



Jackson College Board of Trustees

Monitoring Report: EL – 01 Treatment of Learners

[FULL COMPLIANCE]

Note: Board Policy is indicated in bold typeface throughout the report.

I present this monitoring report to the Jackson College Board of Trustees which addresses the Board’s Executive Limitations Policy EL-01: “Treatment of Learners”. I certify that the information contained herein is true and represents compliance, within a reasonable interpretation of the established policy, unless specifically stated otherwise below. Please note that all of my interpretations of the policy remain unchanged from the previous report, unless otherwise noted.

10.13.25

Daniel J. Phelan, Ph.D.
President and CEO

Date

POLICY STATEMENT: The CEO shall not cause or allow conditions, procedures or decisions related to the treatment of learners that are unsafe, not merit-based, disrespectful, or unnecessarily intrusive.

Further, without limiting the scope of the above statement by the following list, the CEO shall not:

- 1. Permit learners and others who use College property and equipment to be without proper training and reasonable protections against hazards or conditions that might threaten their health, safety or well-being.**

INTERPRETATION:

Compliance will be demonstrated when:

- All operational policies, procedures, and training programs are in place to protect learners from any conditions that might threaten their health, safety or well-being.
- All chemicals requiring Safety Data Sheets (SDS) are maintained and accessible and available upon request to employees and learners in compliance with OSHA standard 1910.1200(b)(4)(ii).
- A current emergency reference guide is available to all employees and learners

and the guide content and placement of the guide is consistent with advice from local police and fire departments.

- d) A Drug Free Schools and Campus Plan, which complies with the Drug Free Schools and Campuses Regulation (EDGAR Part 86), is accessible on the website.
- e) The College complies with Federal Cleary reporting requirements.
- f) The College has a pandemic plan that is current and accessible.
- g) Learners have reasonable access to communications regarding emergencies and campus closings.
- h) The College complies with all State requirements regarding elevator, boiler, and fire system inspection.
- i) The College provides campus-based mental, physical, and dental health services for all learners.

This interpretation is reasonable because it ensures compliance with National and State requirements for safety and security for institutions of higher education.

EVIDENCE:

- a) The Operations Coordinator confirmed on 10.06.25 that the following policies were accessible online and have been reviewed in the last two years:
 - i. [Tobacco Free Environment 1715](#) - last approved on 06.25.24.
 - ii. [Threats and Violence 2609](#) – last approved on 06.25.24
 - iii. [Student Rights, Responsibilities and Code of Conduct 2701](#) – last approved on 02.07.24.
- b) The Chief Facilities and Logistics Officer confirmed on 10.05.25 that the [Safety Data Sheets](#) were current for all cleaning chemicals on Central Campus and accessible on the Jackson College website.
- c) The Operations Coordinator confirmed on 09.23.25 that the [emergency reference guide](#) was available online.
- d) The Operations Coordinator confirmed on 09.23.25 that the [Drug and Alcohol Abuse and Prevention Program \(DAAPP\)](#) was accessible online. The document was updated on 09.16.25.
- e) The Operations Coordinator confirmed on 09.29.25 that the 2025 [Campus Crime and Fire Report](#) was available online and contains statistics for 2022 to 2024.
- f) The Chief Operating Officer confirmed on 09.25.25 that a pandemic plan was in place and can be reinstated in the event of an emergency.
- g) The Operations Coordinator confirmed on 09.23.25 that the College used the Nixle and LiveSafe alert systems available to learners. Information on Nixle signup was available [online](#) and the Live Safe App could be downloaded. Information on both was provided during the mandatory new employee orientation, with additional reminders provided throughout the year. Communication regarding emergencies was also sent via email.

- h) The Chief Facilities and Logistics Officer confirmed on 10.05.25 that inspections were up to date. Documentation of inspections for elevator and boiler inspections and the Fire Safety & Extinguisher inspection reports were current and were stored by them and/or their staff.
- i) The Chief Operating Officer confirmed on 10.02.25 that annual contracts were on file with the Chief Operating Officer that define provisions for the College's Oasis Center which provides mental health services to learners and employees, as well as for the College's Health and Dental Clinics, which provide medical and dental care and evaluation to learners and employees.

1.1. Allow learners to be without policies that minimize the potential for exposure to harassment, provide remedy for harassment situations, and provide methods for dealing with individuals who harass.

INTERPRETATION:

Compliance will be demonstrated when:

- a) The College has a current Sexual Discrimination/Harassment Policy which is accessible to learners.
- b) The College has an Incident Reporting Form and anonymous tip line, independent of the College, available to learners to report issues of sexual discrimination and harassment.
- c) The College has a full-time Compliance Officer who also assumes responsibilities of Title IX Coordinator.

The interpretation is reasonable because it includes all elements required for compliance with legal requirements related to the Clery Act, and it is consistent with the College's Zero Tolerance policy.

EVIDENCE:

- a) The Chief Operating Officer confirmed on 09.23.25 that the [Sexual Harassment Policy 1717](#) was last reviewed on 2/11/25 and was accessible on the website.
- b) The Chief Operating Officer confirmed on 09.23.25 that as described within policy 1717 the following reporting methods were available online for learners and employees
 - i. An [incident reporting form](#) is available and located online.
 - ii. Information on how to submit an anonymous tip using an [online tip form](#) online, via a text message and smartphone app were available online.
- c) The CEO designated the Chief Operating Officer as the Title IX Coordinator. All related contact information was [readily available online](#). This was confirmed by the Operations Coordinator on 09.23.25

A clear [Title IX Investigation Process](#) was up to date and accessible online. This was verified by the Operations Coordinator on 09.23.25

The Office of General Counsel confirmed on 09.23.25 that there have been no sexual discrimination and harassment investigations during this 12-

month period.

The Operations Coordinator confirmed on 09.29.25 that the Clery Act report which was filed on 9/22/25 included a report of all incidents reported and investigated in this monitoring period.

1.2 Modify curricula or program delivery in a way that compromises objective academic standards in favor of identity-based considerations.

INTERPRETATION:

Compliance will be demonstrated when:

The College evaluates programmatic- and course-level learning outcomes to ensure compliance with objective academic standards.

The interpretation is reasonable because it allows for academic freedom while meeting federal requirements.

EVIDENCE:

The Chief Academics Officer confirmed on 10.07.25 that Jackson College remains committed to academic excellence grounded in objective, evidence-based standards. Faculty and academic leadership continuously review and assess course- and program-level learning outcomes to ensure that instruction and assessment practices reflect the rigor expected of an accredited institution of higher education.

The College's approach honors the principles of academic freedom by allowing faculty to explore diverse perspectives and pedagogical methods, while maintaining fidelity to federal and accreditor expectations for quality and consistency. Learning outcomes are developed and evaluated based on measurable competencies, disciplinary standards, and student achievement data—not on identity-based criteria.

This process is embedded within the College's assessment and program review cycle, which includes oversight by the Academic Affairs Council and institutional effectiveness teams. As such, the College demonstrates compliance by ensuring that curriculum development, instructional delivery, and outcome assessment are all grounded in objective academic standards that promote equitable access to high-quality education without compromising academic integrity.

2. Use methods of collecting, reviewing, storing or transmitting learner information that unreasonably protect against improper access to personal information.

INTERPRETATION

Compliance will be demonstrated when:

- a) The College complies with the Family Educational Rights and Privacy Act. (FERPA).

- b) FERPA training is mandatory for all employees.

The interpretation is reasonable because it ensures compliance with legal requirements via required training for employees.

EVIDENCE:

- a) On 10.07.25, the Registrar / Director of Jackson College Lenawee and Judicial Affairs Officer both confirmed that no confirmed FERPA violations were reported to JC's legal counsel during this cycle.
- b) On 10.06.25, the Director of Compliance/Deputy Title IX Coordinator confirmed that 97% (274/282) of the employees working during the last year (10.06.24 – 10.05.25) completed the FERPA training during the year.

The FERPA training was assigned to each new employee and the training was completed during their new employee orientation. The Learning Management System utilized, Vector Solutions, reassigned the training to each employee 365 days after the prior completion. Employees received automatic email notifications from Vector Solutions when they had training that was due within 30 days and if the training was not completed they received reminder emails every 2 weeks. The Director of Compliance also monitored the system and contacted employees, and their supervisor, when an employee had outstanding mandatory training.

On 10.06.25, the Registrar confirmed that in each semester in the past year, all enrolled learners were sent an email informing them of their FERPA rights.

3. Permit student services, admission, registration, evaluation, or recognition processes or policies that treat learners in a non-merit-based fashion.

INTERPRETATION

Compliance will be demonstrated when:

- a) The College has an established academic complaint process for incidents.

The interpretation is reasonable because it complies with federal requirements.

EVIDENCE:

- a) On 10.06.25, the Chief Student Services Officer confirmed that an [Admissions Policy](#) was in place and that the process for admission was clearly outlined for students who sought admission to Jackson College. All applicants who accurately completed the admissions application process were granted admission in accordance with our policy.

On 10.06.25, The Chief Student Services Officer confirmed that during each term of the monitoring period, all students were allowed to register for classes on the opening day of the enrollment period. Preferential treatment was not provided to students based on academic level (freshmen or sophomores), military status (veterans or active duty), nor dependent status (pregnant or parenting).

On 10.06.25, the Chief Student Services Officer confirmed that an [Academic Complaint](#)

process was in place and that the process was clearly outlined online for students.

4. Permit non-merit-based, inconsistent or untimely handling of learner complaints or appeals, or permit learners to be uninformed of the process for registering either.

INTERPRETATION

Compliance will be demonstrated when

- a) A process and timeline is prescribed for academic, non-academic and financial aid appeals.

The interpretation is reasonable because a statement of process and timelines is provided for learners, which is a common practice among institutions of higher education.

EVIDENCE:

- a) On 10.06.25, the Chief Student Services Officer confirmed that an [Academic Complaint process](#) was in place and that the process is clearly outlined online for students.

On 10.06.25, the Chief Student Services Officer also confirmed that the [Student Appeals policy](#) was online. This policy was current and appropriate as it was last reviewed on 05.01.25.

4.1 Retaliate against any learner for non-disruptive expression of dissent.

INTERPRETATION

Compliance will be demonstrated when:

- a) The College has a current Demonstrations Policy in place that protects learner free expression.

The interpretation is reasonable because it is consistent with federal law and interpreted by legal counsel as a practical application.

EVIDENCE:

- a) On 09.29.25, the Chief Operations Officer confirmed that [Policy 2612 Free Speech, Expressive Activities & Demonstrations](#) was current and accessible online. This policy was last reviewed on 05.01.25.

5. Permit learners to be uninformed of learner rights and responsibilities, including expectations for learner behavior, and the consequences of failure to adhere to the expectations.

INTERPRETATION

Compliance will be demonstrated when:

- a) The College has a Learner Rights, Responsibilities and Code of Conduct Policy.
- b) All learners receive communication regarding the Learner Rights, Responsibilities and Code of Conduct Policy.

The interpretation is reasonable because it is based on best practices used by other

institutions.

EVIDENCE:

- a) On 10.06.25, the Chief Student Services Officer confirmed that Policy 2701 Student Rights, Responsibilities and Code of Conduct was available online. This policy was last reviewed on 02.07.24.
- b) On 10.06.25, the Chief Student Services Officer confirmed that all new learners were informed of and received links to Policy 2701 Student Rights, Responsibilities and Code of Conduct during New Student Orientation. Also, on 10.09.25, the Judicial Officer confirmed that all enrolled learners received an email link to Policy 2701 as an annual practice.

6. Permit decisions affecting learners to be taken without appropriate notification to learners.

INTERPRETATION

Compliance will be demonstrated when:

- a) The College maintains and communicates the Learner Consumer Information as required by the Higher Education Opportunity Act of 2008.
- b) The College maintains a Transparency Reporting Web page as required by the State of Michigan Public Act 62 of 2013.
- c) The College maintains multiple methods of communication sent out to learners and social media sites.

The interpretation is reasonable because it ensures the College meets state and national requirements and that communication methods are in place for notifying learners.

EVIDENCE:

- a) On 09.23.25, the Operations Coordinator verified that the [Student Consumer Information](#) page was active and up to date during the prior academic year.
- b) On 09.23.25, the Operations Coordinator verified that the [Transparency Reporting](#) page was active and up to date during the past academic year.
- c) On 09.23.25, the Operations Coordinator verified with the Director of Marketing that weekly announcements were sent to all enrolled students during the past academic year. They also verified that the College had active social media accounts with Facebook, Twitter, YouTube, Linked-In, TikTok and Instagram.

The Jackson College Board of Trustees assessed this monitoring report and found that it demonstrated compliance with a reasonable interpretation of the policy at the regular Jackson College Board meeting on October 13, 2025.