of unreasonably interfering with a person's work performance, or is creating or intimidating, hostile, or offensive in a work or learning environment.'

This policy shall be disseminated widely to the school community through our website, employee orientations, student orientations and other appropriate channels of communication. We provide key staff members with training to enable the schools to handle any allegations of sexual misconduct promptly and effectively. We will take appropriate action to prevent, correct and/or discipline behavior that violates this policy.

## Scope of the Policy

This policy governs sexual misconduct involving students that occurs on campus or in connection with any school-sponsored program or event. This applies to all students, employees, and third parties conducting business with our school, regardless of gender, gender identity, sexual orientation, age, race, nationality, class status, ability, religion or other protected status. We encourage victims of sexual violence to talk to somebody about what happened so victims can get the support they need, and we can respond appropriately. We will seek to respect a victim's request for confidentiality to the extent possible, while remaining mindful of the victim's well-being.

## Prohibited Conduct

Sexual misconduct comprises a broad range of behaviors focused on sex that may or may not be sexual in nature. Any intercourse or other intentional sexual touching or activity without the other person's consent is sexual assault, which is a form of sexual misconduct. Sexual harassment and sexual exploitation, stalking, domestic violence, and dating violence are also forms of sexual misconduct. Intimidation for one of these purposes is sexual misconduct, as is retaliation following an incident of alleged sexual misconduct or attempted sexual misconduct. Misconduct can occur between strangers or acquaintances, or people who know each other well, including between people involved in an intimate or sexual relationship, can be committed by anyone regardless of gender identity, and can occur between people of the same or different sex or gender. This policy prohibits all forms of sexual misconduct.

## Options for Assistance Following an Incident of Sexual Misconduct

We strongly encourage any victim of sexual misconduct to seek immediate assistance. Seeking prompt assistance may be important to ensure a victim's physical safety or to obtain medical care. We strongly advocate that a victim of sexual assault report the incident in a timely manner. Time is a critical factor for evidence collection and preservation.

Victims of sexual misconduct may file a report with the Williston Police Department ((802) 878-6611). Victims may also file a report with the Title IX Coordinator. The victim of the sexual assault may choose for the investigation to be pursued through the criminal justice system and our own disciplinary procedures. The school and criminal justice system work independently from each other. Law enforcement officers do not determine whether a violation of this policy has occurred. The campus Title IX Coordinator will guide the victim through the available options and support the victim in his/her decision.

## Support Services Available

Counseling, advocacy and support services are available for victims of sexual misconduct, whether or not a victim chooses to make an official report or participate in the school's disciplinary or criminal process. We do not provide counseling or health care services. Personal counseling offered by us will be limited to initial crises assessment and referral.

Sexual misconduct crisis and counseling options are available locally and nationally. National Sexual Assault Hotline: 1-800-656-4673 Howard Mental Health (local): 1-802-488-6100

## Sexual Harassment

Title IX is the law that makes sexual harassment illegal in schools. In a school such as the Institute, where a student may be the only male or female in the class, it is especially important that everyone treat each other with respect so that all students have an equal opportunity to learn in a supportive environment.

Some examples of sexual harassment are:

Verbal: foul or offensive language, jokes of a sexual nature, suggestive comments, Sexually degrading words to describe something, repeated flirtation with Someone who is not interested.

Non-Verbal: sexually suggestive objects or pictures on books or clothing; Suggestive, obscene or insulting sounds, whistling, leering, graffiti

Physical: unwanted contact that may include touching or pinching. To be considered harassment, the action must be offensive to the recipient. Sexual harassment includes both intentional conduct and actions that were not intended to harm anyone.

If you are being made uncomfortable by someone in this way, TELL THAT PERSON TO STOP. If it doesn't stop, please report it to one of your supervising educators.

Formal: If the situation does not stop, you may file a formal report. If another student or staff member is found to be engaging in sexual harassment, formal disciplinary action will be taken. A formal report, along with the resolution, will be kept on file.

The campus Title IX Coordinator will work with all students affected by sexual misconduct to ensure their safety and support their well-being. This assistance may include providing accommodations to support or protect a student after an incident of sexual misconduct and while an investigation or disciplinary proceeding is pending. Such accommodations may include the ability to alter class schedules, withdraw from/retake a class without penalty, and access academic support. We may be able to provide additional interim measures to victims while an investigation is pending, such as no contact orders and changing the alleged perpetrator's class schedule.

### Title IX Coordinator

The campus Title IX Coordinator is responsible for monitoring and overseeing each school's compliance with Title IX and the prevention of sexual harassment, sexual misconduct and discrimination. The Title IX Coordinators is: Kelly Sands. The Title IX Coordinator must be:

- Knowledgeable and trained in the school's policies and procedures and relevant state and federal laws
- Available to advise any individual, including a complainant, respondent, or a third party, about this school and community resources and reporting options;
- Available to provide assistance to any employee regarding how to respond appropriately to a report of Title IX prohibited conduct and related retaliations;
- Participates in ensuring the effective implementation of this Policy, including monitoring compliance with all procedural Requirements, record keeping, and timeframes;
- Responsible for overseeing training, prevention, and education efforts and annual reviews of climate and culture.
- **Inquiries or concerns about Title IX may be referred to the campus Title IX Coordinator: Kelly Sands ([kelly@obriensavedainstitute.org](mailto:kelly@obriensavedainstitute.org))**



## **Reporting Policies and Protocols**

We strongly encourage all members of the school community to report information about any incident of sexual misconduct as soon as possible, whether the incident occurred on or off campus. Reports can be made either to the school and/or to law enforcement. An incident of sexual misconduct may be reported directly to the campus Title IX Coordinator. If the campus Title IX Coordinator is the alleged perpetrator of the sexual misconduct, the report should be submitted to the school owner. Filing a report with the school official will not obligate the victim to prosecute, nor will it subject the victim to scrutiny or judgmental opinions from officers. An individual who has experienced an incident of sexual misconduct may report the incident at any time, regardless of how much time has elapsed since the incident occurred. We are committed to supporting the rights of a person reporting an incident of sexual misconduct to make an informed choice among options and services available. We will respond to all reports in a manner that treats each individual with dignity and respect and will take prompt responsive action to end any misconduct, prevent its recurrence, and address its effects.

## **Reporting to Law Enforcement**

An incident of sexual misconduct can be reported to law enforcement at any time, 24 hours a day/7 days a week, by calling 911. At the complainant's request, we will assist the complainant in contacting law enforcement. If the complainant decides to pursue the criminal process, the school will cooperate with law enforcement agencies to the extent permitted by law. A complainant has the option to decide whether or not to participate in any investigation conducted by law enforcement. Filing a police report will:

- \*Ensure that a victim of sexual assault receives the necessary medical treatment and tests
- \*Provide the opportunity for collection of evidence helpful in prosecution, which can't be obtained later
- \*Assure the victim has a referral to confidential counseling from counselors specifically trained in the area of sexual assault

**Reporting of Crimes and Annual Security Reports** Campus safety and security are important issues. Our goal is to provide students with a safe environment in which to learn and to keep students, parents, and employees well informed about campus security. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, or Clery Act, requires institutions of higher education to record and report certain information about campus safety, including the number of incidents of certain crimes on or near campus, some of which constitute sexual misconduct under this policy.

Each year we prepare this report to comply with the Clery Act and update our policy. It is available on our website.

## **Timely Warnings**

In the event that a situation arises, either on or off campus, that, in the judgement of the Campus Director constitutes an ongoing or continuing threat, a campus wide “timely warning” will be issued. This may include instant messages and notices posted in common areas. Anyone with information warranting a timely warning should report it to the Campus Director by phone (1-802-876-7044).

## **Third-Party and Anonymous Reporting**

In cases where sexual misconduct is reported to the Title IX Coordinator by someone other than the complainant (by an instructor, classmate or friend) the Title IX Coordinator will promptly notify the complainant that a report has been received. This Policy and the Procedures will apply in the same manner as if the complainant had made the initial report. The Title IX Coordinator will make every effort to meet with the complainant to discuss available options and resources. Reports from an anonymous source will be treated in a similar fashion.

## **No Retaliation**

We prohibit retaliation against those who file a complaint or third-party report, or otherwise participate in the investigative and/or disciplinary process. The school will take strong responsive action if retaliation occurs. Any incident of retaliation should be promptly reported to the Title IX Coordinator or the school owner.

## **Coordination With Drug Free School Policy**

Students may be reluctant to report instances of sexual misconduct because they fear being disciplined pursuant to our drug/alcohol policy. We encourage students to respond

## **School Policy on Confidentiality**

We encourage victims of sexual misconduct to talk to somebody about what happened—so victims can get the support they need, and so the school can respond appropriately. This policy is intended to make students aware of the various reporting and confidential disclosure options available to them so that they can make informed choices about where to turn should they become a victim of sexual misconduct. We encourage victims to talk to someone identified in one or more of the groups. Privileged and Confidential Communications—Professional & Pastoral Counselors, Professional licensed counselors and pastoral counselors who provide mental health counseling to members of the community are not required to report any information about an incident to the Title IX Coordinator without a victim’s permission. We do not provide Professional or pastoral counseling but can assist a victim of sexual misconduct in obtaining support organizations. A victim who at first requests confidentiality may later decide to file a complaint with our school or report the incident to local law enforcement, and thus far have the incident fully investigated. NOTE: While these professionals may maintain a victim’s confidentiality with our school, they may have reporting or other obligations under the state law. ALSO NOTE: If we determine that the alleged perpetrator poses a serious and immediate threat to the school community, the Director may be called upon to issue a timely warning to the community. Any such warning should not include any information that identifies the victim.

## **Reporting to the Title IX Coordinator**

When a victim tells the Title IX Coordinator about an incident of sexual misconduct, the victim has the right to expect the school to take immediate and appropriate steps to investigate what happened and to resolve the matter promptly and equitably. To the extent possible, information reported to the Title IX Coordinator will be shared only with the people responsible for handling the school's response to the report. The Title IX Coordinator should not share information with law enforcement without the victim's consent or unless the victim has also reported the incident to law enforcement. Before a victim reveals any information to the Title IX Coordinator, the Coordinator should ensure that the victim understands the Coordinator's reporting obligations—and, if the victim wants to maintain confidentiality, direct the victim to confidential resources. If the victim wants to tell the Title IX Coordinator what happened but also maintains confidentiality, the Coordinator should tell the victim that we will consider the request, but cannot guarantee that the school will be able to honor it.

The Title IX Coordinator will not pressure a victim to request confidentiality, but will honor and support the victim's wishes, including for the school to fully investigate an incident. By the same token, the Title IX Coordinator will not pressure a victim to make a full report if the victim is not ready to.

## **Requesting Confidentiality From Our School: How the School Will Weigh the Request and Respond**

If a victim discloses an incident to the Title IX Coordinator but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, we must weigh the request against the school's obligation to provide a safe environment for all students, including the victim. If we honor the request for confidentiality, a victim must understand that the school's ability to meaningfully investigate the incident and pursue disciplinary action against the alleged perpetrator may be limited.

Although rare, there are times when we may not be able to honor a victim's request in order to provide a safe, non-discriminatory environment for all students.

The Title IX Coordinator will evaluate requests for confidentiality. When weighing a victim's request for confidentiality or that no investigation or discipline be pursued, the Title IX Coordinator will consider a range of factors, including the following:

- o The increased risk that the alleged perpetrator will commit additional acts of sexual misconduct or other violence, such as:
    - whether there have been other sexual misconduct complaints about the same alleged perpetrator;
    - whether the alleged perpetrator has a history of arrests or records from a prior school indicating a history of violence;
    - whether the alleged perpetrator threatened further sexual misconduct or other violence against the victim or others;
    - whether the sexual misconduct was committed by multiple perpetrators;
    - whether the sexual misconduct was perpetrated with a weapon
    - whether the victim is a minor
    - whether we possess other means to obtain relevant evidence of the sexual misconduct (e.g., security cameras or personnel, physical evidence)
- Whether the victim's report reveals a pattern of perpetration (e.g., via illicit use of drugs or alcohol) at a given location or by a particular group.

The presence of one or more of these factors could lead us to investigate and, if appropriate, pursue

disciplinary action. If none of these factors is present, the school will likely respect the victim's request for confidentiality.

If we determine that we cannot maintain a victim's confidentiality, the school will inform the victim prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the school's response. We will remain ever mindful of the victim's well-being, and will take ongoing steps to protect the victim from retaliation or harm and work with the victim to create a safety plan. Retaliation against the victim, whether by students or school employees, will not be tolerated. We will also:

- Assist the victim in accessing other available victim advocacy, academic support, counseling, disability, health or mental health services, and legal assistance.
- Provide other security and support, which could include issuing a no-contact order, helping arrange a change of course schedules (including for the alleged perpetrator pending the outcome of an investigation) or adjustments for assignments or tests.
- Inform the victim of the right to report a crime to local law enforcement – and provide the victim with assistance if the victim wishes to do so.
- We may not require a victim to participate in any investigation or disciplinary proceeding. Because we are under a continuing obligation to address the issue of sexual violence campus-wide, reports of sexual violence (including non-identifying reports) will also prompt the school to consider broader remedial action – such as increased monitoring, supervision or security at locations where the reported sexual violence occurred; increasing education and prevention efforts, including to targeted population groups; conducting climate assessments/victimization surveys; and/or revisiting its policies and practices.

If we determine that we can respect a victim's request for confidentiality, the school will also take immediate action as necessary to protect and assist the victim.

## **Miscellaneous**

Take Back the Night and other public awareness events. Public awareness events such as "Take Back the Night," the Clothesline Project, candlelight vigils, protests, "survivor speak outs" or other forums in which students disclose incidents of sexual violence, are not considered notice to us of sexual misconduct for purposes of triggering its obligation to investigate any particular incident(s). Such events may, however, inform the need for campus-wide education and prevention efforts.

Off-campus Counselors and Advocates. Off-campus counselors, advocates, and health care providers will also generally maintain confidentiality and not share information with us unless the victim requests the disclosure and signs a consent or waiver form.

## **Investigation Procedures and Protocols**

The Title IX Coordinator oversees the Institute's investigation, response to, and resolution of all reports of prohibited sexual misconduct, and of related retaliation, involving students, faculty, and staff. The Title IX Coordinator will designate a specially trained investigator (or team of investigators) to interview the complainant, respondent and any witnesses. The investigator will also gather pertinent documentary materials (if any) and other information.

## **Notice of Investigation**

The Title IX Coordinator will inform the complainant before starting an investigation. The complainant may request that an investigation not be undertaken. The Title IX Coordinator will consider such a request in light of our commitment to provide a safe and non-discriminatory environment for all students. If the Title IX Coordinator determines not to investigate, she will notify the complainant in writing, including that the determination was made at the complainant's request. At the complainant's request, the Title IX Coordinator will also notify the respondent in writing, including that the complainant asked the school not to investigate.

The investigator will direct the complainant, respondent, witnesses and other interested individuals to preserve any relevant evidence.

If an investigation proceeds, we will notify the respondent in writing that a report has been filed. The notice will describe the allegations in the report. The complainant and respondent will be given the opportunity to meet separately with the Title IX Coordinator to review the Policy and these Procedures.

## **Investigation Process**

The school's process for responding to, investigating and adjudicating sexual misconduct reports will continue during any law enforcement proceeding. The investigator may need to temporarily delay an investigation while the police are gathering evidence but will resume the investigation after learning that the police department has completed its evidence-gathering and will generally not wait for the conclusion of any related criminal proceeding.

The investigator will interview the complainant, respondent and any witnesses. They will also gather pertinent documentary materials (if any) and other information.

## **Investigation Report**

The investigator will prepare a report detailing the relevant content from the interviews and the documentation gathered. The report will include the assessment of individual credibility and recommended findings of responsibility.

The respondent and complainant will each have the opportunity to review a copy of the investigative report and any other information that will be used during the disciplinary proceedings. The names and other identifying information of other students will be redacted from such materials in accordance with the Family Educational Rights and Privacy Act (FERPA), except to the extent that doing so would interfere with the purpose of Title IX to eliminate sex-based discrimination. The Title IX Coordinator will supervise this review and ensure that reasonable time is afforded for review prior to the hearing.

## **Time Frame for Investigation**

Consistent with the goal to maximize educational opportunities and minimize the disruptive nature of the investigation and resolution, the Title IX Coordinator seeks to resolve all reports in a timely manner. In general, an investigation may last up to 30 days, from receipt of written notice from the complainant of the intent to proceed with an investigation. Adjudication will generally take up to 30 days from the date the investigative report is provided to both the complainant and the respondent. The Title IX Coordinator may set reasonable time frames for required actions under the Policy. Those time frames may be extended for good cause as necessary to ensure the integrity and completeness of the investigation, comply with a request by external law enforcement, accommodate the availability of witnesses, accommodate delays by the parties, account for school breaks or vacations, or address other legitimate reasons, including the complexity of the investigation (including the number of witnesses and volume of information provided by the parties) and the severity and extent of the alleged conduct. Any extension of the timeframes, and the reason for the extension, will be shared with the parties in writing. Best efforts will be made to complete the process in a timely manner by balancing principles of thoroughness and fundamental fairness with promptness.

Where necessary, we will take immediate steps to protect complainants pending the final outcome of an investigation, including academic accommodations and other interim measures. These steps may include the ability to change class schedules; withdraw from/retake a class without penalty; access academic support such as tutoring; issue no contact orders; and change the alleged perpetrator's class schedule.

## **Impact of Victim's Confidentiality Request**

A victim's request for confidentiality will likely limit our ability to investigate a particular matter. The school may take steps to limit the effects of the alleged sexual misconduct and prevent its recurrence without initiating formal action against the alleged perpetrator or revealing the identity of the student complainant. Examples include: providing increased monitoring, supervision, or security at locations or activities where the misconduct occurred; providing training and education materials for students and employees; revising and publicizing our policies on sexual misconduct; and conducting climate surveys regarding sexual misconduct.

## **Voluntary Resolution**

Voluntary resolution, when selected by the complainant and deemed appropriate by the Title IX Coordinator, is a path designed to eliminate the conduct at issue, prevent its recurrence, and remedy its effects in a manner that meets the expressed preference of the complainant and the safety and welfare of our community. Voluntary resolution is not appropriate for all forms of conduct under the Policy.

The school retains the discretion to determine, when selected by the complainant, which cases are appropriate for voluntary resolution. If a complainant requests voluntary resolution, and the Title IX Coordinator concludes that voluntary resolution is appropriate, then the Title IX Coordinator will take appropriate action by imposing remedies designed to maximize the complainant's access to all employment, educational, and extracurricular opportunities and benefits at the school and to eliminate a potential hostile environment. A complainant may request and decide to pursue voluntary resolution at any time. In those cases in which the voluntary resolution involves either the notification to or participation by the respondent, it is the respondent's decision whether to accept voluntary resolution.

Voluntary resolution may include: conducting targeted or broad-based educational programming or training for relevant individuals or groups; providing increased monitoring, supervision, or security at locations or activities where the misconduct occurred; facilitating a meeting with the respondent with the complainant present (in cases that do not involve sexual assault); and any other remedy that can be tailored to the involved individuals to achieve the goals of the Policy. In some forms of voluntary resolution, the remedies imposed will focus on supporting the complainant with no participation or involvement by the respondent. In other forms of voluntary resolution, the respondent may agree to participate. Depending on the type of remedy used, it may be possible for a complainant to maintain anonymity.

Voluntary resolution may also include restorative principles that are designed to allow a respondent to accept responsibility for misconduct and acknowledge harm to the complainant or to the community. Restorative models will be used only with the consent of both parties, and following a determination by the Title IX Coordinator that the matter is appropriate for a restorative approach.

The school will not compel a complainant to engage in mediation, to confront directly the respondent, or to participate in any particular form of informal resolution. Mediation, even if voluntary, is never appropriate in sexual assault cases and will not be used in such cases. As the title implies, participation in voluntary resolution is a choice, and either party can request to end this manner of resolution and pursue an investigation and adjudication at any time, including if voluntary resolution is unsuccessful at resolving the report. Similarly, a complainant can request to end an investigation and pursue voluntary resolution at any time.

The time frame for completion of voluntary resolution may vary, but we will seek to complete the process within 15 days of the complainant's request.

## **Hearing Panel**

If voluntary resolution is not available, we will convene a hearing panel following the end of the investigation. The hearing panel determines whether the respondent is responsible or not responsible for a violation of the Policy. If the respondent is determined to be responsible, the matter proceeds to the sanctions stage.

The hearing panel will generally include the Title IX Coordinator and two additional members who will be individuals associated with us. These additional hearing panel members may include administrators, officers, lawyers or other individuals with relevant experience and special training. Panel members may participate remotely so long as the hearing room is equipped with telephone equipment that allows the panel member to hear all the participants and to be heard by all the participants throughout the hearing proceedings. All panelists will receive training from experts in the field at least once a year. In addition to training on how the adjudicatory process works, the training will include specific instruction about how to approach students about sensitive issues that may arise in the context of sexual misconduct. The complainant and respondent will be informed of the panel's membership before the hearing process begins.

## **Advisors**

Both the complainant and the respondent are entitled to be accompanied to any meeting or proceeding relating to the allegation of sexual misconduct by an advisor or support person of their choice, provided the involvement of such advisor or support person does not result in the postponement or delay of such meeting as scheduled.

## **Written Submissions**

Both the complainant and respondent will have the opportunity to submit written responses to the investigation report and other relevant information to the hearing panel. Each of the complainant and respondent will have the opportunity to review any written submissions by the other. The hearing panel may set reasonable parameters for these written submissions. The hearing panel will review the investigation report and written submissions.

The Title IX Coordinator will, whenever possible, give the complainant and respondent at least five days' advance notice of the hearing. The Title IX Coordinator will arrange to hold the hearing at an off campus location. The hearing is a closed proceeding, meaning that no one other than the panel members, the complainant and respondent, their respective advisors, witnesses (when called), and necessary school personnel may be present during the proceeding. The Campus Director will work with school staff so that any student whose presence is required may participate in the hearing.

## **In general, hearings will proceed as follows:**

- The Title IX Coordinator may set reasonable time limits for any part of the hearing. Each of the complainant and respondent will have the opportunity to present witnesses and other information consistent with the Policy and these Procedures. The panel may determine the relevance of, place restrictions on, or exclude any witnesses or information. When the complainant and respondent are not able to be present for the hearing panel, arrangements will be made for participation via alternate means.
- In cases where either the complainant or respondent opts not to participate in the hearing, the panel may still hear from the other.
- Additional hearing rules include:
- Only the panel may ask questions of the complainant and respondent and any witnesses. Both the complainant and respondent will have the opportunity to suggest questions of the other and of witnesses by submitting suggested questions to the panel in writing. The panel may revise or not ask any or all submitted questions.
- Information Regarding Romantic or Sexual History. The panel will not consider the romantic or sexual history of either the complainant or respondent in cases involving allegations of sexual misconduct, except for testimony offered by one or the other about the complainant's and respondent's shared sexual history that the panel deems relevant. If such information is offered by the complainant or respondent, the other has the right to respond. The existence of a prior consensual dating or sexual relationship between the complainant and respondent by itself does not support an inference of consent to alleged sexual misconduct.
- Prior Conduct Violations. The hearing panel will not consider the respondent's prior conduct violations, unless the investigator provided that information to the hearing panel because the respondent was previously found to be responsible, and the previous incident was substantially similar to the present allegation(s) and/or the information indicates a pattern of behavior by the respondent.



We will keep an audio recording of the hearing for the use of the panel, for sanctioning, and for purposes of appeal. The panelists may request a transcript of the recording. Cell phones and recording devices may not be used in the hearing room(s) unless approved by the panel in advance.

### **Panel Determinations/Standard of Proof**

The panel will use “preponderance of the evidence” as the standard of proof to determine whether a violation of the Policy occurred. Preponderance of the evidence means that a panel must be convinced based on the information it considers that the respondent was more likely than not to have engaged in the conduct at issue in order to find the respondent responsible for violating the Policy. The panel will find a student responsible, or not responsible, based on a majority vote. The panel will generally render a decision within 10 days after the conclusion of a hearing. The panel’s decision will include an explanation of the basis for the decision. If the panel finds the respondent responsible, the matter will proceed to the sanctions stage.

### **Sanctions and Other Remedies**

The Title IX Coordinator, with the advice and counsel of the other hearing panel members, shall be responsible for imposing sanctions that are:

- o Fair and appropriate given the facts of the particular case
- o Consistent with our handling of similar cases
- o Adequate to protect the safety of the campus community; and Reflective of the seriousness of sexual misconduct.

The Title IX Coordinator will consider relevant factors, including if applicable: (1) the specific sexual misconduct at issue (such as penetration, touching under clothing, touching over clothing, unauthorized recording, etc.); (2) the circumstances accompanying the lack of consent (such as force, threat, coercion, intentional incapacitation, etc.); (3) the respondent’s state of mind (intentional, knowing, bias-motivated, reckless, negligent, etc.); (4) the impact of the offense on the complainant; (5) the respondent’s prior disciplinary history; (6) the safety of the our community; and (7) the respondent’s conduct during the disciplinary process.

The Title IX Coordinator will render a sanctioning decision within five days following the receipt of the panel’s determination. The sanctioning decision will be communicated in writing to the complainant and the respondent.

We may impose any one or more of the following sanctions on a student determined to have violated the Policy:

- o Reprimand/warning
- o Changing the respondent’s academic schedule
- o Disciplinary probation
- o Restricting access to our facilities or activities
- o Community service

- o Issuing a “no contact” order to the respondent or requiring that such an order remain in place
- o Dismissal or restriction from our employment
- o Suspension (limited time or indefinite)
- o Expulsion

In addition to any other sanction (except where the sanction is expulsion), we will require any student determined to be responsible for a violation of the Policy to receive appropriate education and/or training related to the sexual misconduct violation at issue. We may also recommend counseling or other support services for the student.

Whatever the outcome of the hearing process, a complainant may request ongoing or additional accommodations and the Title IX Coordinator will determine whether such measures are appropriate. Potential ongoing accommodations include:

Providing an escort for the complainant  
 Changing the complainant’s academic schedule  
 Allowing the complainant to withdraw from or retake a class without penalty  
 Providing access to tutoring or other academic support, such as extra time to complete or retake a class

We may also determine that additional measures are appropriate to respond to the effects of the incident on the school community. Additional responses for the benefit of our community may include:

- Increased monitoring, supervision, or security at locations or activities where the misconduct occurred
- Additional training and educational materials for students and employees
- Revision of our policies relating to sexual misconduct
- Climate surveys regarding sexual misconduct

## **Appeals**

Either the respondent or the complainant or both may appeal the determination of the hearing panel and/or the sanctions. Appeals are decided by the Institute Owner. The three grounds for appeal are:

- A procedural error affecting the determination or sanction
- New information that was not available at the time of the investigation or hearing and that may change the determination or sanction
- Excessiveness or insufficiency of the sanction.

Disagreement with the finding or sanctions is not, by itself, grounds for appeals.

The appealing student must submit the appeal in writing to the Institute Owner within five days after receiving the sanctioning notice. If either the complainant or respondent submits an appeal, the Title IX Coordinator will notify the other that an appeal has been filed and the grounds of the appeal. The non appealing student may submit a written response within five days after notice of an appeal.

If the Institute Owner concludes that a change in the hearing panel’s determination is warranted, he may enter a revised determination, reconvene the panel to reconsider the determination, or return the matter for additional investigation. After consultation with the Title IX Coordinator, the Institute Owner may also change the sanction. If both the complainant and respondent appeal, the appeals will be considered concurrently. The Institute Owner will notify the complainant and respondent of the final decision in writing. Appeals decisions will be rendered within 15 days after the receipt of the written appeal. All appeal decisions are final.

## **Records Disclosure**

Disciplinary proceedings conducted by us are subject to the Family Educational Records and Privacy Act (FERPA), a federal law governing the privacy of student information. FERPA generally limits disclosure of student information outside our school without the student's consent, but it does provide for release of student disciplinary information without a student's consent in certain circumstances.

Any information gathered in the course of an investigation may be subpoenaed by law enforcement authorities as part of a parallel investigation into the same conduct, or required to be produced through other compulsory legal process.

Additional information about FERPA can be found on the school's website.

## **Education and Prevention Programs**

As set forth in Section 3 of this Policy statement, Sexual Assault, Sexual Harassment, Sexual Exploitation, Dating Violence, Domestic Violence, and Stalking are all forms of Prohibited Conduct.

We are committed to offering educational programs to promote awareness and prevention of Prohibited Conduct. Educational programs include an overview of our policies and procedures; relevant definitions, including prohibited conduct; discussion of the impact of alcohol and illegal drug use; consent; safe and positive options for bystander intervention; review of resources and reporting options available for students, faculty, and staff; and information about risk reduction. Incoming students and new employees will receive primary prevention and awareness programming as part of their orientation. The Title IX Coordinator maintains an education and prevention calendar and tailors programming to campus needs and climate.

As part of our commitment to provide an educational and work environment free from Prohibited Conduct, this Policy will be disseminated widely to the school community through e-mail communication, publications, websites, new employee orientations, student orientations, and other appropriate channels of communication.

The Title IX Coordinator, hearing panel members, and anyone else who is involved in responding to, investigating, or adjudicating sexual misconduct will receive annual training from experts in the field. In addition to training on how the adjudicatory process works, the training will include specific instruction about how to approach students about sensitive issues that may arise in the context of sexual misconduct.

## **Definitions of Sexual Misconduct**

Sexual Assault is any unwanted physical contact of a sexual nature that occurs either without the consent of each participant or when a participant is unable to give consent freely. Sexual assault can occur either

forcibly and/or against a person's will, or when a person is unable to give consent freely. Non-consensual sexual intercourse is any form of sexual intercourse (vaginal, anal or oral) with any object without consent. Non-consensual sexual contact is any intentional sexual touching, however slight, with any object without a person's consent.

## **Bystander Intervention**

Our primary prevention and awareness program includes a description of safe and positive options for bystander intervention. Active bystanders take the initiative to help someone who may be targeted for a sexual assault. They do this in ways that are intended to avoid verbal or physical conflict. Active bystanders also take the initiative to help friends, who are not thinking clearly, from becoming offenders of crime. Intervention does not mean that you directly intervene to stop a crime in progress; rather, these steps are "early intervention" – before a crime begins to occur. There are three important components to consider before taking action that we refer to as the ABCs:

- o Assess for safety. Ensure that all parties are safe, and whether the situation requires calling authorities. When deciding to intervene, your personal safety should be the #1 priority. When in doubt, call for help.
  - o Be with others. If it is safe to intervene, you are likely to have a greater influence on the parties involved when you work together with someone or several people. Your safety is increased when you stay with a group of friends that you know well.
  - o Care for the person. Ask if the target of the unwanted sexual advance/attention/behavior is okay – does he or she need medical care? Ask if someone they trust can help them get home safely.
- 
- Risk Reduction
  - Our primary prevention and awareness program includes information on risk reduction. This includes:
    - *Avoiding Dangerous Situations.* While you can never completely protect yourself from sexual assault, there are some things you can do to help reduce your risk of being assaulted.
    - Be aware of your surroundings. Knowing where you are and who is around you may help you to find a way to get out of a bad situation.
    - Try to avoid isolated areas. It is more difficult to get help if no one is around. • Walk with purpose. Even if you don't know where you are going, act like you do.
    - Trust your instincts. If a situation or location feels unsafe or uncomfortable, it probably isn't the best place to be.
    - Try not to load yourself down with packages or bags as this can make you appear more vulnerable.
    - Make sure your cell phone is with you and charged and that you have cab money.
    - Don't allow yourself to be isolated with someone you don't trust or someone you don't know.
    - Avoid putting music headphones in both ears so that you can be more aware of your surroundings, especially if you are walking alone.

### ***Safety Planning. Things to think about:***

- How to get away if there is an emergency? Be conscious of exits or other escape routes. Think about options for transportation (car, bus, subway, etc.).
- Who can help? Friends and/or family, or support centers in your area. Please see Section 4 of this Policy for a list of support organizations.
- Where to go? Options may include a friend's house or relative's house, or you may consider going to a domestic violence or homeless shelter. You may also go to the police. **Important Safety Note:** If the dangerous situation involves a partner, go to the police or a shelter first.
- What to bring? This may include important papers and documents such as birth certificate, social security card, license, passport, medical records, lease, bills, etc. This will also include house keys, car keys, cash, credit cards, medicine, important numbers, and your cell phone. If you are bringing children with you, remember to bring their important papers and legal documents. You can keep all of these things in an emergency bag. You should hide the bag—it is best if it is not in your house or car. If the bag is discovered, you can call it a “tornado” or “fire” bag.

***Protecting Your Friends.*** You have a crucial role to play in keeping your friends safe. No matter what the setting, if you see something that doesn't feel quite right or see someone who might be in trouble, there are some simple things you can do to help out a friend.

- o If you see a friend in a situation that doesn't feel quite right, create a distraction to get your friend to safety. This can be as simple as joining or redirecting the conversation: suggest to your friend that you leave the party, or ask them to walk you home. Try asking questions like: “Do you want to head to the bathroom with me?” or “Do you want to head to another party – or grab pizza?”
- o Step in. If you see someone who looks uncomfortable or is at risk, step in. If you feel safe, find a way to de-escalate the situation and separate all parties involved. Don't be shy about directly asking the person if they need help or if they feel uncomfortable.
- o Enlist others. You don't have to go it alone. Call in friends or other people in the area as reinforcements to help defuse a dangerous situation and get the at-risk person home safely. There is safety in numbers.
- o Keep an eye out. Use your eyes and ears to observe your surroundings. If you see someone who has had too much to drink or could be vulnerable, try to get them to a safe place. Enlist friends to help you. Even if you weren't around when the assault occurred, you can still support a friend in the aftermath.

***Social Situations.*** While you can never completely protect yourself from sexual assault, there are some things you can do to help reduce your risk of being assaulted in social situations.

- When you go to a social gathering, go with a group of friends. Arrive together, check in with each other throughout the evening, and leave together. Knowing where you are and who is around you may help you to find a way out of a bad situation.
- Trust your instincts. If you feel unsafe in any situation, go with your gut. If you see something suspicious, contact law enforcement immediately.
- Don't leave your drink unattended while talking, dancing, using the restroom, or making a phone call. If you've left your drink alone, just get a new one.
- Don't accept drinks from people you don't know or trust. If you choose to accept a drink, go with the person to the bar to order it, watch it being poured, and carry it yourself. At parties, don't drink from the punch bowls or other large, common open containers.

- Watch out for your friends, and vice versa. If a friend seems out of it, is way too intoxicated for the amount of alcohol they've had, or is acting out of character, get him or her to a safe place immediately.
- If you suspect you or a friend has been drugged, contact law enforcement immediately. Be explicit with doctors so they can give you the correct tests (you will need a urine test and possibly others).

**Information on Risk Reduction was provided by RAINN: Rape, Abuse & Incest National Network: [www.rainn.org](http://www.rainn.org).**

## Amendments

We may amend the Policy or the Procedures from time to time. Nothing in the Policy or Procedures shall affect the inherent authority of our school to take such actions as it deems appropriate to further the educational mission or to protect the safety and security of the school community.

## Definitions of Key Terms

- **Sexual Harassment** – Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's education or employment, (ii) submission to or rejection of such conduct by an individual is used as the basis for education or employment decisions affecting such individuals, or (iii) such conduct has the purpose or effect of unreasonably interfering with an individual's school or work performance or creating an intimidating, hostile, or offensive educational or working environment.
- o **Hostile Environment Caused By Sexual Harassment** – refers to a situation where students and/or **employees** are subject to a pattern of exposure to unwanted sexual behavior that is so severe, persistent, or pervasive that it alters the conditions of education, employment, or participation in a school program or activity, thereby creating an environment that a reasonable person in similar circumstances and with similar identities would find hostile, intimidating, or abusive. An isolated incident, unless sufficiently severe, does not amount to a hostile environment caused by sexual harassment.
- o **Quid Pro Quo Harassment** – refers to a situation where students and/or employees are subject to unwanted sexual behavior where submission or rejection of such conduct is used, explicitly or implicitly, as the basis for decisions affecting an individual's education, employment, or participation in a school program or activity.
- **Sexual Assault** – is any unwanted physical contact of a sexual nature that occurs either without the consent of each participant or when a participant is unable to give consent freely. Sexual assault can occur either forcibly and/or against a person's will, or when a person is unable to give consent freely. Non-consensual sexual intercourse is any form of sexual intercourse (vaginal, anal or oral) with any object without consent. Non-consensual sexual contact is any intentional sexual touching, however slight, with any object without a person's consent.
- **Domestic Violence** – A felony or misdemeanor crime of violence committed (i) by a current or former spouse or intimate partner of the victim; (ii) by a person with whom the victim shares a child in common; (iii) by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; (iv) 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, or (v) 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.

- **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 purpose 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.
- **Prohibited Conduct** – we prohibit the crimes of Sexual Assault, Sexual Harassment, Sexual Exploitation, Dating Violence, Domestic Violence, and Stalking as defined in these Definitions of Key Terms.
- **Sexual Exploitation** – sexual misconduct that occurs when a person takes unjust or abusive sexual advantage of another for his or her own advantage or benefit or for the benefit or advantage of anyone other than the exploited party; and that behavior does not otherwise constitute sexual assault. Examples of sexual exploitation include, but are not limited to, videotaping or photographing of any type (web-cam, camera, Internet exposure, etc.) without knowledge and consent of all persons; prostituting another person; knowingly transmitting HIV or a sexually transmitted disease to an unknowing person or to a person who has not consented to the risk; or inducing incapacitation with the intent to commit sexual assault, without regard to whether sexual activity actually takes place.
- **Stalking** – Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others, or suffer substantial emotional distress. Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling. Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.
- **Retaliation** – means any adverse action, or attempted adverse action, against an individual or group of individuals because of their participation in any manner in an investigation, proceeding, or hearing under this Policy.
- **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.
- **Consent** is a voluntary agreement to engage in sexual activity.
- Past consent does not imply future consent.
- Silence or an absence of resistance does not imply consent.
- Consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another.
- Consent can be withdrawn at any time.
- Coercion, force, or threat of either invalidates consent.

Someone who is incapacitated cannot consent. Incapacitation refers to a situation in which a person is not capable of providing consent because the person lacks the ability to understand her or his decision. This situation may occur due to the use of drugs or alcohol, when a person is asleep or unconscious, or because of an intellectual or other disability that prevents the student from having the capacity to give consent

**Complainant** – means the person making the allegation(s) of sexual misconduct.

**Respondent** – means the person alleged to have committed sexual misconduct.

## Satisfactory Academic Progress Policy

The Satisfactory Academic Progress Policy is consistently applied to all students enrolled at the school. It is printed in the catalog to ensure that all students receive a copy prior to enrollment. The policy complies with the guidelines established by the National Accrediting Commission of Career Arts and Sciences (NACCAS) and the federal regulations established by the United States Department of Education.

EVALUATION PERIODS – The institutions Academic year for all programs is 900 clock hours.

Students are evaluated for Satisfactory Academic Progress as follows:

Cosmetology	500 (actual hours)
Barbering	500 (actual hours)
Esthetics	300 (actual hours)

\*Transfer/crossover Students- Midpoint of the contracted hours or the established evaluation periods, whichever comes first.

Evaluations will determine if the student has met the minimum requirements for satisfactory academic progress. The frequency of evaluations ensures that students have ample opportunity to meet both the attendance and academic progress requirements of at least one evaluation by midpoint in the course.

### ATTENDANCE PROGRESS EVALUATIONS

Students are required to attend a minimum of 79% of the hours possible based on the applicable attendance schedule in order to be considered maintaining satisfactory attendance progress. Evaluations are conducted at the end of each evaluation period to determine if the student has met the minimum requirements. The attendance percentage is determined by dividing the total hours accrued by the total number of hours scheduled. At the end of each evaluation period, the school will determine if the student has maintained at least 79% cumulative attendance since the beginning of the course which indicates that, given the same attendance rate, the student will graduate within the maximum time frame allowed.

### MAXIMUM TIME FRAME

The maximum time (which does not exceed 127% of the course length) allowed for students to complete each course at satisfactory academic progress is stated below:

		<u>MAX MONTHS</u>	<u>MAX HOURS</u>
Cosmetology	1000 Hours	10.58 Months	1270
Barbering	750 Hours	7.93 Months	952.50
Esthetics	600 Hours	6.35 Months	762



The maximum time allowed for transfer students who need less than the full course requirements will be determined based on 79% of the scheduled hours. If the maximum time frame is exceeded, the Director(s) will decide whether the student is allowed to stay or if they will be dropped, based on prior behavior, grades and attendance. If they are allowed to stay, they will be placed on monitoring and have to check in on a weekly basis until they graduate. A student who exceeds that maximum timeframe will no longer receive financial aid. Failure to follow terms set forth in monitoring documentation could lead to termination from the program.

## **ACADEMIC PROGRESS EVALUATIONS**

The qualitative element used to determine academic progress is a reasonable system of grades as determined by assigned academic learning. Students are assigned academic learning and a minimum number of practical experiences. Academic learning is evaluated after each unit of study. Practical assignments are evaluated as completed and counted toward course completion only when rated as satisfactory or better (the computer system will reflect completion of the practical assignment as a 100% rating). If the performance does not meet satisfactory requirements, it is not counted and the performance must be repeated. At least two comprehensive practical skills evaluations will be conducted during the course of study. Practical skills are evaluated according to text procedures and set forth in practical skills evaluation criteria adopted by the school. Students must maintain a written grade average of 70% and pass a FINAL written and practical exam prior to graduation. Students must make up failed or missed tests and incomplete assignments. Numerical grades are considered according to the following scale:

90 - 100	EXCELLENT
80 - 89	GOOD
70 - 79	SATISFACTORY
Below 70	FAILING

## **DETERMINATION OF PROGRESS STATUS**

Students meeting the minimum requirements for academics and attendance at the evaluation point are considered to be making satisfactory academic progress until the next scheduled evaluation. Students will receive a hard-copy of their Satisfactory Academic Progress Determination at the time of each of the evaluations. Students deemed not maintaining Satisfactory Academic Progress may have their Title IV Funding interrupted, unless the student is on warning or has prevailed upon appeal resulting in a status of probation.

### **WARNING**

Students who fail to meet minimum requirements for attendance or academic progress are placed on warning and considered to be making satisfactory academic progress during the warning period. The student will be advised in writing on the actions required to attain satisfactory academic progress by the next evaluation. If at the end of the warning period, the student has still not met both the attendance and academic requirements, he/she may be placed on probation and, if applicable, students may be deemed ineligible to receive Title IV funds.

### **APPEAL PROCEDURE**

If a student is determined to not be making satisfactory academic progress, the student may appeal the determination within ten calendar days. Reasons for which students may appeal a negative progress determination include death of a relative, an injury or illness of the student, or any other allowable special or mitigating circumstance. The student must submit a written appeal to the school's financial aid officer on the designated form with supporting documentation of the reasons why the determination should be reversed. This information should include what has changed about the student's situation that will allow them to achieve Satisfactory Academic Progress by the next evaluation point. Appeal documents will be reviewed by the financial aid officer and a decision will be made and reported to the student within 30 calendar days. The appeal and decision documents will be retained in the student file. If the student prevails upon appeal, the satisfactory academic progress determination will be reversed and federal financial aid will be reinstated, if applicable.

### **PROBATION**

A student assigned a probation status is considered NOT making satisfactory progress. Probation status is given to a student who failed to meet minimum requirements for attendance or academic progress after the warning period (and has appealed the decision and prevailed upon appeal).

Additionally, only students who have the ability to meet the Satisfactory Academic Progress Policy standards by the end of the evaluation period may be placed on probation. Students placed on an academic plan must be able to meet requirements set forth in the academic plan by the end of the next evaluation period. Students who are progressing according to their specific academic plan will be considered making Satisfactory Academic Progress. The student will be advised in writing of the actions required to attain satisfactory academic progress by the next evaluation. If at the end of the probationary period, the student has still not met both the attendance and academic requirements required for satisfactory academic progress or by the academic plan, he/she will be determined as NOT making satisfactory academic progress and, if applicable, students will not be deemed eligible to receive Title IV funds.

## **RE-ESTABLISHMENT OF SATISFACTORY ACADEMIC PROGRESS**

Students may re-establish satisfactory academic progress and Title IV aid, as applicable, by meeting minimum attendance and academic requirements by the end of the probationary period.

## **INTERRUPTIONS, COURSE INCOMPLETES, WITHDRAWALS**

If enrollment is temporarily interrupted for a Leave of Absence, the student will return to school in the same progress status as prior to the leave of absence. Hours elapsed during a leave of absence will extend the student's contract period and maximum time frame by the same number of days taken in the leave of absence and will not be included in the student's cumulative attendance percentage calculation. Students who withdraw prior to completion of the course and wish to re-enroll will return in the same satisfactory academic progress status as at the time of withdrawal.

## **PROGRAM REENTRY**

A student may apply for reentry into a program after they officially withdrew, if the following conditions are met:

- the date of reentry must be a minimum of 10 days and no longer than one year past the withdrawal date
- students need to initiate the reentry process with the Admissions Team prior to the requested return date
- students will meet before the board to be considered for reinstatement
- a student who is granted reentry will be given a reentry date based upon class availability and appropriate placement in their program
- a re-enrollment fee of \$150 does apply
- the student may need to apply for financial aid and complete the entire financial aid process before returning. The student should contact the financial aid office immediately to determine if they must reapply
- students must satisfy or make arrangements to satisfy any outstanding balances due on their account prior to returning to their program
- the student, if accepted, will re-enter at the current tuition and fee rate which will be prorated based on the number of hours needed to complete the program. If books and or supplies are needed, they may be purchased from the school at the current rate. The student must update any pre-existing student equipment/supplies/kit to the standards of the current kit and must possess or purchase the current textbook set

Students are only allowed one reentry per program. A student will return under the same status as they were when they left. All reentry requests are subject to approval and may be denied.

Students will receive the determination of the reentry request from the Admissions Team.

## **ABILITY TO BENEFIT**

O'Briens Aveda Institute does not accept Ability to Benefit students.

## **NONCREDIT AND REMEDIAL COURSES**

Noncredit and remedial courses do not apply to this institution. Therefore, these items have no effect

upon the school's satisfactory academic progress standards.

## **TRANSFER HOURS**

With regard to Satisfactory Academic Progress, a student's transfer hours will be counted as both attempted and earned hours for the purpose of determining when the allowable maximum time frame has been exhausted.

## **Verification Policy**

### **High School Diplomas**

We require a valid high school diploma or the valid final high school transcript showing the date the high school diploma was awarded. If a copy of the applicant's high school diploma or final high school transcript is not available. We may accept alternative documentation from the state. We will not accept self-certification from the student.

Documentation for an equivalent of a high school diploma includes a GED, a State certificate received by the student after the student has passed a State-authorized examination that the State recognizes as the equivalent of a high school diploma.

For homeschooled students: a transcript of the equivalent, signed by the parent or guardian, that lists the secondary school courses completed by the applicant and documents the successful completion of a secondary school education or a secondary school completion credential for homeschool (other than a high school diploma or its recognized equivalent) provided under State law.

### **Identity/Statement of Educational Purposes**

If a student is selected for verification of identity, the student must appear in person and present to the Financial Aid Director a valid government-issued photo identification (driver's license, non-driver's license or passport) AND an in-person signed statement of educational purpose.

We will maintain a noted copy of the identification submitted by the applicant that includes the date documentation was received and the name of the employee authorized to obtain the documentation. If the applicant is unable to appear in person, the applicant must provide us with a copy of a valid government-issued photo identification (driver's license, non-driver's license or passport) and an original notarized statement of educational purpose by the student.

### **General Requirements**

We verify student financial aid documents that are selected on the basis of edits specified by the Secretary for verification through the Central Processing System (CPS).

### **IRS Data Retrieval Tool (DRT)**

Students who are selected for verification and who transfer their income tax return information unchanged using the Internal Revenue Service (IRS) Data Retrieval Tool when initially completing the FAFSA using FAFSA on the web or when making corrections on FAFSA on the web are considered to have verified the FAFSA IRS information for adjusted gross income, taxes paid, and the applicable untaxed income items and education credits. Unless changes were made to the transferred information or we have reason to believe that the information transferred is inaccurate, we will only need to verify the number in the household and number in college. If we are aware that an amended tax return was filed, then in order to complete the verification process the student must submit an IRS Tax Return Transcript.

Under certain conditions, some students who were selected for verification and did not use the IRS Data Retrieval Tool must submit to us an IRS Tax Return Transcript for the applicable tax year. IRS Tax Return Transcripts submitted to us for verification need not be signed by the tax filer.

### Information for All Applicants Selected for Verification

Students selected for verification will be placed into one of several Verification Tracking Groups created by the Central Processing System. Each Tracking Group is designated a specific Verification Worksheet that will need to be completed by the student (and parent if independent).

### Discretionary Verification of Non-required Items

If we have reason to believe there is conflicting information or that any information on an application/FAFSA used to calculate an EFC is not accurate, we will require the applicant to verify the information that it has reason to believe is not accurate.

### Verification in the Same Award Year

Applicants selected for verification more than once in an award year are not required to provide documentation for items previously verified to the extent the information remains the same. We retain flexibility to select additional information or applications for verification.

### Exclusions from Verification

- We will not verify an application submitted for an award year if the applicant dies during the award year
- Spouse or parent who is unavailable-only applies to spouse or parent data.

#### **Examples include but may not be limited to:**

- Deceased spouse or parent
- Mentally or physically incapacitated spouse or parent
- Spouse or parent residing in a country other than the U.S. and can't be contacted by normal means
- Spouse or parent cannot be located-address unknown and student cannot obtain required information The Third Party Service

The Third Party Servicer will notify us if there are additional components that need to be resolved in order to clear up the verification process.

Students selected for verification will be given a copy of this Verification Policy, the Third Party Servicer Verification Worksheet and are required to submit the necessary required documentation to O'Brien's Aveda Institute's financial aid office within 10 calendar days.

If an applicant fails to provide the requested documentation within a reasonable time period, we will not certify the applicant's Federal Direct Subsidized Loan or Pell Grant proceeds for the applicant. Verification does not apply to Direct Unsubsidized Loans and Direct Parent Plus Loans however, a student may not request Unsubsidized Loans to circumvent the verification process.

## Corrections

If possible corrections need to be verified on the student's ISIR, we will notify the student of the items in question and will ask the student/parent to make applicable corrections on the ISIR and sign and date verifying the change. Corrections will be submitted to the Department of Education. After corrections have been submitted and corrected, we will receive a corrected ISIR for the student.

Students will be notified of the results of verification by our Financial Aid Director within 7 calendar days of the change. The notification will be made in person, when applicable, or by email for documentation purposes. If an email address is not available, notification will be made by phone.

## Updating Information

- ✓ An applicant is required to update all changes in dependency status throughout the award year, except changes resulting from a change in the applicant's marital status.
- ✓ An applicant is not required to update her/his marital status within an award year.
- ✓ The Financial Aid Director may require an applicant to update marital status to address inequity or to reflect more accurately the applicant's ability to pay.
- ✓ Applicants must update the number of persons in the household or the number in the household who are attending college if selected for verification.
- ✓ Items must be correct as of the date of verification (Exception: If the household size or number in college was already verified during the current award year and the information has not changed.)

## Interim Disbursements

We will not make interim disbursements. We will make a qualifying disbursement after completing the verification process, an award letter has been issued and the student has reached their qualifying checkpoint. Therefore, there should never be an overpayment of aid prior to completing verification as no aid is disbursed during the interim verification process.

## Tolerances

The \$400 tolerance has been removed. All corrections \$25 or over will be submitted.

## Pell Grant Program

If there is a change in the applicant's EFC information due to verification, we will recalculate the student's award package based on the corrected SAR or ISIR. If the recalculation changes the student's awarded aid, the Financial Aid Director will make adjustments to the already disbursed aid or will disburse the increase of the additional funds if additional funds are awarded per the recalculation of the Cost of Attendance Worksheet.

## Direct Loan Program

If verification changes the applicant's EFC information, the Financial Aid Director will recalculate the student's Cost of Attendance to reflect the new EFC to determine if the unmet need changed or if original calculation resulted in an over award situation. If the loan amount needs to be reduced due to the above, the Financial Aid Director will comply with the procedures specified in 686.61(b)(2) and will notify the borrower and lender as specified in 668.6(b) and 682.604(h). If the applicant has received funds based on information which may be incorrect and the Financial Aid Director has made reasonable effort to resolve the alleged discrepancy, but cannot do so, the student's information including name, social security number and other relevant information will be forwarded by the Financial Aid Director to the Secretary.

## Appeal and Identity

If the financial aid administrator verifies that the parent(s) has ended financial support and refuses to file the FAFSA, she has the discretion to consider offering a dependent student an Direct Unsubsidized Loan. Refusal of a parent to support the student and to complete the FAFSA is not, by itself, sufficient for a dependency override. The financial aid administrator must verify that the parent(s) financial support has ended and that the parent refuses to complete the parental sections of the FAFSA. Financial support includes not only payment by the parent of educational costs, but also providing other cash and non-cash support to the student (such as room/board). Self Certification from the dependent student is not sufficient. We must have: a signed and dated statement from one of the parents specifically stating that s/he has stopped providing financial support to the student, will not provide financial support in the future and refuses to complete the parental section of the FAFSA.

## **Supplemental Education Opportunity Grant Policy (SEOG)** (revised 8/23/16)

We receive a specified amount of SEOG funds each award year. These funds are initially distributed to students who display the most financial need. Specifically, those students with a zero EFC who also qualify for VSAC grants will receive an SEOG grant regardless of the program they are enrolled in. All state scholarships and grants (including state vocational rehabilitation grants) are eligible funds that may be used to meet the non-Federal share requirement for the FSEOG program. As tuition for each program is different, SEOG grants are distributed according to the cost of tuition. Once all eligible students for these programs have been awarded, should there be any funding left, a review of ISIR's will be made and the remaining funds will be awarded based on need according to the lowest EFC.

## **Transfer-Out Policy**

Our programs are designed to prepare students for entry-level employment in the field of training. A student who desires to further his education after completing training is advised that acceptance of transfer hours is at the discretion of the receiving institution. Prospective students are advised to obtain information from all institutions they expect to attend in order to understand each institution's acceptance policies. It is the student's responsibility to confirm whether or not the hours will be accepted by another school of the student's choice. An institution's accreditation does not guarantee credits earned at that institution will be accepted for transfer. No affidavit of hours from O'Brien's Aveda Institute will be released unless a student's balance is 0.



## **General Financial Aid Information**

We appreciate your interest in the Financial Aid programs and funding options offered at our institutes. It is important that you establish a financial plan early to ensure a successful experience. You may or may not receive living expense funds immediately; all financial aid packages vary. Please plan accordingly.

You must submit the Free Application for Federal Student Aid (FAFSA) to receive federal student aid. Apply at [www.fafsa.ed.gov](http://www.fafsa.ed.gov). You will receive a pin number that you will need over the course of the program.

Please be sure that all of the information on your FAFSA is correct!

Our school codes are: 008658

What will your college grade level be when you begin the YYYY/YYYY school year?

Never attended college/1st year – select only if you will be a first-time college student  
Attended college before/1st year – select only if you have attended college before

What degree or certificate will you be working on when you begin the YYYY/YYYY school year?

Certificate/diploma (occupational/technical/education program of less than 2 yr.)

### **FEDERAL PELL GRANT**

A federal Pell Grant does not have to be repaid. Pell Grants are awarded only to undergraduates who haven't earned a bachelor's degree or professional degree. The amount you will receive depends on your financial need, your costs to attend school, and length of your program. We use the current financial aid year's Federal Pell Chart to determine your Pell award. Second academic year Pell awards are pro-rated. You must be enrolled in a full-time program.

### **VSAC GRANT**

If you are a Vermont State Resident, please go to [www.vsac.org](http://www.vsac.org) to see if you qualify for a state grant.

### **DIRECT LOANS**

There are two Direct Loans: Subsidized and Unsubsidized.

You must demonstrate financial need to qualify for Subsidized Loans. You will not be charged interest while you are in school. For Unsubsidized loans, you are responsible for all interest, including interest while you are in school.

There are loan fees on all Direct Subsidized and Unsubsidized Loans—it is a percentage of the amount of each loan you receive.

**To apply for your loans, please go to [www.studentloans.gov](http://www.studentloans.gov) to complete an Entrance Counseling. We encourage you to do this before your start date. This site will include:**

- An explanation of the use of the Master Promissory Note (MPN)
- An emphasis to the borrower the seriousness and importance of the repayment obligation the student borrower is assuming
- A description of the likely consequences of default, including adverse credit reports, delinquent debt collection procedures under Federal law, and litigation
- The obligation of the borrower to repay the full amount of the loan regardless of whether the borrower complete program or completes within regular time for completion, is unable to obtain employment upon completion, or is otherwise dissatisfied with or does not receive the educational or other services the borrower purchased from the school
- Information about the monthly payment amounts based on: a range of student levels of indebtedness of Direct Subsidized Loan and Direct Unsubsidized Loan borrowers with Direct Subsidized, Direct Unsubsidized, and Direct PLUS Loans depending on the types of loans the borrower has obtained; or the average indebtedness of other borrowers in the same program at the same school as the borrower
- To the extent practicable, provide an explanation of the effect of accepting the loans to be disbursed on the eligibility of the borrower for other form of student financial assistance
- Information on the accrual and capitalization of interest
- Borrowers of unsubsidized loans have the option of paying interest while in school
- Importance of contacting appropriate offices if student withdraws prior to completion of program of study
- Sample monthly repayment amounts
- Consequences of default
- Information about the NSLDS and how the borrower can access the borrowers records
- Name and contact information for individual the borrower may contact with questions about the borrower's rights and responsibilities or the terms and conditions of the loan.

You must complete both the Entrance Interview and MPN; your loans cannot be processed without these. You may go to this site anytime during or after your enrollment to review your loan information.

You may cancel all or part of your loan(s) at any time by notifying the institute before it is disbursed.

Toward the end of your course, you will be asked to return to [www.studentloans.gov](http://www.studentloans.gov) to complete an **Exit Counseling** for your loans. The counseling will provide:

- Average anticipated monthly repayment amount
- Repayment plan options
- Options to prepay or pay on shorter schedule
- Debt Management Strategies
- Use of Master Promissory Note
- The seriousness and importance of student's repayment obligation
- Terms and conditions for forgiveness or cancellation
- Copy of information provided by the US Department of Education
- Terms and conditions for deferment or forbearance

- Consequences of default
- Options and consequences of loan consolidation
- Tax benefits available to borrowers
- The obligation of the borrower to repay the full amount of the loan regardless of whether the borrower completes otherwise dissatisfied with or did not receive educational or other services the borrow purchased from the school
- Availability of the Student Loan Ombudsman's office
- Information about NSLDS. The US Department of Education is required to provide a disclosure form for students and prospective students about NSLDS.

Your loan will be submitted to the National Student Loan Data System (NSLDS), and will be accessible by guarantee agencies, lenders, and schools determined to be authorized users of the data system. You may refer to [www.nsls.ed.gov](http://www.nsls.ed.gov) to access your loan information on-line. The National Student Loan Data System is a centralized database that stores information on all Department loans and grants.

Remember that you must repay your student loans; failure to repay your federal loans can have serious consequences.

## **PLUS LOAN**

Parents of dependent students can borrow from the PLUS loan program. The applicant must not have adverse credit. Go to [www.studentloans.gov](http://www.studentloans.gov) to apply for a PLUS loan.

## **PRIVATE LOANS**

Private loans are issued expressly for postsecondary educational expenses. These do not include any Title IV loans. You may select any lender of your choice. We will process any private loan application submitted. Please notify us if you are pursuing a private loan.

## **DISBURSEMENT SCHEDULE**

Financial Aid funds are disbursed according to payment periods. Student must be making Satisfactory Progress.

COSMETOLOGY: 0, 500 hours.

BARBERING: 0, 500 hours.

COSMETOLOGY AND BARBERING: have 1 academic year.

ACADEMIC YEAR: The definition of a financial aid academic year at our institutes is one in which a student completes 900 clock hours at 30 hours per week (non- standard term).

## **Title IV Code of Conduct**

Our code of conduct prohibits:

- Revenue-sharing arrangements with any lender
- Receiving gifts from a lender, a guarantor, or a loan service
- Contracting arrangement providing financial benefit from any lender or affiliate of a lender
- Directing borrowers to particular lenders, or refusing or delaying loan certifications
- Offers of funds for private loans
- Call center or financial aid office staffing assistance
- Advisory board compensation

## **Financial Aid Deadline**

You must have your financial aid information to the Institute at least 3 weeks before classes begin. We will tell you what we need from you—if you are chosen for verification, it is extremely important that you submit the information we need in a timely manner. If you have not been cleared for verification by the deadline, you will not be put into that session. It is the student's responsibility to ensure all necessary forms have been submitted to our business office. We assume no responsibility for notifying applicants on the status of aid applications. We reserve the right to revoke or revise a financial aid award at any time.

## **Loan Default Management Plan**

Goals and Objectives: to educate our student body on financial aid to reduce the number of students in default  
Activities to Achieve the Objectives: Distribute financial aid brochures and instruction to all applicants  
Provide information on financial aid in a variety of ways: print, email, website, telephone, appointments, etc. Review monthly reports on NSLDS Follow up with delinquent accounts.

It is our goal to increase the rate of student success and reduce the number of students in default. Therefore, we have a default management plan in place. This plan is reviewed regularly and the financial aid office continually seeks to improve its service to prospective and current students in order to maintain a low default rate.

Applicants to our programs are offered information on financial aid options available to them and they are provided financial aid guidance by our financial aid director, either in person at the time of application or by email or phone. Open communication between students and our financial aid department is encouraged. A personalized financial aid package is sent, along with instructions of how to accept the package and complete the financial aid process. Established requirements are set forth for students. They must seek Entrance Counseling and the Master Promissory Note prior to processing loans at [www.studentloans.org](http://www.studentloans.org). The student must sign off on the financial aid agreement.

At least one month prior to graduation, students are sent letters via email or in person, to complete their Exit Counseling. Students who withdraw from their program of study prior to graduation are sent instructions on how to complete Exit Counseling. All are reminded of the consequences of defaulting on their student loans.

The financial aid office requests monthly reports on Enrollment Status and Loan Delinquency from NSLDS. The enrollment status is updated approximately every other month through FAS, our 3rd party servicer. The financial aid office uses the Delinquent Report to send letters to any person delinquent for more than 50 days. The letter includes the student's servicer, monthly payment amount, and consequences of defaulting. The financial aid office also provides the loan servicers updated student information.

## **Hazard Communication Standard Policy**

This standard serves to comprehensively evaluate and communicate chemical hazards to employees and students. We are required to use MSDS (Material Safety Data Sheets) and labels and to implement a training to our staff. MSDS will be updated whenever we introduce new chemicals at the Institute. We will affix legible labels to all Hazardous chemical containers. Our MSDS books are located in our dispensary.