Jackson College
Board of Trustees

Monitoring Report:
EL – 02 Treatment of Employees
Monitoring Period: October 2025 – October 2026

[PARTIAL 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-02: "Treatment of Employees". 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 a workplace environment that is non-merit-based, disrespectful, unsafe, disorganized, or otherwise interferes with College employees' abilities to do their jobs.

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

1. Allow employees to be without human resource policies.

1.1 Permit employees to be without adequate protection from harassment and bias.

1.2 Permit employees to be uninformed of the performance standards by which they will be assessed.

1.3 Permit employees to be without a means by which to file a grievance / complaint independent of the College.

INTERPRETATION:

Compliance will be demonstrated when:

a) The College has Human Resource policies and procedures, as well as the two union contracts and administrative manual.

b) There is a process for employees to present grievances and wrongful conditions, including harassment and bias.

c) All employees have clear and measurable performance goals each year.

d) An Incident Reporting Form and anonymous tip line, independent of the College, are available to employees to report grievances.

The interpretation is reasonable because it is consistent with the practices and policies employed by other Higher Education Institutions.

EVIDENCE:

a) On 10.01.26, the Human Resources Director verified that Human Resource policies and procedures, as well as the two union contracts. and the administrative manual, clarify expectations and working conditions. Further, these documents are available to all employees on the Intranet upon ratification, revision and confirmation of ADA compliance.

b) The Human Resources Director confirmed on 09.25.26 that there are clear processes for employees to present grievances and wrongful conditions, including harassment and bias. Reporting was available on Board of Directors page on the JC website at https://www.jccmi.edu/about/leadership/board-of-trustees/file-complaint/ or on the Safety & Security page on the JC website at https://www.jccmi.edu/department/safety-security/.

c) The Human Resources Director confirmed on 9.25.26 that measurable performance goals are established during the annual performance evaluation process between employees and their supervisor. These measurable performance goals can be found in the employee's personnel file in the People and Culture Office.

d) The Human Resources Director confirmed on 09.25.26 that the College has an accessible Incident Reporting Form and anonymous tip line (i.e., 411).

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

INTERPRETATION:

Compliance will be demonstrated when:

a) The College complies with Health Information Portability and Accountability Act (HIPAA).

b) HIPAA training is mandatory for all employees who have access to protected health information.

c) Human Resources best practices are used when storing employee personal information.

d) The College limits access to employee personal information to approved and qualified professionals.

The interpretation is reasonable because it ensures compliance with legal requirements, HR best practices, and required training for employees.

EVIDENCE:

a) On 09.30.26 the Dean of Health Sciences verified that faculty and adjunct faculty working in clinical settings receive annual HIPAA training through their respective hospitals or clinical facilities. Jackson College faculty lead ongoing review of HIPAA policies and updates and provide related training to adjunct faculty and students. Jackson College ensures completion of required training in accordance with the clinical affiliation agreements and Program

Handbooks.

On 09.30.26 the Vice President of Student Achievement and College Operations confirmed external vendors in the Oasis Center and Health Clinic complete HIPPA training through their respective employers.

b) On 09.28.26 the Human Resources Director confirmed JC employees who have access to employee's protected health information complete HIPPA training annually. On 09.30.26 the Dean of Health Sciences confirmed faculty and adjunct faculty receive HIPPA training on an ongoing, annual basis. These individuals lead the research, content development and are qualified to provide training on HIPPA.

c) On 09.25.26 the Human Resources Director confirmed employee personal information is limited to those with a legitimate business need and records are stored securely in personnel files. HR collects only necessary information and follows established retention and secure destruction practices.

d) On 09.25.26 the Human Resource Director confirmed access to personnel information is restricted to authorized employees based on their job responsibilities and legitimate business need. Electronic access is controlled through role-based system permissions while physical records are maintained in secured locations.

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:
On 10.01.26, the VP, Student Achievement & Digital Innovation confirmed:

a) All employees are bound by the Information Security Policy (EC-1614), which governs College data in any system, including AI tools. It classifies personnel, payroll, benefits, and health information as protected, and it prohibits unauthorized access, disclosure, or sharing. Employees in academic roles are also bound by the Academic AI Policy (AC-1053), which prohibits entering confidential information into AI tools unless the College has approved them.

b) Information Security Policy (EC-1614) ensures access to all records are 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 workplace conditions which do not comply with current collective bargaining agreements or the rules and regulations pertaining to staff and faculty labor unions or union labor agreements.

INTERPRETATION:
Compliance will be demonstrated when:

a) All informal and formal grievances have been resolved.

This interpretation is reasonable because it ensures full compliance with said collective bargaining agreements, rules, and regulations.

EVIDENCE:
a) The Human Resources Director confirmed on 09.25.26 that two (2) grievances were filed in the last 12 months and were both resolved.

4. Retaliate against any employee for non-disruptive expressions of dissent as described within College policy.

INTERPRETATION:
Compliance will be demonstrated when:

a) There are no formal complaints filed with the Human Resources Office, the Board's Office of General Counsel, nor are there any tips on the anonymous tip line, that are deemed valid by the Board's Office of General Counsel.

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

EVIDENCE:
a) The Human Resources Director confirmed on 09.30.26 that one (1) formal complaint related to retaliation of any employees for non-disruptive expressions of dissent was filed and investigated by the Boards' Office of General Counsel; However, said claim was deemed invalid. No tips were entered on the anonymous tip line that were deemed valid by the Board's Office of General Counsel.

5. Permit employees to be without reasonable opportunity for professional growth and development.

INTERPRETATION:
Compliance will be demonstrated when:

a) All employees have access to appropriate professional development opportunities.

This interpretation is reasonable because it is consistent with the practices and policies employed by other Higher Education Institutions, and the internal verification that is provided.

EVIDENCE:

a) The Director of Compliance confirmed on 09.23.26 that College employees and Trustees have access to the Vector Solutions Learning Management System and completed 1,177 hours of mandatory and optional online professional development training during this report period

5.1 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 employees.

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.

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

EVIDENCE:

On 10.01.26, the VP, Student Achievement & Digital Innovation confirmed:

a) Employees 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. Employees also learn AI hands-on through the Claude Cohort (named for the AI assistant the group uses for initial design).

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) *Partial Compliance*: The College's AI Responsible Use Policy is in final draft and under review by members of the AI Committee, with completion expected by the end of October 2026. Until it is adopted, the AI Committee oversees responsible AI for use on campus. However, College employees remain bound by the Information Security Policy (1614) and, in academic roles, by the Academic AI Policy (AC-1053). The College is testing AI use in practice before formalizing.

The Jackson College Board of Trustees assessed this monitoring report and found that it demonstrated partial compliance with a reasonable interpretation of the policy at the regular Jackson College Board meeting on October 12, 2026.