



Jackson College Board of Trustees

Monitoring Report: EL – 01 Treatment of Learners

Report Date: 02.12.24
Compliance Status: Fully Compliant

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

I hereby present to the Jackson College Board of Trustees this monitoring report which addresses the Board's Executive Limitations Policy: "Treatment of Learners", according to the schedule previously defined and approved by the Board. I certify that the information contained herein is true and represents compliance, within a reasonable interpretation of the policy, which the Board has previously approved, unless specifically stated otherwise.

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

02.09.24

Date

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

INTERPRETATION:

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:

- a) There are operational policies in place to protect learners from any conditions that might threaten their health, safety or well-being, all of which are accessible on the College's web page, which are reviewed every two years to ensure relevancy and currency.

- b) Safety Data Sheets (SDS) are maintained and accessible upon request to employees and learners in compliance with OSHA standard 1910.1200(b)(4)(ii).
- c) There is a current plan in place for snow and ice removal.
- d) A current emergency reference guide is available on-line and new Emergency Posters have been installed on hallway walls throughout all College buildings. The guide content and placement of the guide is consistent with advice from local police and fire departments.
- e) A Drug Free Schools and Campus Plan, which is reviewed every two years and complies with the Drug Free Schools and Campuses Regulation (EDGAR Part 86), is accessible on the website.
- f) A Campus Security Report is published annually and presents statistics for crimes reported to the Office of Campus Safety and Security during the last three years.
- g) A pandemic plan is current, accessible, and on the College's website, together with the most up to date information on COVID-19 for learners and employees.
- h) Learners and employees have reasonably understandable access to a communications system which informs of campus closings and cancellations due to weather or other emergency situations.
- i) Annual elevator inspections, boiler inspections and quarterly fire system inspections are completed.
- j) The College provides campus-based mental, physical, and dental health services for all learners and employees.

This interpretation is reasonable because it ensures compliance with nationally accepted principles for safety and security for institutions of higher education.

EVIDENCE:

- a) The Chief Operations Officer confirmed on 02.07.24 that the following policies are accessible online and have been reviewed in the last two years:
 - i. [Tobacco Free Environment 1715](#) - last approved on 10.05.22.
 - ii. [Threats and Violence 2609](#) – last approved on 10.05.22
 - iii. [Student Rights, Responsibilities and Code of Conduct 2701](#) – last approved by the Leadership Council on 04.17.23.
- b) The Chief Facilities and Logistics Officer confirmed on 02.09.24 that the [Safety Data Sheets](#) are current for all cleaning chemicals on Central Campus and accessible on the Jackson College website.
- c) The Chief Facilities and Logistics Officer confirmed on 02.09.24 that the operational plans are current to take care of snow and ice removal. This is an internal operational plan that is not posted online.
- d) The Chief Operations Officer confirmed on 02.07.24 that the [emergency reference guide](#) is available online and posters have been installed on hallway walls throughout College buildings.
- e) The Chief Operations Officer confirmed on 02.07.24 that the Drug and Alcohol Abuse and Prevention Program (DAAPP) is accessible online. The document was last updated in September 2022 which is within the two-year review period.

- f) The Chief Operations Officer confirmed on 02.07.24 that the [2022 Campus Crime and Fire Report](#) is available online and contains statistics for 2020 to 2022.
- g) The Chief Operations Officer confirmed on 02.08.24 that the College has a comprehensive business incident management plan in place. Due to the sensitive nature of the document, it is housed with Presidents Office.
- h) The Chief Operations Officer confirmed on 02.07.24 that the College uses the Nixle alert system which students and employees can sign up for [online](#). Information on Nixle signup is provided during the mandatory new employee orientation. Communication regarding emergencies is also sent via email, website and social media plus local radio and TV stations.
- i) The Chief Facilities and Logistics Officer confirmed on 02.09.24 that these inspections are up to date. Documentation of inspections for elevator and boiler inspections and the Fire Safety & Extinguisher inspection reports are stored with the Chief Campus Operations Officer and/or his staff.
- j) Annual contracts are issued and are on file with the Chief Operations Officer that define provisions for the College's [Oasis Center](#), which provides mental health services to students and employees, as well as for the College's [Health Clinic](#), which provides medical care and evaluation to students and employees. A Dental Clinic is also available for students, employees and community members.

1.1. Allow learners to be without current, enforced 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 and employees.
- b) An easily accessible Incident Reporting Form and anonymous tip line, independent of the College, is available to learners to report issues of harassment.
- c) The College has identified a full-time Compliance Officer who also assumes responsibilities of Title IX Coordinator. Their contact information is easily accessible to learners.
- d) Initial information is gathered in response to any incident report or anonymous tip of harassment and when warranted, the Title IX Officer works with the College investigator and the College attorney until there is a resolution.
- e) Results of all sexual discrimination and harassment investigations are retained by Human Resources.
- f) The College annually files the Clery Act report.
- g) All employees complete the required periodic training on recognizing harassment.
- h) New employees review all College policies which includes the Sexual Discrimination/Harassment Policy.

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 Operations Officer confirmed on 02.07.24 that the [Sexual Discrimination/Harassment Policy 1717](#) is accessible on the website and is due for review. This information is also contained in the Student Rights, Responsibilities and Code of Conduct Policy 2701, last reviewed on 02.07.24. Information on Sexual Misconduct Awareness and Title IX is available on the Safety and Security webpage.
- b) The Chief Operations Officer confirmed on 9/28/2022 that as described within [policy 1717](#) the following reporting methods are available online for students and employees
 - i. The Chief Operations Officer confirmed on 02.07.24 that [An incident reporting form is online](#).
 - ii. The Chief Operations Officer confirmed on 02.07.24 that information on how to submit an anonymous tip using an [online tip](#) form online or via a [text message](#) are available online.
- c) The CEO designated the Chief Operations Officer as the Title IX Coordinator. All related contact information is [readily available online](#). This was confirmed by the Chief Operations Officer on 02.08.24.
- d) A clear [Title IX Investigation Process](#) is up to date and accessible online. This was verified by the Chief Operations Officer on 02.07.24
- e) The HR Consultant/Title IX Investigator confirmed on 02.07.24 that there were two investigations conducted by an external legal investigator in the monitoring period related to sexual discrimination or harassment. The claims were not substantiated.
- f) The Chief Operations Officer confirmed on 02.07.24 that the Clery Act report which was filed on 09.28.23 included a report of all incidents reported and investigated in this monitoring period. This was also emailed to all students and employees on 09.28.23.
- g) The HR Consultant/Title IX Investigator confirmed on 02.07.24 that 93% of employees (full-time faculty, full and part time staff, and administrators) have completed Title IX training in the last 12 months.
- h) The HR Director confirmed on 02.07.24 that 55 employees who are new to the College during this monitoring period signed off on a document stating *"I acknowledge that I have read and understand the Jackson College Administrative Policies and related materials which are available on the [JC Policy web page](#). I understand that I am required to abide by college policies as a condition of employment. I am also aware that new policies may be added and that existing policies may be revised, amended or deleted at the discretion of the College and that it is my responsibility to periodically review the manual and policies for updates."*

2. Deliver programs in a manner that is insensitive to learners' culture.

INTERPRETATION

Compliance will be demonstrated when:

- a) The College delivers or makes available cultural training and ongoing professional development to all employees.

- b) The College ensures the curriculum is unbiased, inclusive, and creates a sense of belonging.
- c) The College works with focus groups of learners and staff, Affinity Group Representatives of various populations to increase understanding and connection with the respective local communities.

The interpretation is reasonable because the processes reflect best practices in higher education, as well as current thinking and research regarding sensitivities of various cultures.

EVIDENCE:

- a) The college's Spring '24 Convocation was dedicated to "building a culture of inclusivity." As with all Convocations, offices are closed and attendance is required.
- b) The Course Review Process requires regular and intentional analysis of course content to be free of bias, represent diversity, and be free of any content that would be a barrier to a sense of belonging. This process is led through the Curriculum Committee and incorporates review and feedback from the Assessment Committee, Guided Pathways, and Diversity, Equity, and Belonging.
- c) Focus groups are conducted by Institutional Research and Effectiveness each month with a diverse range of student groups to hear their needs and experiences at the College. The Multicultural Office and Affinity Liaisons have also held many events through the year (listed below).

Multicultural Affairs/Men of Merit & Sisters of Strength

- Men of Merit & Sisters of Strength Promotional Photoshoot (June 12, 2023).
- Juneteenth Community Celebration (June 17, 2023).
- Jackson College Open house (June 23, 2023).
- Ready Set Jet Mentor Training (June 27-30, 2023).
- King Center/Grow Jackson RSJ Community Service (July 19, 2023).
- Ready Set Jet Pathways Showcase (July 21, 2023).
- Michigan Speedway – National Leadership Fundraiser (August 4, 5, & 6, 2023).
- Welcome Week: Jet Jam (August 28, 2023).
- Men of Merit & Sisters of Strength Kick-Off! (September 12, 2023).
- Ella Sharp Park community Service (September 27 & 28).
- Ella Sharp Park Fall Festival Community Service (October 8, 2023).
- Jackson High School Leadership (October – April 2024).
- Middle School at Parkside Leadership (October – April 2024).
- Ella Sharp Park Cookies with Santa Community Service (December 2, 2023).
- Barbershop Initiative (September 12 & 26, October 10 & 24, November 14 & December 12, 2023).
- Hispanic Heritage Month Celebration (September 21, 2023).
- The League Magazine MoM/SoS article (September, 2023).
- Domestic Violence Forum (October 9, 2023).

- 3 on 3 Basketball Intramurals (October 14, 2023).
- Social Justice Speaker - Albion College visit (October 24, 2023).
- Halloweekend at Cedar Point MoM/SoS /Trio trip (October 28, 2023).
- Nursing Department Meeting with Sisters of Strength & Men of Merit (November 6, 2023).
- MoM/SoS Holiday Gathering (December 7, 2023).
- Martin Luther King Jr. Luncheon Celebration (January 15, 2024).
- JDEB Committee Meetings (November 2, December 14, & January 30, 2024).

Affinity Liaisons Events

Elder Community Affinity Liaison

- Computer/Phone (June 21 & 28 2023).
- Computer/Phone (July 5, 12, 19 & 26 2023).
- Watercolor workshop (July 19, 2023).
- Computer/ Phone (August 2, 9, 16 & 23, 2023).
- Lunch and Learn (August 15, 2023).
- Senior Day Grand River Market (September 15, 2023).
- Resource Fair American One Events Center (September 27, 2023).
- Computer/Phone (October 11, 18 & 25 2023).
- Positive Aging Pumpkin Fest (October 4, 2023).
- Computer/Phone (Nov. 1, 8, 15, 29 2023).
- Pantry Pickleball (November 5, 2023).
- Computer/Phone (December 6 & 13 2023).
- Computer/Phone (January 24 & 31 2024).
- Computer/Phone (February 7, 14, 21 & 28 2024).
- Intergenerational Choir (February 5, 12, 19 & 26 2024).

LGBTQIA+ Community Affinity Liaison

- Affinity meetings every month (October – April 2024).
- LGBTQIA liaison meet and greet (February 20, 2024).
- Open house (June 23, 2023).
- Raising of the pride flag (June 12, 2023).
- Pride flag candy making event
- S'mores making event
- LGBTQIA comedy Movie night
- Hot cocoa event
- Movie night
- Meditation
- Herbal make and take
- Pride Waffle Wednesday
- Christmas cards to LGBTQIA Youth
- Women's Kundalini Yoga Meditation to Celebrate Women's History Month (March 18, 2024).
- Pronoun Workshop (March 25, 2024).

- Drag Bingo (February/March 2024).
- Lavender Ceremony (April/May 2024, tbd).
- Color Run (Summer 2024).
- LGBTQIA+ Prom (Summer/Fall 2024).
- Hanger hangout/movie (tbd 2024).
- Pronoun training (tbd 2024).

Asian American/Pacific Islander Community Affinity Liaison

- Halloween Origami at Jackson College (October 2023).
- Halloween Origami at JC Hillsdale Library (October 17, 2023).
- Chopstick 101 at Jackson College (November 6, 2023).
- Chopstick 101 at City of Jackson (November 13, 2023).
- Pokémon Origami at JC Hillsdale Library (January 30, 2023).

3. Permit violation of learner confidentiality and privacy, except where specific disclosure is required by legislation or regulation.

INTERPRETATION

Compliance will be demonstrated when:

- a) A current policy is in place that demonstrates the college is in compliance with the Family Educational Rights and Privacy Act (FERPA).
- b) Training is mandatory for all new employees, and ongoing training is available for all employees.

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

EVIDENCE:

- a) On 02.01.24, the Interim Chief Student Services Officer confirmed the Access to Student Information Policy is current and accessible online. The date of last review was 10.05.22.
- b) On 02.07.24, the HR Consultant/Title IX Investigator confirmed that 93% of all employees completed the annual FERPA training via Vector Solutions for the current monitoring period, and new employees completed the FERPA training within their first 14 days of employment.

3.1. Use forms or procedures that elicit information for which there is no clear necessity.

INTERPRETATION

Compliance will be demonstrated when:

- a) No requests for data/information are approved without having a necessary / legal reason to do so.

The interpretation is reasonable because it ensures compliance with the College's policy 2801 Access to Learner Information, which meets legal requirements.

EVIDENCE:

- a) On 02.01.24, the Interim Chief Student Services Officer confirmed that any requests being made are checked against policy 2801 Access to Student Information policy.
- b) Minutes are kept for all integrity committees as a check and balance for action taken.

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

INTERPRETATION

Compliance will be demonstrated when:

- a) Learner information is collected, stored and transmitted using methods that are consistent with FERPA standards for protecting against improper access as per College policy.
- b) An annual external Information Technology Security audit is conducted every year.

The interpretation is reasonable because these standards are aligned with FERPA standards. The external audit provides transparency and systematically reviews the College's policies and practices to identify any potential security issues.

EVIDENCE:

- a) The College's policy Information Security is current and available online. This policy provides detailed procedures and processes that are meant to protect College data.

4. Permit admission, registration, evaluation, or recognition processes that treat learners inequitably.

INTERPRETATION

Compliance will be demonstrated when:

- a) There is an academic complaint process for incidents where learners feel they have been inequitably treated.
- b) The College offers a wide variety of recognition methods which celebrate our learners' differences.

The interpretation is reasonable because it identifies intentional actions which are consistent with the College's Equity statement.

EVIDENCE:

- a) On 02.09.24, the Interim Chief Student Services Officer confirmed that an Academic Complaint process is in place and that the process is clearly

outlined online for students.

- b) On 02.09.24, the Interim Chief Student Services Officer confirmed with the Interim Chief Diversity Officer that the above-mentioned recognition methods are still active via the aforementioned Multicultural Office and Affinity Liaisons events held. See policy item 2 c) evidence.

5. Permit inequitable, inconsistent or untimely handling of learner complaints.

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 02.01.24, the Interim Chief Student Services Officer confirmed that timelines are included on the academic and non-academic appeal forms. There is no timeline referenced on the financial aid appeal form, but this has been directed to be included.
- b) On 02.01.24, the Interim Chief Student Services Officer confirmed that information for all complaint and appeal processes is available online.

5.1. Permit learners to be without a process for registering a complaint or concern, including an appeal process, or to be uninformed of the process.

INTERPRETATION

Compliance will be demonstrated when:

- a) The College has a current Learner Appeals policy and process for registering complaints and appealing same and is available on the College's webpage.

The interpretation is reasonable because this is a standard practice used by institutions of higher education.

EVIDENCE:

- a) On 02.09.24, the Interim Chief Academic Officer (Health Sciences, Career and Technical Trades) confirmed that a fulltime Student Resolution Advocate is employed and that her contact information is online and easily accessed.
- b) On 02.09.24, the Interim Chief Academic Officer (Health Sciences, Career and Technical Trades) confirmed that all the Academic Complaint, Financial Aid Appeal and Non-Academic Appeal forms are on the Student Resolution Advocate webpage and that they all provide the student with a timeline.
- c) On 02.09.24, the Interim Chief Student Services Officer confirmed that the

Student Appeals policy is online and is scheduled for review.

6. 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) A current Learner Rights, Responsibilities and Code of Conduct Policy is accessible on website.
- b) There is standardized communication to new learners 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 02.01.24, the Interim Chief Student Services Officer confirmed that Policy 2701 Student Rights, Responsibilities and Code of Conduct is available on the website (<https://www.jccmi.edu/wp-content/uploads/2701.pdf>), is current and has been reviewed within two years.
- b) Each semester, all students receive a link to the Student Rights, Responsibilities and Code of Conduct Policy via their Jackson College email address.

6.1 Permit learners participating in non-traditional programs to be without written acknowledgment of the non-traditional nature of the program, its expectations and contingencies.

INTERPRETATION

Compliance will be demonstrated when:

- a) All learner participants have signed and acknowledged their understanding of the structure and limitations of the non-traditional program within which they have enrolled, as well as the learner's responsibilities and commitments for which they will be held accountable.

The interpretation is reasonable because it ensures written acknowledgement of expectations and contingencies without obligating the College to unexpected operations expenses.

EVIDENCE:

- a) On 02.09.24, the Interim Chief Student Services Officer confirmed that a process is in place to ensure communication to students about the expectations and contingencies of a non-traditional program, which may include programs/services which are grant-funded, experimental, or otherwise temporary in nature or length. This process

includes signed acknowledgement of understanding.

7. 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 02.07.24, the Chief Operations Officer confirmed that Policy 2612 Demonstrations is current and accessible online. This policy was last reviewed on 09.28.22.

8. 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 02.07.24 the Chief Operations Officer verified with the Director of Marketing that weekly announcements are sent to all enrolled students. Also verified is that the College has active social media accounts with Facebook, Twitter, YouTube, Instagram TikTok and Linked In.

The Jackson College Board of Trustees assessed this monitoring report and found that it demonstrated full compliance with a reasonable interpretation of the policy at the regular Jackson College Board meeting on February 12, 2024.