# Jackson College
# Board of Trustees

## Monitoring Report:
## EL – 01 Treatment of Learners
**Monitoring Period: October 2025 – October 2026**

**[ 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 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.



10.12.26

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:

a) 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.

b) 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).

c) 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 Clery 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 local permitting requirements, as well as State requirements, regarding elevator, boiler, and fire system inspection.

i) The College provides reasonable campus-based support 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 09.29.26 that the following policies were accessible online and have been reviewed in the last two years:

   i. Tobacco Free Environment 1715 - last approved on 09.24.26.
   ii. Threats and Violence 2609 – last approved on 06.01.26
   iii. Student Rights, Responsibilities and Code of Conduct 2701 – last approved on 12.17.25.

b) The VP, Student Achievement & Enterprise Services confirmed on 09.21.26 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 09.24.26 that Emergency Information is available online.

d) The Operations Coordinator confirmed on 09.28.26 that the Drug and Alcohol Abuse and Prevention Program (DAAPP) is accessible online. The document was updated on 09.01.26.

e) The Operations Coordinator confirmed on 09.28.26 that the 2026 Campus Crime and Fire Report is available online and contains statistics for 2023 to 2025.

f) The VP, Student Achievement & College Operations confirmed on 10.02.26 that a pandemic plan is in place and can be reinstated in the event of an emergency.

g) The Operations Coordinator confirmed on 09.24.26 that the College used LiveSafe alert systems available to learners. Information on LiveSafe is available online and the Live Safe App could be downloaded. Information 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 VP, Student Achievement & Enterprise Services confirmed on 09.21.26 that inspections were up to date. Documentation of inspections for elevator and boiler inspections and the Fire Safety & Extinguisher inspection reports are current and were stored by them and/or their staff.

i) The VP, Student Achievement & College Operations confirmed on 10/2/26 that annual contracts are on file with the VP, Student Achievement & College Operations that define provisions for the College's Oasis Center, through Family Services and Children's Aid, which provides mental health services to learners and employees, as well as for the College's Health Clinic through a partnership with Henry Ford Health Systems. The College, through our academic program, provides 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 VP, Student Achievement & College Operations confirmed on 09.24.26 that the Sexual Harassment Policy 1717 was last reviewed on 02.11.25 and is accessible on the website.

b) The VP, Student Achievement & College Operations confirmed on 09.24.26 that as described within policy 1717 the following reporting methods are 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 VP, Student Achievement & College Operations as the Title IX Coordinator. All related contact information is readily available online. This was confirmed by the Operations Coordinator on 09.24.26.

**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 VP, Student Achievement & Academics confirmed on 10.07.26 that Jackson College continues to develop, review, deliver, and assess its academic programs based on objective academic standards, established learning outcomes, disciplinary expectations, accreditation requirements, and demonstrated student achievement.

During the 2026 monitoring period, faculty and academic leadership continued to review course- and program-level student learning outcomes through the College's established curriculum, assessment, and program review processes. Academic programs are evaluated based on defined competencies, measurable learning outcomes, student performance, workforce or transfer expectations where applicable, and relevant institutional and specialized accreditation standards.

Jackson College has implemented Watermark Planning & Self-Study to strengthen documentation and review of program assessment, student learning outcomes, program review, and institutional effectiveness.

The College continued its review of General Education outcomes through the Institutional Quality Committee, emphasizing measurable competencies such as written and oral communication, mathematical reasoning, and critical thinking.

Curricular decisions proceed through established faculty and academic governance processes. Proposed curriculum changes are evaluated based on academic merit, learning outcomes, disciplinary standards, transfer expectations, workforce requirements, accreditation requirements, and demonstrated educational need. The College does not modify academic standards, grading expectations, course competencies, or program requirements based on a student's identity or other non-academic characteristics.

These practices preserve faculty academic freedom in the selection of appropriate instructional approaches and the examination of differing perspectives while ensuring that the academic standards students are expected to achieve remain consistent, measurable, and academically defensible. Through these established curriculum, assessment, and program review processes, Jackson College demonstrates that program delivery and academic expectations remain grounded in objective educational standards.

**1.3 Neglect to provide relevant and ongoing training and awareness of AI, its strengths, limitations, and responsibility for its use.**

INTERPRETATION:

Compliance will be demonstrated when:

a) The College provides regular AI training to learners.

b) The College maintains a cross-departmental body that focuses on the evolving use of AI.

c) The College develops and maintains an AI responsible use policy.

d) Academics maintains a syllabus template that guides responsible AI use.

The interpretation is reasonable because it demonstrates learner access to AI training tools and knowledge of learner use expectations.

EVIDENCE:

The VP, Student Achievement & Digital Innovation confirmed on 10.01.26

a) Learners have free, self-paced AI training available directly in Canvas through the College's partnerships with Google and Coursera. AI-fluency courses, requiring only a few hours each, build baseline AI literacy. Available longer career tracks build job-ready skills in fields such as data analytics, IT support, cybersecurity, and digital marketing. Learners who complete a track can earn a College digital badge to share on LinkedIn. These offerings are non-credit and co-curricular.

b) The College's AI Committee is a cross-functional group comprised of faculty, administrators and staff that meets monthly to govern acceptable use, policy and tools for AI at the College.

c) The Academic AI Policy (AC-1053) sets expectations for responsible AI use in coursework. Learners must disclose and cite AI use, critically evaluate AI-generated content, and not enter personal or confidential information into AI tools unless the College has approved them.

d) AC-1053 requires faculty to state their AI expectations in each course syllabus.

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

INTEPRETATION

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 09.22.26, the Registrar / Director of Jackson College Lenawee and Judicial Affairs Officer both confirmed that no confirmed FERPA violations were reported to the Board's Office of General Counsel during this cycle.

b) On 09.23.2026, the Director of Compliance confirmed that 99% (304/305) of the employees working during the last year (09.21.25-09.22.26) completed FERPA training. The FERPA training was assigned to each new employee and the training was completed during their new employee orientation. The Learning Management System, utilizing Vector Solutions, reassigned the training to each employee 365 days after the prior completion. On 09.21.26, the Registrar confirmed that in each semester in the past year, all enrolled learners were sent an email informing them of their FERPA rights

### 2.1 Neglect protection for individual privacy and security by misuse of AI.

INTERPRETATION:

Compliance will be demonstrated when:

a) The College defines and communicates the misuse of AI as any use of artificial intelligence systems (including generative AI, automated decision tools, and analytics) that exposes, discloses, or inappropriately uses personally identifiable information (PII), confidential student records, personnel information, health-related data, or other sensitive institutional data; weakens established security controls; or results in unauthorized access, retention, or sharing of data.

b) The College ensures that AI tools are approved and used with appropriate safeguards, including limits on entering sensitive data, vendor and risk review, role-based access, data minimization and retention controls, user guidance and training, monitoring and incident response, and human oversight of AI-supported decisions affecting individuals.

This interpretation is reasonable because it provides thorough and on-going guidance on the misuse of AI and is consistent with practices of other higher education institutions.

EVIDENCE:

The VP, Student Achievement & Digital Innovation confirmed on 10.01.26 that

a) The Information Security Policy (EC-1614) applies to College data in any system, including AI tools. It classifies student records as protected information and health information as restricted, and it prohibits unauthorized access, disclosure, or sharing of either.

b) The Academic AI Policy (AC-1053) prohibits entering personal or confidential information into AI tools unless the College has approved them. Information Security Policy (1614) ensures access to learner records is limited by job role, and multi-factor authentication is required for the most sensitive data. Network monitoring, intrusion detection, and a defined incident response process are in place.

**3. Permit student services, admission, registration, evaluation, or recognition processes or policies that are not merit-based.**

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 09.21.26, the Registrar 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 09.21.26, the Registrar also confirmed that an Academic Complaint process is in place for all students. This process aligns with federal expectations and regulations.

   https://www.jccmi.edu/ombudsman/academic-complaint-process/

**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 09.22.26, the Executive Director, Mission Integration and Human Flourishing confirmed that an Academic Complaint process was in place and is outlined for students online. CEP Students have access to the form and process through the CEP Navigators.

   On 09.22.26, the Executive Director, Mission Integration and Human Flourishing also confirmed that the Student Appeals policy was online. This policy was current and appropriate as it was last reviewed on .02.11.26. CEP Students have access to the form and process through the CEP Navigators.

**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 09.24.26, the VP, Student Achievement & College Operations confirmed that Policy 2612 Free Speech, Expressive Activities & Demonstrations Is 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 behaviour, 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 09.22.26, the Registrar confirmed that Policy 2701 Student Rights, Responsibilities and Code of Conduct was available online. This policy was last reviewed on 12.17.25.

b) On 09.22.26, the Registrar 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 09.22.26, the Student Judicial Officer confirmed that all enrolled learners receive an email link to Policy 2701 as an annual practice each October.

**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 09.24.26, the Operations Coordinator verified that the Student Consumer

Information page was active and up to date during the prior academic year.

b) On 09.24.26, the Operations Coordinator verified that the Transparency Reporting page is active and up to date during the past academic year.

a) On 09.24.26, 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 full compliance with a reasonable interpretation of the policy at the regular Jackson College Board meeting on October 12, 2026.**