

Jan 2024

Tuana European Beauty Academy, LLC

Student Handbook

Dear New Student,

Welcome to Tuana European Beauty Academy, this is the first step into your future. You will be learning new skills, while making new relationships, and learning to be part of a team. This can be a truly magical time in your life. We are about to bring you into the bright world of beauty and the possibilities will be endless with your hard work and perseverance. Along this journey, there will undoubtedly be bumps in your road. Don't stop! Keep your chin up and reach out for the resources we will give you.

At Tuana Academy, our staff truly cares about your success. As we begin our relationship together, it's important to know who takes care of what areas. This booklet is designed to help you learn about Tuana Academy rules and regulations, what assistance we can offer you, and our Annual Security Report. You will learn how to find the resources you may need, and what it means to our students to have a Drug Free School.

We want the best for your time with us. Today, your dreams seem a lifetime away, but I give you my word, this time will fly by and you will be a licensed professional before you know it. You will find your "beauty school bestie", and the two of you will laugh, cry, and curse with each other. You will drink a lot of coffee, get used to a little bleach burning your fingertips because you forgot your gloves, and your hair will go through many transitions here. In 12-15 months, your kidneys will still be working, the burn doesn't hurt any more, and your hair will have returned to a normal state. The day you graduate will be one of the top 10 days of your life, and it is SO worth all the bumps in the road!!

GOOD LUCK!!

Denise Mitchell

Academy Director

tuanaeducator@gmail.com

970-472-2004

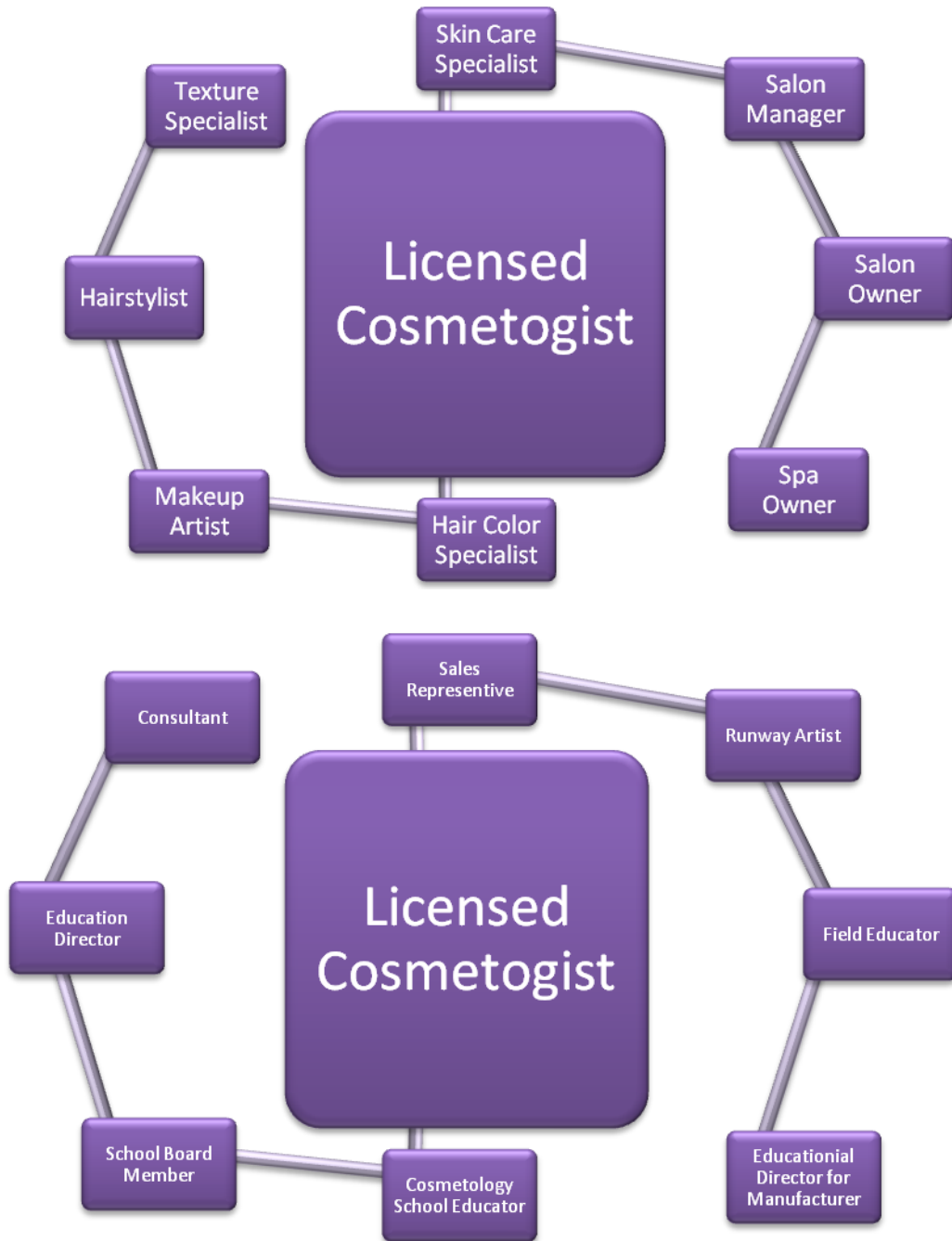
TABLE OF CONTENTS

Tuana Academy Student Handbook

Job Opportunities	4
Tuana Academy Course Outlines.....	5
Graduation Requirements.....	11
Academy Statistics.....	11
Job Placement/Employment.....	11
State Approving/National Accrediting Agencies.....	11
Timely Warnings.....	12
Crime Reporting.....	12
Access Policy.....	12
Sex Offenses and Offenders.....	12
Resource Numbers.....	12
Drug and Alcohol Policy.....	13
Drug Free School.....	13
Drug and Alcohol Abuse Prevention.....	13
Physical Warning Signs of Drug & Alcohol Abuse.....	14
Student Grievance Procedure.....	14
Information Availability.....	14
Students with Disabilities.....	15
Entrance Counseling.....	15
Financial Aid Availability.....	15
Applying for Aid.....	15
Awarding of Aid.....	16
Verification Policy.....	17
Professional Judgment & Dependency.....	18
Eligibility.....	20
Loan Disclosures.....	20
Student Budget.....	21
Student Records and Privacy / Ferpa Policy.....	21
Tuana Academy Information Security Policy.....	22
Kits Opt-Out Policy	27
Leave of Absence Policy.....	28
Satisfactory Academic Program.....	29
Change in Course Study.....	33
Transfer Student.....	33
Exit Interview.....	33
Refund Policy.....	34
Return of Title IV Funds.....	35
General Academy Rules.....	39
Time Clock Procedures.....	39
Personal Items/Lockers.....	39
Parking.....	39
Vaccination Policy.....	39
Constitution Day.....	39
Copyright Material Policy.....	39
Internet Policy.....	40

Dress Code.....	40
Kits and Textbooks.....	40
Voter Registration.....	40
Title IX Policy.....	41
Diploma & Transcript Validation Process	41
Annual Security Report.....	42
Preparation of Annual Security Report.....	43
Campus Security Authorities and Campuses Personnel.....	43
Procedure on Reporting a Crime or Emergency.....	43
Emergency Evacuation Plan.....	44
First Aid.....	44
Timely Warnings.....	44
Building Security and Access Policy.....	45
Security Awareness and Prevention of Criminal Activity.....	45
Preventing Dating Violence, Domestic Violence, Sexual Assault & Stalking.....	45
Prevention And Education.....	47
Confidentially.....	47
Victim Services.....	48
Campus Disciplinary Actions.....	48
Restraining Orders.....	50
Sex Offender Registration Program.....	50
Crime Definitions.....	50
Monitoring Off Campus Locations of Recognized Student Organizations.....	52
Crime Statistics.....	53
Emergency Response Plan.....	54
Additional Recourses.....	54
Drug Free Workplace Policy.....	56
Introduction.....	57
Health Risks.....	57
Laws Relating to Drug Violations.....	60
Policy Distribution Procedures.....	60
Drug Schedules and Penalties.....	61
Student Loan Code of Conduct.....	63
Kits.....	65

JOB OPPORTUNITIES:



TUANA ACADEMY COURSE OUTLINE

COSMETOLOGY COURSE

1500 Hours

COURSE DESCRIPTION

The primary purpose of this Cosmetology Course is to train the student in the basic manipulative skills, safety judgments, proper work habits, and desirable attitudes necessary to obtain licensure and for competency in entry-level position in cosmetology or a related career field.

METHOD OF INSTRUCTION

Class will be a combination of lecture, lecture/lab, group discussion, hands-on activities and self-study.

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 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 areas of hairstyling, 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.
- Create a professional resume and confidently prepare for an interview.
- Successfully search for a job within the beauty industry.

COURSE TOPICS

Shampoo, Rinsing & Condition	48 hours
Hair Coloring	222 hours
Haircutting	227 hours
Hairstyling	190 Hours
Chemical Texture Service	96 hours
Manicuring &Pedicuring	160 hours
Application of Artificial Nails	113 hours
Facials &Skin Care	159 hours
Facial Makeup	30 hours
Hair Removal	69 hours
Law, Rules & Regulations	23 hours
Business Practices	23 hours
Disinfection, Sanitation &Safe Work Practices	140 hours

SCHEDULE

- Freshman 480 Scheduled Hours (16 Weeks) 4 blocks
 - Weeks 1-4 Block 1 Hair Design
 - Week 5-8 Block 2 Chemical Services
 - Weeks 9-12 Block 3 Skin
 - Weeks 13-16 Block 4 Nail
- Junior 600 Scheduled Hours (20 weeks) 5 blocks-Clinic Floor
 - Weeks 17-20 Block 1 Biology

- Weeks 21-24 Block 2 Behind the Chair
- Weeks 25-28 Block 3 Sciences
- Weeks 29-32 Block 4 Sanitation
- Weeks 33-36 Block 5 Foundations
- Senior 420 Scheduled Hours (14 weeks) 4 blocks-Clinic Floor
 - Weeks 37-40 Red Carpet
 - Weeks 41-44 Boards
 - Weeks 45-48 Boards
 - Weeks 49-50 Boards

GRADING

- Assessments 50%
- Skills 50%
- Grading Scale
 - 96% to 100% = A Excellent
 - 88% to 95 % = B above Average
 - 80% to 87% = C Average
 - Below 80% = F Failing

SUPPLIES & TEXTBOOKS

To successfully complete this course, you will need:

- Required:
 - Milady Textbook: Author: Milady Publisher: Milady Pub Corp Year: 2015 Format: Hardcover ISBN: 9781285769417
 - Milady Work Books: Author: Milady Publisher: Delmar Cengage Learning Edition: 13th, Year: 2015 Format: Paperback ISBN: 9781285769455 and ISBN: 9781285769479
 - Milady Test Book: Author: Milady Publisher: Cengage Format: Book ISBN13: 9781285769554
 - Tuana Workbook: Author: Tuana Custom Publish
- Suggested:
 - General educational supplies
 - Camera (for portfolio)

HAIRSTYLING COURSE

1200 Hours

COURSE DESCRIPTION

The primary purpose of this Hairstyling Course is to train the student in the basic manipulative skills, safety judgments, proper work habits, and desirable attitudes necessary to obtain licensure and for competency in entry-level position in cosmetology or a related career field.

METHOD OF INSTRUCTION

Class will be a combination of lecture, lecture/lab, group discussion, hands-on activities and self-study.

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 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 areas of hair styling, hair shaping, hair coloring, texture services, scalp and hair conditioning.

- 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.
- Create a professional resume and confidently prepare for an interview.
- Successfully search for a job within the beauty industry.

COURSE TOPICS

• Shampoo, Rinsing & Condition	60 hours
• Haircoloring	240 hours
• Haircutting	240 hours
• Hairstyling	210 Hours
• Chemical Texture Service	120 hours
• Law, Rules & Regulations	30 hours
• Management, ethics, interpersonal skills, & salesmanship	30 hours
• Disinfection, sanitation & safe work practices	270 hours

SCHEDULE

- Freshman 240 Scheduled Hours (8 Weeks) 2 Blocks
 - Weeks 1-4 Block 1 Hair Design
 - Week 5-8 Block 2 Chemical Services
- Junior 600 Scheduled Hours (20 weeks) 5 blocks-Clinic Floor
 - Weeks 9-12 Block 1 Biology
 - Weeks 13-16 Block 2 Behind the Chair
 - Weeks 17-20 Block 3 Sciences
 - Weeks 21-24 Block 4 Sanitation
 - Weeks 25-28 Block 5 Foundations
- Senior 120 Scheduled Hours (12 Weeks) 3 Blocks-Clinic Floor
 - Weeks 29-32 Red Carpet
 - Weeks 33-36 Boards
 - Weeks 37-40 Boards

GRADING

- Assessments 50%
- Skills 50%
- Grading Scale
 - 96% to 100% = A Excellent
 - 88% to 95 % = B above Average
 - 80% to 87% = C Average
 - Below 80% = F Failing

SUPPLIES & TEXTBOOKS

To successfully complete this course, you will need:

- Required:
 - Milady Textbook: Author: Milady Publisher: Milady Pub Corp Year: 2015 Format: Hardcover ISBN: 9781285769417
 - Milady Work Books: Author: Milady Publisher: Delmar Cengage Learning Edition: 13th, Year:2015 Format: Paperback ISBN: 9781285769455 and ISBN: 9781285769479
 - Milady Test Book: Author: Milady Publisher: Cengage Format: Book ISBN13: 9781285769554
 - Tuana Workbook: Author: Tuana Custom Publish

- Suggested:
 - General educational supplies
 - Camera (*for portfolio*)

ESTHETICS COURSE

600 Hours

COURSE DESCRIPTION

The primary purpose of this Esthetician Course is to train the student in the basic manipulative skills, safety judgments, proper work habits, and desirable attitudes necessary to obtain licensure and for competency in entry-level position in Esthetics or a related career field.

METHOD OF INSTRUCTION

Class will be a combination of lecture, lecture/lab, group discussion, hands-on activities and self-study.

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 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 areas of esthetics and safe practices.
- 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. Create a professional resume and confidently prepare for an interview.
- Successfully search for a job within the beauty industry.

COURSE TOPICS

- | | |
|---|-----------|
| • Facials & skin care | 210 hours |
| • Facial makeup | 30 hours |
| • Hair removal | 90 hours |
| • Laws, rules & regulations | 30 hours |
| • Management, ethics, interpersonal skills & salesmanship | 30 hours |
| • Disinfection, cleaning & safe work practices | 210 hours |

SCHEDULE

- Weeks 1-4 (120 Scheduled Hours)
 - Skin
 - Block 1-Biology
- Weeks 5-8 (120 Scheduled Hours)-Clinic Floor
 - Block 2-Behind the Chair
- Weeks 9-12 (120 Scheduled Hours)-Clinic Floor
 - Block 3-Sciences
- Weeks 13-16 (120 Scheduled Hours)-Clinic Floor
 - Block 4-Sanitation
- Weeks 17-20 (120 Scheduled Hours)-Clinic Floor
 - Block 5-Foundations
 - Boards

GRADING

- | | |
|---------------|-----|
| ▪ Assessments | 50% |
| ▪ Skills | 50% |

- Grading Scale
 - 96% to 100% = A Excellent
 - 88% to 95 % = B above Average
 - 80% to 87% = C Average
 - Below 80% = F Failing

SUPPLIES & TEXTBOOKS

To successfully complete this course, you will need:

- Required:
 - Milady Standard Foundations with Standard Esthetics: Fundamentals: *Author: Milady Publisher: Milady Pub Corp Year: 2020 Format: Hardcover, ISBN: 9780357263792*
Student Workbook for Milady Standard Esthetics: Fundamentals, 12th + Student Workbook for Milady Standard Foundations : *Author: Milady Publisher: Delmar Cengage Learning Edition: 12th, ISBN: 9780357482841*
 - Milady Esthetician Test Book: *Author: Milady Publisher: Cengage Format: Book, ISBN: 9780357871478*
- Suggested:
 - General educational supplies
 - Camera (*for portfolio*)

MANICURING COURSE

600 Hours

COURSE DESCRIPTION

The primary purpose of this Manicuring Course is to train the student in the basic manipulative skills, safety judgments, proper work habits, and desirable attitudes necessary to obtain licensure and for competency in entry-level position in the field as a Manicuring or a related career field.

METHOD OF INSTRUCTION

Class will be a combination of lecture, lecture/lab, group discussion, hands-on activities and self-study.

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 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 areas manicuring, pedicuring, nail enhancements and save practices
- 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.
- Create a professional resume and confidently prepare for an interview.
- Successfully search for a job within the beauty industry.

COURSE TOPICS

- | | |
|---|-----------|
| • Manicuring & Pedicuring | 210 hours |
| • Application of artificial nails | 150 hours |
| • Law, rules & regulations | 30hours |
| • Management, ethics, interpersonal skills & salesmanship | 30 hours |
| • Disinfection, cleaning & safe work practices | 180 hours |

SCHEDULE

- Weeks 1-4 (120 Scheduled Hours)
 - Nails
 - Block 1-Biology
- Weeks 5-8 (120 Scheduled Hours) Clinic Floor
 - Block 2-Behind the Chair
- Weeks 9-12 (120 Scheduled Hours) Clinic Floor
 - Block 3-Sciences
- Weeks 13-16 (120 Scheduled Hours) Clinic Floor
 - Block 4-Sanitation
- Weeks 17-20 (120 Scheduled Hours) Clinic Floor
 - Block 5-Foundations
 - Boards

GRADING

- Assessments 50%
- Skills 50%
- Grading Scale
 - 96% to 100% = A Excellent
 - 88% to 95 % = B above Average
 - 80% to 87% = C Average
 - Below 80% = F Failing

SUPPLIES & TEXTBOOKS

To successfully complete this course, you will need:

- Required:
 - **Milady Nail Technology Textbook:** Author: Milady Publisher: Milady Pub Corp Year: 2015 7th Edition
Format: Paperback ISBN: 9781285080475
 - **Milady Nail Technology WorkBook:** Author: Milady Publisher, Format: Paperback,
ISBN: 9781285080512
 - **Milady Nail Technology Test Book:** Author: Milady Publisher: Cengage Format: Book,
ISBN: 9781285080543
- Suggested:
 - General educational supplies
 - Camera (*for portfolio*)

GRADUATION REQUIREMENTS

Future professionals must meet the following requirements in the applicable course of study to qualify for graduation and be issued a certified Final Transcript of Hours and Diploma:

- Student must complete the hours in the course of instruction.
- Student must meet minimum academic requirements.
- Student must fulfill all financial obligations Tuana Academy.

Upon completion of the course of study and all graduation requirements, a Tuana European Beauty Academy diploma will be awarded. After all graduation requirements have been met and the scheduled course has ended, the graduate will be eligible to pay the required examination fee and file an application for the state licensing exam. Upon obtaining a valid license, the graduate may engage in his or her chosen field for compensation.

ACADEMY STATISTICS

	2020	2021	2022
Full time	80%	100%	36%
Part Time	20%	0%	64%
Graduation Rate*	50%	100%	80%
Licensure Rate*	100%	100%	100%
Placement Rate*	33%	100%	100%
Women	100%	100%	97%
Men	0%	0%	3%
Enrollment by Ethnicity			
Decline to answer	20%	0%	8%
White –Non Hispanic	80%	75%	53%
Hispanic	0%	0%	36%
Native American	0%	25%	3%

* based on NACCAS Annual Report Cohort Grid

JOB PLACEMENT/EMPLOYMENT

While the school cannot guarantee employment for graduates, assistance in finding suitable employment is provided by posting area job openings on a career opportunities bulletin board for students to review. Students will also receive training in professionalism and job search skills including how to write a resume. Graduates are encouraged to maintain contact with the school and follow-up with the school on current employment or employment needs. When possible, the School will notify students regarding job openings via phone or email.

STATE APPROVING AGENCIES/NATIONAL ACCREDITING AGENCY

- The School is Approved and Regulated by the Colorado Department of Higher Education, Private Occupational School Board, 1560 Broadway, Suite 1600, Denver, CO 80202, 303-862.3001 or www.highered.colorado.gov/dpos.
- Tuana European Beauty Academy is accredited by the National Accrediting Commission of Career Arts and Sciences (NACCAS), 3015 Colvin St. Alexandria, VA 22314 (703) 600-7600.

TIMELY WARNINGS

- In the event a situation arises either on or off campus and impacts students, and in the judgment of local enforcement constitutes an ongoing or continuing threat, a “timely warning” will be issued. The warning will be issued to staff and students as the information is made available from local and state authorities as well as any instructions or recommendations regarding the situation.
- Students will receive the information via special assembly, during theory class, and/or via text message.
- More information can be found in attached Annual Security Report.

CRIME REPORTING

- All criminal actions occurring on campus should be reported immediately to the Academy Director.
- The Academy Director will inform the appropriate law enforcement agency or assist the student in notifying the authorities if the student makes such a request.
- Students are encouraged to report all criminal activities in a timely manner.

ACCESS POLICY

- Tuana European Beauty Academy, LLC does not have any campus residences or dormitories. Nor does the school employ any security personnel or police force or offer any crime prevention programs.
- During business hours, the school will be open to students, staff and clients.
- During non-business hours, the building will be locked.

SEX OFFENSES AND OFFENDERS

Students and staff can access public information about registered sex offenders from the state official reporting web sites:

- Colorado: <http://www.city-data.com/so/Colorado.html>

Unlawful use of this information for purposes of intimidating or harassing another is prohibited and may be punishable by law. More information can be found in attached Annual Security Report.

RESOURCE NUMBERS - ALL EMERGENCIES DIAL 911:

- State Patrol 970.224.3027
- Suicide crisis 970.221.2114
- Abuse shelter 970.669.5150
- Chemical abuse 1.888.744.0069
- Counseling 970.221.2114
- Sexual Assault Victim 970.472.4204
- Alcohol/Drug dependency 866.850.7550

DRUG AND ALCOHOL POLICY

Tuana European Beauty Academy, LLC is part of the Drug-Free Schools and Communities Act, which requires the implementation of a program to prevent the use and abuse of alcohol and illegal drugs by students, faculty, and staff. It is the policy of the Academy to prohibit the unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance or alcoholic beverage during school time or on school premises. The Academy has a strict policy that all employees and students completely abstain, on campus, from the possession, use, or distribution of any alcohol, marijuana, or illegal drug and abstain from the use, possession or distribution of any controlled legal substance without specific medical authorization. Staff or students known to be possessing, using, or distributing illegal drugs or alcohol on campus are subject to disciplinary action and, if appropriate, to legal sanctions pursuant too local, state, and federal law.

Educational programs and information regarding Crime Prevention and Drug and Alcohol Abuse and Sexual Assault Prevention are available to all students and staff through various local professional organizations and support groups. Additional information is attached to Annual Security Report distributed to all students and employees annually.

DRUG FREE SCHOOL

- Unlawful possession, use, or distribution of illicit drugs, alcohol and/or marijuana within school premises is PROHIBITED. Any student or employee involved in any activity involving illicit drugs, alcohol, or marijuana will not be allowed to remain on school property.
- The local police department will be notified of such activity and if necessary, the assistance of law enforcement will be utilized to resolve such situations.
- Students or employees facing such problems will be referred to the local rehabilitation program for counseling and treatment.
- Disciplinary sanctions imposed by the school for the student/employee involved with drugs or alcohol:
 - First occurrence: Advising by the school staff and referral to local organization dealing with drug and alcohol related problems.
 - Second occurrence: Termination from school and notification to local law enforcement.

DRUG AND ALCOHOL ABUSE PREVENTION

- Tuana Academy will immediately contact law enforcement officials to report all unlawful activities.
- The health risks of the use of illicit drugs and alcohol abuse require providing education and referral for students and staff. Health risks associated with the use of illicit drugs and the abuse of alcohol include impaired mental and physical health, neurological disease/damage, memory and intellectual performance interference, mental and physical depression, uncontrollable violence, impulsive behavior, convulsive seizures, homicide, suicide, cardiac disease or damage, cardiovascular collapse or heart failure, gastrointestinal disease or damage, ulcers or erosive gastritis, anemia, liver and pancreatic disease, liver failure or pancreatitis, deteriorating relationships, and death.

Tuana Academy provides education and distribution of materials annually and refers students and staff to local services.

- Area drug abuse information, counseling, referral and treatment and rehabilitation centers information is made available to students or staff members.

PHYSICAL WARNING SIGNS OF DRUG AND ALCOHOL ABUSE

- Bloodshot eyes, pupils larger or smaller than usual
- Changes in appetite or sleep patterns
- Sudden weight loss or weight gain
- Deterioration of physical appearance, personal grooming habits
(Alcohol and Other Drug Abuse and Violence Prevention (AOD) Re-Published 3-2018)
- Unusual smells on breath, body, or clothing
- Slurred speech, or impaired coordination
- Depression
- Irritability
- Fatigue
- Nausea and vomiting and Headaches

STUDENT GRIEVANCE/INTERNAL COMPLAINT PROCEDURE**

- In accordance with the institution's mission statement, the school will make every attempt to resolve any student complaint that is not frivolous or without merit.
- Evidence of final resolution of all complaints will be retained in school files in order to determine the frequency, nature and patterns of complaints for the institution.
- To register a complaint at any time the student must do the following:
 - The student should first bring the issue to their current educator.
 - If the student doesn't feel the issue has been appropriately handled, he/she should schedule a formal meeting with Academy Director. Student should be prepared by having any supporting document or information substantiating the complaint.
 - If the issue is unresolved at this point, the student request should be submitted in writing to the Academy President. A meeting will be scheduled with the student.

***Attempting to resolve any issue with the school first is strongly encouraged. Student Complaints may be brought to the attention of the Division of Private Occupational Schools online at <http://highered.colorado.gov/dpos>, 303-862-3001. There is a two-year statute of limitations from the student's last date of attendance for the Division to act on a student complaint.*

INFORMATION AVAILABILITY

An administrator will be available Monday-Friday 9am-5pm to assist students with enrollment, financial aid, and institutional forms and policies. Students may schedule an appointment, call or email for information.

Denise Mitchell

Academy Director

(970) 472.2004

tuanaeducator@gmail.com

STUDENTS WITH DISABILITIES

Tuana European Beauty Academy provides students with disabilities equal access to all programs, facilities, activities at the Academy, and helps promote self-advocacy skills. The Academy is committed to providing effective accommodations for all qualified students with disabilities under section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act. Reasonable accommodations are determined on an individual, case-by-case basis after submission of documentation to the Academy Director.

ENTRANCE COUNSELING

Students will be required to attend Entrance Counseling that will include the following information:

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

FINANCIAL AID AVAILABILITY

Tuana European Beauty Academy currently offers the following Financial Aid Programs to help finance your education and training:

- VA Benefits
- Federal Title IV Financial Aid

APPLYING FOR AID

PELL GRANTS:

The student must complete the free application for Federal Student Aid (FAFSA).

STAFFORD SUBSIDIZED AND UNSUBSIDIZED LOANS:

The student must complete the FAFSA for Federal Student Aid and fill out the Master Promissory Note (MPN).

PLUS LOANS:

The student's parents must fill out the Plus MPN.

BENEFITS:

Student must contact their VA Benefits Department.

There are other loan options available, please contact FSA director Tuana Academy.

AWARDING OF AID**PELL GRANTS:**

A distinguished feature of the PELL GRANT program is its control concept "entitlement" which guarantees that a student who demonstrates a need will receive a grant. This gift grant is based on need and the cost of education at the school he/she chooses to attend. The most a student can receive in an award year, if eligible, is \$5,730.

STAFFORD SUBSIDIZED LOAN:

The subsidized loan program enables students to borrow money from a bank at a low interest rate to meet educational expenses. As an undergraduate, he/she may borrow up to \$3,500 for the first year and \$4,500 for the second year. However, a student cannot borrow more than the cost of attendance at his/her school less any other financial aid he/she may receive. Interest rates are variable, and the student must repay the loan. Payments will begin 6 months after graduation.

STAFFORD UNSUBSIDIZED LOAN:

The unsubsidized loan for students is an educational loan that must be repaid. It is based on need. Independent undergraduates may borrow up to \$6,000 per academic year and dependent students may borrow up to \$2,000 per academic year. Interest rates are variable. Students must pay interest while attending school, but the principle is not due until 6 months after graduation.

PLUS LOANS:

The Plus Loan is an educational loan that must also be repaid. Parents of dependent students can receive a Parent Plus Loan. Parents of dependent students may borrow up to the total cost of education per academic year for a child enrolled at least half-time.

The interest rate is variable and can change once per year. Payments are not due until 6 months after the student graduates. If parents are denied a Plus Loan the student may borrow up to \$6,000.

VA BENEFITS:

At least one of the parents of the student must be a Veteran of the United States Armed Services.

VERIFICATION POLICY

Purpose:

Once a student completes the FAFSA to apply to participate in federal financial aid their application is sent to the Central Processing System (CPS). CPS will select applications to verify the information submitted by the student. This process is called verification and student must submit the proper documentation to verify their information to be eligible to participate in federal aid. This policy describes the process to be followed

Policy:

1. Only those students selected for verification by the U.S. Department of Education (DOE) or those with conflicting information in their records will be required to submit supporting documentation.
2. In most cases, the required documentation consists of a completed Verification Worksheet by the student and/or parent and the use of the Data Retrieval Tool (DRT) through the FAFSA which is a direct link to the IRS, a Tax Transcript from the IRS or w2's from the required year. This information is to be provided by the student to the campus Financial Aid Coordinator for processing.
3. Students eligible to receive a Pell Grant or a Subsidized Direct Loan will have 30 calendar days to complete verification beginning no later than the students start date. If the student fails to submit or complete the required verification documentation in the allotted amount of time. They will be considered a cash pay student and payment will be required at that time.
4. No Federal Pell Grant or Subsidized Direct Loan funds will be disbursed prior to the completion of verification.
5. All students will be notified on a timely basis if they were selected for verification and what supporting documentation is required. At that time the student will be informed of the time parameters and the consequences of not completing the verification procedure. The institution will notify the student of the results of the verification process and any other documentation needed. The institution will assist the student in correcting any information that is inaccurate and will notify the student via award letter if an award changes. The institution will use as its reference the most recent Verification Guide supplied by the U.S. Department of Education (DOE).
6. If the student receives an overpayment based on inaccurate or conflicting information on any application and refuses to correct the information or repay the Federal funds after being counseled by the institution, the school will refer the case to DOE for resolution and an overpayment will be reported. Unless required by DOE, no Federal financial aid will be disbursed to the student.
7. The financial aid file will be documented that verification has been completed.
8. This information is taken from the 2020-2021 FSA Handbook (Chapter 4: This link will take you to Chapter 4: <https://fsapartners.ed.gov/sites/default/files/2021-03/2021FSAHbkAVGCh4.pdf>
 - What method will the school use to notify student if their EFC and Title IV aid amounts changed.
 - The procedures the school or students will follow to correct FAFSA data
 - The procedure the school will follow to refer a student to the Office of Inspector General (OIG)
 - All school personnel are responsible for reporting fraud, waste, or abuse to the U.S. Department of Education, Office of Inspector General. You can make your report at the [OIG Fraud Hotline](#). The regulations governing this responsibility can be found in the verification regulations under 34 CFR 668.16. This link will take you to the Office of Inspector General: <https://www2.ed.gov/about/offices/list/oig/misused/srespons.html>

PROFESSIONAL JUDGEMENT & DEPENDENCY OVERRIDE

Professional Judgment

1. The school does not have the authority to change the needs analysis formula itself or to make direct adjustments to the EFC. Instead, the school may make adjustments to the data elements that may then affect the EFC. The changes to the data elements are dictated by the impact of the special circumstances on the family's income and assets.
2. The verification and PJ cannot submit on the same day. We should get new ISIR after verification then we can submit PJ.
3. The decision of the financial aid administrator is final and there is no appeal. The Dept. of ED cannot override the final determination made by the financial aid administrator.
4. The reason for the adjustment must be documented (by a third party if possible) in the student's file, and it must relate to the special circumstances that differentiate the student – not to conditions that exist for a whole class of students.
5. The school must resolve any inconsistent or conflicting information shown on the output document and clear verification before exercising a PJ adjustment. An FAA's decision regarding adjustments is final and cannot be appealed to the Dept. of ED.
6. Some Special Circumstances that MAY warrant a Professional Judgment:
 - a) Recent unemployment of student or family member / Disability
 - b) Unusually high medical or dental expenses NOT covered by insurance
 - c) Change in earnings
 - d) Unusually high child care or dependent care costs
 - e) Dislocated worker status
 - f) One-time income distribution
 - g) Nursing Home expenses NOT covered by insurance
7. Some Unreasonable Professional Judgment Examples:
 - a) Mortgages/Rent
 - b) Auto loans / insurance/repairs
 - c) Consumer debt
 - d) Chapter 7 & 11 Bankruptcy
 - e) Vacation expenses
 - f) Standard living Expenses
 - g) Student demonstrates self sufficiency

Dependency Override

1. If a dependency override decision is made for a student, Tuana Academy does **NOT** make the decision using any of these four examples:
 - a) Parents refuse to contribute to the student's education.
 - b) Parents are unwilling to provide information on the FAFSA for verification.
 - c) Parents do not claim the student as a dependent for income tax purposes.
 - d) Student demonstrates total self-sufficiency.
2. Some Unusual circumstances that DO warrant a Dependency Override
 - a) Abandonment by parents
 - b) Abusive family environment that threatens the student's health or safety
 - c) Unable to locate parents

3. None of the conditions above singly or in combination, qualify as unusual circumstances meriting a dependency override. (There must be some documented unusual circumstances that establishes a student as one where an expectation of parental tie is not appropriate).
4. All dependency overrides are evaluated on a case by case basis and are documented. Documentation is kept in the student's file.
5. Tuana Academy only exercises Professional Judgment to make a dependent student an independent student (cannot make independent student a dependent student).
6. If a student is verified as an unaccompanied youth who is homeless, documentation is provided by either a director, or designee, of an emergency shelter or a transitional housing program funded by HUD, a director, or designee, of a homeless youth basic center or transitional living program; or a high school or school district homeless liaison; or financial aid administrator.
7. If a student is verified as an unaccompanied youth who is at risk of homelessness and is self-reporting, documentation is provided by either a director or designee of a homeless youth basic center or transitional living program, or financial aid administrator.
8. Homeless (or at risk) students who are 22 or 23 years old are processed as Dependency Overrides. Note: In order to be considered a homeless youth, the student must be under the age of 22 or still in high school. If the school encounters students who fit all of the parameters of being homeless or at risk of being homeless but are age 22 or 23, and the student is not independent for some other reason, he or she would be a dependent student since he or she no longer fits the definition of "youth". In this case, Tuana Academy may decide to do a dependency override. If so, Tuana Academy will follow all appropriate procedures for documented Dependency Overrides.
9. The following circumstances the school will consider for Professional Judgement:
 - Dependency Status Appeal
 - Do you now have or will you have children who will receive more than half of their support from you between July 1, 2020 and June 30, 2021?
 - Do you have dependents (other than your children or spouse) who live with you and who receive more than half of their support from you, now and through June 30, 2020?
 - At any time since you turned age 13, were both your parents deceased, were you in foster care or were you a dependent or ward of the court?
 - As determined by a court in your state of legal residence, are you or were you an emancipated minor
 - Do you now have or will you have children who will receive more than half of their support from you between July 1, 2020 and June 30, 2021?
 - Do you have dependents (other than your children or spouse) who live with you and who receive more than half of their support from you, now and through June 30, 2020?
 - At any time since you turned age 13, were both your parents deceased, were you in foster care or were you a dependent or ward of the court?
 - As determined by a court in your state of legal residence, are you or were you an emancipated minor
 - At any time on or after July 1, 2018, did your high school or school district homeless liaison determine that you were an unaccompanied youth who was homeless or were self-supporting and at risk of being homeless
 - At any time on or after July 1, 2018, did the director of an emergency shelter or transitional housing program funded by the U.S. Department of Housing and

Urban Development determine that you were an unaccompanied youth who was homeless or were self-supporting and at risk of being homeless?

- At any time on or after July 1, 2018, did the director of a runaway or homeless youth basic center or transitional living program determine that you were an unaccompanied youth who was homeless or were self-supporting and at risk of being homeless
- Substantial loss of Income
- Selective Service
- Deaths – passing of a spouse, domestic partnership, parent or guardian

10. The Free Application for Federal Student Aid (FAFSA) does not provide families with a place to explain special circumstances affecting their ability to pay for the student's education. The Federal Need Analysis Methodology (FM) is a rigid formula with no provisions for exceptions. To remedy this, Congress, through The Higher Education Act (HEA) of 1992, delegated to school's financial aid administrators to make professional judgment decisions when there are special or unusual family or student circumstances that may call for adjustments in determining a student's eligibility for financial aid. Circumstances requiring professional judgment will be analyzed on a case-by-case basis and will be documented.

Professional judgment refers to the authority of a school's financial aid administrator to make adjustments to the data elements on the FAFSA." For additional information please visit IFAP website.

ELIGIBILITY

Pell Grants/Stafford Loan:

- You are a U.S. citizen or an eligible non-citizen.
- You demonstrate that you have need. (Need is the difference between the cost of education and the amount you or your family can afford to pay.) Need is determined by the information that is supplied on the free application for student aid.
- You maintain satisfactory progress towards completing your course of studies.
- You are not in default of a NDSL Stafford Loan or a Plus Loan.
- You have a High School Diploma or General Education Development (GED) certificate.
- You do not owe a refund on a Pell Grant or SEOG at any school.
- You must be enrolled as a regular student working toward a degree or certificate in an eligible program.
- You have a valid Social Security Number.
- You signed a statement of updated information.
- You registered with the Selective Service.

LOAN DISCLOSURES

- Student loan information published by the US Department of Education (The Guide to Federal Student Aid) is available in the Financial Aid Office.
- NSLDS (National Student Load Data System) – student loans will be submitted to the NSLDS and will be accessible by guaranty agencies, lenders, and Tuana Academy determined to be authorized users of the data system.

STUDENT BUDGET

It is important to know the financial expectations when beginning a new path. Below is a sample of a 12-month budget to help determine your financial responsibilities during your education.

• Tuition	\$ 17,995.00
• Registration Fees	\$ 150.00
• Books/Kit	\$ 2,250.00
• Personal Expenses	\$ 1,980.00
• Transportation	\$ 2,220.00
• Loan Fees	\$ 170.00
• <u>Room and Board</u>	<u>\$ 15,792.00</u>
Total	\$ 40,557.00

STUDENT RECORDS AND PRIVACY/FERPA POLICY

The Family Educational Rights and Privacy Act is designed to protect the privacy of a student's educational records.

- FERPA gives certain rights to parents regarding their children's education records.
 - These rights transfer to student or former student who has reached the age of 18 or is attending any school beyond high school level.
 - Parents or guardians of dependent minors or eligible students have the right to inspect and review all the student's education records maintained by the school. Schools are not required to provide copies of materials in education records unless for reasons such as great distance, it is impossible for parents or eligible students to inspect the records personally. The school may charge a fee for copies.
 - The school must have written permission from the parent or eligible student before releasing any information from a student's record. However, the law allows schools to disclose record, without consent, to the following parties:
 - School employees who have a need to know
 - Other schools to which a student is transferring
 - Parents or legal guardians of dependent minors.
 - Certain government officials in order to carry out lawful functions
 - Appropriate parties in connection with financial aid to a student
 - Organizations doing certain studies for the school
 - Accrediting organizations
 - 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 adopted before November 19, 1974 Tuana European Beauty Academy, LLC
 - The school may release without consent directory type information such as student's name, address, phone number, date and place of birth, honors and awards, dates and attendance. This school does not provide directory information to outside sources.
 - Parents or eligible students can review their records in the business office during regular school days and hours.
- All requests for record review should be written and submitted through an instructor. Copies of records are available for a fee per sheet, all request for copies must also be in writing accompanied

with payment. Current records can be reproduced in two days for records a year or older please allow at least 10days.

TUANA ACADEMY INFORMATION SECURITY POLICY

INTRODUCTION

This Information Security Plan ("Plan") describes Tuana European Beauty Academy (Tuana Academy)'s safeguards to protect covered data and information also known as Sensitive Personally Identifiable Information (sPII). (1)

These safeguards are intended to:

Promote security and confidentiality of covered data and information;
 Protect against anticipated threats or hazards to the security or integrity of such information; and,
 Protect against unauthorized access to or misuse of sPII and information that could result in substantial harm or inconvenience to any individual who has provided covered data and information.

This Plan also provides mechanisms to:

Identify and assess the risks that may threaten covered data and information maintained by Tuana Academy;
 Develop written policies and procedures to manage, control and mitigate these risks;
 Implement and review this Plan; and,
 Adjust this Plan to reflect changes in the Information Security landscape, the sensitivity of sPII and internal or external threats to information security

CONFIDENTIAL DATA

(1) Confidential data, also referred to as Personally Identifiable Information or sPII, includes any information defined as such in Federal, State, School data privacy laws and regulations. Examples include, but are not limited to: Social Security; Driver's License; Passport Numbers; Birth Date; financial information; individual's medical or academic information; any data covered by FERPA. Unauthorized access, transmission, collection or storage of confidential data is prohibited. Access to and storage of confidential information on personal (user owned) devices can pose substantial risk to the School (as well as the individual) and is prohibited.

STUDENT INFORMATION

The Office of Registrar is the official source of aggregate or summary student information, such as academic and directory Information.

POLICY STATEMENT

Information is a vital asset and requires protection from unauthorized access, modification, disclosure, or destruction. Maintaining the security, confidentiality, integrity, and availability of information stored in the electronic systems and in paper form is a responsibility shared by all users. Violations of this policy may result in disciplinary action up to and including termination.

POLICY PROCEDURES

Users of the organization's systems, both electronic and physical, are responsible for protecting the information processed, stored or transmitted using these resources, and for incorporating the following industry standard best practices into their daily activities.

ENFORCEMENT OF POLICY

Each department is responsible for enforcing this data security policy. School policy states that confidential information is to be used only when necessary for School business. Refusal to adhere to this policy is a clear violation of the Family Educational Rights and Privacy Act of 1974. Offenders will be subject to disciplinary action and possible referral of the violation to the proper authorities.

INFORMATION SECURITY COORDINATORS

a. Coordinators

The information Security Policy Coordinator and the Director of Student Financial Aid (collectively referred to hereinafter as the "Coordinators") are responsible for coordination and execution of this Plan. The Coordinators are responsible for assessing the risks associated with unauthorized transfers of sPII and implementing procedures to minimize those risks to Tuana Academy.

b. Correspondence and Inquiries

Correspondence and inquiries regarding this Plan should be directed to the Coordinators at:
826 S. College Ave. Fort Collins CO 80524
Denise Mitchell – 970.472.2004

IDENTIFICATION AND ASSESSMENT OF POTENTIAL RISKS TO COVERED DATA AND INFORMATION

Tuana Academy recognizes that both potential internal and external risks exist. These potential risks include, but are not limited to the following:

- Unauthorized access of sPII by someone other than the owner of the covered data and information;
- Compromised system security as a result of system access by an unauthorized person;
- Interception of data during transmission;
- Loss of data integrity;
- Physical loss of data in a disaster;
- Errors introduced into the system;
- Corruption of data or systems;
- Unauthorized access of sPII by employees;
- Unauthorized requests for covered data and information;
- Unauthorized access through hardcopy files or reports; and,
- Unauthorized transfer of covered data and information through third parties.

To control the risks identified through these risk assessments, only coordinators have permit access to authorized users and limit authorized users' access to only the information they need to perform their

duties. At Tuana Academy, data is segregated, with stratified levels of access according to the user's needs. The scope of access and controls on it will be reevaluated periodically.

Tuana Academy recognizes that this may not be a complete list of the potential risks associated with the protection of sPII. Since technology growth is not static, new risks may occur periodically. Accordingly, the Information Technology Department of Tuana Academy will actively participate and monitor advisory groups.

Tuana Academy Information Technology Department's current safeguards are reasonable and sufficient to provide security and confidentiality to sPII maintained by Tuana Academy. Additionally, these safeguards protect against currently anticipated threats or hazards to the integrity of such information.

DESIGN AND IMPLEMENTATION OF SAFEGUARDS PROGRAM

a. Employee Management and Training

Tuana Academy areas that are covered by this policy are Business Affairs, Information Technology, Registrar, Student Affairs and Student Financial Aid, and any other areas that work with sPII on a regular basis. During employee orientation, new employees in said areas will receive training on the importance of confidentiality of student records, student financial information, and other types of covered data and information. Tuana Academy also will train current employees working in these areas on the importance of confidentiality of sPII. Training of new and current employees working in these areas will include controls and procedures to prevent employees from providing confidential information to an unauthorized individual, and how to properly dispose of documents that contain sPII. All new employees, whether or not they are in an area responsible for maintaining sPII, will receive general training in the proper use of computer information and passwords. The Coordinators will review and update security awareness training materials when necessary to reflect risks identified by the risk assessment.

Each area responsible for maintaining sPII is instructed to take steps to protect the information from destruction, loss, misuse, or damage due to environmental hazards, such as fire and water damage, employee mishandling, or technical failures. Faculty, employees, students and affiliates, prior to employment will complete a Confidentiality Agreement, as required by Tuana Academy. Exceptions to multifactor restrictions can be made since the coordinators approves in writing the use of reasonably equivalent or more secure access controls.

b. Physical Security

Tuana Academy has addressed the physical security of covered data, and information shall be accessed only by those employees who have a business reason to know such information. For example, personal customer information, accounts, balances and transactional information are available only to Tuana Academy employees with an appropriate business need for such information.

Loan files, account information, and other paper documents are kept in file cabinets, rooms, or vaults that are locked each night. Only authorized employees know combinations and the location of keys. Paper documents that contain sPII shall be shredded at time of disposal.

c. Information Systems

Access to sPII via Tuana Academy's computer information system is limited to those employees who have a business reason to know such information. Each employee is assigned a user name and password. Databases containing personal covered data and information, including, but not limited to, accounts, balances, and transactional information, are available only to Tuana Academy employees in appropriate departments and positions.

Static passwords used to authenticate User ID's must be changed in a timely manner and must meet the minimum password requirements set by Information Technology. User and system passwords are also required to comply with the Tuana Academy password requirements.

Tuana Academy data custodians will take appropriate steps consistent with current technological developments and guidelines to secure all covered data and information and to safeguard the integrity of records in storage and transmission. All sPII will be maintained on servers that are approved by Tuana Academy Security.

All Information systems, including network and software design, as well as information processing, storage, transmission and disposal, will be maintained on the computer's network so that it can be backed up each night.

Protecting confidential information and securing information on workstations and other electronic systems

- DO NOT distribute confidential or sensitive data to external entities unless approved by the appropriate authority.
- Only distribute confidential information to internal entities on a need-to-know basis.
- Assume all student information is private unless the student has signed a FERPA release form.
- Use secure means to transmit confidential data.
- Utilize strong passwords to minimize the risk of a password being compromised and data being lost due to unauthorized access.
- Secure devices by requiring a password when the device is turned on and when the screen saver is deactivated.
- All computers (desktops/laptops) accessing electronic data must run up-to-date antivirus/malware software.
- Keep all computer systems up to date with the latest software maintenance releases.
- Log out of public systems when finished working.
- DO NOT save passwords in web browsers or e-mail clients when using a public computer system.
- DO NOT post material on any publicly accessible computer or website unless first approved by the appropriate authority.
- DO NOT intentionally damage, alter, or misuse any business-owned or maintained hardware, software, or information.
- DO NOT share account names and passwords if the account was not configured to be a shared account.

- DO NOT open attachments and links embedded in emails unless you are confident the email is from a reliable source and intended to be sent from that source.

d. Management of System Failures

Information Technology Department has developed below plans to detect any actual or attempted attacks on Tuana Academy systems for responding to unauthorized access to sPII.

- Be prepared to respond immediately to information security-related incidents;
- Provide appropriate training to staff with security breach responsibilities;
- Implement an incident handling capability for security incidents that includes preparation, detection and analysis, containment, eradication, and recovery.

Communicating security and confidentiality issues

- Notify administration immediately if passwords or other system access control mechanisms are lost, stolen or disclosed, or are suspected of being lost, stolen or disclosed.
- Notify administration if sensitive or critical information is lost or disclosed to unauthorized parties, if any unauthorized use of systems has taken place, or if there is suspicion of such loss, disclosure, or unauthorized use.
- DO NOT discuss information security-related incidents with individuals outside of the organization, or with those inside the organization who do not have a need to know.

e. Reviews

Data owners and custodians maintaining sPII will be responsible for conducting annual reviews of their respective areas to assess the internal control structure and to verify that their areas comply are in compliance with requirements and applicable state and federal laws.

SELECTION OF APPROPRIATE SERVICE PROVIDERS

It may be necessary for service providers to access sPII and provide resources that Tuana Academy determines not to provide on its own. In the process of choosing a service provider that will maintain or regularly access covered data and information, the evaluation process shall include the ability of the service provider to safeguard confidential financial information. In addition to the standard contract clauses, contracts with service providers shall include the following provisions:

- An explicit acknowledgement that the contract allows the service provider access to confidential information held or collected by Tuana Academy;
- A specific definition or description of the confidential information being provided;
- A stipulation that the confidential information will be held in strict confidence and accessed only for the explicit business purpose of the contract;
- An assurance from the service provider that the provider will protect the confidential information it receives according to commercially acceptable standards and no less rigorously than it protects its own confidential information;
- A provision providing for the return or destruction of all confidential information received by the contract provider upon completion or termination of the contract;
- An agreement that any violation of the contract's confidentiality conditions may constitute a material breach of the contract and entitles Tuana Academy to terminate the contract immediately without penalty; and

- A provision stating that the contract's confidentiality requirements shall survive termination.

CONTINUING EVALUATION AND ADJUSTMENT

The Coordinators develop, implement and maintain a disposal policy for sPII and review it regularly for any unnecessary data retention based on Colorado State regulations and laws, unless such information is necessary for business operations or for other legitimate business purposes and is otherwise required to be retained by law or regulation.

Additionally, the Coordinators will perform annual tests and/or exercises of its incident response capability to formally determine incident response effectiveness and make corrections, based on any deficiencies. Based on the results of required testing and monitoring, any material changes to its operations or business arrangements; the results of the required risk assessments; or any other circumstances that it knows or has reason to know may have a material impact the information security program; this Information Security Plan will be subject to periodic review and adjustment. The most frequent of these reviews will occur within Information Technology Department, where constantly changing technology and evolving risks mandate increased vigilance. Information Technology, as well as other relevant areas, will conduct an annual data and information security review. Continued administration of the development, implementation, and maintenance of the program will be the responsibility of the Coordinators who will assign specific responsibility for implementation and administration as appropriate. The Coordinators will review the standards set forth in this policy and recommend updates and revisions as necessary. It may be necessary to adjust the plan to reflect changes in technology, the sensitivity of student/customer data and internal or external threats to information security.

DISCIPLINARY ACTION

To enforce this Plan, Tuana Academy may take appropriate disciplinary measures directed to Tuana Academy employees, faculty, students or affiliates. These disciplinary measures include, but are not limited to, letters of reprimand, removal of access to information systems, suspensions with or without pay, or termination

KIT OPT-OUT POLICY

Tuana Academy offers a textbook & supplies purchase program to our students in effort to provide affordable and timely delivery of all textbooks & supplies for their coursework. In accordance with Federal regulations, effective March 12, 2019 Tuana Academy has established a policy under which an eligible Title IV financial aid recipient may opt-out and purchase the required textbooks & supplies from other sources. An itemized book & supply list, along with ISBN for the books are available on our website and a copy will be issued to students during orientation.

- Title IV aid recipients have the option of purchasing books & supplies at their own expense from other sources. It is the responsibility of the student to purchase all the required books & supplies for the program should the student decide to opt-out.
- It is the student's responsibility to review the book & supply list on our website/ during orientation and confirm the title and ISBN for the current books and supplies being used for the course, as editions can change frequently.

- Students will be charged by book & kit at the Tuana Academy booklist price.
- Upon receiving official notice that a student chooses to opt out the program, textbook & supply fees will not be charged to the student's account.
- The academy is not responsible for providing textbooks & supplies to students who opt-out.
- Institutional need based aid may be affected if the student opts out.
- If the student chooses to opt-out and an actual or anticipated credit balance (financial aid that exceeds charges), the student may use these excess funds to purchase textbooks) and supplies from another source.
- The financial aid office will determine the amount available to the student based on the amount of financial aid awards and anticipated institutional charges , not to exceed the Institution's total textbook and supply charges for the term or payment period.
- Textbook and supply purchases in excess of the available credit balance are solely the student's responsibility.
- Changes to the opt-out election can only be made at the start of the academic year. The student must complete the opt-out form and return it to the Student Financial Services Department.

LEAVE OF ABSENCE (LOA) POLICY

If a Student desires to take a leave of absence from his/her studies, then the student must follow this policy:

1. The request must be made in signed writing and reasons for the leave must be specified and then submitted to academy director prior to first day of leave.
 - A) LOA's will be granted on a case by case basis, student must show just cause for requesting LOA, examples of reasons for LOA are illness, unexpected emergency, planned vacations. Academy director will approve LOA request on a case by case basis.
 - B) If a student is unable to submit a request prior to taking their leave, Tuana Academy may approve the LOA on a case by case basis, with proper documentation, with the reason(s) for its decision and allow the paperwork to be submitted at a later date for unforeseen circumstances. The beginning of the leave will be determined as the first date the Student was unable to attend the school.
2. The student must fill out and sign an LOA Request Form.
3. The LOA may not exceed 180 calendar days in a 12 month period. A "12-month period" begins on the first day of the student's initial leave of absence.
4. The LOA may not be less than 14 calendar days.
5. There must be a reasonable expectation that the student will return for LOA.
6. The LOA may affect the student's eligibility for financial aid.
7. A student returning from an LOA will return at the same progress status as prior to leaving.
8. Time lapsed during the LOA will extend the student contract end date by the same number of calendar days taken in LOA, and will not be included in the students cumulative attendance percentage. All parties must sign and initial Contract Addendum reflecting new contract end date.
9. A student will not be assessed additional fees as a result of the LOA.
10. Any student granted a LOA is not considered to have withdrawn and no refund will be calculated

at that time.

11. If a student fails to return for the LOA, the student's last day of attendance will be considered the withdrawal date.
12. LOA will be denied if the LOA, together with any additional LOAs previously granted, exceed a total of 180 days in any 12-month period.
13. Student will be withdrawn from the program if the student takes an unproved LOA or does not return from the LOA

A) The student's withdrawal date for purpose of calculating a refund will be the student's last date of attendance.

14. If the student is a title IV, HEA program loan recipient, the institution explains to the student, prior to granting the leave of absence, the effects that the student's failure to return from a leave of absence may have on the student's loan repayment terms, including the exhaustion of some or all of the student's grace period.

SATISFACTORY ACADEMIC PROGRESS POLICY (SAP)

The Satisfactory Academic Progress Policy is consistently applied to all students enrolled at Tuana European Beauty Academy. 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

Students are evaluated for Satisfactory Academic Progress as follows:

- ☐ Cosmetology 450, 900, 1200 clocked (actual) hours
- ☐ Hairstyling 450, 900 clocked (actual) hours
- ☐ Esthetics 300 clocked (actual) hours
- ☐ Manicuring 300 clocked (actual) hours

*Transfer Students- Midpoint of the contracted hours or the established evaluation periods, whichever comes first. SAP evaluation periods are based on actual contracted hours at the institution. Our school academic year is 900 clock hours / 30 weeks. An institution calculates the pace at which the student is progressing by dividing the cumulative number of hours the student has successfully completed by the cumulative number of hours the student has attempted. In making this calculation, the institution is not required to include remedial courses.

ATTENDANCE PROGRESS EVALUATIONS

Students are required to attend a minimum of 75% 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 75% 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.

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. Students must maintain a written grade average of 80% 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:

Grading System

- ☐ 96% to 100% = A Excellent
- ☐ 88% to 95% = B above Average
- ☐ 80% to 87% = C Average
- ☐ Below 80% = F 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 will be notified of their Satisfactory Academic Progress Determination at the time of each of the evaluations. If a student is not meeting SAP, they will be notified during SAP evaluation in writing, this document is hand delivered to the student, and requires a signature from the student. 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 while during the warning period. The student will be advised in writing on the actions required to attain satisfactory academic progress by the next evaluation. The student may continue to receive Title IV aid for one payment period during the warning period without an appeal. 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.

PROBATION

Students who fail to meet minimum requirements for attendance or academic progress after the warning period will be placed on probation and considered to be making satisfactory academic progress while during the probationary period, if the student appeals the decision, and prevails 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 warning or probationary period.

MAXIMUM TIME FRAMES

Fully executed Leave of Absence will extend the maximum time frame by the same number of days taken in the Leave of Absence. Transfer hours from another instructions that are accepted toward the student's educational program are counted as both attempted and completed hours for the purpose of determining when the allowable maximum time-frame has been exhausted.

- The maximum time (which does not exceed 133% of the course length) allowed for students to complete each course at Satisfactory Academic Progress is stated below:

COSMETOLOGY: 1500 Hours (1995 Max)

not to exceed 67 weeks - 201 days as a full-time student

not to exceed 111 weeks - 333 days for less-than full-time student

HAIRSTYLING: 1200 Hours (1596 Max)

not to exceed 53 weeks - 159 days as a full-time student

not to exceed 89 weeks - 267 days for less-than full-time student

MANICURING: 600 Hours (798 Max)

not to exceed 27 weeks - 81 days as a full-time student

not to exceed 44 weeks - 132 days for less-than full-time student

ESTHETICS: 600 Hours (798 Max)

not to exceed 27 weeks - 81 days as a full-time student

not to exceed 44 weeks - 132 days for less-than full-time student

Full time students are scheduled 3 days per week. Full-time students are scheduled to attend 30 Hours per week and part-time are scheduled to attend 18 Hours per week.

Students who have not completed the course within the maximum time frame may continue as a student at the academy on a cash pay basis.

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 that the time of withdrawal. Additionally, students can't withdraw from a course or have incompletes.

If a student does not attend class for a period of 14 consecutive calendar days without any documentation or has not applied for a formal leave of absence, the school will withdraw the student. (Documentation may be a call to the school in which the school makes a note in the students file, or a formal written statement that the student will be out for a brief period of time). Students may be re-admitted if the student left in good standing and met the requirements of Satisfactory Academic Progress prior to their withdrawal.

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 on the designated form describing why they failed to meet satisfactory academic progress standards, along 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 and a decision will be made and reported to the student within 7 calendar days. The appeal and decision documents will be retained in the student file. If the student prevails upon appeal, they will be placed on academic probation, and deemed making satisfactory academic progress and financial aid will be reinstated, if applicable.

NONCREDIT, REMEDIAL COURSES, REPETITIONS

Noncredit, remedial courses and repetitions 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. School does not guarantee the transferability of its credits to another institution unless there is a written agreement with another institution.

TERMINATION

Any student that drops below the Satisfactory Academic Progress Standards, have excessive unexcused absences, have disciplinary challenges, or are in violation of rules of conduct are subject to withdrawal/termination.

CHANGE IN COURSE STUDY

Program transfers may be granted on a case by case basis. Student must submit a Transfer Request Form and attend an advisory meeting to discuss all changes to contract obligations and be advised of new program requirements. Student is responsible for returning any applicable scholarships, scholarships and tuition discounts may not be transferable to new program. Student must pay for all scheduled clock hours prior to being granted transfer and may be subject to a \$150 fee.

TRANSFER STUDENT

Transfer students may complete their training at Tuana Academy in accordance with the state requirements. All transfer students must prove competency for the hours being transferred with written and practical evaluations. Tuana Academy also requires transcripts from your previous school that will be evaluated on a case-by-case basis by our faculty and state requirements. Tuana Academy does not guarantee that all hours will be accepted. The tuition cost for transfer students will be considered for the completion requirements for their particular program, plus any kit items or books that may be needed. Transfer students will pay an enrollment fee of \$150.00 as well as any required kit or book items. Tuana Academy might not guarantee the transfer of hours to another school without a written agreement between both schools.

EXIT INTERVIEW

Each student will be required to attend an Exit Counseling session that will cover the following topics:

- Average anticipated monthly repayment amount
- Repayment plan options
- Options to prepay or pay on shorter schedule
- Debt Management Strategies
- Use of Master Promissory Note
- The seriousness and importance of student's repayment obligation
- Terms and conditions for forgiveness or cancellation
- Copy of information provided by the U.S. Department of Education
- Terms and conditions for deferment or forbearance
- Consequences of default
- Options and consequences of loan consolidation
- Tax benefits available to borrowers
- The obligation of the borrower to repay the full amount of the loan regardless of whether the borrower completes program or completes within regular time for completion, is unable to obtain unemployment upon completion, or is otherwise dissatisfied with or did not receive the educational or other services the borrower purchased from the school
- Availability of the Student Loan Ombudsman's office

- Information about NSLDS. The U.S. Department of Education is required to provide a disclosure form for students and prospective students about NSLDS

REFUND POLICY

Tuana Academy will apply this policy to all terminations for any reason, by either party, including student decision, course or program cancellation, or school closure. Students not accepted to the school are entitled to all moneys paid. Students who cancel this contract by notifying the school within three (3) business days are entitled to a full refund of all tuition and fees paid. Students who withdraw after three (3) business days, but before commencement of classes, are entitled to a full refund of all tuition and fees paid except the maximum cancellation charge of \$150.00 or 25% of the contract price whichever is less. In the case of students withdrawing after commencement of classes, the school will retain the cancellation charge plus a percentage of tuition and fees, which is based on the percentage of contact hours attended in the Program/Stand Alone Course, as described in the table below. The refund is based on the official date of termination or withdrawal.

<u>Student is entitled to upon withdrawal/termination</u>	<u>Refund</u>
Within first 10% of Program	90% less cancellation charge
After 10% but within first 25% of Program	75% less cancellation charge
After 25% but within first 50% of Program	50% less cancellation charge
After 50% but within first 75% of Program	25% less cancellation charge
After 75% (If paid in full, cancellation charge is not in applicable)	NO REFUND

NOTE: Refund calculations are based on scheduled hours

- The student may cancel this contract at any time prior to midnight of the third business day after signing this contract.
- All refunds will be made within 30 days from the date of termination.
- The official date of termination or withdrawal of a student shall be determined in the following manner:
 - *The date on which the school receives written notice of the student's intention to discontinue the training program; or
 - *The date on which the student violates published school policy, which provides for termination.
 - *Should a student fail to return from an excused leave of absence, the effective date of termination for a student on an extended leave of absence or a leave of absence is the earlier of the date the school determines the student is not returning or the day following the expected return date.
- The policy for granting credit for previous training shall not impact the refund policy.
- Unofficial withdrawals for clock hour students are determined by monitoring hours weekly.
- If a program is canceled subsequent to a student's enrollment, and before instruction has begun, the school shall at its option provide a full refund of all monies paid or provide completion of the program.
- If a 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:
 - *Provide a pro rata refund for all students transferring to another school based on the hours accepted by the receiving school; or
 - *Provide completion of the course and/or program; or
 - *Participate in a Teach – Out Agreement; or
 - *Provide a full refund of all monies paid
- In case of permanent school closure, students are entitled to a pro-rata refund or participate in a Teach out Agreement.

** Please note, that the refund policy is effective for all full pay students and payments that have been made in advance for training not yet received. Refunds will not be given for training already received and paid for.

KITS & BOOKS FEES ARE NON REFUNDABLE, KITS & BOOKS ARE STUDENTS PROPERTY. All students will be issued a kits & books invoice at time of issue, it is students responsibility to check that all kit items are complete and in good working order. Once students have signed kits & books invoice, school takes no responsibility for student's personal kits & books property.

RETURN OF TITLE IV FUNDS

Purpose

The Return of Title IV policy is to establish the processes for returning federal funds for students who completely withdraw from the institution and/or withdraw from all courses in a given period of enrollment. As defined by the U.S. Department of Education, these students must have a Return of Title IV Funds (R2T4) calculation performed to determine the percentage of aid earned based on the amount of time the student was enrolled at the Institution.

Student Responsibilities

Student's responsibilities regarding the Return of Title IV funds:

- Becoming familiar with the Return of Title IV Funds (R2T4) policy and how withdrawing from all courses affects eligibility for Title IV aid;
- Resolving any outstanding balance owed to the Tuana European Beauty Academy resulting from a required return of unearned Title IV aid;
- Resolving any repayment to the U.S. Department of Education as a result of an overpayment of Title IV grant funds.

Withdrawals and Financial Aid

Federal Financial Aid (Title IV aid) is awarded under the assumption that a student will remain in attendance for the entire period of enrollment for which aid was awarded. When a student withdraws from all courses, regardless of the reason, the student may no longer be eligible for the full amount of the federal financial aid originally awarded. Instead, the student will only be eligible to keep a portion of the federal financial aid the student received for that time period.

Therefore, students who receive federal financial aid and who do not remain in attendance through the end of the term could be responsible for repaying a portion of the financial aid originally received.

Federal regulations require a recalculation of financial aid eligibility if a student:

- Completely withdraws from all classes;
- Stops attending before the time period end;
- Does not complete all parts of term (modules) in which the student is enrolled as of the start date of the period of enrollment;
- Fails to earn a passing grade in any class

How to Calculate Earned Aid

Students who receive federal financial aid must remain in their registered classes to “earn” the aid they originally received. The amount of federal aid earned is based on a pro-rated formula. Students who withdraw or do not complete all classes in which they were enrolled may be required to return some of the aid originally awarded to the student. If the amount R2T4 calculation exceeds the school portion, the student must repay those funds

The following explains the formula used to determine the percentage of unearned aid to be returned to the federal government:

- The percent earned is equal to the number of hours scheduled to complete up to the student’s withdrawal date divided by the total number of hours in the payment period.

- This calculation must be performed within 30 days of the date the school determines that a student has completely withdrawn. The institution must return the unearned funds within 45 days of the calculation.

When calculating the percentage, the student completed in the payment period, if a student attended more than 60% of the payment period, the student is considered to have earned 100% of the Title IV funds the student was scheduled to receive during that period.

After the Return of Title IV calculation and the institutional calculation are complete, the student may still owe a balance to the school. In this case the school will notify the student/parent and will be placed on a financial hold by Tuana Academy. An example of how the R2T4 calculation is done. For example:

- Student is scheduled to complete 250 out of 450 hours in the payment period. Student completed 55.56% of the payment period and has earned 55.56% of Title IV funds. Student has not completed more than 60% of the payment period and therefore 44.44% is unearned and must be returned to the Department of Education.

Institutional Charges

The institutional charges used in the calculation are the charges initially assessed the student's account for the period of enrollment. Initial charges may only be adjusted by those changes the institution made prior to the student's withdrawal. The items to be included in the Institutional Charges for the period of enrollment include:

- Tuition
- Mandatory fees
- Kit and Book fees

Order of Return to Federal Aid Programs

Tuana Academy must return Title IV funds to the financial aid programs from which the student received aid during the payment period, in the following order, up to the net amount disbursed from each source:

- Federal Direct Unsubsidized Loan
- Federal Direct Subsidized Loan
- Federal Direct PLUS Loan
- Federal Pell Grant

Loan Repayment Information

The loan grace period begins on the withdrawal date from the school or when a student ceases to be enrolled at least half-time. If the student does not re-enroll as a half-time student within 6 months of withdrawal or less than half-time enrollment, the loan(s) enters repayment. The promissory note signed by the borrower outlines the repayment obligations. The student should contact his/her loan servicer to make repayment arrangements.

Post-Withdrawal Disbursements (PWD)

In the event a student withdraws and no Title IV Aid was processed prior to the student's withdrawal date, a post-withdrawal disbursement offer may be made to the student or parent if a Plus Loan. A post-withdrawal disbursement, a type of late disbursement, is Title IV Aid that was not disbursed before a student withdrew, but the student has earned based on a Return of Title IV Funds Calculation. A student or parent will be notified in writing within 30 days of the date the school determined the student withdrew of any available post withdrawal funds. School must establish a timeframe for a response from the student and if no response is received, the school will not disburse the loan funds.

Grant PWD

- Grants from a PWD may be credited to the student's school account without obtaining student permission. However, it may only be credited for tuition, fees, and room and board (if the student contracts with the school) or disbursed directly to the student. UTEP must obtain the student's authorization to credit a student's school account for charges other than current charges.

Loan PWD

- Tuana Academy must obtain confirmation from the student, or from a parent for a Direct Parent PLUS Loan, before making any disbursement of loan funds. Also, for a Direct Loan, the institution must have originated the loan prior to the withdrawal.

The timing regarding post-withdrawal disbursements:

- Grants must be disbursed within 45 days.
- Loans must be offered to the student within 30 days, allowing the student at least 14 days to respond to accept or decline the funds.
- All post-withdrawal disbursements are applied to student account first, and any resulting credit balance will be refunded to student. A credit balance must be disbursed as soon as possible and no later than 14 days after the calculation of R2T4

Consequences of Non-Repayment

Students who owe the U.S. Department of Education for an overpayment of Title IV funds are not eligible for any additional federal financial aid until the overpayment is paid in full or payment arrangements have been made with the U.S. Department of Education.

Students who owe Tuana Academy because of an R2T4 calculation will be placed on a financial hold by Tuana Academy. Students will not be allowed to register for subsequent semesters or receive academic transcripts until the balance is paid in full.

In addition, at the time the R2T4 calculation is completed, if the student received Federal Direct Loans, the Tuana Academy will notify students of the federal Loan Exit Counseling requirements.

R2T4 Deadlines

- Withdrawal date of determination without notification:
 - o 14 calendar days of non-attendance
- Return of unearned Title IV funds:
 - o No later than 45 days after the date the school determines the student withdrew
- Post-withdrawal disbursement for outstanding current allowable charges:
 - o No later than 180 days after the date the school determines the student withdrew
- Written notification to students to accept PWD for loans:
 - o Within 30 days of the school's determination that the student withdrew
- Post-withdrawal disbursement to the student:
 - o From the date school determined student withdrew:
 - o Loans No later than 180 days, and
 - o Grants No later than 180 days

Official Withdrawal – The student can provide notification of withdrawal (call, e-mail, in person, in writing, etc.) and this date that on which school receives notice of student's intention to discontinue the program will be withdrawal date. An official withdrawal can also be when the school terminates a student per policy.

Unofficial Withdrawal – The last date of attendance is the last day the student was physically in attendance at school. A withdrawal determination date on a student who had been previously attending could be up to, but not to exceed, 14 calendar days from that student's actual last date of attendance. An active student is considered unofficially withdrawn when they have been absent for 14 calendar days from their last date of physical attendance without notifying school's administrative office. When this happens, R2T4 calculation performed by school to determine the percentage of aid earned based on the amount of time the student was enrolled at the school and school will notify the student/parent.

Quality Assurance

All official and unofficial R2T4's will be subject to review for accuracy by management

Disbursement of Credit Balance Summary

If the student has financial aid that exceeds his or her tuition and fee charges for the academic year in which the disbursement occurred, the student will have a credit balance. All credit balance refunds will be issued by check within 14 calendar days from when the Credit Balance was created.

A credit balance refund will be given to the parent if: The amount of the PLUS loan is greater than the student's tuition and fees charges for the academic year in which the disbursement occurred. All credit balance refunds will be issued by check within 14 calendar days of the date of disbursement.

Tuana Academy will not hold Title IV credit balances for the student or parent unless it has obtained a student's or parent's authorization to hold a Title IV credit balance.

GENERAL ACADEMY RULES

TIME CLOCK PROCEDURES

1. It is the student's responsibility to clock in and out for themselves.
2. Failure to clock out correctly for the day may result in loss of hours.
3. NEVER clock in/out for another student.
4. You must use the manual time clock AND record your information on the Time Clock Form, located directly by the time clock.
5. No time clock adjustments will be made.
6. You must complete your hours to complete your program.
7. Hours will be updated every Monday via the communication log.
8. Students must clock in/out when leaving or entering the campus.

PERSONAL ITEMS/LOCKERS

Tuana European Beauty Academy is not responsible for any lost, damaged, or stolen items. Personal items should be kept in a secure location (lockers/kits/car).

PARKING

Student parking is located on the Remington side of the Alley. Lock your car, Tuana European Beauty Academy is not responsible for any damage or theft.

VACCINATION POLICY

Tuana European Beauty Academy has no policy of vaccinations.

CONSTITUTION DAY

We will begin the day with the Pledge of Allegiance, then continue with a celebration and activity to refresh our memory of the Constitution and its meaning on September 17th.

COPYRIGHT MATERIAL POLICY

Summary of Civil and Criminal Penalties for Violation of Federal Copyright Laws Copyright infringement is the act of exercising with permission or legal authority, one or more of the exclusive rights granted to the copyright owner under section 106 of the Copyright Act, (Title 17 of the United States Coded.) These rights include the right to reproduce or redistribute a copyrighted work. In the file sharing context, downloading or uploading substantial parts of a copyrighted work without authority constitutes an infringement.

Penalties for copyright infringement include civil and criminal penalties. In general, anyone found liable for civil copyright infringement may be ordered to pay either actual damages or "statutory" damages affixed at not less than \$750 and no more than \$30,000 per work infringed. For "willful" infringement, a court may award up to \$50,00 per work infringed. A court can, in its discretion, also assess costs and attorneys' fees. For details, see Title 17, United States Code, Sections 504, 505. \Willful copyright infringement can also result in criminal penalties, including imprisonment of up to five years and fines of up to \$250,000per offense. For more information, please see the website of the U.S.Copyright Office at (www.copyright.gov).

INTERNET POLICY

Tuana Academy provides free wireless Internet in various locations across the school. This service is intended to allow Students limited access to the Internet. As the configuration of each manufacturer's device is unique, please refer to your documentation for connection instructions. Tuana Academy and staff cannot be responsible for assisting you in making changes to your devices.

DRESS CODE

Student attire is to be clean and in good repair. Tops, jackets and sweaters worn in the classroom or salon, bottoms and dresses must be black. Shorts and skirts must be no higher than 2 inches above the knee, no midriff, and conservative neckline are required. Accessories (scarves, jewelry, etc.) and shoes may be any color. No flip/flops. Dress code may be altered for special occasions with director's approval

KITS AND TEXTBOOKS

Disbursement of books and kits will be completed during orientation, prior to the first day of school. Students are expected to mark their kits and books appropriately. Students should bring their kit and books to school every day.

Cosmetology – Books & Supplies: \$2,250.00

Hairstyling – Books & Supplies: \$2,000.00

Esthetics – Books & Supplies: \$1,600.00

Manicuring – Books & Supplies: \$1,500.00

Milady Standard Cosmetology Textbook | 13th Edition | ISBN 9781285769417 | Cengage Learning \$133.95

Milady Standard Cosmetology Theory Workbook | ISBN-13: 9781285769455 | Cengage Learning \$55.95

Milady Standard Cosmetology Exam Review | ISBN-13: 9781285769554 | Cengage Learning \$40.95

Milady Standard Esthetics: Fundamentals | 11th Edition | ISBN: 9781111306892 | Cengage Learning \$163.95

Milady Standard Esthetics: Fundamentals Workbook | ISBN-13: 9781111306915 | Cengage Learning \$88.95

Milady Standard Esthetics: Fundamentals Exam Review | ISBN-13: 9781111306922 | Cengage Learning \$55.95

Milady Standard Nail Technology | 7th Edition | ISBN: 9781285080475 | Cengage Learning \$136.95

Milady Standard Nail Technology Workbook | 7th Edition | ISBN: 9781285080512 | Cengage Learning \$70.95

Milady Standard Nail Technology Exam Review | 7th Edition | ISBN: 9781285080543 | Cengage Learning \$48.95

VOTER REGISTRATION

Information on registration for voting will be available in the administration office. Each classroom will have voter registration cards available.

TITLE IX POLICY

“The U.S. Department of Education’s [Office for Civil Rights](#) (OCR) enforces, among other statutes, Title IX of the Education Amendments of 1972. Title IX protects people from discrimination based on sex in education programs or activities that receive federal financial assistance. Title IX states:

No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance”.

DIPLOMA & TRANSCRIPT VALIDATION POLICY

I. REASON FOR THIS POLICY

Students applying for freshman admission to Tuana European Beauty Academy are enrolled in coursework pursuing, or have completed the coursework required to obtain a high school diploma. As required by rule 688.16, the validity of a student’s high school diploma or transcript must be ensured by the Offices of Admission and Financial Aid and/or procedures must be developed and followed when the institution suspects that the high school diploma was not obtained from an entity that provides secondary school education. This policy governs the process of ensuring the validity of a potential student’s high school diploma.

II. STATEMENT OF POLICY

In the event that a potential student submits a high school diploma with their application for freshman admission to Tuana European Beauty Academy, the Offices of Admissions and Financial Aid are required to ensure the high school diploma is valid. If questions about the validity of a high school diploma arise, the Diploma and Transcript Validation Process is to be followed.

III. DEFINITIONS DIPLOMA AND TRANSCRIPT VALIDATION PROCESS:

- 1) Review the documents (diploma and/or transcripts) and call all the State where the diploma/transcripts are originated from and see if the school is a valid learning institution. Have the institution send the diploma and the transcripts through a electronic secure third party company.
- 2) Contact the school or individual listed on the document
- 3) Request direct written communication (preferably in the form of an official transcript) from the school validating graduation of the student in question.

IV. PROCEDURES

When the Office of Admissions receives an application for admission from a potential freshman student which contains a high school transcript or diploma, the document must be validated. If the validity of the document(s) submitted by the student is in question, the evaluator of the application must follow the Diploma and Transcript Validation Process. After completing the Diploma and Transcript Validation Process, the application evaluator will be able to assess the validity of any documentation provided by the student. In the case of students applying for Transfer admission to Tuana European Beauty Academy, high school transcripts and diplomas are assumed to be previously validated by the previous institution.



Tuana European Beauty Academy, LLC

Annual Security Report

ANNUAL SECURITY REPORT

PREPARATION OF THE ANNUAL SECURITY REPORT

This Annual report is prepared Denise Mitchell, in cooperation with local law enforcement authorities and includes information provided by them as well as by the campus staff. This information will be updated and provided to students via the student handbook every January, posting to student information board, and via the web site www.tuanaacademy.com. Staff will receive notification at the annual staff meeting. Hard copies of the report may also be obtained at no cost at the admission office.

CAMPUS SECURITY AUTHORITIES AND CAMPUSES PERSONNEL

Tuana European Beauty Academy, LLC does not maintain a separate police department. We work closely with the local law enforcement agencies and police departments that have jurisdiction over the campus. If a crime happens to you or your property or if there is an emergency occurring on campus, contact the designated Campus Security Authority or any available administrator.

Campus Security Authority

Denise Mitchell – Tuana European Beauty Academy - 970-472-2004

PROCEDURE ON REPORTING A CRIME OR EMERGENCY

To report a crime:

For non-emergencies contact the appropriate campus security authority identified above or dial 911 (emergencies only). If you are the victim of a crime and do not want to pursue action within the Academy's structure or the criminal justice system, you may still want to consider making a confidential report. With your permission, the Campus authority can file a report on the details of the incident without revealing your identity.

The purpose of a confidential report is to comply with your wish to keep the matter confidential, while taking steps to ensure the future safety of yourself and others. With such information, the Academy can keep an accurate record of the number of incidents involving students, determine where there is a pattern of crime regarding allocation, method, or assailant, and alert the campus community to potential danger. Reports filed in this manner are counted and disclosed in the annual crime statistics for the institution. The Academy encourages accurate and prompt reporting of all crimes to the Campus authority's office or to local law enforcement authorities where the crime occurred.

Report a Hazard:

Students are encouraged to report hazardous conditions or safety concerns to their educator, the administrative staff, and the academy director.

The local news media may be utilized to disseminate emergency information to members of the larger community, including neighbors, parents and other interested parties. Individuals who are members of the larger community and interested in receiving information pertaining to emergencies on campus may also access that information by visiting school website.

Academy staff responsible for carrying out the Emergency response and evacuation procedures is Denise Mitchell (Director) – Tuana European Beauty Academy - 970-472-2004

EMERGENCY EVACUATION PLAN

The emergency evacuation procedures are tested at least annually each year. Students and employees learn the locations of the emergency exits in the buildings and are provided guidance about the direction they should travel when exiting each facility for a short-term building evacuation.

There are two exits in the building, the front door is located at the north end of the building and exits to 18th street. The second exit is located at the south end of the building and exits into to the ally. Please refer to diagram at end of this handbook.

In the event of evacuation please proceed to the nearest exit available. Students performing services, please escort your client with you to the nearest exit.

Students, clients and staff are to meet in the parking lot across the street on 18th street.

Students and clients must stay in this area in order that staff may take attendance.

No one may enter the building until the staff gives approval.

No smoking in the event of an evacuation, this is NOT a break.

No one leaves the site until dismissed.

Listed below are the procedures to be followed in an emergency:

- a. Fire - staff and students are to call "911" and evacuate premises
- b. Medical - staff and students are to call "911" for assistance
- c. Criminal - staff and students are to call "911" when safe to do so
- d. Tornado or earthquake - staff and students should remain in the building and go to secure areas.

FIRE EXTINGUISHERS

Fire extinguishers are located throughout the building and clearly marked.

To operate fire extinguisher if necessary, do the following:

- 1) Pull the pin
- 2) Aim the nozzle at bottom of the fire
- 3) Squeeze the handle
- 4) Sweep from side to side at base of fire

FIRST AID

- First aid supplies are located in the dispensary

TIMELY WARNINGS

Reporting and notification:

Anyone with information warranting a timely warning should immediately report to Campus authority or staff member. Shortly after the incident is reported a decision regarding the issuance of a Timely Warning will be made on a case-by-case basis considering all the facts of the situation. The timing of the notification shall be based on the seriousness of the crime in relation to possible risk of compromising law enforcement efforts and the continuing threat to the students, employees, and guests of Tuana

European Beauty Academy. Information included in the warnings may include, but are not limited to, the following information:

- Type of crime
- Location
- Date and time occurred
- Any suspect information

Procedure:

The following methods may be used to disseminate information to the campus community about crimes that represent a continuing threat to students and employees:

- Text message—issued campus-wide
- Flyers—posted in visible areas, such as entry doorways.

BUILDING SECURITY AND ACCESS POLICY

Tuana European Beauty Academy, LLC does not have any campus residences or dormitories on location. Tuana European Beauty Academy, LLC does not maintain any off-campus locations of student organizations. During regular business hours, the school will be open to students, staff and clients. All visitors and clients must check in at the front desk. During non-business hours, the building will be under lock and key, only staff will be permitted in the building and the doors will remain locked. Students and the public will not be permitted in the building during non-business hours without direct permission of the Academy Director.

SECURITY AWARENESS AND PREVENTION OF CRIMINAL ACTIVITY

Tuana European Beauty Academy, LLC is committed to providing a safe and secure environment for all students, visitors and staff. The Academy seeks to improve the security of its campuses and the members of its campus communities by periodically presenting educational programs to inform students and staff about campus security procedures and practices, to encourage students and staff to be responsible for their own security and the security of others and to inform them about the prevention of crimes. The Academy regularly schedules guest speakers and offers classes on personal safety and self-defense.

PREVENTING DATING VIOLENCE, DOMESTIC VIOLENCE, SEXUAL ASSAULT, AND STALKING

Tuana Academy is committed to providing a safe learning and working environment. The school prohibits dating violence, domestic violence, sexual assault, and stalking and reaffirms its commitment to equal opportunity in educational programs, employment, and access to institutional programs and activities. Students, staff, administrators, and school are entitled to an educational and working environment free from these behaviors.

If you are a victim of a sexual assault, your priority should be to get to a place of safety. You should then obtain necessary medical treatment. Time is a critical factor for evidence collection and preservation. An assault should be reported directly to a Campus authority or staff member.

Filing a report will:

- ensure that a victim of sexual assault receives the necessary medical treatment and tests, at no expense to the victim.
- provide the opportunity for collection of evidence helpful in prosecution, which cannot be obtained later (ideally a victim of sexual assault should not wash, douche, use the toilet, or change clothing prior to a medical/legal exam).
- assure the victim has access to free confidential counseling from counselors specifically trained in sexual assault crisis intervention. The Academy strongly advocates that a victim of sexual assault reports the incident in a timely manner to the local police. Time is a critical factor for evidence collection and preservation. The campus personnel will assist the victim in contacting the local police, although the victim also has the option to decline to make such notification. Once a complaint of sexual violence (including sexual assault), domestic violence, dating violence, or stalking is made, the complainant has several options such as, but not limited to:
 - contacting parents or a relative
 - seeking legal advice
 - seeking personal counseling (always recommended)
 - pursuing legal action against the perpetrator
 - pursuing disciplinary action
 - requesting that no further action be taken

Tuana Academy will provide written notification to victims about options for, and available assistance in, changing academic, transportation, and working situations. If victims request these accommodations and they are reasonably available they will be provided, regardless of whether the victim chooses to report the crime to campus security or local law enforcement.

Standard of Evidence

For all Formal Complaints of Sexual Harassment (including where employees are Respondents), the Academy utilizes the “preponderance of the evidence” standard.

P) The Academy ensures that its Title IX personnel have adequate Title IX training, including annual training on issues related to Sexual Assault, Dating Violence, Domestic Violence and Stalking. The Title IX Coordinator and Investigators are trained on the definition of Sexual Harassment, the scope of the Academy’s education Program or Activity, how to conduct an investigation, the Academy’s Grievance Process (including Live Hearings, appeals, and Informal Resolution processes, as applicable) and how to serve impartially by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. Decision-Makers are trained on the definition of Sexual Harassment, the Live Hearing process, and technology to be used in Live Hearings, and issues of relevance (including how to apply the rape shield protections provided for Complainants). Informal Resolution facilitators are trained on the Informal Resolution process.

PREVENTION AND EDUCATION

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

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

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

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

CONFIDENTIALITY

In order to make informed choices, it is important to be aware of confidentiality and reporting requirements when consulting academy resources. Any Team Member may report to the Title IX Coordinator. Education Team and Team Leads must report to the Title IX Coordinators and are considered mandatory reporters. Academy employee's designated mandatory reporters will notify the Title IX Coordinator of any complaints received.

An individual who seeks completely confidential assistance may do so by speaking with professionals who have legally protected confidentiality. The Academy does not have confidential reporting resources, such as pastoral or professional counselors on campus. Crisis, mental health and victim resource hotline information is available at the conclusion of this policy. Information shared with confidential resources will not be shared with the Academy (including the Title IX Coordinator) or anyone else without express, written permission of the individual seeking services unless required by law or court order.

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

VICTIM SERVICES

Victims will be provided written notification about off-campus counseling, health, mental health, victim advocacy, legal assistance, and other services available to them local community. Those services include:

Colorado Organization for Victim Assistance

www.coloradocrimevictoms.org

Alternatives to Violence, INC

www.alternativestoviolence.org

Crisis Number: 970-880-1000

Fort Collins Police Services

970-419-FCPD (3273)

A Woman's Place, INC

www.awpdv.org

970-356-4226

CAMPUS DISCIPLINARY ACTIONS

A victim of a sexual offense by a student or staff member may choose to report the alleged perpetrator to the Academy Director.

THE ACCUSER WILL BE:

- treated with consideration and understanding;
- encouraged to report the incident to appropriate local law enforcement authorities, and to seek appropriate legal redress;
- informed of the option to be assisted by campus authorities in notifying law enforcement authorities;
- given a list of off-campus sex offense victim services (medical, legal, ecclesiastical, educational and mental health), and encouraged to utilize these resources;
- informed of reasonable options and assistance in changing academic arrangements;
- informed that he/she must identify the accused and provide sufficient details of the event in writing for the Academy to investigate and, if justified, sanction the accused;
- informed that a person of his/her choice may accompany them, for the purpose of providing support, to any resulting campus disciplinary proceeding;
- informed that he/she will be promptly informed as to the outcome of the disciplinary proceeding;

Tuana European Beauty Academy, LLC Annual Security Report 7

- informed that the Academy will act responsibly to respect his/her privacy;
- informed that the Academy will initiate reasonable measures to assist in his/her safety.

THE ACCUSED

- informed of the nature of the allegations and asked to participate in an investigative interview.
- treated with consideration;
- allowed to respond in writing as to the allegation;
- cautioned to have no contact with the accuser during this process;
- informed that he/she will be promptly informed as to the outcome of the disciplinary proceeding

A timely determination will be made as to an appropriate sanction based upon all information gathered during the investigation. The range of appropriate sanctions may vary according to the facts. If the administrative personnel determine that it is more probable than not that the sex offense as alleged by the accuser did take place, appropriate sanctions will be imposed. If the accuser or accused elect to appeal the decision and/or sanction, the matter will then be heard by the Academy Director. If it is not feasible for the Director to come to a decision with respect to the allegation and the accuser pursues legal redress through the criminal or civil courts, the determination may be deferred pending the outcome of the legal process. Depending upon the court action, the Director may impose an appropriate sanction retroactive to the date of the sexual offense. Sanctions include, but are not limited to, no-contact order, suspension, probation or termination from the program. The Academy will act responsibly to protect the welfare and privacy of the accused with respect to the disciplinary process.

Tuana Academy disciplinary process includes a prompt, fair, and impartial initial investigation and final resolution process. In all instances, the process will be conducted in a manner that is consistent with the institution's policy and that is transparent to the accuser and the accused.

The accuser and the accused will have the same opportunities to have others present during any institutional disciplinary proceeding. The accuser and the accused each have the opportunity to be advised by an advisor of their choice at any stage of the process and to be accompanied by that advisor to any related meeting or proceeding. The Academy will not limit the choice of advisor or presence for either the accuser or the accused in any meeting or institutional disciplinary proceeding. However, the role of the advisor is limited to observing and consulting with and providing support to the Complainant or Respondent. An Advisor may not participate (speak) in the investigation and hearing processes on the Student's/Complainant's behalf. The advisor should also maintain confidentiality

The accuser and the accused will be notified simultaneously, in writing, of the any initial, interim and final decision of any disciplinary proceeding.

RESTRAINING ORDERS

Any student or staff member who has a restraining order, order of protection, no contact order or any other such order issued by a court against another individual (whether or not that individual is also a student or staff member) is encouraged to notify an Academy Director of the threat and to provide a copy of the restraining order so that it can be enforced, if necessary.

Sex offense prevention sessions are presented to all new students in orientation.

Additional information is attached to this Security Report distributed to all students and employees annually.

SEX OFFENDER REGISTRATION PROGRAM

In accordance with the federal Campus Sex Crimes Prevention Act (CSCPA), notice must be given of registered sex offenders to institutions of higher education if the offender is employed, carries on a vocation, or is a student at the institution. Information regarding registered sex offenders residing within a specific geographic location can be accessed via:

Colorado Sex Offenders Registry: <https://apps.colorado.gov/apps/dps/sor/>

CRIME DEFINITIONS

The definitions of these offenses follow FBI guidelines and are as follows:

- *Murder and non-negligent manslaughter*: The willful (non-negligent) killing of one human being by another.
- *Negligent manslaughter*: The killing of another person through gross negligence.
- *Sex offenses--forcible*: Any sexual act directed against another person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent.
- *Sex offenses*—non-forcible: unlawful, non-forcible sexual intercourse (i.e. incest or statutory rape).
- *Rape*: Penetration, no matter how slight, of the vagina or anus with a body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
- *Statutory Rape*: Non-forcible sexual intercourse with a person who is under the statutory age of consent
- *Fondling*: The touching of the private body parts of another person for the purpose of sexual gratification, forcibly and/or against that person's will; or, not forcibly or against that person's will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental incapacity
- *Incest*: The non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- *Robbery*: The taking or attempting to take anything of value from the care, custody or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.
- *Aggravated assault*: An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury, usually accompanied by the use of a weapon or by a means likely to produce death or great bodily harm.

- **Burglary**: The unlawful entry of a structure to commit a felony or a theft.
- **Motor vehicle theft**: The theft or attempted theft of a motor vehicle.
- **Arson**: Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.
- **Domestic violence**: Includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of a victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse or the victim under the domestic or family violence laws of the jurisdiction, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Tuana European Beauty Academy, LLC Annual Security Report 9

- **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 where the existence of such a relationship shall be determined based on consideration of the following factors:
 - the length of the relationship
 - the type of relationship
 - the frequency of interaction between the persons involved in the relationship.
- **Stalking**: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:
 - a) fear for his or her safety or the safety of others.
 - b) suffer substantial emotional distress.
- **Hate Crimes**: Any of the aforementioned offenses, and any other crime involving bodily injury, larceny-theft, simple assault, intimidation, and destruction, damage, or vandalism of property that manifests evidence that the victim was intentionally selected because of the actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability of the victim.
- **Illegal Weapons Possession**: The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons. This classification encompasses weapons offenses that are regulatory in nature. Included in this classification are: the manufacture, sale, or possession of deadly weapons; carrying deadly weapons—concealed or openly; the manufacture, sale, etc. of silencers; furnishing deadly weapons to minors; aliens possessing deadly weapons; and attempts to commit any of the above.
- **Drug Law Violations**: The violation of laws prohibiting the production, distribution and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance; and arrests for violations of state and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs.

- **Liquor Law Violations**: The violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages—not including driving under the influence and public drunkenness.

Included in this classification is: the manufacture, sale, transporting, furnishing, possessing, etc., of intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating a still; furnishing liquor to a minor or intemperate person; underage possession, using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; and attempts to commit any of the above.

- **Consent**: In relation to sexual activity, as follows: Consent shall be defined to mean positive cooperation in act or attitude pursuant to an exercise of free will. The person must act freely and voluntarily and have knowledge of the nature of the act or transaction involved.

MONITORING OFF CAMPUS LOCATIONS OF RECOGNIZED STUDENT ORGANIZATIONS

The school monitors and records, through local police agencies, any criminal activity in which students have engaged at off-campus locations of student organizations officially recognized by the school, including student organizations with off-campus housing facilities.

CRIME STATISTICS

The Clery Act requires institutions of higher education to disclose crime statistics covering the previous three years.

Violation	2020		2021		2022	
	Academy Campus	Non Campus and Public Property	Academy Campus	Non Campus and Public Property	Academy Campus	Non Campus and Public Property
Criminal Offenses						
Murder/Non-Negligent Manslaughter	N/A	N/A	0	0	0	0
Negligent Manslaughter	N/A	N/A	0	0	0	0
Robbery	N/A	N/A	0	0	0	0
Aggravated Assault	N/A	N/A	0	0	0	0
Burglary	N/A	N/A	0	0	0	0
Motor Vehicle Theft	N/A	N/A	0	0	0	0
Arson	N/A	N/A	0	0	0	0
Sexual Assault, including:						
Rape	N/A	N/A	0	0	0	0
Fondling	N/A	N/A	0	0	0	0
Incest	N/A	N/A	0	0	0	0
Statutory Rape	N/A	N/A	0	0	0	0
VAWA Offenses						
Domestic Violence	N/A	N/A	0	0	0	0
Dating Violence	N/A	N/A	0	0	0	0
Stalking	N/A	N/A	0	0	0	0
Liquor, Drug & Weapon Violations						
Liquor Law Violations: Arrests	N/A	N/A	0	0	0	0
Liquor Law Violations: Disciplinary Referral	N/A	N/A	0	0	0	0
Drug Law Violations: Arrests	N/A	N/A	0	0	0	0
Drug Law Violations: Disciplinary Referrals	N/A	N/A	0	0	0	0
Weapons: Carrying, Possessing, etc.: Arrests	N/A	N/A	0	0	0	0
Weapons: Carrying, Possessing, etc.: Disciplinary Referral	N/A	N/A	0	0	0	0
Hate Crimes						
Race	N/A	N/A	0	0	0	0
Gender	N/A	N/A	0	0	0	0
Gender Identity	N/A	N/A	0	0	0	0
Religion	N/A	N/A	0	0	0	0
Sexual Orientation	N/A	N/A	0	0	0	0
Ethnicity	N/A	N/A	0	0	0	0
National Origin	N/A	N/A	0	0	0	0
Disability	N/A	N/A	0	0	0	0

EMERGENCY RESPONSE PLAN

WEAPONS

- Someone brings a weapon into the Academy, there are many levels of danger this can bring. Please use your best judgment when dealing with such a dangerous subject. If at any time you feel threatened in any way, please call 911. Tuana Academy strongly feels the police are there to protect and serve, therefore, they will not get upset if we call them.
 - IMMEDIATELY GET YOUR EDUCATOR

FIRE

- CALL TO YOUR EDUCATOR
- Fires can spread quickly-Safety first-call 911 execute emergency evacuation procedures
- If you feel comfortable go to the fire extinguisher and execute proper fire extinguisher procedures to extinguish fire.

PHYSICAL THREATS

- Homeless-never approach someone if you feel they could be a danger, notify your educator if you see any suspicious or concerning actions.
- Safety hazards-use caution during times of remodel/repairing/upgrading-debris can be on the floor and cause slipping and tripping hazard, please avoid these areas.
- General dangers-if at any time you see something that could cause harm to the building, students, or staff members please notify your educator immediately.

ADDITIONAL RESOURCES

National Sexual Violence Resource Center

Contact Information: 877-739-3895

Rape, Abuse and Incest National Network (RAINN)

Contact Information: 800-656-4673

National Sexual Assault Hotline

Contact information: 1800-656-4673

*Counseling, advocacy and support for victims, regardless of whether or not a victim chooses to make an official report or participate in the Institutional disciplinary or criminal process. Option to disclose with confidentiality. Counselors can provide ongoing support during the institutional disciplinary or criminal process.

Sexual Assault Response Team (SART)

Contact information: 877-739-3895

*Helps victims navigate medical, emotional and legal issues along with associated procedures. SART is available for quick reference and immediate assistance. SART will help victim find options to seek treatment for injuries, preventative treatment for sexually transmitted diseases and other health services.

Law Enforcement

Contact Information: dial 911

Sexual Assault Nurse Examiner (SANE)

Forensicnurses.org

*Offers assistance in obtaining a rape kit and preservation



Tuana European Beauty Academy, LLC

Drug Free Workplace Policy

DRUG FREE WORKPLACE POLICY

INTRODUCTION

The following Drug-Free Workplace Policy is to notify all employees and students that pursuant to the Federal Drug-Free Workplace Act of 1988 (Public Law 101-690), prohibits the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in the workplace, on school property, or as part of any school activity. Similarly prohibits the unlawful use, possession, and distribution of alcohol in the workplace, on school property, or as part of any school activity, as well as any other unlawful conduct involving alcohol.

The drug-free workplace consists of all locations where business does. This includes, but is not limited to, all lecture classrooms, parking lots, all administrative offices, corridors, storage rooms, and any space added to the school or school property.

HEALTH RISKS

The abuse of narcotics, depressants, stimulants, hallucinogens, or alcohol can cause serious detriment to a person's health. The health risks associated with the misuse of the previously mentioned drugs vary, but may include, and are not limited to: convulsions, coma, paralysis, irreversible brain damage, tremors, fatigue, paranoia, insomnia, and possible death. Drug and alcohol abuse is extremely harmful to a person's health and interferes with productivity and alertness. Working while under the influence of drugs or alcohol could be a danger to the individual under the influence, coworkers, and students. Described below are additional dangers and symptoms relative to use and/or abuse.

CANNABIS

Commonly known as marijuana, marijuana is a plant with the botanical name of *cannabis sativa*. Marijuana is almost always smoked but can be ingested. Use causes the central nervous system to become disorganized and confused. Most users experience an increase in heart rate, reddening of eyes, and dryness of the throat and mouth. Studies have proven that marijuana's mental effects include temporary impairment of short-term memory and an altered sense of time. It also reduces the ability to perform tasks requiring concentration, swift reactions, and coordination. Feelings of euphoria, relaxation, and bouts of exaggerated laughter are also commonly reported. Smoking marijuana may cause: brain chemical changes, an altered reality, physically damaged lungs, emphysema, chronic bronchitis, lung cancer, a weakened immune system, damage to sperm in males, irregular menstrual cycles in females, and reduced fertility and sex drive.

Regardless whether or not the state allows the use of marijuana or medical marijuana, at the federal level, marijuana remains classified as a Schedule I substance under the Controlled Substances Act, in which Schedule I substances are considered to have a high potential for dependency and no accepted medical use, making distribution or use of marijuana a federal offense. Therefore, regardless of the circumstance, marijuana cannot be brought to or used on the school's campus.

COCAINE/CRACK

Cocaine is a stimulant drug, which is derived from the coca plant. Street cocaine is available in the form of a powder or a “rock” of crack and is most commonly inhaled or smoked. Cocaine increases the heart rate and blood pressure and is highly addictive.

Crack is a form of smokable cocaine named for the popping sound it makes when burned. It is a mixture of cocaine, baking soda, and water. It is 5–10 times more potent than cocaine and is extremely harmful. It has been reported that addiction can occur with as few as two “hits.”

Some symptoms of cocaine/crack abuse are: personality changes; unexplained weight loss; excess sniffing and coughing; insomnia; depression; irritability; neglect of responsibility toward work, school, family, and friends; and panic attacks.

ALCOHOL

In small amounts, alcohol has a tranquilizing effect on most people, although it appears to stimulate others. Alcohol first acts on those parts of the brain that affect self-control and other learned behaviors; lowered self-control can lead to aggressive behavior. Alcohol use can also cause dehydration, coordination problems, and blurred vision.

In large amounts, alcohol can dull sensation and impair muscular coordination, memory, and judgment. Taken in larger amounts over a long period of time, alcohol can damage the liver, heart, and brain, and cause numerous other health and medical issues.

HALLUCINOGENS

Hallucinogens are also known as psychedelics. The effects vary; a user’s reactions can vary by occasion. Most users are affected by changes in time and space perception, delusions, and hallucinations. The effects may be mild or overwhelming, depending on the dose and quantity of the drug. Physical reactions range from minor changes, such as dilated pupils or an increase in temperature and heartbeat, to major changes, such as tumors. High doses can significantly alter the state of consciousness. After taking a hallucinogenic drug, the user loses control of thought processes. Although many perceptions are benign, others may cause panic or may make the user believe he or she cannot be harmed. Such delusions can be dangerous.

HEROIN

Heroin is a narcotic, which relieves pain and induces sleep. Commonly known as “junk” or “smack,” heroin is a highly addictive depressant and has been attributed as the cause of many deaths. Symptoms include “pin-point pupils”; drowsiness, lethargy, and slurred speech; and an inability to concentrate. Related medications used to treat pain include oxycontin and oxycodone, methadone, and codeine. The abuse of painkillers ranks second only to the abuse of marijuana in the United States.

Heroin users experience a higher rate of infectious disease due to a weakened immune system and sharing contaminated needles. Children can be born addicted or can become addicted as a result of heroin in the mother's breast milk.

CRYSTAL METHAMPHETAMINE

Crystal methamphetamine is a colorless, odorless, powerful, and highly addictive synthetic (man-made) stimulant. Crystal methamphetamine typically resembles small fragments of glass or shiny blue-white “rocks” of various sizes. Like powdered methamphetamine, crystal methamphetamine produces long-

lasting euphoric effects. Crystal methamphetamine, however, typically has a higher purity level and may produce even longer-lasting and more intense physiological effects than the powdered form of the drug. Crystal methamphetamine use is associated with numerous serious physical problems. The drug can cause rapid heart rate, increased blood pressure, and damage to the small blood vessels in the brain, which can lead to stroke. Chronic use of the drug can result in inflammation of the heart lining. Overdoses can cause hyperthermia (elevated body temperature), convulsions, and death. Crystal methamphetamine users may experience episodes of violent behavior, paranoia, anxiety, confusion, and insomnia. The drug can produce psychotic symptoms that persist for months or years after an individual has stopped using the drug. Crystal methamphetamine users who inject the drug expose themselves to additional risks, including contracting HIV (human immunodeficiency virus). Methamphetamine users also risk scarred or collapsed veins, infections of the heart lining and valves, abscesses, pneumonia, tuberculosis, and liver or kidney disease.

DEPRESSANTS

Depressants are highly addictive; they are usually known as “downers.” A user may be drowsy and lethargic, suffer from memory loss, and have slurred speech. Many lawful drugs that have characteristics of depressants are from the family of drugs called barbiturates. More serious effects of the abuse of downers are liver damage, paradoxical anxiety and excited rage, coma, and death.

ECSTASY (MDMA)

Also known as XTC, X, and E, Ecstasy is a mind-altering drug with hallucinogenic and speed-like side effects. Often used at raves, it is taken to promote loss of inhibition, excitability, euphoria, energy, and sexual stimulation. Ecstasy increases the amounts of serotonin in the user’s brain, which causes increased energy and euphoria; it also contains anti-coagulative properties, which can cause the user to bleed to death if injured. Ecstasy can also cause serious brain damage in a short time. Side effects of ecstasy include: depression, increased heart rate and blood pressure, muscle tension, nausea, blurred vision, faintness, chills, brain damage, organ damage, and death. Similar “designer drugs” include MDEA and MDA (also known as “Adam” and “Eve”).

RITALIN

Methylphenidate (Ritalin) is a medication prescribed for individuals (usually children) who have an abnormally high level of activity or attention-deficit hyperactivity disorder (ADHD). It contains amphetamines and can be abused as a stimulant by those for whom it is not prescribed. When abused, the tablets are either taken orally or crushed and snorted. Some abusers dissolve the tablets in water and inject the mixture — complications can arise from injection as insoluble fillers in the tablets can block small blood vessels.

GHB

Gamma-hydroxybutyrate is an intoxicating chemical with medical, recreational, and potentially dangerous uses. Its use is illegal for any purpose in the United States. Nicknamed the “date rape drug,” it is a clear liquid often mixed in drinks to promote relaxation or increased sociability. When taken, side effects can include: drowsiness, dizziness, vomiting, amnesia, decreased motor skills, slurring of speech, unarguable sleep (coma), and death. GHB was used as a dietary supplement until banned by the FDA. GHB is now illegal in the United States. Common slang names for GHB are: G, Liquid X, GBH, Gamma-oh, Blue Verve, Grievous Bodily Harm, Goop, and EZLay.

Drug Conviction Notification and Imposed Sanctions:

- Any employee or student must notify of any criminal drug statute conviction for a violation occurring in the workplace no later than five days after such a conviction.
- Within 30 days after receiving notice of an employee or student conviction, will impose corrective measures on the employee or student convicted of drug abuse violations in the workplace by:
 - Taking appropriate action against the employee or student up to and including expulsion or termination of employment and referral for prosecution and/or
 - Requiring such employee or student to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law enforcement, or other appropriate agency.

LAWS RELATING TO DRUG VIOLATIONS

Attached (page 45) is a list of violation codes associated with the unlawful manufacture, distribution, dispensing, possession, or use of any controlled substance. Any employee or student violating any of the described laws of the Health and Safety Code or the Business and Professional Code could be subject to fines and imprisonment.

Where can students go for help? Where can staff go for help?

Drug Abuse and Addiction Information and Treatment Centers

The Recovery Village -877-850-6231

Aspen Ridge Recovery -866-850-7550

Alcohol Anonymous -Northern Colorado Intergroup, INC www.northcoloradoaa.org - 970-224-3552

Substance Abuse Treatment Referral Service -1(800)662-4889

Al-Anon & Alateen 1(888)425-2666

Alcoholics Anonymous (602)264-1341

POLICY DISTRIBUTION PROCEDURES

Drug-Free Workplace Policy will be distributed to all employees and students on an annual basis using the following procedure:

- Students will receive a copy of the Drug-Free Workplace Policy at the time of initial enrollment. The enrollment agreement signed by every student will acknowledge receipt of the Drug-Free Workplace Policy.
- Staff employees will receive a copy of the Drug-Free Workplace Policy with the initial employment agreement.

It will be read, and the signature page will be returned with the employment agreement. Annually, the human resources department will be responsible for distributing the policy to current staff employees. Biennial Review. The school conducts a biennial review of its Drug-Free Workplace Policy to determine the program's effectiveness; any needed changes, the number of drug- and alcohol-related violations and fatalities, and the number and type of sanctions imposed. Contact the School Director to request a copy of the biennial review.

DRUG SCHEDULES AND PENALTIES

Federal Trafficking Penalties*

Drug/Schedule	Quantity	Penalties	Quantity	Penalties
Cocaine (Schedule II)	500–4,999 grams mixture	<p>First offense: Not less than five years, and not more than 40 years. If death or serious injury, not less than 20 years or more than life imprisonment. Fine of not more than \$2 million if an individual, \$5 million if not an individual.</p> <p>Second offense: Not less than 10 years, and not more than life imprisonment. If death or serious injury, life imprisonment. Fine of not more than \$4 million if an individual, \$10 million if not an individual.</p>	5 kilograms or more mixture	<p>First offense: Not less than 10 years, and not more than life imprisonment. If death or serious injury, not less than 20 years or more than life imprisonment. Fine of not more than \$4 million if an individual, \$10 million if not an individual.</p> <p>Second offense: Not less than 20 years, and not more than life imprisonment. If death or serious injury, life imprisonment. Fine of not more than \$8 million if an individual, \$20 million if not an individual.</p> <p>Two or more prior offenses: Life imprisonment</p>
Cocaine Base (Schedule II)	28–278 grams mixture		279 grams or more mixture	
Fentanyl (Schedule II)	40–399 grams mixture		400 grams or more mixture	
Fentanyl Analogue (Schedule I)	10–99 grams mixture		100 grams or more mixture	
Heroin (Schedule I)	100–999 grams mixture		1 kilogram or more mixture	
LSD (Schedule I)	1–9 grams mixture		10 grams or more mixture	
Methamphetamine (Schedule II)	5–49 grams pure or 50–499 grams mixture		50 grams or more pure or 500 grams or more mixture	
PCP (Schedule II)	10–99 grams pure or 100–999 grams mixture	100 grams or more pure or 1 kilogram or more mixture		
Penalties				
Other Schedule I and II Drugs (and any drug product containing Gamma Hydroxybutyric Acid)	Any amount	<p>First offense: Not more than 20 years. If death or serious injury, not less than 20 years, or more than life imprisonment. Fine \$1 million if an individual, \$5 million if not an individual.</p> <p>Second offense: Not more than 30 years. If death or serious injury, not less than life imprisonment. Fine \$2 million if an individual, \$10 million if not an individual.</p>		
Flunitrazepam (Schedule IV)	1 gram or more			
Other Schedule III Drugs	Any amount	<p>First offense: Not more than five years. Fine not more than \$250,000 if an individual, \$1 million if not an individual.</p>		
Flunitrazepam (Schedule IV)	30 to 999 milligrams	<p>Second offense: Not more than 10 years. Fine not more than \$500,000 if an individual, \$2 million if not an individual.</p>		
All Other Schedule IV Drugs	Any amount	<p>First offense: Not more than three years. Fine not more than \$250,000 if an individual, \$1 million if not an individual.</p>		
Flunitrazepam (Schedule IV)	Less than 30 milligrams	<p>Second offense: Not more than six years. Fine not more than \$500,000 if an individual, \$2 million if not an individual.</p>		
All Schedule V Drugs	Any amount	<p>First offense: Not more than one year. Fine not more than \$100,000 if an individual, \$250,000 if not an individual.</p> <p>Second offense: Not more than two years. Fine not more than \$200,000 if an individual, \$500,000 if not an individual.</p>		

Federal Trafficking Penalties — Marijuana*

Drug	Quantity	First Offense	Second Offense
Marijuana	1,000 kilograms or more mixture; or 1,000 or more plants	<ul style="list-style-type: none"> • Not less than 10 years, not more than life imprisonment. • If death or serious injury, not less than 20 years, not more than life imprisonment. • Fine not more than \$4 million if an individual, \$10 million if other than an individual. 	<ul style="list-style-type: none"> • Not less than 20 years, not more than life imprisonment. • If death or serious injury, mandatory life imprisonment. • Fine not more than \$8 million if an individual, \$20 million if other than an individual.
Marijuana	100 kilograms to 999 kilograms mixture; or 100 to 999 plants	<ul style="list-style-type: none"> • Not less than five years, not more than 40 years. • If death or serious injury, not less than 20 years, not more than life imprisonment. • Fine not more than \$2 million if an individual, \$5 million if other than an individual. 	<ul style="list-style-type: none"> • Not less than 10 years, not more than life imprisonment. • If death or serious injury, mandatory life imprisonment. • Fine not more than \$4 million if an individual, \$10 million if other than an individual.
Marijuana	more than 10 kilograms hashish; 50 to 99 kilogram mixture more than 1 kilogram of hashish oil; 50 to 99 plants	<ul style="list-style-type: none"> • Not more than 20 years. • If death or serious injury, not less than 20 years, not more than life imprisonment. • Fine \$1 million if an individual, \$5 million if other than an individual. 	<ul style="list-style-type: none"> • Not more than 30 years. • If death or serious injury, mandatory life imprisonment. • Fine \$2 million if an individual, \$10 million if other than an individual.
Marijuana	1 to 49 plants; less than 50 kilogram mixture	<ul style="list-style-type: none"> • Not more than five years. • Fine not more than \$250,000, \$1 million if other than an individual. 	<ul style="list-style-type: none"> • Not more than 10 years. • Fine \$500,000 if an individual, \$2 million if other than an individual.
Hashish	10 kilograms or less		
Hashish Oil	1 kilogram or less		

*From the U.S. Drug Enforcement Administration

STUDENT LOAN CODE OF CONDUCT

To comply with the 2008 Higher Education Opportunity Act, enacted August 14, 2008, Tuana European Beauty Academy adopts the following Student Loan Code of Conduct to serve as the guiding principles in ensuring the integrity of the student financial aid process. All Tuana Academy employees who have responsibilities with respect to educational loans are required to comply with this Student Loan Code of Conduct.

Neither Tuana Academy as an institution nor any individual employee shall enter into any revenue-sharing arrangements with any lender. For the purposes of this document, revenue-sharing is defined to mean any arrangement between an institution and a lender making Title IV loans wherein the institution recommends the lender or the loan products, and in exchange, the lender pays a fee or provides a service to the institution or its employees.

An employee who has responsibilities with respect to education loans, or any of their family members, shall not solicit or accept any gift from a lender, guarantor, or servicer of education loans. For purposes of this prohibition, the term "gift" means any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a trivial amount. The term includes a gift of services, transportation, lodging or meals, whether provided in-kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.

An employee who has responsibilities with respect to education loans shall not accept from any lender or affiliate of any lender any fee, payment, or other financial benefit (including the opportunity to purchase stock) as compensation for any type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to education loans.

Tuana Academy shall not, through award packaging or other methods, assign a first-time borrower's loan to a particular lender or refuse to certify, or delay certification of, any loan based on the borrower's selection of a particular lender or guaranty agency.

Tuana Academy shall not request or accept from any lender any offer of funds to be used for private education loans, including funds for an opportunity pool loan, in exchange for the institution providing concessions or promises to a lender regarding a specified number of loans made, insured, or guaranteed; a specified volume of loans; or a preferred lender arrangement for such loans. An opportunity pool is defined as a private education loan made by a lender to a student (or the student's family) that involves payment by the institution to the lender for extending credit to the student.

Tuana Academy shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing unless those services are short-term and nonrecurring, in the event of an emergency or disaster or for office staff professional development. Those services may include providing counseling, financial literacy, or debt management materials to borrowers as long as such materials

disclose to borrowers the name of the lender that provided or assisted in the preparation of the materials.

Any employee who has responsibilities with respect to education loans or other student financial aid, and who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, shall be prohibited from receiving anything of value from the lender, guarantor, or group of lenders or guarantors, except that the employee may be reimbursed for reasonable expenses incurred in serving on such advisory board, commission, or group.

