

Anti-Hazing Policy

Policy Statement, Purpose, and Scope

Legacy Education Inc. and its institutions prohibit hazing in any form, by any person, on or off campus. This policy implements the federal Stop Campus Hazing Act (Pub. L. 118-173) and applicable California law.

Institutions covered. High Desert Medical College (HDMC), Central Coast College (CCC), Integrity College of Health (ICH), and Contra Costa Medical Career College (CCMCC), including all California campuses, additional locations, and online programs (each, the "Institution").

Persons covered. This policy applies to:

- Current, former, and prospective students, including applicants and admitted students not yet enrolled
- Student organizations, whether or not established or recognized by the Institution
- Faculty, staff, administrators, clinical and externship supervisors, contractors, and volunteers
- Visitors and guests participating in Institution programs or activities

Locations and activities covered. This policy applies to conduct on Institution property, at clinical and externship sites, at Institution-sponsored events, in online and electronic environments, and off campus when the conduct affects a person's participation in an Institution program or activity.

Consent is not a defense. Hazing is prohibited regardless of the willingness of the person to participate.

Legal Authority

This policy is adopted under the following laws. Where they differ, the Institution applies the broadest protection.

Law

Stop Campus Hazing Act, Pub. L. 118-173 (enacted Dec. 23, 2024), amending HEA Sec. 485(f), 20 U.S.C. 1092(f) (Jeanne Clery Campus Safety Act)

California Penal Code 245.6 ("Matt's Law")

What it requires of the Institution

Hazing statistics in the Annual Security Report (ASR); an ASR policy statement on hazing, reporting, investigation, and applicable laws; research-informed prevention programs; a Campus Hazing Transparency Report; a website notice

Makes hazing a crime; hazing causing death or serious bodily injury may be charged as a misdemeanor or felony; authorizes civil actions against participants and organizations

California Education Code 66305 to 66309 (AB 2193, Ch. 704, Stats. 2024; California's "Stop Campus Hazing Act")

Institutional accreditor and BPPE standards

Prohibits subjecting any person to hazing in programs of institutions that receive or benefit from state financial assistance or enroll students receiving state aid; creates institutional civil liability for incidents on or after Jan. 1, 2026, with a rebuttable presumption of reasonable steps if specified antihazing measures are in place

Student conduct standards, grievance procedures, and catalog disclosures

Definitions

The Institution uses one broad definition for discipline and the federal definition for Clery statistics. California's criminal and civil definitions are provided for information.

Hazing (Institutional Definition, for Conduct and Discipline)

Hazing means any intentional, knowing, or reckless act, committed by a person alone or with others, against another person regardless of that person's willingness to participate, that:

1. is committed in the course of an initiation into, affiliation with, or maintenance of membership in a student organization, a cohort, a program, or the student body; and
2. causes, or creates a risk of, physical or psychological injury, or personal degradation or disgrace resulting in physical or mental harm, above the reasonable risk encountered in normal participation in the Institution or the organization.

Hazing (Federal Definition, for Clery Act Reporting)

For ASR statistics, the Institution applies the definition in 20 U.S.C. 1092(f) as amended by the Stop Campus Hazing Act. Hazing is any intentional, knowing, or reckless act committed by a person, individually or with others, against another person regardless of their willingness to participate, that is committed in the course of initiation into, affiliation with, or maintenance of membership in a student organization, and that causes or creates a risk, above the reasonable risk of participation, of physical or psychological injury, including:

- whipping, beating, striking, electronic shocking, placing a harmful substance on someone's body, or similar activity
- causing, coercing, or inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or similar activity
- causing, coercing, or inducing another person to consume food, liquid, alcohol, drugs, or other substances
- causing, coercing, or inducing another person to perform sexual acts
- any activity that places another person in reasonable fear of bodily harm through threatening words or conduct
- any activity against another person that includes a criminal violation of local, State, Tribal, or Federal law
- any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, State, Tribal, or Federal law

Source: Clery Center, SCHA Getting Started Guide, quoting the statute.

Student Organization

An organization at the Institution (such as a club, society, association, varsity or junior varsity athletic team, club sports team, fraternity, sorority, band, or student government) in which two or more members are students enrolled at the Institution, whether or not the organization is established or recognized by the Institution. This is the federal definition. For this policy, it also includes informal groups such as a cohort, study group, or class section acting together.

Affiliated organization. An organization currently recognized or sanctioned by the Institution through its official student organization approval process (Cal. Educ. Code 66306(a)). An organization whose recognition has been withdrawn or revoked is not affiliated.

California Definitions (Information)

- **Criminal (Penal Code 245.6(b)):** any method of initiation or preinitiation into a student organization or student body, whether or not officially recognized, that is likely to cause serious bodily injury to any former, current, or prospective student of any educational institution in California. Customary athletic events and school-sanctioned events are excluded.
- **Civil (Educ. Code 66306(c)):** any method of initiation or preinitiation into an affiliated student organization or student body that the initiator knows or should have known is likely to cause serious bodily injury to any former, current, or prospective student. The same exclusions apply.

Other Terms

- **Campus Security Authority (CSA):** as defined in 34 CFR 668.46(a), including officials with significant responsibility for student and campus activities.
- **Hazing Compliance Officer:** the official designated in Section 5 to receive reports and coordinate investigations.
- **Retaliation:** any adverse action or threat against a person for reporting hazing or participating in an investigation.

Prohibited Conduct

The following are violations of this policy and of the Student Code of Conduct and employee standards of conduct:

1. Engaging in, planning, directing, encouraging, or assisting in hazing
2. Conspiring to engage in hazing
3. Knowingly permitting hazing on property or at an activity under one's control
4. Failing to intervene or report, for employees and student organization officers (see Section 8)
5. Retaliating against any person who reports hazing or participates in an investigation
6. Knowingly providing false information in a hazing report or investigation

Examples, in the allied health setting. Hazing may include:

- Requiring new cohort members to perform personal errands, clean up after others, or pay for others' meals or supplies to be "accepted"
- Forcing consumption of alcohol, energy drinks, food, or other substances

- Sleep deprivation, such as all-night "study" sessions imposed by senior students or organization members
- Practicing clinical skills (injections, venipuncture, restraints) on an unwilling person, or outside faculty supervision, as a rite of passage
- Humiliating costumes, public shaming, or degrading social media posts or group chat challenges
- Isolation, exclusion from required academic activities, or threats of exclusion used to coerce participation
- Any sexual act or sexualized activity as a condition of acceptance

Conduct that is also sexual harassment, discrimination, or a crime is addressed under this policy and any other applicable Institution policy, including the Title IX and nondiscrimination policies.

How to Report Hazing

Anyone may report hazing, including the person affected, a witness, a family member, or an employee. Reports may be made by name or anonymously to the Campus Director. Reports can be made verbally or in writing.

Emergencies. If anyone is in immediate danger, call 911 first, then notify the Institution.

Anonymous reporting. The Institution maintains an anonymous reporting method, as required for the presumption in Cal. Educ. Code 66308(b)(1)(A). Anonymous reports are reviewed and acted on to the extent the information allows.

Reporting to police. Hazing may be a crime under Penal Code 245.6. Reporters may contact police directly, and the Institution will help a reporter do so on request. A person may also report to the Institution without contacting police.

Non-retaliation. The Institution prohibits retaliation against anyone who reports hazing in good faith or participates in an investigation. Retaliation is a separate violation subject to discipline.

Investigation Process

The Hazing Compliance Officer, or a trained designee without a conflict of interest, investigates every report. Target timelines below are in business days and may be extended for good cause with written notice to the parties.

1. **Intake and safety (within 1 day).** Log the report with the date received. Assess immediate safety risks and put interim measures in place, such as no-contact directives, schedule or cohort changes, or interim suspension of an organization's activities.
2. **Clery review (within 2 days).** The Clery compliance lead determines whether the incident meets the federal definition, occurred on Clery geography, and requires a timely warning or a crime log entry.

3. **Initial assessment (within 5 days).** Determine whether the alleged conduct, if true, would violate this policy. If it would, open a formal investigation and record the date it began.
4. **Written notice.** Give written notice to each respondent individual and any respondent organization, describing the allegations, the policy provisions involved, and the process.
5. **Evidence gathering.** Interview the reporter, affected persons, respondents, and witnesses. Collect documents, messages, social media content, and other evidence. Each party may present witnesses and evidence and may bring one advisor.
6. **Determination (target: within 30 days of opening).** The decision-maker decides responsibility using the preponderance of the evidence standard and issues a written outcome with findings, sanctions, and the date the investigation ended.
7. **Notice of outcome.** Provide written outcome notice to each respondent and, for organizations, record the date notice was given. This date is required for the Campus Hazing Transparency Report.
8. **Appeal.** A party may appeal in writing within 10 days on grounds of procedural error, new evidence, or disproportionate sanction. A different official decides the appeal within 15 days.

Coordination with other processes. If the conduct may also be sexual harassment or discrimination, the Title IX Coordinator is notified, and the applicable procedures are followed. A police investigation does not end the Institution's investigation, though fact-gathering may be briefly delayed at law enforcement's request.

Privacy. Records are kept confidential as permitted by law, including FERPA (20 U.S.C. 1232g).

Sanctions

Sanctions depend on the severity of the conduct, harm caused, prior violations, and cooperation. Institutional sanctions are separate from any criminal or civil consequences.

Respondent	Possible sanctions
Students	Written warning; required education; probation; removal from leadership roles; loss of externship or clinical placement eligibility; suspension; dismissal
Employees	Written warning; required training; suspension; termination, consistent with employment policies
Student organizations	Warning; probation; required education; loss of privileges or funding; suspension; withdrawal or revocation of recognition
Contractors, volunteers, visitors	Removal from the program or property; termination of the contract or clinical affiliation

Criminal penalties (California). Under Penal Code 245.6, hazing that does not result in serious bodily injury is a misdemeanor. Hazing that results in death or serious bodily injury may be charged as a misdemeanor or a felony. See Penal Code 245.6.

Civil liability (California). A person who is hazed may sue participants and the organization under Penal Code 245.6(e). For incidents on or after Jan. 1, 2026, a former, current, or prospective student may also sue an educational institution under the conditions in Educ. Code 66308(a).

Prevention and Awareness

The Institution will run a research-informed, campus-wide hazing prevention program for students, faculty, and staff that includes education on the following to meet the federal program requirement and the California "comprehensive prevention and outreach program" in Educ. Code 66308(b)(3):

- Hazing awareness: what hazing is, its warning signs, and its harms
- This policy, including how to report, the anonymous reporting option, and the investigation process
- Applicable federal and California law and penalties
- Primary prevention strategies to stop hazing before it starts, including bystander intervention skills, ethical leadership, and building group cohesion without hazing

Resources

We are committed to education and prevention. Below are links to organizations offering information on anti-hazing and state hazing laws:

<https://stophazing.org/resources/>

<https://stophazing.org/policy/state-laws/california/>

<https://hazingpreventionnetwork.org/>

<https://www.clerycenter.org/>