



ADDENDUM TO
AMERICAN INSTITUTE CATALOG VOLUME 1.3

(PUBLISHED May 11, 2026)

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**(This addendum is an integral part of the catalog. Any data stated in the addendum
supersedes any contradictory information contained in the catalog.)**

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**Addendum for General Information
(Applicable Laws and Regulations)
Effective June 02, 2026**

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APPLICABLE LAWS AND REGULATIONS

American Institute's policies and practices are in accordance with all applicable laws and regulations including, but not limited to:

- Title VI of the Civil Rights Act of 1964, as amended, and the implementing regulations 34 CFR Part 100 (barring discrimination on the basis of race, color, or national origin)
- Title IX of the Education Amendments of 1972 and the implementing regulations 34 CFR Part 106 (barring discrimination on the basis of sex)
- The Family Educational Rights and Privacy Act of 1974 and the implementing regulations 34 CFR Part 99
- Section 504 of the Rehabilitation Act of 1973 and the implementing regulations 34 CFR Part 104 (barring discrimination on the basis of a handicap)
- The Age Discrimination Act of 1975 and the implementing regulations 34 CFR Part 110 and
- The Americans with Disabilities Act of 1990 and the implementing regulations in 28 CFR Part 36

The Chief Compliance Officer for Vocate, has been designated as the administrator for American Institute's compliance with Title IX of the Education Amendments of 1972. The following persons have been designated to coordinate American Institute's compliance with Section 504 of the Rehabilitation Act of 1973 (Section 504), the American with Disabilities Act of 1990 (ADA) and the Age Discrimination Act of 1975:

Position Title	Location	Address	Telephone Number
Campus Director/ Director of Education	West Hartford	99 South Street, West Hartford, CT 06110	(860) 947-2299
Campus Director/ Director of Education	Cherry Hill	2201 NJ-38, 8 th Floor, Cherry Hill, NJ 08002	(856) 444-5600
Campus Director/ Director of Education	Clifton	346 Lexington Avenue, Clifton, NJ 07011	(973) 340- 9050
Campus Director/ Director of Education	Clifton	1117 Main Avenue, Clifton, NJ 07011	(973) 340- 9500
Campus President/ Director of Education	Toms River	2363 Lakewood Road, Toms River, NJ 08755	(732) 719- 2730
Campus Director/ Director of Education	Somerset	80 Cottontail Lane, Suite 103, Somerset, NJ 08873	(732) 201- 8335

For questions or concerns regarding American Institute's Non-Discrimination policy, please contact:

Nadine Bailey
9309 N. Florida Ave.
Tampa, FL 33612
813-532-8054
nbailey@vocate.org

**Addendum for General Information
(Sexual Discrimination Prohibited by Title IX Policy)
Effective June 02, 2026**

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SEXUAL DISCRIMINATION PROHIBITED BY TITLE IX POLICY

A. Scope

This policy applies to conduct of which Vocate Education Solutions, Inc. "Vocate" entities have Actual Knowledge, and that:

- meets the definition of Sexual Harassment
- occurs in Ultimate Medical Academy's "UMA" or American Institute's "AI" Educational Programs or Activities and
- is against a person in the United States

Capitalized terms have the meaning assigned in this policy.

This policy is one component of Vocate's commitment to a discrimination-free work and educational environment. Conduct that does not fall into the scope of this policy may fall under the scope of another policy, for example Vocate's Non-Discrimination and Non-Harassment policy applicable to team members, or the Code of Conduct for Students policy, and may be subject to procedures associated with those other policies.

B. Definitions

Below are key definitions relating to Sexual Harassment:

"Actual Knowledge" Provision of notice of Sexual Harassment or allegations of Sexual Harassment to the Title IX Coordinator, or to another UMA or AI official with the authority to institute corrective measures on behalf of School. Those other officials with the authority to institute corrective measures on behalf of UMA are the Campus President of UMA's Clearwater campus and the Vocate Associate Title IX Coordinators. For convenience, all individuals with the authority to institute corrective measures on behalf of UMA can be reached through TitleIX@vocate.org. Those other officials with the authority to institute corrective measures on behalf of AI are the Campus Presidents of the respective AI campus and the AI Associate Title IX Coordinators. For convenience, all individuals with the authority to institute corrective measures on behalf of AI can be reached through TitleIX@vocate.org. Actual Knowledge is not present where the Respondent of an allegation of Sexual Harassment is the only School official with knowledge.

"AI" American Institute, as operated by AI Education, Inc. ("AI")

"Associate Title IX Coordinator" A School team member appointed by the Title IX Coordinator who is responsible for assisting in the administration of this policy. The mailing address for all Associate Title IX Coordinators is 9309 N. Florida Ave., Tampa, FL 33612. The Associate Title IX Coordinators are:

- For UMAE team member issues: Wanda Torres Kim (wtorreskim@vocate.org or 813-466-1665), Tinita Wright ([tiamilton@vocate.org](mailto:tihamilton@vocate.org) or 813-388-4781), and Kayla Crouse (kcrouse@vocate.org or 813-283-6800).
- For UMA student issues, Lisa McClure (lmclure@vocate.org or 813-676-1653).
- For AIE team member issues, Christine Bry (cbry@vocate.org or 484-332-9516)
- For AI student issues, Christine Partite (cpartite@americaninstitute.edu or 848-207-7650) for AI student issues.

"Clery Act" The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, 20 U.S.C. Section 1092(f); 34 C.F.R. Part 668.46. The Clery Act requires each School to compile statistics for (among other things) incidents of Sexual Harassment.

"Complainant" An individual who is alleged to be the victim of Sexual Harassment. To file a Formal Complaint, a Complainant must be participating in or attempting to participate in School's Educational Program or Activities.

"Consent" Words or actions that show a knowing and voluntary willingness to engage in mutually agreed-upon sexual activity. Consent cannot be gained by force, intimidation, or coercion; by ignoring or acting in spite of objections of another; or by taking advantage of the Incapacitation of another where the Respondent knows or reasonably should have known of such Incapacitation. Consent is also absent when

the activity in question exceeds the scope of Consent previously given. Past Consent does not imply present or future Consent. Silence or an absence of resistance does not imply Consent. Consent can be withdrawn at any time by either Party by using clear words or actions. Intoxication due to use of alcohol or drugs may impair an individual's capacity to Consent freely and may render an individual incapable of giving Consent.

“Educational Programs or Activities” A School-sponsored location or event, or other circumstance over which School exercised substantial control over both the context and the Respondent to an allegation of Sexual Harassment. School’s online course environment is explicitly included in this definition. |

“Formal Complaint” A document filed by and signed by either the Complainant or the Title IX Coordinator that alleges Sexual Harassment against a Respondent and requests that Vocate, UMA, or AI investigate the allegation. A Formal Complaint can be filed with the Title IX Coordinator, an applicable Associate Title IX Coordinator in person, via email, or via mail or to TitleIX@vocate.org An electronic submission that indicates that the Complainant is the one filing the formal complaint will be considered to be signed by the Complainant for purposes of this policy. Where the Title IX Coordinator files and signs a Formal Complaint, the Title IX Coordinator is not considered to be a Complainant.

“Incapacitation” The physical and/or mental inability to make informed, rational judgments. Incapacitation can result from mental disability, sleep, involuntary physical restraint, status as a minor under the age of 16, or from intentional or unintentional taking of alcohol and/or other drugs. Whether someone is Incapacitated is to be judged from the perspective of an objectively reasonable person.

“Parties” or “Party” The Complainant and/or Respondent.

“Respondent” An individual who has been reported to be the perpetrator of Sexual Harassment. To be a Respondent subject to this policy, an individual must be under School’s substantial control. If during an investigation or hearing into a Formal Complaint, a Respondent ceases being a School team member or student, School may dismiss the Formal Complaint.

“School” UMA or AI as applicable to a student Complainant and/or Respondent and Vocate as to a team member Complainant and/or Respondent.

“Sexual Harassment” Conduct on the basis of sex that satisfies one or more of the following: (1) a team member conditioning the provision of an aid, benefit, or service from School on the Complainant’s participation in unwelcome sexual conduct; (2) unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies the Complainant equal access to a School Education Program or Activity; or (3) the following crimes defined under the Violence Against Women Act: “sexual assault” as defined in 20 U.S.C. 1092(f)(6)(A)(v), “dating violence” as defined in 34 U.S.C. 12291(a)(10), “domestic violence” as defined in 34 U.S.C. 12291(a)(8), or “stalking” as defined in 34 U.S.C. 12291(a)(30).

“Supportive Measures” Non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to a Complainant or Respondent before or after the filing of a Formal Complaint, or where no Formal Complaint has been filed. Such measures are designed to restore or preserve equal access to School’s Education Programs or Activities without unreasonably burdening the other Party, including measures designed to protect the safety of all Parties or the educational environment, or deter Sexual Harassment. Examples of Supportive Measures are: counseling, extensions of deadlines or other course-related or work-related adjustments, modifications of work or class schedules, escort services while on School premises, mutual restrictions on contact between the Parties, changes in work locations, leaves of absence, increased security and monitoring of certain areas of the campus, and other similar measures. School will maintain as confidential any supportive measures provided to a Complainant or Respondent, to the extent that maintaining such confidentiality does not impair School’s ability to provide the Supportive Measures. The Title IX Coordinator and Associate Title IX Coordinators are responsible for coordinating the effective implementation of Supportive Measures.

“Title IX” The federal statute and associated regulation promulgated by the U.S. Department of Education which govern the efforts of educational institutions to maintain campuses free from sex and gender discrimination, including Sexual Harassment.

“Title IX Coordinator” The team member who is ultimately responsible for overseeing School's compliance with Title IX. The Title IX Coordinator is Nadine Bailey (nbailey@vocate.org or 813-532-8054). The mailing address for the Title IX Coordinator is 9309 N Florida Ave #100, Tampa, FL 33612.

“UMA” Ultimate Medical Academy, as operated by UMA Education, Inc.

“United States” Physical location within one of the fifty United States, the District of Columbia, or territories of the United States of America.

C. Prohibition on Sexual Harassment

As required by Title IX, School expressly prohibits discrimination on the basis of sex, including Sexual Harassment, in its Educational Programs and Activities and is committed to fostering an environment for both students and team members where Sexual Harassment is promptly reported, Supportive Measures are offered as appropriate, and any Formal Complaints are resolved in a fair and timely manner.

Regardless of the definitions provided in this policy, those who believe they are victims of Sexual Harassment should seek immediate medical and/or safety assistance as appropriate and report the incident as soon as possible as described below. Information regarding resources and options available to victims can be found through the following resources:

For team members:

- Employee Assistance Program (confidential resources available) – <https://www.mutualofomaha.com/eap>; 800.316.2796

For students:

- UMA's Student Guidance Center (confidential resources available) – <https://www.ultimatemedical.edu/help>; (web id: UMASAP) or 866.797.1622 (open 24/7)
- American Institute: If the residence-based information in this section below does not apply, please see the Campus Director/Director of Education for resources.

For residents of the Tampa Bay area:

- The Spring of Tampa Bay – <https://www.thespring.org>; 813.247.7233 (open 24/7)
- CASA (Community Action Stops Abuse) of St. Petersburg - <https://www.casa-stpete.org>; 727.895.4912 (open 24/7)
- Crisis Center of Tampa Bay – <https://www.CrisisCenter.com>; 813.694.1964 or 211 (open 24/7)

For residents of the Cherry Hill area:

- Camden County Domestic Violence Center 311 Market St. Camden, NJ 08102 (856) 227-1234
- Jewish Family & Children's Service of Southern New Jersey SARAH Project 1301 Springdale Rd, Suite 150, Cherry Hill, NJ 08003 (856) 424-1333; ask for "Sarah"
- Child Abuse Hot Line- Division of Youth & Family Services (800) 792- 8610
- Statewide NJ Coalition for Battered Women 800-572-7233
- Battered Lesbian Hotline (NJ only) 800-224-0211
- Women Against Abuse 866-723-3014 (PA)
- Women In Transition 866-723-3014 (PA)
- Domestic Abuse Project Delaware Co. 610-565-4590 (PA)

For residents of the Clifton area:

- Passaic County Women's Center- Shelter for Assault & Abuse (973) 881-1450
- Post-Partum Depression Hotline (800) 328-3838
- Child Abuse Hot Line- Division of Youth & Family Services (800) 792-8610
- Parent 24 Hr. Stress Line (800) 843-5437
- Statewide NJ Coalition for Battered Women 800-572-7233
- Battered Lesbian Hotline (NJ only) 800-224-0211
- Child Abuse Hotline 877-NJ-ABUSE Child Support Assistance 877-NJ-KIDS1
- Strengthen Our Sisters, Ringwood- women's shelter (973) 728-0007
- Child Abuse Hot Line- Division of Youth & Family Services (800) 792- 8610
- Statewide NJ Coalition for Battered Women 800-572-7233
- Bergen County Alternatives to DV 201-336-7575
- Shelter Our Sisters 201-944-9600
- Family Violence Program 973-484-4446
- The Rachel Coalition 973-740-1233
- New Jersey Coalition Against Sexual Assault, 800-601-7200
- East Orange Crisis Intervention Unit 973-672-9685

- Edison Rape Crisis Intervention Center 732-452-5900
- Hackensack Bergen County Rape Crisis Center 201-487-2227
- Jersey City Medical Center 201-433-6161
- Morristown Morris County Sexual Assault Center 973-829-0587
- Newark Safe & Sound Rape Crisis Center 973-972-1325
- Paterson Passaic County Women's Center 973-881-1450

For residents of the Somerset area:

- Post-Partum Depression Hotline (800) 328-3838
- Child Abuse Hot Line- Division of Youth & Family Services (800) 792-8610
- Parent 24 Hr. Stress Line (800) 843-5437
- Statewide NJ Coalition for Battered Women 800-572-7233
- Battered Lesbian Hotline (NJ only) 800-224-0211
- Child Abuse Hotline 877-NJ-ABUSE
- Child Support Assistance 877-NJ-KIDS1
- Manavi for South Asian Women 908-687-2662
- Bergen County Alternatives to DV 201-336-7575
- Northeast New Jersey Legal Services 201-487-2166
- Office of Victim-Witness Advocacy 201-646-2057
- Shelter Our Sisters 201-944-9600
- Alternatives to Domestic Violence 201-487-8484
- Essex County Council of Jewish Women 973-997-WISN
- Essex-Newark Legal Services 973-824-3000
- Family Violence Program 973-484-4446
- Office of Victim-Witness Advocacy 973-621-4707
- The Rachel Coalition 973-740-1233
- The Safe House 973-759-2154
- Hudson County Christ Hospital Mental Health 201-795-837
- 3 Northeast Legal Services 201-792-6363
- Office of Victim-Witness Advocacy 201-795-6400
- Women Rising Hotline (YWCA) 201-333-5700
- Women's Referral Central 800-322-8092
- Morris County Battered Women's Services 973-267-4763
- Care Program 973-971-4715
- Legal Services of Northwest Jersey 973-285-6911
- Office of Victim-Witness Services 973-285-6200
- Passaic County Northeast Jersey Legal Services 973-523-2900
- Office of Victim-Witness Advocacy 973-881-4887
- Strengthen Our Sisters 973-728-0007
- Women's DV Program 973-881-1450
- Union County Central Jersey Legal Services 908-354-4340
- Office of Victim-Witness Advocacy 908-527-4500
- Project Protect 908-355-4357
- New Jersey Coalition Against Sexual Assault, 800-601-7200
- East Orange Crisis Intervention Unit 973-672-9685
- Edison Rape Crisis Intervention Center 732-452-5900
- Hackensack Bergen County Rape Crisis Center 201-487-2227
- Jersey City Medical Center 201-433-6161
- Morristown Morris County Sexual Assault Center 973-829-0587
- Newark Safe & Sound Rape Crisis Center 973-972-1325

- Paterson Passaic County Women's Center 973-881-1450

For residents of the Toms River area:

- Post-Partum Depression Hotline (800) 328-3838
- Child Abuse Hot Line- Division of Youth & Family Services (800) 792-8610
- Parent 24 Hr. Stress Line (800) 843-5437
- Statewide NJ Coalition for Battered Women 800-572-7233
- Battered Lesbian Hotline (NJ only) 800-224-0211
- Child Abuse Hotline 877-NJ-ABUSE
- Child Support Assistance 877-NJ-KIDS1
- Catholic Charities Diocese of Trenton 732-244-8259
- Coalition Against Rape and Abuse 609-522-6489
- Dottie's House 732-262-2009

For residents of the West Hartford area:

- ABC Women's Ctr Incorporated: (860) 344-9292 180 E Main St, Middletown, CT
- Alternative Living Center: (860) 714-3705, 56 Coventry St, Hartford, CT 06112
- Covenant to Care: (860) 243-1806, 120 Mountain Ave, Ste 212, Bloomfield, CT
- Jewish Family Services: (860) 236-1927 333 Bloomfield Ave, Ste A, West Hartford, CT
- Manchester Domestic Violence: (860) 645-4033, Manchester, CT
- My Sisters' Place: (860) 895-6629, 221 Main St, Hartford, CT 06106
- Prudence Crandall Ctr-Women: (860) 225-6357, 594 Burritt St, #1, New Britain, CT
- Rape Crisis Service: (860) 635-4424 29 Crescent St, Middletown, CT
- Prudence Crandall Ctr-Women: (860) 225-6357, 594 Burritt St, #1, New Britain, CT
- Rape Crisis Service: (860) 635-4424 29 Crescent St, Middletown, CT
- Connecticut Alliance to End Sexual Violence: (860) 282-9881, 96 Pitkin St, East Hartford, CT 06108
- Connecticut Domestic Violence Hotline 1-888-774-2900 English, 1-844-831-9200 Spanish
- Connecticut Coalition Against Domestic Violence (888) 774-2900
- Post-Partum Depression Hotline (800) 328-3838
- Child Abuse Hot Line- Division of Youth & Family Services (800) 792-8610
- Parent 24 Hr. Stress Line (800) 843-5437

For all:

- RAINN (Rape, Abuse & Incest National Network), the nation's largest anti-sexual violence organization
 - The National Sexual Assault Hotline: 800.656.HOPE (4673) (open 24/7)
 - Online chat: <https://hotline.rainn.org/online>
 - State specific resources can be found at <https://www.rainn.org/state-resources>

D. How to Make a Report of Sexual Harassment Under this Policy

Any person may report Sexual Harassment or suspected Sexual Harassment to the Title IX Coordinator, an Associate Title IX Coordinator, or toTitleIX@vocate.org. Reports of conduct confirmed to be Sexual Harassment that are provided to any of these sources will give School Actual Knowledge of the report.

Aside from School's internal complaint process, team members and students may choose to pursue legal or administrative remedies, including with the United States Department of Education's Office for Civil Rights at <http://www.ed.gov/about/offices/list/ocr/complaintintro.html>. Nothing in this policy prohibits a student or team member from reporting a crime directly to law enforcement, including the local police department.

E. Initial Assessment of the Report and Initiation of Formal Complaint

Upon receiving a report, School will determine whether the reported allegations fall within the scope of this policy, namely whether the allegations, if accepted as true:

- meet the definition of Sexual Harassment.
- occurred in School's Educational Programs or Activities; **and**

- are against a person in the United States.

If the allegations do not fall within the scope of this policy, School will consider the report according to the Team Member Complaint and Investigation Procedures in the Team Member Handbook (for team members) or the General Student Complaint Procedure/Grievance Policy or Code of Conduct for Students in the School Catalog (for students), and/or any other applicable School policies.

If the allegations do fall within the scope of this policy, the Title IX Coordinator will promptly (i.e., generally within seven days of receipt of Actual Knowledge) reach out to the Complainant, who may or may not be the person who made the report, and: (1) discuss any appropriate Supportive Measures, and (2) provide the process for filing a Formal Complaint. If the Complainant declines to file a Formal Complaint, the Title IX Coordinator may choose to initiate a Formal Complaint. No other person is eligible to file a Formal Complaint under this policy.

Upon the filing of a Formal Complaint, School will operate from a presumption that the Respondent is not responsible for the alleged conduct until a determination is made regarding violation of this policy is made at the conclusion of the investigation, hearing, appeal and/or informal resolution processes.

F. Notice of a Formal Complaint

If a Formal Complaint is filed, School will issue a written notice to the Complainant and the Respondent within 14 days of the filing of the Formal Complaint containing, at minimum:

- notice of the investigation and hearing procedure set out in this policy,
- notice of the allegations of Sexual Harassment, including sufficient details known at the time (including the identities of known Parties involved in the allegations) and with sufficient time to prepare a response before any initial interview,
- a statement that the Respondent is presumed not responsible for the alleged conduct and that a determination regarding violation of this policy is made at the conclusion of the process,
- a statement that the Complainant and Respondent may have an advisor of their choice, who may be, but is not required to be, an attorney,
- a statement that School will, within a reasonable amount of time after a request from a Complainant or Respondent, provide an advisor to a Complainant or Respondent who does not identify their own advisor,
- a statement that even if a Complainant or Respondent does not request an advisor, one will be provided at the hearing if the Complainant or Respondent does not bring their own advisor to the hearing,
- a statement that the Complainant and Respondent may inspect and review evidence compiled during the investigation, and
- a statement that School's Business Ethics, Conduct and Compliance policy and School's Code of Conduct for Students policy prohibit knowingly making false statements or knowingly submitting false information during the process.

If, in the course of an investigation, School determines that it will investigate allegations about the Complainant or Respondent that are not included in the written notice provided at the outset of the investigation, School will provide written notice of the additional allegations to the Complainant and the Respondent.

In appropriate cases, School may consolidate Formal Complaints as to allegations of Sexual Harassment against more than one Respondent, or by more than one Complainant against one or more Respondents, or by one Party against the other Party, where the allegations of Sexual Harassment arise out of the same facts or circumstances.

G. Informal Resolution

Formal Complaints can be resolved by either informal resolution or by the investigation and hearing processes described in this policy. Informal resolution is voluntary and can be facilitated by School at any point before a determination is reached regarding whether the Respondent violated this policy. Once initiated, an informal resolution process will typically conclude within 45 days.

At any point during the informal resolution process prior to reaching an agreement, the Complainant and/or the Respondent are free to withdraw from the informal resolution process and resume the investigation, hearing, and appeal processes. However, once reached and agreed to by both the Complainant and the Respondent, an informal

resolution is final, and precludes the Complainant and Respondent from pursuing a Formal Complaint arising from the same allegations.

Before engaging in informal resolution, School will provide the Complainant and the Respondent with written notice disclosing the allegations, the requirements of the informal resolution process (including the Parties' right to withdraw during the process and the final nature of any agreement reached), and any consequences resulting from participating in the informal resolution process, including the records that will be maintained or could be shared. Both the Complainant and the Respondent must consent in writing to participate in the informal resolution process. Participation in an informal resolution is not required as a condition of enrollment, continuing enrollment, employment, or continuing employment.

School does not offer or facilitate informal resolution to resolve allegations that a Vocate, UMA or AI team member Sexually Harassed a student at a School institution for which the team member was working; such allegations will be handled through the Formal Complaint process.

H. Dismissal of a Formal Complaint Short of a Resolution

If at any point during the investigation or hearing procedures School discovers that the conduct described in the Formal Complaint does not, even if proven, fall under the scope of this policy, School will dismiss the Formal Complaint or the portions of the Formal Complaint that are out of scope. Such conduct may be evaluated under other School policies, as applicable.

- School may, at its option, dismiss a Formal Complaint where:
- A Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw the Formal Complaint or any allegations therein;
- The Respondent is no longer enrolled with or employed by School; or
- Specific circumstances prevent School from gathering evidence sufficient to reach a determination as to the Formal Complaint or specific allegations therein.

When School dismisses a Formal Complaint, it will promptly, i.e., generally within seven days of the dismissal, send written notice of the dismissal and the reason(s) therefor simultaneously to the Complainant and the Respondent.

L. Sanctions and Remedies

Sanctions will not be imposed on a Respondent unless the investigation and hearing procedures or the informal resolution procedure in this policy have been followed. The sanctions that may be imposed on a Respondent for violation of this policy include:

For team members:

- Warning – A verbal or written notice that a team member has not met School's conduct expectations.
- Training – One or more sessions that a team member is required to complete to School's satisfaction on a required topic.
- Probation – A written reprimand with stated conditions in effect for a designated period of time, including the probability of more severe disciplinary sanctions if the team member does not comply with School policies or otherwise does not meet School's conduct expectations during the probationary period.
- Unpaid leave – Unpaid leave from employment with School for a defined period of time, after which the team member may be eligible to return to active employment.
- Limiting order – Restriction on a team member's permission to be in the same proximity as another team member and/or others, with the parameters of the restriction to be defined by School.
- Termination of employment – Separation of a team member's employment with Vocate, UMA or AI

For students:

- Warning – A verbal, written, or final notice that the student has not met School's conduct expectations.
- Training – One or more sessions that the student is required to complete to School's satisfaction on a required topic.

- Probation – A written reprimand with stated conditions in effect for a designated period, including the probability of more severe disciplinary sanctions if the student does not comply with School policies or otherwise does not meet UMA’s conduct expectations during the probationary period.
- Restitution – Compensation for loss, damage or injury. This may take the form of appropriate service and/or monetary or material replacement.
- Suspension – Separation of the student from School for a defined period, after which the student may be eligible to return. Conditions for readmission may be specified.
- Suspension of Services – Ineligibility to receive specified services or all School services for a specified period, after which the student may regain eligibility. Conditions to regain access to services may be specified.
- Dismissal – Separation of the student from all School locations and eligibility to return at a specified date.
- Expulsion – Permanent separation of the student from all School locations and ineligibility to receive specified or all School services.
- Ineligibility for Services – Permanent ineligibility to receive specified or all School services.
- Limiting Order – Restriction on a student’s permission to be in the same proximity as the Complainant and/or others, with the parameters of the restriction to be defined by School

If a Respondent is not a team member or a student, School may impose variations of the sanctions listed above that correspond to School’s relationship with the Respondent, e.g., termination of contract, ineligibility for future contracting or services.

More than one sanction may be applied to the same Respondent as a result of a single violation. The listing of the sanctions should not be construed to imply that Respondents are entitled to progressive discipline, or that the employment relationship between Vocate, UMA or AI and its team members is anything other than at-will. The sanctions may be used in any order and/or combination that School deems appropriate for the conduct in question.

The Title IX Coordinator may also implement remedies designed to restore or preserve equal access to School’s Educational Programs or Activities. Remedies include efforts similar to Supportive Measures, but when imposed as a remedy, a measure need not be non-disciplinary or non-punitive and need not avoid burdening the Respondent. Remedies will not be granted to a Complainant unless the investigation and hearing procedures or the informal resolution procedure in this policy have been followed.

M. Appeal

The Complainant and Respondent may appeal a determination regarding whether the Respondent violated this policy, and may also appeal School’s dismissal of a Formal Complaint or any allegations therein, on the following grounds:

- Procedural irregularity that affected the outcome of the matter;
- New evidence that was not reasonably available at the time the determination regarding violation of this policy or dismissal was made, that could affect the outcome of the matter; and
- The Title IX Coordinator, investigator, or decision-maker(s) had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that affected the outcome of the matter.

The decision-maker for the appeal will be unbiased and appropriately trained, and will not be the same person as the investigator, the Title IX Coordinator, or any decision-maker at the hearing for the same matter.

All appeal procedures will apply equally to both Parties. Appeals must be filed with the Title IX Coordinator within 14 days of receipt of the written determination or notice of dismissal, as applicable. If either the Complainant or the Respondent files an appeal, School will notify the other Party in writing. Both the Complainant and the Respondent will have a reasonable, equal opportunity to submit a written statement in support of or challenging the outcome, which must be received by the decision-maker for the appeal within 14 days of receipt of the notice that an appeal has been filed.

Within 30 days of the deadline for Parties to submit written statements in support of or challenging the outcome, the appeal decision-maker will issue a written decision describing the result of the appeal and the rationale for the result, which will be provided simultaneously to the Complainant and the Respondent. The decision of the decision-maker for any appeal is final.

N. *Emergency Removal and Administrative Leave*

In appropriate cases, School may remove a Respondent who is a student from its Educational Programs or Activities on an emergency basis. School will not execute such an emergency removal without performing an individualized safety and risk analysis that supports that an immediate threat to the physical health or safety of the student or other individual arising from the allegations of Sexual Harassment justifies the removal. Where an emergency removal is executed, School will provide the student with notice and an opportunity to challenge the decision immediately following the removal.

In appropriate cases, Vocate, UMA or AI may place a team member who is a Respondent on an administrative leave during the pendency of an investigation and hearing process described under this policy. See the Administrative Leave policy in Vocate's Team Member Handbook for more information about administrative leaves.

O. *Exception to Timeframes Stated in Policy*

The timeframes stated in this policy estimate adequate time to resolve a Formal Complaint where the Parties, witnesses, and evidence is readily available, and interviews, meetings, and hearings are able to be scheduled without delay. Circumstances in individual cases may cause temporary delays, necessitating limited extension of stated time frames for good cause, including but not limited to the absence or unavailability of a Party, a Party's advisor, or a witness; concurrent law enforcement activity; or the need for language assistance or accommodation of disabilities. Where a timeframe requires a limited extension, School will send written notice to the Complainant and the Respondent of the circumstances giving rise to the need for the extension.

P. *No Retaliation for Reporting Sexual Misconduct or Participating in Related Investigations*

Team members have a duty to report Sexual Harassment they experience or observe. Retaliation against a team member for good faith reporting or participating in an investigation of Sexual Harassment is prohibited.

Specifically, it is a violation of this policy and of Vocate's Policy Prohibiting Retaliation (for team members) and School's Code of Conduct for Students policy to intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX, or because the individual has made a report or Formal Complaint, or testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under this policy. Specifically, School does not threaten or bring charges of misconduct unrelated to Sexual Harassment but arising out of the same facts or circumstances as a report or Formal Complaint for the purpose of interfering with any right or privilege secured by Title IX.

Charging an individual with a Code of Conduct or other policy violation for making a materially false statement in bad faith in the course of a Formal Complaint, investigation, or hearing proceeding under this policy does not constitute retaliation; provided, however, that a finding that a Respondent did or did not violate this policy, alone, is insufficient to conclude that any Party made a materially false statement in bad faith.

A report of retaliation related to an investigation of Sexual Harassment will be treated as a report under this policy, which may be consolidated with the other report(s) or Formal Complaint(s) to which it is related.

Q. *Confidentiality*

Except as required by law, as permitted by the Family Educational Rights and Privacy Act and its regulations, or as appropriate to carry out School's responsibilities under Title IX (including but not limited to conducting investigations, hearings, and informal resolutions under this policy), School will keep confidential the identity of Complainants, Respondents, individuals who have made a report of Sexual Harassment, and witnesses involved in proceedings under this policy.

School reserves the right to exercise discretion and disclose details of an incident or allegation to assure community safety or the safety of an individual, or to otherwise comply with its obligations to maintain a safe and discrimination-free environment. Any public release of information to comply with the timely warning provisions of

the Clery Act will not include the names of Complainants or reporters, or information that could easily lead to a Complainant's or reporter's identification.

R. Training

School will ensure through appropriate training that its Title IX Coordinator, investigators, decision-maker(s), and any individuals facilitating informal resolution under this policy are free of conflict of interest or bias for or against Complainants or Respondents generally. Should a conflict of interest arise relating to a Complainant or Respondent in an individual case, conflicted School officials are required to recuse themselves from participation in the matter(s) in which the conflict arises.

School will provide training to Title IX Coordinators, investigators, decision-makers, and any individuals facilitating informal resolution under this policy on the following topics:

- the definition of Sexual Harassment under Title IX and this policy,
- the scope of School's Educational Programs and Activities,
- how to conduct investigations, hearings, appeals, and informal resolution processes (as applicable to the individual's role) that comply with Title IX and the requirements of this policy, and
- how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias.

Additionally, School will provide targeted training as follows:

- to decision-makers on how to use technology to conduct live hearings under this policy, and on issues of relevance of questions and evidence, including when questions and evidence about the Complainant's sexual predisposition or prior sexual behavior are not relevant.
- to investigators on issues of relevance to create an investigative report that fairly summarizes relevant evidence.

Training provided under this policy will not rely on sex stereotypes and will promote impartial investigations and adjudications of Formal Complaints of Sexual Harassment.

S. Record-Keeping

School will retain the following records created pursuant to this policy for seven years:

- Documentation of outreach to Complainants in response to a report within scope for this policy
 - If no Supportive Measures are offered to a Complainant, School will maintain documentation as to why no such measures were appropriate.
- Formal Complaints
- Written notices of allegations
- Investigation reports (including any appended evidence)
- Notices regarding informal resolution
- Informal resolution agreements and/or other documentation evidencing the terms of an informal resolution
- Written notices of determination
- Appeals
- Written notices of appeal
- Written notices of appeal determination
- Hearing transcripts or recordings
- Documentation of Supportive Measures provided or offered (to the extent not contained in other listed documentation)
- Documentation of sanctions imposed on a Respondent (to the extent not contained in other listed documentation)
- Documentation of remedies provided to a Complainant (to the extent not contained in other listed documentation)

- Materials used to train Title IX Coordinators, investigators, decision-makers, and individuals who facilitate an informal resolution process
 - School will also make current training materials available on its website.

T. Violence Against Women Act Notice

In compliance with the Violence Against Women Act (“VAWA”). School prohibits the crimes of dating violence, domestic violence, sexual assault, and stalking, as those terms are defined in this policy. School provides incoming students and new team members primary prevention programs (i.e., information and training designed to prevent) and awareness programs (i.e., information and training designed to help identify) regarding these sex crimes. School also provides ongoing prevention and awareness programs (i.e., information and training available throughout enrollment or employment) regarding these sex crimes. Such information and training include a description of safe and positive options for bystander intervention (i.e., strategies for witnesses to disrupt situations involving potential sex crimes), strategies for risk reduction (i.e., to reduce the likelihood of sex crime victimization), and direction to School’s policies and procedures after a sex offense occurs. School’s compliance with these VAWA provisions does not constitute a violation of section 444 of the General Education Provisions Act (20 U.S.C. 1232g), commonly known as the Family Educational Rights and Privacy Act of 1974 (FERPA).

Addendum for Academic Standards (Satisfactory Academic Progress) Effective July 02, 2026

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MAXIMUM TIME ALLOWED TO COMPLETE PROGRAM

Credit Hour Programs

The maximum time within which students are allowed to complete their program is based on total credit hours. Students are allowed 150% of the published time (total credit hours) to complete their program. The maximum time frame (MTF) for each program is as follows:

Program	Maximum Allowable Program Credits Attempted
Dental Assisting	63
Diagnostic Medical Sonography*	90
Electrical Trades Technology	66
Massage Therapy	60
Medical Assisting	60
Medical Coding and Billing	72
Pharmacy Technician	36

* Diagnostic Medical Sonography students are limited to one course failure in the program, regardless of their credit value. Failing a course can result in delayed clinical placement and graduation. Sixty credits is the standard number of credits for the program without failures. The maximum number of credits allowed can vary based on which class was failed.