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Safety Policy

The safety policy of AOMA is designed to comply with the Standards of the Occupational Safety and Health Administration, and to endeavor to maintain a safe and injury/illness free workplace. A copy of the OSHA Safety and Health Standards 1926 and 1910 are available for all employees' use and reference. These standards shall be available in the human resources office.

It is the goal of AOMA to provide a safe and healthy environment for the faculty, staff, students and visitors to our campus. In addition, we want to have efficient operations, minimize waste and damage to property and equipment. To achieve this goal, this manual has been developed to provide AOMA with a comprehensive and effective safety program.

The participation of each individual in this program is essential for this goal to be achieved. Accidents can be reduced by increasing safety awareness. Improved safety can be attained and maintained by the constant, positive effort of each person to identify, report and, when possible, correct situations that pose threats. The authorization and responsibility for enforcement has been given to the AOMA OSHA coordinator and the facility manager shares in this responsibility.

This manual is not intended to cover every possible eventuality that might arise, but should be considered a broad statement of safety policy, which establishes responsibilities throughout AOMA and briefly describes the various aspects of the program on this basis. We have a responsibility to insure that this institution is operated safely to minimize health hazards and reduce the risk of injury. All employees, faculty and students are responsible for complying with the safety policies and procedures presented in this manual. In doing so, our contributions will greatly enhance the overall safety posture of AOMA and create the safe and healthful environment we all desire.

Safety & Health Program

Accountability of AOMA’s Safety & Health Program
We will insure that all employees and students comply with these practices by maintaining the following standards:

- We will inform all employees and students of the provisions of our safety and health program.
- We will evaluate the safety and health performance of all employees, faculty and students.
- We will recognize and commend employees who perform safe and healthful work practices.
- We will provide safety and health training to all employees and students.
Safety at AOMA

- We will hold all employees and students accountable for following safe work practices as outlined in this manual.
- We will take corrective action for those who fail to comply with safe and healthful work practices.

Communicating Workplace Safety
We are all responsible for communicating in an open and supportive manner. Our communication system encourages everyone to inform us about workplace hazards. It is extremely important that all hazards be reported immediately so that they can be addressed and minimized efficiently. All work-related or clinic-related injuries and illnesses must be reported to your supervisor as soon as possible, and at a minimum, within 24 hours of the occurrence.

Employee and Student Training
All new employees/students shall receive instruction on AOMA safety policies and procedures at orientation. Additional training shall be provided:
- when there are any changes to the plan and/or facility;
- when an employee’s responsibilities change.

To facilitate a flow of information we are committed to the following standards:
- We will conduct regularly scheduled safety meetings/discussions.
- We will post safety information on our bulletin boards and maintain the latest required labor laws posters.
- We will maintain a system for workers to inform management about workplace hazards.
- Employees and students should email the facilities manager with any recommendations or concerns they have regarding hazards or potential hazards on the AOMA campus. Email: AOMA – Facilities.edu. They can also complete a Potential Fire & Workplace Hazard form which is available on bulletin boards around campus. A copy of the form is in the back of this manual.
- We will maintain a system for management to update employees and students on planned changes in response to their concerns or suggestions.

Assessment of Potential Hazards
AOMA’s Facilities Department will conduct a monthly safety review of the campus to identify and evaluate potential hazards. This report will be provided to AOMA’s OSHA Coordinator.
- Needle sticks and blood borne pathogen control – Procedures posted in consultation rooms.
- A clean up kit is located with each first aid kit.

Potential Workplace Hazards at AOMA:
Sharps containers that store used needles in clinic rooms:
- Containers will be inspected daily.
- When full, will be stored in a labeled biohazard box that is inspected weekly to insure safety. When the biohazard box is full, it is picked up by the medical
Potential Fire Hazards at AOMA:
AOMA conducts an annual fire inspection with a fire marshal with the Austin Fire Department. Any hazards identified are remediated.

Additional Fire Hazards
The following items pose a potential fire hazard if not handled properly. These potential fire hazards must be properly extinguished, or turned off, so they do not create a fire. In addition, they must never be left unattended.

- Candles, incense, moxa, heat lamps, space heaters

Breaker Box Locations
Check with the AOMA facilities department for breaker box locations. The areas around the breaker boxes are to be kept clear. They will be inspected during the monthly safety inspection performed by the facilities department.

Smoking Prohibited
Smoking is prohibited in any campus buildings, or within 15 feet of a public entrance, in accordance with the City of Austin Ordinance 050303-05.
Work Related Injury or Incident

For Employees – Workers Compensation Insurance
AOMA subscribes to the Texas Workers’ Compensation program through The Hartford insurance company. If an AOMA employee sustains a work-related injury or illness, it must be reported immediately to human resources, and a Workers’ Compensation Injury Report must be completed and turned into the compensation and benefits coordinator. If immediate medical attention is necessary, the employee should go to an in-network provider as listed with The Hartford, or the nearest emergency care center, or if necessary, call 911. The AOMA Incident/Accident Report must be completed in addition to the Workers’ Compensation Injury Report. All new employees will receive a worker’s compensation enrollment packet and sign an acknowledgement form.

Injury or Incident Reporting For Employees, Students, Patients, Visitors

Sharps Incident Report
A Sharps Incident Report must be completed for all sharps/needle stick related incident/accident or blood borne pathogen exposure. The name of the affected person must be on the form, but will not appear in any reports. If an employee is exposed or injured, they must also complete a Workers’ Compensation Injury Report.

Incident/Accident Report
An Incident/Accident Report must be completed for any kind of incident/accident that occurs at the workplace or any educational or clinical site that does NOT involve a sharps/needle stick.

- Employees are to notify their supervisor of all work-related injuries and illnesses as soon as possible, but in no case later than the day after occurrence. An exception to the rule is provided when the injury or illness physically prevents the employee from timely notification
- Employees must complete also complete a Workers’ Compensation Injury Report.
- Students are to notify the dean of students, instructor, or clinical supervisor of any school related injuries and illnesses immediately, in accordance with the guidelines outlined on the incident report forms.
- Administrators, faculty and clinical supervisors are responsible for completing and submitting an Incident Report or Sharps Incident Report and accompanying reports to the human resources office within 24 hours from the date of the occurrence. See report forms.
- The Chief Financial Officer and the President will be notified of all incident reports, sharps incident reports, and workers compensation Injury Reports.

Incident Investigation
AOMA will promptly investigate any injury or illness that is of a serious nature or could lead to a serious incident. AOMA’s goal is to determine the root cause of the incident
so that future occurrence is prevented.

**Workplace Condition Correction**
Unsafe or unhealthy working conditions, practices or procedures in our workplace will be corrected in an efficient manner.

- Corrections will be made immediately, if feasible.
- When immediate corrections cannot be made, interim protections will be provided.
- If an imminent hazard is detected that cannot be immediately abated without endangering employees, students or property, we will remove people from that area until corrected.

AOMA must maintain a record of all incidences to be compliant with OSHA regulations. An annual summary of incidences/accidents is posted on campus bulletin boards.

Current incident reporting forms are available on the AOMA server under HR Toolbox/OSHA in all clinic locations, office areas, and in the office of the facilities manager.
Post-Exposure Procedures - Quick Reference

Sharps Incident/Blood-borne Pathogen

1) Thoroughly wash the exposed skin area well with soap and water, or flush mucous membranes with water.
2) Complete the Sharps Incident Report form or Incident/Accident Report form for non-sharps incident.
3) Complete Exposed Individual’s Consent or Refusal for blood testing.
4) Complete Source Individual’s Consent or Refusal for blood testing, as necessary.
5) Get Referral for Medical Evaluation form for any injury or blood borne pathogen exposure requiring medical attention.
6) After consent, Exposed and Source Individuals must IMMEDIATELY go to Pro Med for post-exposure blood tests. Testing MUST BE COMPLETED within 24 hours.
7) IMMEDIATELY Contact OSHA Coordinator by office phone 512-492-3003 AND email – hr@aoma.edu.
8) Submit all paperwork within 24 hours of the incident to the OSHA Coordinator. Read 2nd page of report form for details.
Exposure Control Plan

In compliance with the OSHA Blood-borne Pathogens Standard, 29 CFR 1910.1030, the following exposure control plan has been developed for the purpose of eliminating or minimizing employee occupational exposure to blood or other potentially infectious materials. For clarification, please refer to the OSHA coordinator in the human resources office.

Exposure Determination
OSHA requires employers to determine the risk of exposure to blood and other potentially infectious materials for employees. AOMA has established that student interns will follow the same policies and procedures as those for employees. Please note that OSHA requirements are only for employees. The exposure determination is made without regard to the use of personal protective equipment (i.e., employees are considered to be exposed even if they wear personal protective equipment). In this exposure determination, AOMA is required to list all clinical job classifications in which employees may be at risk of occupational exposure, regardless of frequency. The following table illustrates the job classifications, locations, and activities that are considered to be at risk of exposure to blood-borne pathogens or other infectious materials.

At Risk of Exposure

<table>
<thead>
<tr>
<th>Job Classifications</th>
<th>Locations</th>
<th>Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Licensed acupuncturists as clinic supervisors</td>
<td>Desks</td>
<td>Treatments involving needling, cupping, bodywork, etc.</td>
</tr>
<tr>
<td>Licensed acupuncturists in the professional clinic</td>
<td>Treatment tables</td>
<td>Physical contact with patients</td>
</tr>
<tr>
<td>Licensed acupuncturists teaching acupuncture technique classes</td>
<td>Biohazard units</td>
<td>Removing needles from patients</td>
</tr>
<tr>
<td>Student interns treating patients in the student clinic (Not OSHA required.)</td>
<td>Floors</td>
<td>Handling contaminated waste</td>
</tr>
<tr>
<td>Student observers in the clinic (Not OSHA required.)</td>
<td>Trash cans</td>
<td></td>
</tr>
<tr>
<td>Students participating in acupuncture technique classes (Not OSHA required.)</td>
<td>Treatment rooms</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Clinics</td>
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<td></td>
<td>Classrooms</td>
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</tbody>
</table>

OSHA requires a listing of job classifications, locations, and tasks in and at which staff may be at risk of exposure to blood-borne pathogens or other potentially infectious materials. Not all individuals who perform these tasks may be aware that they are at risk
Exposure Control Plan

The following table lists the support functions that present a risk of exposure to blood-borne pathogens and other infectious materials.

**Possible Risk of Exposure**

<table>
<thead>
<tr>
<th>Job Classifications</th>
<th>Locations</th>
<th>Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clinic staff, receptionists</td>
<td>Clinics</td>
<td>Vacuuming the clinic floor</td>
</tr>
<tr>
<td>Facilities staff</td>
<td>Classrooms</td>
<td>Cleaning and arranging work surfaces, desks,</td>
</tr>
<tr>
<td>Housekeeping staff</td>
<td>Desks</td>
<td>counters, etc.</td>
</tr>
<tr>
<td>Laundry staff</td>
<td>Countertops</td>
<td>Removing/replacing sharp’s containers</td>
</tr>
<tr>
<td></td>
<td>Floors</td>
<td>Picking up and putting away laundry</td>
</tr>
<tr>
<td></td>
<td>Trash cans</td>
<td>Cleaning restrooms</td>
</tr>
<tr>
<td></td>
<td>Bodywork tables</td>
<td></td>
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<td></td>
<td>Restrooms</td>
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</tbody>
</table>

By performing the tasks listed, it may reasonably be anticipated that an employee may be occupationally exposed to blood or other potentially infectious materials by one or more of the following routes: skin, blood, mucous membranes, and bodily fluids.

**Implementation Schedule and Methodology**

OSHA requires that the AOMA Infection Control Plan includes a schedule and method of implementation for the various OSHA requirements and standards. The following outlines AOMA’s implementation schedule and methodology for adherence to OSHA requirements.

1) **Universal Precautions:** Universal precautions shall be observed to prevent contact with blood or other potentially infectious materials. “Universal precautions” means that all patients shall be assumed to be infectious for HIV and other blood-borne pathogens (e.g., Hepatitis B).

2) **Sanitary Engineering and Work Practice Control:** Sanitary engineering and work practice control will be utilized to eliminate or minimize exposure to employees and interns at this facility. Where occupational exposure remains after institution of these controls, personal protective equipment shall be utilized. At this facility, employees and interns must observe the following work practice controls:
   a. Hands must be washed before treatment, between patients, and before inserting needles. All clinical personnel shall wash their hands immediately or as soon as possible after the removal of gloves or other protective equipment and after hand contact with blood or other potentially infectious materials.
   b. All personal protective equipment shall be removed immediately upon leaving the clinic and taken home for washing. Contaminated and/or dirty lab coats must be cleaned and washed as soon as possible after the clinic shift.
   c. Needles are to be placed in the biohazard units immediately after use.
d. Eating, drinking, smoking, applying cosmetics, hand cream, lipstick or lip balm, and handling contact lenses are activities prohibited in work areas where there is a potential for occupational exposure.

e. Food and drink shall not be stored in areas of possible contamination. No food or drink is allowed in the treatment areas.

f. All procedures involving blood or other potentially infectious materials shall be performed in such a manner as to minimize splashing, spraying, and use of aerosol or spraying of these substances.

3) **Personal Protective Equipment**

   a. When there is potential for occupational exposure, clinical personnel will be provided with and/or shall use appropriate personal protective equipment such as gloves, lab coats, or face masks. The appropriate personal protective equipment shall be discussed with all clinical personnel and shall be required based upon the tasks involved and the hazards of the job duty.

   b. Cleaning, laundering, or disposal of personal protective equipment such as lab coats will not be provided by AOMA, but by clinical personnel.

   c. When necessary, personal protective equipment such as gloves and face masks will be provided by AOMA.

   d. Gloves shall be worn when there is potential for clinical personnel to have direct skin contact with blood, mucous membranes, or non-intact skin when handling items or surfaces soiled with blood or other potentially infectious materials, and when a patient has an active skin infection (e.g., staph, herpes, etc.).

      i. Disposable, single use gloves, such as surgical or examination gloves, shall be replaced as soon as possible when visibly soiled, torn, punctured, or when their ability to function as a barrier is compromised. They shall not be re-used.

      ii. For personnel or students who clean the clinic, utility gloves may be re-used if the integrity of the glove is not compromised, however they must be discarded if they are cracked, peeling, discolored, torn, punctured, or exhibit other signs of deterioration.

   e. Masks shall be worn whenever splashes, spray, spatter, droplets, or aerosols of blood or other potentially infectious materials may be generated and there is potential for eye, nose, or mouth contamination.

   f. Lab coats and other protective body clothing must be worn.

      i. Clean, white lab coats or medical scrubs by students and clinic supervisors or professional practitioners must be worn at all times in clinic since there is a potential for soiling clothes with blood or other potentially infectious materials.

      ii. Closed-in shoes, with socks or stockings must be worn at all times, during all seasons in the clinic. No sandals are allowed. Clean athletic shoes are allowed.

4) **Clean and Sanitary Work Site**: The work site must be clean and sanitary at all times. The administration will determine and implement the appropriate written schedule for cleaning and disinfection based on the type of surface to be cleaned, and the tasks and procedures to be performed.
a. All equipment and working surfaces shall be properly cleaned after contact with blood or other potentially infectious materials.
   i. Work surfaces shall be decontaminated with an appropriate disinfectant after completion of procedures, when surfaces are overtly contaminated, immediately after any spill of blood or other potentially infectious materials, and at the beginning of every clinic session.
   ii. All bins, cans, and similar receptacles intended for reuse which have a potential for becoming contaminated shall be inspected, cleaned, and disinfected on a regularly scheduled basis and immediately upon visible contamination.
   iii. Reusable items (such as cups) that are contaminated with blood or other potentially infectious materials shall be disinfected.

b. Infectious Waste Disposal
   i. All infectious waste destined for disposal shall be in closable, leak-proof containers or bags that are clearly labeled. Disposal of all infectious waste shall be in accordance with all local, state and federal regulations.
   ii. Immediately after use, disposable needles shall be disposed of in biohazard containers. Biohazard containers shall be easily accessible to personnel and located in the immediate area of use. They must be closed after each treatment session, replaced routinely, and not allowed to overfill.

c. Laundry (sheets, gowns, pillow cases, blankets)
   i. Laundry that is contaminated with blood or other potentially infectious materials shall be treated as if it were contaminated and handled as little as possible and with a minimum of agitation. Contaminated laundry shall be bagged and labeled as such at the location where it was used and shall not be sorted in patient care areas.

5) Communication of Hazards
   a. Warning labels shall be affixed to containers of infectious waste, and shall include the following legend: BIOHAZARD.
   b. Labels shall either be an integral part of the container or shall be affixed as close as safely possible to the container by string, wire, adhesive or other method that prevents their loss or unintentional removal.

6) Personnel Training
   a. All clinical personnel at risk of occupational exposure to blood-borne pathogens or other infectious materials must participate in a training session at the time of their initial entry into the clinic and at least annually thereafter. Student interns will receive this training as part of their Clean Needle Techniques class. Training will include:
      i. Information as to the location of the written infection control plan as well as any applicable standards;
      ii. A basic explanation of the epidemiology and symptoms of blood-borne diseases, and the modes of transmission of pathogens,
      iii. An explanation of this infection control plan;
iv. An explanation of the appropriate methods for recognizing tasks and activities that may involve exposure to blood and other potentially infectious materials;

v. An explanation of the use and limitations of practices that will prevent or reduce exposure, including appropriate sanitation, work practice controls, or personal protective equipment;

vi. An explanation of the basis for selection of personal protective equipment;

vii. Information on the hepatitis B vaccine, including information on its efficacy and safety, and the benefits of being vaccinated;

viii. Information on the appropriate actions to take and persons to contact in the event of an emergency;

ix. An explanation of the procedures to follow if an exposure incident occurs, including the methods of reporting the incident and the medical follow-up that will be made available;

x. An explanation of the labels, tags, and/or coding in use in the facility.

7) **Hepatitis B Information:** AOMA shall make available information on the hepatitis B vaccine and vaccination series to all employees and students who are at risk of occupational exposure. Additionally, AOMA will make available post exposure follow-up to employees and students who have had an exposure incident. The OSHA coordinator is in charge of the hepatitis B program for employees. Student hepatitis B vaccination acknowledgement forms for students will be the responsibility of the registrar’s office. A copy of the Hepatitis B Vaccination form is at the end of this manual.

a. **Hepatitis B Vaccination**

i. Information about the hepatitis B vaccination shall be made available before an employee’s or student’s initial assignment, unless the employee or student has previously received the complete hepatitis B vaccination series, has an antibody test that revealed that the employee is immune, or if the vaccine is contraindicated for medical reasons.

ii. AOMA will provide information on where an employee or student can obtain the vaccination. An employee whose job classification puts them at high risk, may receive the hepatitis B vaccination at no cost to them.

iii. Students who wish to receive the hepatitis vaccination can do so at their own cost. Additionally, AOMA will not be held liable for side-effects resulting from the vaccination.

iv. Participation in a pre-screening program shall not be a prerequisite for receiving the hepatitis B vaccination.

v. All employees or students who decline the hepatitis B vaccination shall sign the required waiver indicating their refusal. AOMA will not be held liable for an individual refusing to obtain the vaccination.

vi. If the employee or student initially declines the hepatitis B vaccination, he/she may at a later date decide to be vaccinated and complete a new Hepatitis B Vaccination Acknowledgment
vii. If a routine booster dose of hepatitis B vaccine is recommended by the U.S. Public Health Service at a future date, AOMA will notify the employee or student.

b. **Post-exposure Evaluation and Follow-Up:** Following a report of an exposure incident, the OSHA coordinator will make available in a timely manner and at no cost to the employee, a confidential medical evaluation and follow-up performed by a licensed healthcare professional according to the recommendations of the U.S. Public Health Service.

c. **Student Incident Payment Limit:** if exposed person is an AOMA student, AOMA will pay for, or reimburse student, for a total of $500 per incident for post exposure medical evaluation and follow up, contingent upon completion of AOMA’s Sharps Incident Report form or Incident Report form within stated time period. This evaluation and follow-up will include at least the following elements:

   i. Documentation of the route(s) of exposure, HIV and HBV antibody status of the source patient(s) (if known), and the circumstances under which the exposure occurred.
   
   ii. Collection and testing of the source patient’s blood (if he/she can be found and permission is obtained) to determine the presence of HIV or HBV infection.
   
   iii. Collection of blood from the exposed individual as soon as possible after the exposure incident for the determination of HIV and/or HBV status. Actual antibody or antigen testing of the blood or serum sample may be done at that time or at a later date if the individual so requests.
   
   iv. Follow-up of the exposed individual including antibody or antigen testing, counseling, illness reporting, and safe and effective post-exposure prophylaxis according to standard recommendations for medical practice.

d. The OSHA coordinator shall provide the following information to the evaluating healthcare professional:

   i. A copy of OSHA regulations and its appendices, if employee incident.
   
   ii. A description of the exposed individual’s duties as they relate to the individual’s exposure incident.
   
   iii. Documentation of the route(s) of exposure and circumstances under which they occurred.

e. The OSHA coordinator shall obtain and provide the exposed individual with a copy of the evaluating healthcare professional’s opinion within 15 working days of the completion of the evaluation. The written opinion should contain the following information:

   i. The healthcare professional’s written opinion for Hepatitis B vaccination shall be limited to whether Hepatitis B vaccination is indicated for an employee/student, or if the employee/student has received such a vaccination.
ii. The healthcare professional’s written opinion for post-exposure evaluation and follow-up shall be limited to the following information:
   1. A statement that the individual has been informed of the results of the medical evaluation, and
   2. That he/she has been informed of any medical conditions that may develop as a result of exposure to blood or other infectious materials, which require further evaluation or treatment.

iii. All other findings or diagnoses shall remain confidential and shall not be included in the written report.

8) Record Keeping
   a. The OSHA coordinator shall establish and maintain accurate medical records for all clinical personnel in accordance with OSHA Standard 29 CFR 1910.20.
      i. Clinical personnel medical records should contain the following documents:
         1. Name and social security number;
         2. A copy of the individual’s hepatitis B vaccination records and medical records relative to his/her ability to receive vaccination, or the circumstances of an exposure incident;
         3. A copy of all results of physical examinations, medical testing, and follow-up procedures as they relate to the individual’s ability to receive vaccination or to post-exposure evaluation following an exposure incident;
         4. The OSHA coordinator’s copy of the written opinion of the physician;
         5. A copy of the information provided to the physician.
      ii. The OSHA coordinator shall ensure that all confidentiality guidelines and requirements are met with regard to maintaining clinical personnel files. Files shall be kept confidential, and no information contained therein shall be disclosed to any person within or outside the workplace.
      iii. The OSHA coordinator shall maintain clinical personnel records for at least the duration of employment or enrollment plus 30 years.

   b. The OSHA coordinator is responsible for maintaining training records.
      i. Personnel training records should contain the following documentation:
         1. The dates of all training sessions;
         2. An outline describing materials presented;
         3. The names and qualifications of the persons conducting the training;
         4. The names and job classifications of all persons attending the training sessions.
      ii. Employee training records shall be maintained in the human resources office for three years following the date of training.

   c. All employee records shall be made available to the individual involved,
in accordance with 29 CFR 1910.20. These records shall also be made available upon request to the assistant secretary of labor for OSHA and the director of the National Institute for Occupational Safety and Health.

d. If the facility closes or if there is no successive employer to receive and retain the records for the prescribed period, the director of NIOSH shall be contacted for final disposition.

e. The OSHA coordinator is responsible for annually reviewing this program and its effectiveness, and for updating this program as needed.
Hazard Communication Program

Overview
We work with a variety of materials, some of which are considered potentially hazardous. It is important that we are aware of the hazardous materials in our workplace and understand the labeling and communication about these materials so that we can safely manage their use.

AOMA provides information regarding hazardous materials at our school with the use of Material Safety Data Sheets (MSDS). The sheets are found in a bright yellow notebook in the facility manager’s office.

In addition, our plan ensures our safety by complying with the OSHA Hazard Communication Standard, 29 CFR 1910.1200 and requires:
- All containers are labeled
- MSDS are actively used and all employees have access to the MSDS
- All employees receive effective hazard communication

What is a Hazardous Material?
OSHA defines hazardous materials as any chemical or chemical product that can pose a physical hazard such as flammability, toxicity, corrosiveness and bio-hazardous. The standard exempts consumer products if that product is used as a consumer would at home. For example, if you use a desk cleaner in the proper way for the standard duration of time, just as you would at home, then the OSHA standard does not cover the product. However, if your job is to use the cleaner to clean desks all day long, then the product is included in the standard because it is no longer being used as a consumer would use it.

Container Labeling
The Facility Manager will be responsible for all containers of Hazardous chemicals entering the workplace and will assure that the chemical containers are properly labeled with:
- Chemical name
- Hazard warnings
- Name and address of the manufacturer, importer, or responsible party

Material Safety Data Sheets (MSDS)
MSDS sheets will provide us with specific information on the materials we use at AOMA. The Facility Manager will maintain a binder with an MSDS on every substance on the list of hazardous materials, and maintain the binders around campus. New materials shall not be used until an MSDS has been obtained. Bright yellow and black plastic binders with the MSDS are available for review in the following locations:
- Bldg. A, Clinic Conference Room
- Bldg. C, Facilities Office
Emergency Procedures

The objective of AOMA’s Emergency Procedures is to comply with the Occupational Safety and Health Administration’s (OSHA) Emergency Action Plan Standard, 29 CFR 1910.38, and to prepare employees for dealing with emergency situations. This plan is designed to minimize injury and loss of human life and company resources by training employees, procuring and maintaining necessary equipment, and assigning responsibilities. This plan applies to all emergencies that may reasonably be expected to occur at AOMA.

Hierarchy of Responsibility
In case of emergency (such as fire, explosion, chemical spill, accidental release of toxic gas, lightning strike, personal injury or the like), the hierarchy of responsibility during emergencies shall be as follows:

- Building A - Dojo: Faculty Member
- Building A – Clinic: Clinic Manager, Faculty, Reception
- Building B - Store: Store Manager, Clerk
- Building C - Offices: Finance, Admissions, Registrar
- Building D – Library: Librarian
- Building D – Administration: President, Vice President

The employee in charge, if present at the time of the emergency and capable of taking command, shall be responsible for managing the emergency. The person in charge should alert all persons in their building. If the first person listed is not present, the next individual on the list who is present and capable will be in charge.

Emergency Notification
In an emergency situation, the employee in charge should quickly notify everyone involved that an incident is occurring. If the phone system is available, the employee should page all phones (#(PAGE) and then 0)

Emergency Notification System - Email and Text Messaging Service
AOMA contracts with a third-party vendor that provides the technological ability to send email and text messages to members of the campus community. Only messages about emergencies and messages used periodically to test the system are sent. Any data provided to the vendor by AOMA is protected by contractual arrangements.

Evacuation – Fire, Gas, Bomb Threat, School Shooting (non-weather related)
If in the judgment of the employee in charge an emergency requires evacuation of any of the buildings, all personnel, students, patients, and other visitors must evacuate the buildings immediately. Emergency exit routes are mapped out on the yellow school layout diagrams posted prominently in each building. Clinics need to ensure that no patients are left in the clinic rooms. No one other than personnel responding to the emergency situation is permitted to stay in the building for any purpose.
Evacuation Locations

<table>
<thead>
<tr>
<th>Building A:</th>
<th>Southwest Parking Lot</th>
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<tbody>
<tr>
<td>Mind Body Center</td>
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<tr>
<td>Clinic</td>
<td>Northwest Parking Lot</td>
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<tr>
<td>Building B:</td>
<td>Southwest Parking Lot</td>
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<tr>
<td>Student Lounge</td>
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<tr>
<td>Herb Store and Herb Classroom</td>
<td>Northwest Parking Lot</td>
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<tr>
<td>Building C:</td>
<td>Northeast Parking Lot</td>
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<td>Offices</td>
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<tr>
<td>Building D:</td>
<td>Southeast Parking Lots</td>
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<td>Library</td>
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<tr>
<td>Building D:</td>
<td>Northeast Parking Lot</td>
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<td>Faculty Lounge and Administration</td>
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<tr>
<td>Building E:</td>
<td>E1 and E3 – Southwest Parking Lot</td>
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<tr>
<td>Classrooms</td>
<td>E2 and E4 – Southeast Parking Lot</td>
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</table>

Shelter - Weather Emergency or Chemical/Biological Threat

If the person in charge determines that the school is threatened by severe weather (e.g. tornado) or a chemical/biological threat then he/she will direct all personnel, students, patients, and other visitors to rooms away from doors and windows. The person in charge will direct all individuals to take shelter in the following areas:

<table>
<thead>
<tr>
<th>Building A:</th>
<th>Restrooms</th>
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<tbody>
<tr>
<td>Mind Body Center</td>
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<tr>
<td>Clinic</td>
<td>A16</td>
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<tr>
<td>Building B:</td>
<td>Herb Store Herb Room</td>
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<td>Student Lounge</td>
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<tr>
<td>Herb Store and Herb Classroom</td>
<td>Herb Room</td>
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<td>Building C:</td>
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<td>Offices</td>
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<td>Building D:</td>
<td>Quiet Study Room</td>
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<td>Library</td>
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<tr>
<td>Building D:</td>
<td>Restroom</td>
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<tr>
<td>Faculty Lounge and Administration</td>
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<tr>
<td>Building E:</td>
<td>Storage Closet</td>
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<tr>
<td>Classrooms</td>
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</tbody>
</table>

Police or Medical Emergency

- If the employee in charge determines that the school has a police or medical emergency, he/she will first contact emergency personnel (911) or delegate this task.
• An employee will be stationed outside by the parking lot to direct emergency personnel to the emergency location.
• The employee in charge may personally perform only such rescue and medical duties as he/she is trained and permitted to do by law (e.g. CPR). Otherwise, he/she must wait until professional help arrives.
• Lockdown - If the employee in charge determines that the safest alternative is for all personnel to shelter in place, an announcement will be made via the campus telephone system asking each classroom/office/clinic space door to be locked and personnel to stay inside.
• Contact AOMA's facilities department at 512-492-3079.

Emergency Response Training
Emergency response training occurs annually (usually in the fall). All aspects of the AOMA Emergency Plan will be reviewed during the training.

First Aid Kits
• Bldg. A Clinic Reception Area
• Bldg. B Student Lounge
• Bldg. C Copy Machine Area
• Bldg. D Faculty Lounge

AED Cabinet Locations
• Bldg. A Clinic Reception Area
• Bldg. B Student Lounge
• Bldg. D Faculty Lounge
AOMA uses the National Fire Protection Association Life Safety Code as the minimum standards to be attained for fire and building safety.

Hallways
Storage of any kind, or use of office equipment in hallways is not permitted. Normally, only water foundations, fire protection equipment, and safety equipment will be installed in hallways. Transparent covers on bulletin boards and display cabinets must be safety glass or other non-splintering material.

Doors
Fire doors and smoke partition doors are equipped with self-closing mechanisms or automatic release hold-open devices and must be maintained in working order. It is extremely important that these doors are not blocked open by wooden wedges or other devices. All exit doors must be maintained to permit egress at all times. When two or more doors exist at an exit, all of the doors shall be free to operate when the building is open to the public.

Railings, Steps, Walkways
The area immediately outside of building exits shall be maintained free of obstructions at all times.

Bicycles
Bicycles are not permitted in hallways, stairwells, lobbies or on sidewalks immediately adjacent to exits. They must be parked at bicycle racks located around the campus.

Slips, Trips, Falls
Slips, trips and falls are among the most common causes of injury. Nationwide, they are second only to motor vehicles as causes of accidental deaths. These types of accidents occur in many varied types of environments. Individuals walking across campus are presented with hazards ranging from uneven to cracked pavement, tree roots, holes, projecting objects, etc. These hazards can cause falls if the pedestrian is not being observant or it is dark.
Security at AOMA

Introduction
AOMA strives to provide a crime free and safe environment through strategic policing, integrity, respect, and strong community partnerships.

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (20 USC § 1092(f)) is the landmark federal law, originally known as the Campus Security Act, that requires colleges and universities across the United States to disclose information about crime on and around their campuses. AOMA is in compliance with the Clery Act.

The law was amended in 1992 to add a requirement that schools afford the victims of campus sexual assault certain basic rights, and was amended again in 1998 to expand the reporting requirements. The 1998 amendments also formally named the law in memory of Jeanne Clery.

Subsequent amendments in 2000 and 2008 added provisions dealing with registered sex offender notification and campus emergency response, respectively. The 2008 amendments also added a provision to protect crime victims, "whistleblowers", and others from retaliation. The following information is intended to comply with this federal legislation. Please read it carefully and keep it in an easily accessible location. These policies and guidelines will be amended and updated whenever necessary.

Any questions and concerns or comments about AOMA's security policy should be directed to the Office of the President, 512-492-3006, or Human Resources, 512-492-3003.

Workplace and Campus Violence Policy
AOMA is committed to maintaining a safe learning and working environment for all members of the AOMA community. AOMA will not tolerate acts of aggression, harassment, or violence on its campus, at off-campus locations administered by AOMA, or in its programs. This policy of "zero tolerance" includes but is not limited to verbal and/or physical aggression, attacks, threats, harassment, intimidation, bullying, domestic violence, or other disruptive behavior which causes or could cause a reasonable person to fear physical harm by an individual(s) or group(s) against any person(s) and/or property. Such behavior is prohibited by AOMA.

The State of Texas allows licensed handgun carriers to store a handgun in a locked, privately owned motor vehicle in the institution’s parking lot. Beyond this, the use, possession, or display of firearms or other weapons by students, employees (other than by a law enforcement officer in the course of his/her duty) or visitors while on campus is not permitted. This includes those with legal permits. Non-uniformed law enforcement personnel must advise AOMA President or Chief Financial Officer of their presence on campus or anticipated presence as soon as possible.
This policy applies to students, faculty, staff, and visitors to AOMA.

Definitions:

**Violent behavior** includes any behavior, whether intentional or reckless, which results in bodily injury to one's self, another person and/or damage to property.

**Threatening behavior** includes any behavior, whether intentional or reckless, that by its nature would be interpreted by a reasonable person as intent to harm one's self, another person, or damage property belonging to another. Threats may be oral, written, or communicated through conventional mail, electronic, fax, or telephonic means and may be direct or implied.

**Campus violence** encompasses threatening and violent behavior. Campus violence can include, but is not limited, to the following:

- Physically assaulting a person, including slapping, hitting, punching, pushing, poking or kicking; or physical threats to inflict physical harm;
- Arson, sabotage, equipment vandalism, damaging or destroying property, throwing or hitting objects;
- Displaying a weapon or an object which appears to be a weapon in a threatening manner; carrying a firearm of any kind onto University owned or controlled property; or using a weapon to harm someone;
- Using greater physical size/strength to intimidate another; intimidating or threatening gestures, bullying or hazing;
- Intimidating, threatening, hostile or abusive language directed toward another person that communicates the intention to engage in violence against that person and leads a reasonable person to expect that violent behavior may occur;
- Stalking another person.

See the General Appendices, Appendix C, for complete information on definitions and the reporting process for harassment or violence.
Crime Alerts - Timely Warnings

If a situation arises, either on or off campus, that may be a potential threat, the president’s office, or designee, will issue a campus wide “timely warning”. The immediate notification/warning will be issued through the AOMA email system, CAMS student portal, AOMA website and/or through posted flyers. Anyone with information warranting a timely warning should report the circumstance in person to a member of the president’s cabinet or by phone to 512-492-3079.

Reporting Criminal Offenses

Responsibility to Report
Anyone witnessing or receiving a report of prohibited behavior, or possession, display or use of any weapon shall immediately notify the appropriate authorities as listed below. Any supervisor who fails to make such a report shall be subject to corrective and/or disciplinary action.

Emergency or Life-Threatening Situation
In the case of an emergency or life-threatening situation, immediately call 911. As per the AOMA emergency operations plan, be prepared to provide as much information as possible, such as:

- What is happening
- The location of the incident
- Who is involved
- Type of weapon(s) involved, if any
- Your name and current location

Non-Emergency Situations
In the case of a non-emergency situation, all levels of management should be involved. Employees should initially notify their immediate supervisor. If the immediate supervisor is otherwise unavailable, or if the situation involves the immediate supervisor, notify human resources, the facilities department (512-492-3079), the chief financial officer, or the president. The police non-emergency number is 311.

Students are urged to report concerns about acts of aggression, harassment, or violence to the chief financial officer, the dean of students, the director of their respective academic program, or the director of human resources.

Enforcement
Individuals who engage or threaten to engage in prohibited behavior shall be held accountable under AOMA policy and under local, state and federal law. Any employee or student who commits or threatens to commit prohibited behavior may be subject to disciplinary action, up to and including, dismissal or expulsion, as well as arrest and prosecution. Any visitor or affiliate who commits or threatens to commit prohibited behavior may be subject to exclusion from campus, arrest, prosecution, termination of his/her business relationship with AOMA, and/or any other appropriate
action.

Reports of aggression, harassment, violence or threats of violence will be promptly investigated, and, if warranted, disciplinary action will be taken in accordance with applicable procedures. AOMA will notify law enforcement authorities of criminal conduct as appropriate. In addition, AOMA may refer individuals accused of violations of this policy for an assessment of the likelihood that they will carry out violent acts or are a danger to themselves or others.

AOMA will not permit retaliation against anyone who, in good faith, brings a complaint of acts of aggression, harassment, or violence or serves as a witness in the investigation of a complaint of campus violence.

Vendors who conduct business on AOMA premises must conform to the requirements of this policy. AOMA reserves the right to remove from campus vendor’s employees who engage in acts prohibited by this policy.

**Telephone Threats (Bombs, Terrorism)**

If you receive a telephone bomb threat, try to stay as calm as possible. The safety of AOMA and your fellow employees may well depend on how much information you are able to elicit from the caller. The following questions should be asked in the order listed:

- When is the bomb going to explode?
- Where is it right now?
- What does it look like?
- What kind of bomb is it?
- What will cause it to explode?
- Did you place the bomb? Why?
- What is your address?
- What is your name?
- If possible, keep the caller talking and signal a co-worker to call the police.
  - Immediately after hanging up with the caller, dial 911 and summon the Police Bomb Disposal Squad.
  - Next, telephone the administration office, which will notify all other departments.
  - Evacuate all personnel and go to designated area.

**Written Threats**

In case you receive a written bomb threat, immediately place the document inside a clear plastic report binder, or in some other protective covering to avoid fingerprint contamination. Dial 911 and report the threat. Any threatening mail other than bomb threats should be passed on to the Facilities Manager, 512-492-3079, as soon as possible.

**Parcel / Letter Bombs**

All staff who perform mail handling / sorting duties should know the warning signs for potential letter and parcel bombs. Briefly, the most important potential seaming signs are:
• Oily stains or discoloration
• Excessive weight
• Rigid, lopsided or uneven envelope
• Protruding wires or tinfoil
• Excessive securing materials such as masking tape, string, etc.

If you receive a letter or parcel that looks suspicious do not attempt to open or handle it yourself. Call the Facilities Manager at 512-492-3079.
General Information

Security and Access to Campus Facilities – Operating Hours
Except for these hours no one is allowed in the administration hallways with the following exceptions: Office staff who are authorized to work after hours or weekends; maintenance, security, and cleaning staff performing their assigned duties.

North Clinic:
Monday through Wednesday 8:00 a.m. to 8:30 p.m., Thursday/Friday 8:00 a.m. to 5:00 p.m., Saturday 9:30 a.m. to 12:00 p.m.

South Clinic:
Tuesday through Friday 9:00 a.m. to 5:00 p.m.

AOMA Herbal Medicine North:
Monday through Wednesday 9 a.m. to 9:00 p.m., Thursday and Friday 9:00 a.m. to 6:00 p.m., Saturday 9:00 a.m. to 5:00 p.m., and Sunday 12:00 p.m. to 5:00 p.m.

AOMA Herbal Medicine South:
Monday through Friday 9:00 a.m. to 6:00 p.m., Saturday 10:00 a.m. to 2:00 p.m.

Classrooms
Classes are scheduled Monday through Thursday 9:30 a.m. to 9:30 p.m., Friday, Saturday, and Sunday 9:00 a.m. to 6:00 p.m.

Library
Monday through Thursday 9:00 a.m. to 8:00 p.m., Friday 9:00 a.m. to 4:00 p.m., Saturday 10:00 a.m. to 4:00 p.m. The Library is closed on Sunday.

Administrative Offices
Monday through Friday 8:30 a.m. to 5:00 p.m.

Campus Law Enforcement
AOMA’s point of contact for security issues during the regularly scheduled work day is the facility department, 512-492-3079.

AOMA maintains a close working relationship with the Austin Police Department. Officers from the Austin Fire Department meet with AOMA officials on a regular basis to provide security advice and exchange information.

Dissemination of Security Policy
AOMA employees receive the Safety & Security Manual with their Employee Manual. In addition, a representative of the president’s cabinet will brief the campus periodically on campus security policies and procedures.
Formal sessions devoted to campus security policy and procedures are included as part of the orientation schedule for all incoming students. Each student will receive a copy of the Student Manual and the Safety and Security Manual.

Dissemination of Crime Prevention Information
Additional literature on crime prevention may be distributed to all students and employees as appropriate. A formal presentation on crime prevention is included in the campus security presentation given to students during orientation, as well as during the yearly security briefings given by the President’s Office to each campus department.

AOMA Drug & Alcohol Abuse Prevention Policy
In accordance with the Drug-Free Schools and Communities Act of 1986 and the Higher Education Act of 1965 as amended by the Drug-Free Schools and Communities Act Amendments of 1989, Public Law 101-226, AOMA adopts the following policy to prevent the unlawful possession, use and distribution of illicit drugs and alcohol by employees and students. AOMA’s policy is in accordance with the Federal Drug-Free Workplace Act of 1988, part of the Anti-Drug Abuse Act of 1988, is incorporated herewith. Refer to General Appendices – E.

Sexual Discrimination/Sexual Harassment Policy
It is the policy of AOMA to provide an educational and working environment for its students, faculty, and staff that is free from sex discrimination and sexual harassment. In accordance with federal and state law, AOMA prohibits discrimination on the basis of sex, including sexual harassment. Sex discrimination and sexual harassment will not be tolerated, and individuals who engage in such conduct will be subject to disciplinary action. AOMA encourages students, faculty members, staff members, and visitors to promptly report sex discrimination and sexual harassment. Refer to General Appendices – C.

ID Theft Prevention
The risk to AOMA, its employees and customers from data loss and identity theft is of significant concern. AOMA’s complete identity theft policy is in the General Appendices – H.

Identity Theft - On a Personal Note
- Buy a good shredder – use it to shred pre-approved credit applications, credit card receipts, bills and other information you don’t want before discarding them
- Never leave receipts at bank machines, bank counters, or public trash receptacles
- Never give out personal information over the phone, such as your social security number, date of birth, mother’s maiden name, credit card number, or bank PIN code, unless you initiated the phone call or know exactly who you are dealing with
- Never loan your credit card(s) to anyone else
- Report all lost or stolen credit cards, or other personal information, immediately to credit card company, or other agency
• Be aware of thieves who use interactive service sites on the web or mail or telephone solicitations disguised as surveys or promotions offering instant prizes or awards to obtain your personal information or your credit card numbers

What to do if your wallet or purse is stolen or lost?
• Cancel credit cards immediately
• Have the toll free numbers for credit card companies handy so you know whom to call. DO NOT keep this information in your wallet or purse.
• Contact the bank if your checkbook or ATM card was stolen
• File a police report immediately
• Call all of the following numbers immediately to place a fraud alert on your name and social security number. This alert means requires that you are contacted by phone to authorize new credit:
  • Equifax (800) 525-6285
  • Experian (888) 397-3742
  • Trans Union (800) 680-7289
  • Social Security Administration Fraud Hotline (800) 269-0271

Additional Safety Considerations

Reducing the Opportunity for Theft
• Do not leave your wallet/purse/valuables unattended in an unlocked desk or cabinet
• Lock your door or your desk when you leave, even if you are gone for a short time
• Be alert for suspicious looking activity & promptly report to the Facility Manager
• Maintain strict key/security code control
• Keep updated inventory of all office equipment
• All AOMA equipment should have a security ID tag on it

Vehicle Safety Tips
If leaving campus after hours or when dark, leave with another person.
• Have your vehicle keys in hand when you approach your vehicle
• Before getting into your vehicle, check the inside and look underneath
• Immediately lock all doors when you get into your vehicle or exiting vehicle
• Maintain your vehicle in good working order, with sufficient gas and safe tires
• Do not leave valuables visible in your vehicle
• Close all windows and lock all doors before leaving your vehicle

Carjacking
Your life is more important than anything of material value. It is recommended that you give up your keys immediately and without protest. Avoid getting into the vehicle with the suspect(s) if possible. If you need to surrender your vehicle, try to remember details about the suspect such as race, sex, approximate height, clothing, speech, the direction they left in, type of weapon(s). Immediately report this information to “911”. Also contact AOMA’s facility department at 512- 492-3079.
Home/Apartment Safety Tips
- Be alert to suspicious activities or people in the garage, hallway, or other common areas
- Do not enter elevator if you are uncertain of any occupant
- Try to stand near the elevator control panel. If accosted, press all the buttons
- Have keys ready to enter residence quickly
- Keep door entrances well-lit and locked at all times
- Install and use a wide angle peephole in all exterior doors
- Change locks or re-key immediately if door keys have been misplaced
- Lock windows if they are easily accessible from the outside
- Identify callers before opening doors, check ID’s of all repair and sales people prior to permitting entry into your home
- If you suspect someone is inside your home, avoid confrontation, get out and call “911”.
- Keep your valuables, purse or wallet out of plain view from the window
- Keep your curtains and blinds closed at night
- Place lights on timer to make it appear occupied if you will be away
- Do not allow newspaper or other mail to accumulate when away, have newspaper stopped and friend/neighbor pick up mail for you if necessary

Personal Safety
- Travel with a friend or in a group, use well-lit, frequently traveled routes
- Be alert and aware of surroundings
- Be assertive
- Do not carry excess amounts of cash or more credit cards than you need

Personal Safety on Public Transportation
- Wait for a bus in well lighted area
- Sit up front close to the driver
- When you disembark, be aware of who else is getting off and if they are following you. If you feel you are being followed, go to the nearest store or occupied building to request assistance.

Domestic Violence
If you are in a relationship with someone who is threatening to harm you or is physically, emotionally or verbally abusing, you may be experiencing domestic violence.

Whether you are concerned about yourself or someone else in the AOMA community, educational resources and support services are available for anyone who is in an abusive relationship, has experienced relationship or intimate partner violence in the past, or wants to learn more about how domestic violence affects our community.

For additional assistance, contact SafePlace at 267-SAFE.
## AOMA Campus Crime and Security Data Report 2016

For calendar year 2015

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### Security Training/Orientation

Formal sessions devoted to campus security policy and procedures are included as part of the orientation schedule for all incoming students. Each student will receive a copy of the Student Handbook, Safety & Security Manual, and General Appendices, which includes this policy and statistical statement.

### How to Report a Crime

The victim, witness, or employee in charge determines if the school has a police or medical emergency. As appropriate, you should contact emergency personnel at “911”. ALL crime reports should also be reported to AOMA’s Facilities Department 512-492-3079.

### Reporting Non-Emergency Occurrences

For non-emergency assistance contact the AOMA Facilities Department, 512-492-3079 or the Austin Police Department at “311”, as appropriate. This includes missing items on campus, keys locked in car, general inquiries, etc.

AOMA’s Safety & Security Manual contains the school’s security policies including emergency response, evacuation procedures and timely warning. This report is posted on the CAMS student portal, on the staff login page on the AOMA website, on bulletin boards around campus, and in the Admissions office.
Important Phone Numbers & Websites

EMERGENCY 911
Police NON-Emergency 311
SafePlace (Austin Rape Crisis Center AND Center for battered Women 512-267-SAFE (7233)
Austin 24 Hour Hotline 512-472-HELP (4357)
AOMA President’s Office 512-492-3006
AOMA Human Resources 512-492-3003
AOMA Facility Department 512-492-3079
AOMA Lost and Found 512-492-3079
Pop-A-Lock of Austin 512 836-1011
(Years locked in vehicle)
Yellow Cab of Austin 512-452-9999
Poison Control 800-222-1222

Websites
Victim assistance: http://www.austintexas.gov/department/victim-services

Crime prevention, safety, vehicle safety, safety for kids: https://www.tcsheriff.org/community/programs

Sex Offender Registry (TX Dept. of Public Safety): https://records.txdps.state.tx.us

City of Austin helpful phone numbers: http://www.austintexas.gov/contact-us

Identity theft: www.consumer.gov/idtheft

Alcohol and drug prevention: http://www.drugfree.org

Federal Trade Commission, Fraud and consumer protection: www.ftc.gov
