

**Brown Mackie College – Tulsa
4608 South Garnett Road
Tulsa, OK 74146**

**Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Report
October 1, 2011**

Brown Mackie College - Tulsa is providing the following information to all of its employees and students as part of the Brown Mackie College - Tulsa commitment to safety and security pursuant to the requirements of the federal Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. If you should have questions about any of the information provided in this Report, please contact the President, John Pappas, by mail or by phone:

4608 South Garnett Road
Tulsa, OK 74146
(918) 628-3700

CAMPUS SECURITY AND CRIME PREVENTION POLICY

Brown Mackie College - Tulsa Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Report is distributed to every student and employee on an annual basis and is available to prospective employees and students at their request. A copy of the Campus Security and Crime Prevention Policy is placed in each employee's mailbox. The report is distributed to all students on an annual basis in their classes and posted in the classroom. This is distributed to new students during the monthly Orientation. It is distributed to new employees.

REPORTING CRIMES AND EMERGENCIES

A safe environment is everyone's responsibility. Students and employees are encouraged to report all criminal acts, suspicious activities or emergencies promptly and have the right to report these matters confidentially. Victims or witnesses to a crime are encouraged to file a report of the incident. Reports can be filed on a voluntary and confidential basis for inclusion in the annual disclosure of crime statistics by contacting the Dean of Academic Affairs James Fountain. Reports are kept in a secure location in the office of the Campus President, John Pappas. Names of victims or witnesses are not disclosed in the crime report. It is the policy of Brown Mackie College - Tulsa that all criminal acts or other emergencies be properly documented and reported to local authorities as required by law.

Students and employees should promptly report all criminal actions and emergencies occurring on or around Brown Mackie College - Tulsa facilities to the Dean of Academic Affairs James Fountain, either by person or by calling (918) 628-3700. If the Dean of Academic Affairs, James Fountain, is not available you should contact the Campus President, John Pappas, at (918) 628-3700 and the Tulsa Police Department by dialing 911 or (918) 669-6000.

All criminal activity is documented by the completion of an Incident Report and is reported to local police agencies and to the Campus President, John Pappas, or Dean of Academic Affairs James Fountain. Criminal activity might include, but is not limited to, burglary, motor vehicle theft, aggravated assault, robbery, sexual offense, hate crimes, gender crimes or murder.

In the event of fire or medical emergencies, staff and employees should contact the Tulsa Police Department by dialing 911 and then notify the Campus President, John Pappas.

POLICIES FOR PREPARING THE ANNUAL DISCLOSURE OF CRIMINAL STATISTICS

All incidents are reported and documented on the Incident Report, which is sent to John Pappas, Campus President. Reports are kept in a secure location in the campus President's Office. The annual crime report is prepared by gathering campus crime statistics and data from the local police department and other relevant information by the Campus President, John Pappas.

SECURITY AND ACCESS TO THE INSTITUTION

It is the policy of Brown Mackie College - Tulsa that access to Institution's facilities is limited to authorized personnel, students and invited visitors. Visitors are at all times subject to Brown Mackie College - Tulsa's policies and conduct codes. Students and employees are responsible for the conduct of their guests at all times.

In pursuit of this policy all employees shall be required to:

1. Keep all unsupervised and unoccupied areas locked at all times.
2. Routinely check the security lighting and surveillance to ensure their operational effectiveness.
3. Report immediately to the Dean of Academic Affairs, James Fountain, any suspicious activities that relate to the Institution, regardless of how minor these may seem. You should also contact Tulsa Police Department by dialing 911 or (918) 669-6000.

5. Be familiar with all the Institution's procedures regarding the handling of any accidents or criminal activities. The procedures are identified below:
 - a. Immediately determine the condition of any injured employees, students, or other parties
 - b. In the case of an automobile accident, secure the accident scene.
 - c. Notify the appropriate authorities by calling 911
 - d. Complete an Incident Report
 - e. Obtain a copy of the police report
 - f. Obtain information from witnesses
 - g. Investigate property damage or theft, following steps **c**, **d**, **e**, and **f** above
 - h. Should an alleged sex offense on campus be reported, the parties involved are permitted, if applicable, to change their academic schedule, depending on the availability of classes
 - i. Ensure that entrances to each building in the evening are restricted to the front doors, or to doors where entry is continuously monitored.

All Students are required to:

1. Notify the Dean of Academic Affairs, James Fountain, if a student becomes ill or is injured while at the campus.
2. Upon enrollment, report to the Dean of Academic Affairs, James Fountain, any physical condition that may require immediate medical attention. A copy of this notification is maintained in the student's permanent confidential file.
3. Gain knowledge of any announcements, newsletter, etc., missed because of absence. These communications contain information important to students. This may also contain information regarding the change criminal/emergency contact information.

RELATIONSHIPS WITH LOCAL AND STATE POLICE

Brown Mackie College - Tulsa is located in Tulsa, County. Brown Mackie College - Tulsa maintains a close working relationship with the Tulsa Police Department with periodic contact initiated by Brown Mackie College - Tulsa personnel to ensure that Brown Mackie College - Tulsa is aware of criminal offenses and arrests occurring on or near the campus so that they can be properly reported, and if necessary, provide for timely warning reports on crimes that represent a continuing threat. Timely warning reports are placed in employee mailboxes and students are notified via memos or other correspondence handed out to them in class by their respective instructors

PROGRAMS TO INFORM STUDENTS AND EMPLOYEES ABOUT CAMPUS SECURITY

All new Brown Mackie College - Tulsa employees are instructed on crime awareness, prevention, and campus security during the hiring process. Employees are instructed and are also encouraged to take responsibility for their own security, as well as their fellow co-workers and students.

All new Brown Mackie College - Tulsa students are instructed on crime awareness, prevention and campus security during monthly orientation, and are encouraged to take responsibility for their own security, as well as their fellow classmates and the Brown Mackie College - Tulsa employees. The monthly orientation includes a description of campus security policies and procedures, suggestions on how to avoid becoming a crime victim, evacuation plans at the institution, and procedures for reporting any criminal activity or emergency. Evacuation plans for the Institution are posted in each classroom and office. Brown Mackie College - Tulsa has no formal policy in place that allows victims or witnesses to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics. Note: Names of victims or witnesses that provide information on criminal offenses are not disclosed in the annual disclosure of crime statistics and are maintained by the Campus President.

PROGRAMS TO INFORM STUDENTS AND EMPLOYEES ABOUT THE PREVENTION OF CRIMES

Students are requested to review the Institution's School Catalog where sections discussing Student Conduct Policy can be found. Also, students are requested to read this *Security Policy and Campus Crime Statistics Report* handout that discusses procedures for reporting Crimes and Emergencies and Crime Awareness. Employees are requested to review the Institution's *Employee Code of Conduct* for information regarding employee conduct and safety can be found. Furthermore, employees are requested to read this *Security Policy and Campus Crime Statistics Report* handout that discusses procedures for reporting Crimes and Emergencies and Crime Awareness.

EMERGENCY RESPONSE AND EVACUATION PROCEDURES

Evacuation plans are posted in all classrooms and offices as well as in restrooms showing layout of building, exits and fire alarm pull stations. In the event of a significant emergency or dangerous situation involving the immediate threat to the health or safety of students or staff occurring on the campus, a fire alarm is to be pulled to notify students and staff to evacuate the building. Evacuation drills are conducted annually to insure everyone knows what to do.

1. Crisis Notification process

a. Communicate Crisis

Any BMC-Tulsa employee, upon learning of or suspecting a crisis situation, should immediately contact a member of the Crisis Management Team. Because time is of the essence in crisis situations, employees must be especially persistent in tracking down a member of the CMT.

b. Assemble the Crisis Management Team

The CMT will be activated by the school President or designee upon notification that an emergency situation has developed that warrants a coordinated response by BMC-Tulsa.. Upon learning of an incident, the Campus President or designee calls an emergency meeting in the following manner:

1. All members of the campus' Executive Committee that are on campus will meet in the President's office and the President or designee immediately contacts BMC CS with news of the crisis.
2. Depending on the nature of the emergency, the President may contact the Public Relations Director and Grubb & Ellis Properties.

In the event it is not possible to meet on campus because of the type of crisis, alternative locations include the residence of an Executive Committee member or other property managed by Grubb & Ellis Properties. The alternate location will be announced based on circumstances

The CMT will oversee the management of the crisis by taking the following steps:

c. Define the Crisis

The CMT will rely on the support of the entire organization to quickly gather information pertaining to the crisis. The CMT should research the following before making any public statements:

What happened?

In what order and when did the events occur?

Why did it happen?

What is BMC-Tulsa going to do about it?

What past actions has BMC-Tulsa taken to prevent such a crisis?

What is the status of the official investigations?
What are the names and contact information of those involved?

d. Prepare the Message

The CMT will discuss appropriate response alternatives for BMC-Tulsa, developing several courses of action, and then select the best as is determined by consensus.

1. Important Elements:

- a. Show concern for the victim(s) and his/her families.
- b. Communicate how BMC-Tulsa is handling the situation.
- c. Demonstrate a solid track record.
- d. Demonstrate measures that BMC-Tulsa has taken to prevent such a crisis.
- e. Communicate what measures BMC-Tulsa will take to prevent such an occurrence from happening in the future.
- f. Show speed of response and completeness of information.

2. Tools:

- a. Media spokesperson
- b. Fact sheet/press releases

e. Establish Communication Systems

In times of crisis, BMC-TULSA must be seen by its constituents as actively managing the situation. For this reason, it is especially important that BMC-TULSA keep its many audiences apprised of how it is handling the crisis. The CMT should take care to utilize the communication system that will most effectively reach each audience.

f. Crisis Audit

In the aftermath of a crisis, the usual response is a strong desire to move forward and resume the normal activities. However, in order that BMC-TULSA is best prepared to handle the next crisis, the CMT must evaluate how the crisis plan was effective and useful, where the plan fell short, and what changes should be made to the plan.

Once the CMT determines that the crisis situation has passed, BMC-TULSA should communicate the news to both its internal and external audiences. The message can be disseminated in the form of a letter, email, or meeting, and should outline how the crisis was handled, what we learned, and how we plan to move forward.

2. Specific responsibilities of each member are listed below:

a. President:

1. The BMC-Tulsa President will have the overall supervision of the Crisis Management Team.
2. The BMC-Tulsa President will be responsible for contacting the corporate offices.

b. President & Public Relations Director:

1. The statement for faculty & staff will brief the faculty & staff on the incident and notify them not to speak to the media, but to refer media requests to the Campus President or Public Relations director.
2. A statement to the media will brief the media on the incident with general facts about the incident being careful not to reveal confidential or sensitive information. (i.e. - Student Privacy Act.)

3. The media statement should insure that procedures are in place to prevent this type of event from happening again. The statement should also reflect that we take the safety of our students and employees very seriously.
 4. The Public Relations Director will be responsible for review of all external and internal communications.
- c. **Dean of Academic Affairs/Registrar**
1. Will provide the President and Public Relations Director with a brief background on the student or students involved including; Name, Course of Study, Home Town, Honors or awards (Scholarships, President's list, etc.), Name of Faculty member, Length of employment, Department, Educational and work background, etc.
 2. Will notify all Department Chairs and set up a procedure to notify the student body.
- d. **Senior Director of Admissions:**
1. Will notify the receptionist where to refer questions.
 2. Will work with Public Relations Director to develop a statement for new and prospective students, assuring them of the safety at the College.
 3. Will notify all Assistant Directors of Admissions of this statement above.
- e. **Director of Career Services:**
1. The Director of Career Services will be responsible for contacting the student's employer if the student employer was recommended by our career services department.
- f. **VP of Human Resources Region 3:**
1. The BMC CS Human Resources will coordinate employee related issues, especially in cases where the crisis incident involves primarily employees.
 2. Will coordinate benefits accessibility for medical, dental, vision, life, and AD&D, STD, and LTD claims.
 3. Will coordinate employee counseling needs with outside counselors.
 4. Will develop training programs necessary to educate employees on how to handle crisis situations and prevent them from occurring.
 5. Will develop any policies & procedures with the Executive Committee approval to outline how the Institute's employees are to act in times of crisis; HRD will also recommend temporary changes to policies that may be needed to respond to the crisis.
 6. Will work w/other Executive Committee members to assure that the ongoing work of the Institute continues – setting up temporary offices, hiring temporary workers, etc.
- g. **Building Management:**
1. The Building Management will be notified for any repair or clean up.
 2. Will be notified if any emergency parking needs arise.
 3. Will handle any emergency needs by the various outside departments, i.e. Fire Department, Public Service Company, etc.
 4. Will be responsible for overall security in partnership with Goldstar
 5. The Campus President and Building Manager will be the contact persons for emergency Response team , i.e. local police, fire department.
- h. **Sr. Financial Aid Officer/Business Manager:**
1. All pending disbursements of BMC-Tulsa are immediately cancelled.
 2. Loan service is notified (to stop paperwork from being mailed).
 3. All outstanding paperwork and unfilled materials will be gathered and placed in the file to prevent unnecessary contact.

4. A family member should be notified of the need to provide a death certificate in order to have loans forgiven.
5. If we are provided with the death certificate, we will forward a copy to the lender so that loan forgiveness procedures can begin.

OFF-CAMPUS STUDENT ORGANIZATIONS

Should a student or employee be a victim of injury or crime during a School-sponsored activity, the student or employee should notify the appropriate agencies, (i.e. police, ambulance, or fire department). The student or employee should notify the appropriate person at the Institution as soon as possible.

DRUG AND ALCOHOL POLICIES

In keeping with section 120(a) through (d) of The Higher Education Act of 1965, as amended, including the Drug-Free Schools and Communities Amendments of 1989 (Public Law 101-226), a “Drug Free Schools and Campuses” publication, the Drug Prevention Policy, is provided to all Brown Mackie College - Tulsa annually.

Pursuant to federal and state drug laws, students are prohibited from the unlawful manufacture, distribution, possession, sale or use of illicit/illegal drugs. Brown Mackie College - Tulsa also enforces state and municipal laws regarding underage drinking. This prohibition applies while on the property of the school or when participating in any institutional activity. Students or employees who violate this policy will be subject to disciplinary action up to, and including, expulsion from school or termination of employment. The policy is detailed in Brown Mackie College’s Academic Catalog.

PROCEDURES REGARDING SEXUAL ASSAULT

Should a student or employee be sexually assaulted, it is the student(s)/employee(s) option to notify the appropriate law enforcement authorities, including on-campus authorities and local police. At the student’s/employee’s request, security, the Dean of Academic Affairs, the Executive Committee or other Brown Mackie College - Tulsa officials will assist in notifying the proper authorities. Victims of sexual assault or rape should follow these recommended steps:

Go to a safe place following the attack.

Do not shower, bathe or destroy any of the clothing you were wearing at the time of the attack.

Go to a hospital emergency room for medical care.

Make sure you are evaluated for the risk of pregnancy and venereal disease.

(A medical examination is the only way to ensure you are not injured and it could provide valuable evidence should you decide to prosecute.)

Call someone to be with you, you should not be alone.

It is also recommended that victims call the Rape Crisis Hotline (918) 744-7273. It is open 24 hours a day and their counselors can help answer medical and emotional questions at any hour and in complete confidence. Reporting the rape to the police is up to the victim, but it is important to remember that reporting a rape is not the same as prosecuting a rape. Victims are strongly encouraged to call the police and report the rape. If the victim requests, Brown Mackie College - Tulsa will assist in identifying off-campus counseling or mental health services. After any campus sexual assaults are reported, the victims of such crimes have the right to request that Brown Mackie College - Tulsa personnel take steps or actions reasonably feasible to prevent any unnecessary or unwanted contact or proximity with alleged assailants, if applicable or the transfer of classes.

Other rape crisis centers or mental health agencies available to assist a victim of sexual offenses include:

Domestic Violence Intervention Services

4300 S Harvard Ave Ste 100
Tulsa, OK 74135
(918) 585-3163

Disciplinary Action and Sanctions

On-campus disciplinary procedures against students will be in accordance with Brown Mackie College - Tulsa published Student Conduct Policy. Both the accuser and the accused are entitled to have others present during a disciplinary proceeding. Both will be informed of the outcome of any campus disciplinary proceeding. For this purpose, the outcome of a disciplinary proceeding means only Brown Mackie College – Tulsa’s final determination and any sanction with respect to the alleged sexual offense. Sanctions, which may be imposed following a final determination of a disciplinary proceeding regarding rape, acquaintance rape, or other forcible or non-forcible sex offenses, may include warning, probation, suspension or dismissal.

INFORMATION REGARDING REGISTERED SEX OFFENDERS

Information regarding registered sex offenders under section A.R.S. 13-3827 of the Violent Crime Control and Law Enforcement Act of 1994 is available with the Tulsa Police Department, located at:

600 Civic Center
Tulsa, OK

Additional information can be obtained by calling the police department at (918) 596-1336.

OR:

Information regarding registered sex offenders under section A.R.S. 13-3827 of the Violent Crime Control and Law Enforcement Act of 1994 is available on-line at:

http://docapp8.doc.state.ok.us/servlet/page?_pageid=190&_dad=portal30&_schema=portal30

On-campus computer labs with internet access are available for you to view the above website in all computer classrooms and the library from:

Mon, Tues, Thurs:	9:00 a.m. to 10:00 p.m.
Wed.:	9:00 a.m. to 8:00 p.m.
Fri:	8:00 a.m. to 5:00 p.m.
Sat:	9:00 a.m. to 1:00 p.m.

CRIME STATISTICS

The following statistics are provided for your information in compliance with the Jeanne Clery Disclosure of Campus Security Act and Campus Crime Statistics Act. Brown Mackie College - Tulsa prepares the crime statistic policies annually by gathering all reported data and updating the report. The report will then be forwarded to Lia Miller at EDMC for final approval. Moreover, local police agencies are contacted by Campus President John Pappas to maintain a working relationship and formulate statistics for the annual crime statistics report. Set forth in the first box below are statistics available to the Institution concerning the occurrence on the Institution's campus which were reported to local police agencies. The second box below sets forth available statistics concerning the number of criminal offenses in

relation to hate crimes on the Institution's campus, non-campus buildings and property, and public property. Finally, in the third box arrests and "referrals for campus disciplinary action" for liquor law violations, drug law violations, and illegal weapons possession are listed. Victims or witnesses may report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics.

** Public property includes: 1. The parking lot which surrounds the Campus and is in between the buildings, including an unpaved lot behind the campus along the Broken Arrow Expressway. 2. The portion of Garnett Road and the sidewalk that is adjacent to the parking lot.

Local Police statistics are not included in the criminal offenses listed above due to statistics only being available for an unreasonably contiguous area which would not accurately reflect crimes that occurred on the Campus, public property, and non-campus buildings or property.

NOTE: Crime statistics in the above outlined category were requested by the local police department. These statistics covered the Tulsa area and as such cover too large an area to be considered in this report. As a result, the numbers listed reflect only those crimes for which the campus reported itself and for which it has documentation.

Brown Mackie College - Tulsa

The following statistics show the **total** criminal offenses, hate crimes and arrests/referrals for campus disciplinary action that occurred on the Institute's campus, non-campus buildings & property and public property.

CRIME STATISTICS The following statistics are provided for your information in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. Set forth below are statistics available to the Institute concerning the occurrence of criminal offenses in the listed categories which were reported to campus security officials or local police agencies.

Criminal Offenses	Calendar Year								
	2008			2009			2010		
	On Campus	Non-campus buildings and property	Public Property**	On Campus	Non-campus buildings and property	Public Property**	On Campus	Non-campus buildings and property	Public Property**
Murder & Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Forcible Sex Offense	0	0	0	0	0	0	0	0	0
Non-Forcible Sex Offense	0	0	0	0	0	0	0	0	0
<i>Incest</i>	0	0	0	0	0	0	0	0	0
<i>Statutory Rape</i>	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0	0

The crimes listed above plus any other crimes involving bodily injury reported to local police agencies or to a campus security authority, that manifest evidence that the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability are listed below, according to type of criminal offense and category of prejudice.

Should a hate crime be reported, it will be identified by hate crime category (race, gender, religion, etc.).

Hate Crimes	Calendar Year								
	2008			2009			2010		
	On Campus	Non-campus buildings and property	Public Property**	On Campus	Non-campus buildings and property	Public Property**	On Campus	Non-campus buildings and property	Public Property**
Murder & Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Forcible Sex Offense	0	0	0	0	0	0	0	0	0
Non-Forcible Sex Offense	0	0	0	0	0	0	0	0	0
<i>Incest</i>	0	0	0	0	0	0	0	0	0
<i>Statutory Rape</i>	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0

Agravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction, Damage, Or Vandalism of Property	0	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0	0

Arrests/Persons Referred for Campus Disciplinary Action

	Calendar Year								
	2008			2009			2010		
	On Campus	Non-campus buildings and property	Public Property**	On Campus	Non-campus buildings and property	Public Property**	On Campus	Non-campus buildings and property	Public Property**
Arrests									
Weapons: carrying, possessing, etc	0	0	0	0	0	0	0	0	0
Drug Abuse Violations:	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0
Disciplinary Actions									
Weapons: carrying, possessing, etc	0	0	0	0	0	0	0	0	0
Drug Abuse Violations:	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0	0

**Public property includes the sidewalks and parking lot outside of the building

NOTE: Crime statistics in the above outlined category were requested by the local police department. These statistics covered the Tulsa area and as such cover too large an area to be considered in this report. As a result, the numbers listed reflect only those crimes for which the campus reported itself and for which it has documentation.