



# Great Lakes Christian College

## Employee Handbook

Last Revised: Jun 26, 2025

Policies & Procedures Manual for  
Great Lakes Christian College Employees

This Handbook does not apply to Student Employees.

Great Lakes Christian College,  
an institution of higher education affiliated with  
Christian Churches/Churches of Christ,  
seeks to glorify God by preparing students to be servant-leaders in the church and world.

# TABLE OF CONTENTS

<b>Section A: Introduction.....</b>	<b>6</b>
History of the College.....	6
Mission Statement.....	6
Purpose of this Handbook.....	6
Policy Changes.....	7
Great Lakes Christian College is . . .	7
Doctrinal Statement.....	8
<b>Section B: Personnel Structure.....</b>	<b>9</b>
Personnel Groups.....	9
Administrative Structure.....	9
<b>Section C 1: Employment Policies.....</b>	<b>12</b>
Compensation Policies.....	12
Flextime.....	12
Compensatory Time.....	13
Overtime Pay.....	13
Deductions from Pay.....	13
Holiday Pay and Related Compensation.....	13
Payroll Dates.....	14
Employment Policies.....	14
Terms of Employment.....	14
Personal Conduct.....	14

One-on-One Meetings with Others.....	15
Confidential Information.....	15
Conditions of Employment.....	15
Dress Code.....	15
Employment of Relatives.....	15
Nondiscrimination Policy.....	16
Personnel Records.....	16
Unemployment Compensation.....	16
Personal Cell Phone Use.....	16
Weather.....	16
Workers' Compensation Insurance.....	17
<b>Section C 2: Employee Benefits.....</b>	<b>18</b>
Plan Administrator.....	18
Insurance.....	18
Retirement Program.....	19
Tuition.....	19
Chapel Attendance.....	19
Jury Duty.....	19
Bereavement Leave.....	20
Military Service.....	20
Personal Leave.....	20
Purchases.....	21

Sick Leave.....	21
Speaking Engagements.....	21
Vacation.....	22
<b>Section D: Employee Services.....</b>	<b>23</b>
Bookstore Purchases.....	23
Borrowing Equipment & Custom Work Policy.....	23
Check/Cash Requests.....	23
College Computers.....	23
Key Use Guidelines.....	24
Mail.....	24
Notary Services.....	24
Safety.....	24
Security.....	25
Transportation Services.....	25
<b>Section E: Employment Practices.....</b>	<b>28</b>
Employee Review.....	28
Changes of Status: Permanent, Temporary, Full-Time.....	29
Hiring Procedures.....	29
Layoff and Recall Policies.....	30
Promotional Considerations.....	30
Termination of Employment.....	31
Disciplinary Policy & Procedures.....	31

<b>Section F: Computer Use and Support Policy.....</b>	<b>33</b>
<b>Section G: Other Policies.....</b>	<b>43</b>
Alcohol and Other Drug Policy.....	43
Policy on Sex, Sexuality, and Gender Identity.....	50
Title IX – Sexual Misconduct Policy.....	52
Introduction.....	52
Definitions.....	53
Teacher – Student Consensual Relations.....	57
Other Related Misconduct.....	58
Title IX Staff.....	58
Grievance Process.....	60
Steps in the Grievance Process.....	60
Retaliation; False Complaints.....	66
<b>Section H: Appendix.....</b>	<b>67</b>
Christian Church and Church of Christ Colleges & Universities Intercollegiate Tuition Waiver Program (ITWP).....	67

## Section A: Introduction

---

### History of the College

In 1949, men and women of God were deeply concerned with the lack of vitality and the shrinking numbers of Christian Churches/Churches of Christ in Michigan. Their concern led to founding Great Lakes Bible College, at Rock Lake, near Vestaburg, Michigan. Twelve students were enrolled during the first year and their classes convened in the log cabin of Ralph R. Woodard, the first President of the College.

In 1951, the young College purchased a nearby eighty-acre farm and converted it into the first campus. Recognizing the advantages of a more urban location, the Trustees moved the College to the capital city, Lansing, in 1958. The College occupied the Dodge Mansion for fourteen years. In 1970, the College purchased a forty-acre site on the west edge of Lansing, and the first buildings were constructed for use in 1972. Additional land was later added, and facilities have been constructed as needed. In 1992, the College name was changed to Great Lakes Christian College.

In 2003, the College earned accreditation from the Higher Learning Commission. In 2022, the College became an associate member of the Association for Biblical Higher Education.

The Doty Center was built in 2007. This facility is designed to accommodate large events and athletic contests. This multi-purpose gymnasium is named after the late Dr. Brant Lee Doty who was a professor, dean, and chancellor of GLCC. This building continues his legacy of service to students and constituents in the Lansing area and beyond. The most recent construction is the Knowles Learning Center. It provides opportunities for the College to expand the learning capacity for past, current, and future students.

The impact of GLCC is felt far and wide. Our alumni are in 40 states throughout the United States and many foreign countries. In particular, Churches in the Great Lakes region are impacted by our graduates who serve as preachers, youth ministers, music ministers, and Christian education directors. Since 1949, the College continues to be true to her mission of training students to be servant leaders in the church and world.

### Mission Statement

Great Lakes Christian College, an institution of higher education affiliated with Christian Churches/Churches of Christ, seeks to glorify God by preparing students to be servant-leaders in the church and world.

### Purpose of this Handbook

This handbook is not intended as a contract of employment and so does not constitute a contract. The handbook is designed to enable employees to become better acquainted with the College and with policies that affect their work. No written statement can be an effective substitute for direct daily contact with immediate supervisors. Employees should read the information carefully, and then keep this Handbook as a ready reference. When questions arise which are not answered herein, employees should first ask their immediate supervisor.

## Policy Changes

Great Lakes Christian College reserves the right to change, revise, or delete the plans, policies, benefits, and procedures described in this Handbook at any time the College determines such a change is necessary. As changes to the policies outlined in this Handbook become necessary, the College will make such changes through administrative action and then communicate to all employees.

## Great Lakes Christian College is . . .

Accredited by the

The Higher Learning Commission  
([www.hlcommission.org](http://www.hlcommission.org))

Approved by the

United States Office of Student Financial Assistance  
(for offering federal student aid)

Approved by the

State of Michigan Department of Education  
(for offering state financial assistance)

Authorized by the

United States Immigration and Customs Enforcement  
(for enrolling non-immigrant foreign students)

Approved by the

Department of Veterans Affairs  
([www.va.gov](http://www.va.gov))

A Member of the

Evangelical Council for Financial Accountability  
(for compliance with the ECFA standards of financial integrity and Christian ethics)

A Member of the

Association for Biblical Higher Education  
([www.abhe.org](http://www.abhe.org))

## Doctrinal Statement

We believe in the full and final inspiration of the Bible to the extent that it is the infallible Word of God and the all-sufficient rule of life, and therefore, serves as our guide in all matters of faith and doctrine.

We believe the world was created by God, and that He breathed the breath of life into man.

We believe Jesus is the Son of God, fully God and fully man, that He was born of a virgin, died as a sacrifice for our sins, bodily rose from the dead, and is now at the right hand of God the Father.

We believe Jesus Christ is the only way to God and that all who believe Jesus is the Son of God are commanded to repent of their sins, confess Jesus as Lord, and be baptized into Him for the forgiveness of sins and to receive the gift of the indwelling presence of the Holy Spirit.

We believe the Lord's Supper represents the body and blood of Jesus Christ, and that Christians portray His death for our sins as they partake. We also believe the church celebrates the resurrection of Christ as it participates in the Lord's Supper each first day of the week, the day on which He arose.

We believe individual Christians are members of the body of Christ, and, therefore, united with all individuals who belong to that body. We further believe that individual believers as well as the body of believers must seek to be Christ-like both in character and in deeds. We also believe it is the responsibility of Christians to witness for the Lord Jesus Christ, seeking to lead people outside the body of Christ into a saving relationship with God through His only begotten Son, Jesus.

We believe Jesus will return to take all believers to be with Him for eternity and to judge all who do not obey the gospel of the Lord Jesus Christ.

We believe Jesus Christ is the sole head of the church which is His body, and therefore, the church must submit to the authority of Jesus as expressed through the Word of God.

## Section B: Personnel Structure

---

### Personnel Groups

This Handbook of policies and procedures is established as an aid in understanding and efficiency for each of the groups of GLCC employees. These groups are identified as:

#### Executive Administrators

The Executive Administrators include the President, Vice President of Academic Affairs, Vice President of Enrollment Management, Vice President of Finance and Operations, and Vice President of Institutional Advancement. The President is employed by the Board of Trustees, to whom he reports. Other Executive Administrators are appointed by, report directly to, and are responsible to, the President. They coordinate, supervise, and direct those areas of the College program assigned by the President.

#### Administrative Staff

The Administrative Staff includes persons filling a salaried position in which the primary duty is planning, organizing, and managing specific departments within the institution. Such positions carry the title of “Dean” or “Director” and require an academic degree and/or specially acquired management skills. Persons filling such responsibilities are classified as “Staff” for benefit and employee group purposes.

#### Faculty

The Faculty includes persons employed for instructional purposes as well as certain designated Administrative Staff personnel.

#### Staff

The Staff includes all employees not included in the Executive Administrators, Administrative Staff, or Faculty personnel groups.

### Administrative Structure

#### Board of Trustees

Final authority for the policies of Great Lakes Christian College rests with the Board of Trustees.

#### President

The President of the College serves as the Chief Executive Officer. He is subject to the Board of Trustees and has general charge of the business affairs and property of the

Corporation and the general supervision over its officers and agents. The President is an ex-officio member of all committees of the College, Board of Trustees and Faculty.

#### Vice President of Academic Affairs

The VPAA serves as the Chief Academic Officer. He oversees all academic, curricular, and faculty matters. The Registrar, Director of Library Services, Director of Outreach Ministries, Special Assistant to the Vice President of Academic Affairs, Director of Student Success, Director of Online Education, Academic Dean, Dean of Students, Director of Online Education and all Faculty members, appointed as well as adjunct, report to him.

#### Vice President of Enrollment Management

The VPENM serves as the Chief Enrollment Officer. He oversees all admissions, recruiting, and retention areas and employees. He also oversees the Athletic Department.

#### Vice President of Finance and Operations

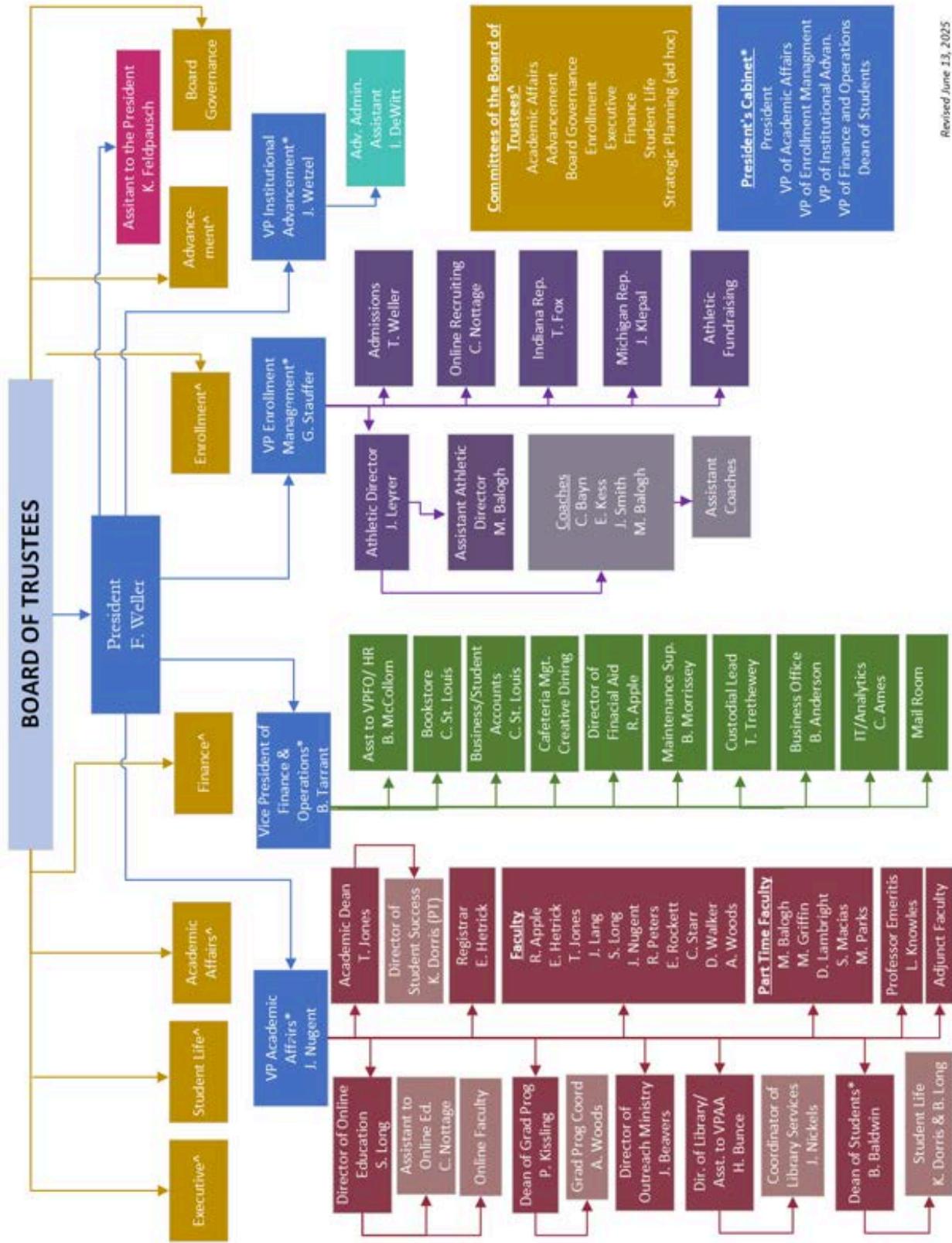
The VPFO serves as the Chief Financial Officer and Chief Operations Officer. He oversees the Business Office, Financial Aid Office, Information Technology, Administrative Assistant for the Vice President of Finance and Operations, Maintenance, Bookstore, and Cafeteria. The manager of each of these areas reports to him.

#### Vice President of Institutional Advancement

The VPIA oversees the advancement of the College in relation to the raising of funds, connecting with alumni, and the cultivation of friends.

#### President's Cabinet

The Cabinet is composed of the President, Vice Presidents of the College, and other members as designated by the President.



Revised June 13, 2025

# Section C 1: Employment Policies

---

## Compensation Policies

It is the policy of Great Lakes Christian College to provide guidance to employees on proper use of flextime, compensatory time and overtime in accordance with the Fair Labor Standards Act and College policies.

### **Definitions:**

- **Compensatory Time:** Any time accumulated above 40 hours (for full-time employees) physically worked in a work week (Sunday – Saturday) will be calculated at time and half. For part-time employees, any time accumulated above the physically worked hours in a work week (Sunday – Saturday) as defined in the contract will calculate one hour for one hour.
- **Exempt employees:** Exempt salaried employees are not subject to the FLSA minimum wage and overtime. Exemptions from the law are narrowly defined and the employer must prove that the exemption rules apply. Reference DOL Fact Sheet 17. <https://www.dol.gov/agencies/whd/fact-sheets/17a-overtime> Exempt employees are only eligible for Flextime and cannot be paid overtime or accumulate compensatory time.
- **Flextime:** A work period that may vary from the standard work hours established for a department.
- **Non-exempt employees:** Employees who are covered by or subject to the minimum wage, overtime and recordkeeping provision of the federal Fair Labor Standards Act (FLSA). Non-exempt employees are eligible for flextime, compensatory time, and **in very limited situations**, overtime.
- **Overtime:** Time worked by a non-exempt employee above the normal forty (40) hour work week.
- **Workweek:** A seven (7) day period in which the required working hours for full-time employees equal forty (40) hours, with distribution of such hours during the workweek a matter of scheduling left to the individual departments. Hours for part-time employees are defined in individual contracts.

**Reason for Policy:** To ensure that all Great Lakes Christian College employees understand that altering schedules to accommodate projects and /or events is allowed as long as supervisors make every effort to accommodate scheduling changes using flextime first. In the event that flextime is not an option, compensatory time may be used and then, **in very limited situations**, overtime may be requested (requires VPFO approval). The policy is also in place to ensure compliance with the Fair Labors Standard Act and College policies.

### Flextime

- Flextime may be utilized by exempt and nonexempt employees as long as it is approved by the employee’s supervisor, and it is only for a temporary need.
- Flextime scheduling should take place within the same work week (Sunday – Saturday) for non-exempt employees and within the same pay period for exempt employees.

- Every effort should be made to accommodate scheduling needs using flextime before use of compensatory time.

### Compensatory Time

- If a non-exempt employee cannot fulfill business operation needs using flextime, that employee's supervisor may approve use of compensatory time.
- All compensatory time must be logged in ADP and will be calculated at time and a half.
- Supervisors must allow employees to utilize all compensatory time earned as soon as reasonably possible but before July 1 of each year. Supervisors must seek approval from the Vice President within their division for compensatory time that cannot be utilized in a given fiscal year before such time can be carried over to the following year.
- Employees are required to use accrued compensatory time prior to using other leave (including vacation).
- Employees may accumulate up to the FLSA maximum (240 hours) of compensatory time.

### Overtime Pay

- Overtime may only be utilized with the written permission of the Vice President of Finance and Operations.

### Deductions from Pay

Certain deductions will be made from each paycheck.

- Federal and State income tax laws require that an employer withhold income taxes on wages earned. The amount of tax withheld is in accordance with the tax withholding table established by the United States government and the State of Michigan.
- Under provisions of the Federal Insurance Contributions Act (Social Security and Medicare), the employee and the College contribute on an equal basis to provide for retirement and for dependents in the event of the employee's death. The employee's share of this contribution is handled by payroll deduction.
- Other deductions may be made if specifically authorized by the employee. Examples of these deductions are 401(k) pre-tax retirement savings, 401(k) post-tax retirement savings (Roth), elective insurance, and donations to the College.
- Employees may modify their deductions at will by contacting the Business Office.
- Ordained ministers may choose to have part of their pay dedicated to housing allowance.

### Holiday Pay and Related Compensation

Time off with compensation is provided for full-time employees for the following holidays or the equivalent days:

- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day, the Wednesday before, and the Friday after

- Christmas Day & New Year's Day (and the day before and after at minimum) The VPFO in conjunction with other cabinet level employees, will give consideration to additional time off around these holidays.

To qualify for pay for these holidays and related days, each employee, according to his or her regular work schedule, must work the last full shift before and the first full shift following these days off, unless he or she is excused by the Vice President of Finance & Operations, based upon the recommendation of his or her supervisor, prior to the holiday dates. The Vice President of Finance & Operations has discretion to add additional days off around stated holidays.

### Payroll Dates

The regular payday is the 5<sup>th</sup> and 20<sup>th</sup> of each month. If the 5<sup>th</sup> or the 20<sup>th</sup> are a Saturday or Sunday, payday will be the Friday before. Exceptions to these rules will be communicated to the staff in advance.

All hourly employees shall have their reported time worked approved by their supervisors and turned in to the Business Office at least four days prior to the payroll date.

## Employment Policies

### Terms of Employment

Great Lakes Christian College is an at-will employer. This at-will employment policy applies to all employees. Employment and any of the terms or conditions of employment may be terminated at any time, with or without cause. The at-will employment relationship may not be modified by any oral or implied agreement by any person, statement, act, series of events, or patterns of conduct.

### Personal Conduct

As exemplars of the campus community, employees are expected to set an example in their living, habits, and actions, for students and other adults in concordance with the GLCC Employee Code of Christian Conduct. Accordingly, personal living is to be within the Christian framework as established by the College's Doctrinal Statement. While some of these expectations are not viewed as absolute standards by all Christians, at Great Lakes Christian College they are observed with the belief that they serve both the good of the individual and of the institution, and are in accord with Biblical principles.

Departures from these expectations may result in termination of employment, suspension, or other sanctions at the sole discretion of Great Lakes Christian College. Misconduct including, but not limited to, violations of the Alcohol and Illegal Drug Policy (including tobacco), violation of the Sexual Misconduct Policy, adultery, fornication, homosexual activity, theft, breach of confidentiality, criminal activity, misuse of GLCC property, or any other behavior which may interfere with or degrade the reputation, character, or functioning

of GLCC, its staff, or the College's Doctrinal Statement as expressed in this Employee Handbook can subject an employee to termination, suspension, or other sanctions. For sanctions short of termination, the scope and nature of such sanction shall be at the discretion of the Vice President who leads the division in which the employee works.

Great Lakes Christian College is a drug-free, smoke-free and alcohol-free campus.

#### One-on-One Meetings with Others

All College personnel should understand and recognize the risks and potential liabilities of being alone with a student, other employee, or a member of the opposite sex in an unobservable setting. One-on-one meetings of this kind are neither wise nor permitted. Inappropriate behavior is to be reported to an administrator.

#### Confidential Information

In the course of normal work, employees may have access to confidential information regarding the College, its students, its donors, or fellow employees. It is one of the most serious responsibilities that employees in no way reveal or divulge any such information and that they use information only in the performance of their duties.

#### Conditions of Employment

College employees are selected on the basis of character, ability, experience, training, and a consideration for permanent versus temporary employment. Full-time employees must be at least 18 years of age. The maximum age is governed by the requirements of the job to be filled.

#### Dress Code

All employees working in the College classrooms or offices where they will come in contact with the public, are expected to wear attire appropriate for the environment. Supervisors may make allowances in areas such as maintenance, the cafeteria, and wherever else the work calls for alternative dress.

Within these guidelines, supervisors may determine what is appropriate for faculty and staff in their departments. Wednesday is typically casual dress for faculty. Fridays are casual dress days for staff, unless direct supervisor requests differently. All other days employees should dress business/business casual.

#### Employment of Relatives

Relatives of employees may be employed at the College. Such employment will be based upon the standard employment criteria, with no special consideration given because of the family relationship. Employees will not be permitted to hold a position in which they work for or report directly to a relative, unless approved by the President.

### Nondiscrimination Policy

Because of our commitment to the Biblical principle (“There is neither Jew nor Greek, slave or freemen, neither male nor female...” Galatians 3:28), Great Lakes Christian College has been, and remains, nondiscriminatory in all policies and programs. Great Lakes Christian College admits students of any race, color, and national, or ethnic origin to all rights, privileges, programs, and activities generally made available to students at the College. It does not discriminate on the basis of gender, race, physical handicap, national or ethnic origin in administration of educational programs, admissions policies, scholarship and loan programs, employment practices, athletics, or other activities. The College actively seeks to fulfill federal, state, and local laws and regulations in all its practices and facilities. The facilities are designed to provide access for the physically disabled.

### Personnel Records

It is important that personnel records contain accurate and up-to-date personal information about each employee. Any change in an employee’s marital status or the number of children or other dependents in the immediate family should be reported promptly to the Business Office. This information may have a direct bearing on the amount of payroll deduction for State and Federal Withholding Tax and on the amount of insurance premiums and benefits (if any). Any change in telephone numbers or addresses should be reported to Human Resources.

### Unemployment Compensation

The College participates in the State of Michigan Unemployment Insurance Agency program.

### Personal Cell Phone Use

While at work, employees are expected to practice discretion when using personal cell phones. Excessive personal calls during the workday can interfere with employee productivity and be distracting to others. Employees are encouraged to make personal calls during non-work time and ensure that friends and family members know GLCC’s policy.

Excessive cell phone use impedes employees’ ability to work effectively and efficiently. Should excessive calls, text, or other use occur, supervisors will implement corrective action up to and including termination. Employees may have their GLCC email added to their cell phone to aid in working remotely.

### Weather

The decision to delay or cancel the school and work day for GLCC will be made by the VPFO or other designated persons. When these decisions are made to delay or close the school and work day, employees may check the following sources:

- An email will be sent from VPFO to all students, staff, and faculty.
- The Dean of Students will send a text through the college's emergency alert system.
- All social media platforms affiliated with GLCC will be updated.
- Schools main voicemail will be updated with delay or closure details.
- The VPFO will notify local news outlets to include information in their school closing information.

Essential staff and functions that will be required to still report to work may include the Kitchen Staff, the Creative Dining Staff, Maintenance, and Snow Removal Personnel.

### Workers' Compensation Insurance

The College purchases Workers' Compensation Insurance insurance to provide for employees for injuries arising out of or occurring in the course of employment with the College.

This insurance will pay a weekly income at a rate determined by law (MCL Section 418.301) after the first seven days of disability. It provides medical attention and hospital services; and in the event of permanent disability or death, it will pay certain sums to the injured employee or to the family of the deceased. Any injury arising out of, and in the course of, employment must be reported immediately to the employee's supervisor. Claim forms are to be completed at the Business Office within 24 hours of the injury by the employee or someone representing him or her.

## Section C 2: Employee Benefits

---

### Plan Administrator

Under the provisions of the Employee Retirement Income Security Act of 1974 (ERISA) the Vice President of Finance and Operations has been designated the “Plan Administrator” with the authority to control and manage the operation and administration of all employee benefit programs at Great Lakes Christian College.

### Insurance

The insurance coverage is briefly outlined below, however additional information providing greater detail is available from the Business Office. (“Full-time” for insurance purposes is 30 hours or more per week.) Coverage of an employee already covered under the 30-hour minimum provision may be considered for continuation upon a reduction in work schedule if employed 20 hours or more per week and if this is permitted under insurance carrier policy.

- Health Insurance: College-provided health insurance has been suspended indefinitely in lieu of a stipend paid to full-time employees. The intended purpose of the stipend is to help enable employees to purchase their own health insurance policy. This practice will be evaluated yearly for its value to employees.
- Life Insurance: Full-time employees are provided life insurance coverage in the amount of twice their annual earnings, rounded up to maximum \$100,000 of insurance coverage. Coverage is currently through Unum Life Insurance Company of America ([www.unum.com](http://www.unum.com)). The Business Office has information about the plan as does Unum’s website.
- Long Term Disability Insurance: Full-time employees are provided financial protection in the event of a long-term disability. This protection amounts to 60% of one’s monthly pay up to a maximum of \$3,500 per month. Coverage is through Unum Life Insurance Company of America ([www.unum.com](http://www.unum.com)). The Business Office has information about the plan as does Unum’s website.
- Termination of Insurance: In case of termination of employment, insurances will be affected as follows:
  - All health (if provided), life, and disability insurances will continue in force until the end of the month in which the last deduction and/or contribution is made toward these insurances; continued coverage may be purchased as provided by law.
  - Long-term disability and life insurance coverage ceases on the last day of the month of termination.

Retirement Program

Full-time employees have the opportunity to participate in a 401(k) Retirement Savings Plan through ADP. There is up to a 3% dollar for dollar employer match of contributions. The Business Office can provide information about options.

Tuition

Full-time faculty, staff, and administrators of the College, along with their spouses and dependent children, are eligible to receive Full-Time Employees Tuition Grant for GLCC classes taken at the College. Recipients must first apply for federal financial aid. Federal and state grant money will be applied before this Grant, but the net result is that the recipient will not bear any of the cost of tuition. Housing, meal plan, course fees, books, materials, private music instruction fees, and independent study fees are not included.

A Full-Time Employees Tuition Grant is also available to part-time employees (accepting student employees) as follows:

After 2,000 hours of employment	50% tuition
After 4,000 hours of employment	100% tuition

If any full-time faculty, staff, or administrator becomes totally disabled, dies, or retires during the time he or she is employed by Great Lakes Christian College, this benefit will be extended to the spouse and dependent children as follows:

Years of Employment	Benefit Rate
0 – 5	0%
6 – 10	50%
11 +	100%

The Association of Christian Church College and Universities offers the Intercollegiate Tuition Waiver Program. Please view Section H: Appendix for more information.

Chapel Attendance

All full time employees are expected to attend chapel services each week. There is no salary deduction for time spent in chapel and arrangements are made for one employee to answer Great Lake Christian College phone calls.

Jury Duty

Employees called to serve on jury duty will receive their regular compensation for the actual service time. Pay received by the employee for this service, except for travel expense reimbursement, is to be given to the College. The employee is expected to return to their College duties if excused from attendance at court, during the employee’s normal work hours.

### Bereavement Leave

In the event of a death in the immediate family of an employee, the College grants up to five days of paid leave time, as needed for extended travel time or special responsibility. Immediate family is defined as spouse, children, parents, other corresponding in-law or step-relationship and any other relative or person living in the same household. In the event of a death in the extended family of an employee, the College grants three days of paid leave time. Extended family is defined as: grandparent, grandchild, sibling, or other corresponding in-law or step-relationship.

If more time is required than granted above or for funerals of persons not meeting the above stated relations, employees will follow the policies for time off. Bereavement time is given per occurrence not per fiscal year.

### Military Service

For military service of more than thirty days, the employee will be placed on Military Leave of Absence and reinstated with full benefits upon return to active employment, subject to employment openings for which the employee is qualified; otherwise, the employee will be put on the preferred waiting list for the first vacancy, for which the employee is qualified.

### Personal Leave

A Personal Leave of Absence may be requested for the following reasons:

- Education – Granted for a maximum of six months. Extensions may be granted, subject to supervisor approval. The education must directly relate to the employee's job.
- Family Care – Granted for a maximum of ninety days, for the purpose of providing care for immediate family members who are suffering from a catastrophic injury, disability or illness. The employee must return to work for six months before becoming eligible for another leave.
- Non-Disability Maternity – Granted for a maximum of ninety days during pregnancy and may extend into post-pregnancy.

Personal Leave must be requested in writing to the employee's supervising Vice President and is available only to those with more than one year of continuous service. All personal leave will be without pay and will become effective after all vacation time has been used.

The College will continue to make contributions to the employee's benefit package at the level in effect on the last day worked.

No holiday pay is available for an individual on Personal Leave. If Personal Leave extends from one fiscal year to the next, the individual will not be entitled to vacation time for the new contract year until after a return to work of at least fourteen calendar days. An individual on approved Personal Leave will have his or her continuous service preserved for vacation eligibility. Sick leave will not accumulate while on personal leave.

### Purchases

Personal purchases through the College are not permitted except in instances when an employee's discount can be received directly by the employee through the vendor. Personal purchases may be made through the College only when it is for the convenience of the vendor and when financial arrangements have been made for payment of the account.

### Sick Leave

Full-time salaried employees will accumulate sick leave at the rate of 6 hours per month for each full month of employment. This will be 9 days of sick leave earned in each fiscal year. Faculty members should see the Faculty Handbook for the faculty policy. For part-time employees, sick leave will be considered in conjunction with the hours worked per week. An employee may accumulate up to a maximum of twenty days. Accumulated sick leave is not chargeable to the College for additional wages. An employee hire date will prorate this benefit for them in the initial fiscal year.

Sick leave is to be used for personal illness or immediate family use. When ill, the employee must notify his or her supervisor as soon as possible. Any time lost because of an accident or injury on the job is covered by Workers' Compensation Insurance and is not chargeable against sick leave.

In the event an employee's absence continues beyond eight consecutive days, the employee may be eligible for benefits under the College's disability insurance program. The employee must use any eligible time (vacation, personal, and sick days) to cover this period.

After the eighth consecutive day of absence due to illness, the employee shall file the proper disability forms with the Business Office. In certain cases of disability, the employee may be eligible to be paid up to a maximum of three months. Extensions of this time are granted at the discretion of the President.

Requests for sick leave are to be made by the employee through their supervisor.

### Speaking Engagements

Speaking engagements will be considered on an individual basis and approved by the Vice President in their division. In case of a request for a Vice President, the speaking engagement will be approved by the President.

## Vacation

Full-time staff members receive vacation as an earned benefit. It will be rewarded at the beginning of the fiscal year. All vacations must be taken at a time approved by the division's Vice President. Faculty please refer to the Faculty Handbook for information on faculty vacation time. The length of earned vacation is determined as follows unless the employee's contract states differently:

<u>Length of Employment</u>	<u>Vacation Time</u>
Beginning 1 <sup>st</sup> year through 5 <sup>th</sup> year	10 working days
Beginning 6 <sup>th</sup> year through 10 <sup>th</sup> year	15 working days
Beginning 11 <sup>th</sup> year and succeeding	20 working days

For new employees, vacation time will be prorated based on when the employee was hired during the fiscal year.

A maximum of 5 working days in vacation credit may be accumulated and/or carried over from one year to the next.

Part-time staff members will receive one week's worth of average hours of vacation after one year of service. This will be credited to part-time staff members yearly after the first year of service.

Vacations must be requested via the payroll system two weeks prior to their beginning. Supervisors and administrators reserve the right to refuse vacations at certain times and to assign vacation times if necessary.

## Section D: Employee Services

---

### Bookstore Purchases

Items may be purchased from the Bookstore, either from stock or by special order at a 20% discount. Special orders made with the College as the purchasing agent may be made only through the Bookstore.

### Borrowing Equipment & Custom Work Policy

College equipment, supplies, and personnel are purchased or employed specifically for College purposes. Equipment capacity and employee hours are established to meet College needs and employee schedules.

Photocopying services and other similar processes shall be provided for specific College needs only. Exceptions may be:

- Occasional assistance may be provided for local service-oriented groups such as Kiwanis, firemen, etc. Large or frequent jobs should be done elsewhere.
- College employees may purchase such service if there is flexibility for working the job around scheduled College jobs.
- Use of College-owned equipment shall ordinarily be limited to official College needs. Occasional exceptions may be made for College personnel if advance arrangements are made with the department responsible for the equipment, scheduled around official needs, equipment is properly signed out and returned, and with the understanding the user is responsible for any damages which result from the use. Items of special concern are maintenance equipment and audio-visual equipment such as projectors, recorders, sound equipment, etc.
- Students and non-employees are not allowed to use office phones or College equipment. Computers are available in designated College facilities for student use.

### Check/Cash Requests

If an employee is making a College-sponsored trip or other authorized expenditure requiring the drawing of an advance, the request should be made at the Business Office at least 48 hours in advance of the departure date. Expense reports must be filed, and the advance cleared within three working days after return.

### College Computers

All employees are responsible for following the College policy on computer use. (See Computer Use and Support Policy.)

### Key Use Guidelines

- Great care of keys is essential to College safety, security, and preservation of assets. Employees should guard College-issued keys securely.
- The issuing of duplicate keys will be authorized by solely the Vice President of Finance and Operations. No other employee is authorized to do so.
- Keys must never be left on a desk, chair, shelf, etc. Keys should be kept in a pocket, on a ring attached to apparel, in a purse, or other secure place under immediate control.
- Keys should never be loaned to students. For legitimate requests an employee may unlock a facility for another person instead of loaning the key.
- The loss of any key should be reported immediately to the Vice President of Finance and Operations.
- When an employee's assignment no longer requires the use of certain issued keys or employment is discontinued with the College, keys issued to him/her shall be immediately collected by the employee's supervisor.
- All College keys must be turned in at the designated place before the employee's final paycheck is issued.
- Employees are not to turn keys over to a successor.
- Part-time faculty members must turn in their keys at the conclusion of their teaching responsibilities.
- A replacement charge of \$125 will be made for each key lost.

### Mail

Intracampus mail is distributed each workday with each employee having a mailbox or other designated place to receive campus communications.

GLCC mailroom and delivery facilities are intended for the handling of College mail. Accordingly, all personal mail should be sent to the employee's personal mailing address. College stationery and postage are to be used only for official College correspondence. College personnel are permitted to have packages delivered to the College if home delivery might lead to theft of packages. Packages delivered to the College in this scenario must come in the name of the employee.

### Notary Services

Notary services are available to College employees without cost. The Assistant to the President will offer these services.

### Safety

Employees are expected to comply with College safety rules and regulations. Where appropriate, supervisors will inform employees of special safety guidelines. If an on-the-job injury occurs, or an unsafe condition exists, it should immediately be reported to the employee's supervisor for appropriate action. An incident report Google form will be filled out by the supervisor and be reported to the Vice President of Finance and Operations.

General questions regarding safety should be referred to the Vice President of Finance and Operations.

In case of workplace injury employees should

1. Seek medical treatment (hospital, urgent care facility, doctor) if necessary. Please make the provider aware that it is a work-related injury.
2. Notify their immediate supervisor if able to do so. A co-worker or other party with knowledge of the incident may notify the supervisor if the worker cannot.
3. The supervisor must complete an Injury Report Google Form from the office of the Vice President of Finance and Operations.

### Security

Campus security can only be achieved through cooperative efforts. All staff members leaving for the day should ensure their work area is properly secured for the day. They are responsible to turn off the lights and be sure the windows and doors are locked. Anytime personnel gain access to or are present in College facilities after hours or during the weekend they should be certain that any doors used are left locked and latched. All employees and students will be issued ID cards, issued at the time of employment by IT, to be utilized to gain entry to all college buildings. Lost ID cards should be reported immediately to the IT office so that the badge may be deactivated.

### Transportation Services

#### Definitions:

- “College vehicle” refers to any vehicle owned or procured by Great Lakes Christian College for transportation purposes. Also included is any personal vehicle for which a driver is reimbursed for mileage when transporting an approved College group.
- “Drivers” refers to approved drivers of College vehicles (see below).
- “Approved College group” refers to employees and/or current students of Great Lakes Christian College.
- Note: Only College/Administrator-approved personnel and/or groups may drive and ride in College vehicles.

#### Driver Approval:

Employees AND Student Drivers of Great Lakes Christian College must meet all the following requirements to operate a College vehicle:

- According to the College insurance agency: To be covered by insurance, drivers of College-owned vehicles must be at least 21 years of age (25 years for bus drivers and rental vehicles), up to a maximum age of 75 (unless they have an approved physician’s statement in which case they may drive until age 80) and possess a valid US driver’s license.
- Employees AND Students Drivers must also provide: A completed “Application for Qualified Driver Status” form (available from the Assistant to the Vice President of

Operations and Finance), including a front and back copy of their driver's license, three weeks before operating a College vehicle;

- Appropriate use of College vehicles (see next section) with signature page, also returned to the Assistant to the Vice President of Finance and Operations, three weeks before operating a College vehicle.
- All prospective and current College employees/student drivers will undergo regular motor vehicle record checks arranged by the College. Violations gathered from MVRs are categorized as follows:
  - College drivers may have no more than one moving accident in the previous year, no speeding violation in the previous two years, or any major moving violation in the previous three years.

#### Appropriate Use of College Vehicles / Responsibilities of College Vehicle Drivers:

- Drivers must obey all federal, state, and local laws. College vehicles must be driven at or below posted speed limits at all times. Drivers are responsible for the payment of fines associated with any traffic or parking violations that they incur during the operation of a College vehicle. Drivers must immediately report any accidents involving College vehicles to local law enforcement authorities and GLCC officials.
- Drivers must wear seat belts at all times, and drivers are responsible for all passengers wearing seat belts. Drivers are responsible for carrying only the number of passengers as seat belts are available in the vehicle.
- During daylight hours, it is recommended drivers should take a break every four hours. During nighttime hours, drivers should take a break every two hours. Drivers should not drive a vehicle for more than 10 hours during a 24 hour day. This may only be accomplished by allowing another college approved driver to operate the vehicle.
- Drivers are responsible for loading and unloading of vehicles. Baggage and materials (when not loaded in an enclosed trunk space) may not be loaded above the height of the vehicle seats.
- Drivers are responsible for vehicle keys which must be returned by 8 a.m. to the business office the following morning of vehicle use. After hours, the keys may be deposited in the outgoing mail slot by the Mailroom. If the administration building is locked, the driver should call or text the assistant to the Vice President of Finance and Operations (574-206-6268) immediately to report the location of the keys and when they will be returned.
- Drivers are responsible for returning College vehicles to the designated parking spaces following use or returning rental vehicles to the appropriate facility.
- Drivers are responsible for immediately reporting lost or stolen keys to the assistant to the Vice President of Finance and Operations (574-206-6268).
- Drivers are responsible for filling College vehicles with gas after every use.
- Drivers are responsible for immediately removing all debris from College vehicles after use. Groups will be responsible for any damage caused to the vehicle due to misuse or for any cleaning that may be needed.
- Drivers are responsible for replacing seats that were removed from College vehicles.
- Drivers are responsible for completing an inspection of the vehicle before leaving campus and before returning the key.

Note:

- Driver approval may be withdrawn at any time at the discretion of College officials.
- Drivers or approved groups that fail to abide by these policies may lose the privilege of using College vehicles or College funds for transportation purposes.

## Section E: Employment Practices

---

### Employee Review

Employee Reviews will be conducted annually in December by the direct supervisor in each department. The Employee Review should be discussed with the employee promptly, The Review should be signed and dated by the direct supervisor and employee. The direct supervisor must send the completed review to the Business Office for the employee's file. Each direct supervisor is welcome to keep a copy of the Employee Review for their files; however, The original review should be sent to the Business Office. Faculty please refer to the Faculty Handbook for information on the faculty review process.

The review form template will be provided to the direct supervisor in each department by the Administrative Assistant to the Vice President of Operations and Finance.

### Changes of Status: Permanent, Temporary, Full-Time

When a part-time or temporary employee moves to full-time or permanent employee classification, the employee's prior service for determining fringe benefits participation eligibility shall be equated on the following basis:

- For each fiscal year the subject employee served 2,000 or more hours, the employee shall be credited with a full year of service.
- For each fiscal year the employee has accumulated 1,000 hours but less than 2,000 hours, the employee shall be credited with ½ year of service. (Years of less than 1,000 hours service shall not count for this determination.)
- When a permanent employee enrolls at GLCC for seven or more semester hours of credit in a given semester, the employee's status will be considered to have become that of a student or temporary employee, with references to fringe benefits participation. (The intent is to limit the full-time employee's academic load to ½ time. This is also true for internships.) Exceptions to benefits participation may be made for employees having been employed at the College full-time for at least three years and continuing employment at the College for at least 20 hours per week, while participating in a required full-time block academic load such as internships. Such employees may participate in all benefits programs at ½ cost to which their full-time employment would entitle them for not more than one semester.

### Hiring Procedures

The immediate supervisor or administrator normally handles the hiring of designated personnel, with normal approvals. Applicants must complete the application forms provided by the College. The application forms must be filled out and signed by the applicant. Once the application forms are received, the Vice President of Finance and Operations will run a pre-employment criminal background check.

A pre-employment criminal background check will be conducted for all persons the College wishes to hire. This policy does not apply to temporary student-worker positions.

After the pre-employment criminal background check has been conducted, the payroll paperwork will be given to the applicant. When this paperwork has been filled out and returned with a copy of a driver's license or state identification card, a contract will be drafted and given to the applicant for signature.

Any individual who commits or has committed any conduct that would adversely impact the health and safety of any student, as determined on a case-by-case basis, and including but not limited to criminal sexual conduct of any degree, or any other violent crime, is ineligible for employment at GLCC.

GLCC will not pay an employee until the signed contract has been returned.

At this time, IT will assign an email address, issue an employee ID, and give the employee access to the computer programs that the employee will utilize. A key will be issued to the employee by the Vice President of Finance and Operations.

### Layoff and Recall Policies

If GLCC determines that it must reduce or increase employment, then layoffs and recall from layoffs will generally be conducted in accordance with the procedures described below.

#### Regarding layoffs:

1. In the event that a layoff is expected, GLCC will attempt to communicate information about an impending layoff as soon as possible. However, management reserves the right to alter the layoff procedure and withhold information about the layoff as permitted by law to protect the College's interests.
2. Employees will be selected for layoff based on the following criteria:
  - Non-transferability of skills to other positions within the College.
  - Demonstrated current and past performance.
  - The needs of the College.
  - Length of service with the College.
3. Employees selected for layoff will be given a two weeks' notice.
4. If the layoff is expected to exceed thirty days, vacation pay equal to the number of unused vacation days accrued will be paid at the time of layoff. Employees who are laid off will not accrue vacation or sick leave during the layoff.

#### Regarding recalls:

Employees will be recalled according to the needs of GLCC. Notice of recall will be sent by registered mail, return receipt requested, to the current home address on record with the Business Office. Unless an employee responds to the recall notice within seven days following receipt of the notice or its attempted delivery, the employee's name will be removed from the recall list and the employee will no longer have any job rights with GLCC.

### Promotional Considerations

At GLCC, we believe in recognizing and rewarding employees who consistently demonstrate outstanding performance, make valuable contributions to the College's success, and are actively engaged in their professional development. Promotions are based on a combination of performance evaluations, contributions to the College, and alignment with our strategic goals. We strive to provide a transparent and equitable promotion process, ensuring that all employees have equal opportunities for growth. While we encourage all employees to pursue career advancement, promotions are not guaranteed and are subject to a number of factors, including the availability of suitable positions and the specific needs of the College.

## Termination of Employment

Resignation – The College hopes an employee’s association with the College will be long. However, an employee may be released from his or her employment at the employee’s request with a thirty days written notice to the employee’s supervisor or Vice President of Finance and Operations. Failure of an employee to give notice may result in loss of any accumulated benefits.

If an employee chooses to leave the College, his or her supervisor should be notified as soon as possible. Advance notice helps in preparation and prompt payment of the final pay. It also permits the College to give the employee complete information about available insurance benefits.

Pay for hourly employees terminating will be available on the next regularly scheduled payday. All salary staff are paid two weeks in advance throughout the year. The pay due to an employee after termination will be based on 30 days of payment. Therefore, a terminated employee may only receive one additional paycheck after termination

Employees in good standing are given consideration if they wish to return to work at a later date.

Administrative Decision – If economic or program revisions make it essential for the College to terminate or revise the number of employees, this may be done with not less than thirty days written notice to the affected employees.

## Disciplinary Policy & Procedures

### Disciplinary Policy

Unsatisfactory job performance or violations of College rules and regulations can result in disciplinary action. Supervisors are expected to deal with such situations in a timely and fair manner. In cases where unsatisfactory job performance or inappropriate workplace behavior have occurred, employees will be informed of the nature of the problem(s), and expectations and time frame for correcting the situation. However, if the employee fails to show expected improvement in the areas identified within the established period, the staff member may be suspended without pay or separated from College employment. Serious breaches of rules and regulations or gross negligence in the performance of work may result in immediate suspension without pay or dismissal from employment, depending on the severity of the offense.

### Disciplinary Procedures

Below are the steps that managers, academic chairs, and supervisors are expected to follow in progressively disciplining an employee for poor performance or bad behavior. They are intended to be fair and allow the employee opportunity for improvement where possible. It is important to note that the College retains the right to determine the sequence of discipline in any case.

### **Oral Warning**

The supervisor should inform the employee of the nature of the unsatisfactory performance and indicate the improvement expected in a face-to-face meeting. The supervisor will make a written notation of the discussion for his or her records to document that the oral warning was given.

### **Written Warning(s)**

If the unsatisfactory performance continues or reoccurs, the supervisor will again discuss the problem with the employee. The employee will be given a written warning which will state the nature of the unsatisfactory performance, the improvement expected, and the time frame in which the improvement should occur. A copy of the letter will be sent to the business office and placed in the employee's file.

The employee will be allowed a reasonable period to correct the problem as specified in the written warning. If the problem can be easily corrected, the improvement may be expected immediately. If the problem is more complex, a longer period may be appropriate.

In the event the behavior is not corrected or improved, a second written warning will be issued. A corrective action plan will be developed. If the problem persists then a suspension or termination will occur. Again, a copy of the letter should be sent to the Vice President of Finance and Operations and placed in the employee's file.

NOTE: Written warnings must be forwarded to the Vice President of Finance and Operations **BEFORE** review with the employee.

### **Suspension or Discharge**

If the expected improvement is not achieved by the date specified or if the problem reoccurs, the employee may be suspended without pay or separated from College employment, depending on the severity of the problem(s). The employee will be provided with written notice of the action taken by the supervisor or department head. In the case of a suspension without pay, a reoccurrence of the problem upon return to work will result in immediate separation from College employment.

## Section F: Computer Use and Support Policy

### **I. Purpose**

To establish the permitted and prohibited use of the College's technology resources and use of college-wide data.

### **II. Scope**

This policy applies to all users (employees, students, trustees, alumni, contractors, and guests) of the College's technology resources and data, including those using the College's network via a personally owned device.

### **III. General**

#### **A. Overview**

Great Lakes Christian College provides students and employees with access to network, computing, and other technological resources as an integral part of the educational and work environment. Those using these resources should do so responsibly in a manner consistent with the GLCC mission and objectives. As a private network, GLCC reserves the right to define and enforce appropriate regulations to ensure that the use of these resources is consistent with its mission. This policy serves to explain the expectations of responsible use, the norms for GLCC System monitoring and administration, and the enforcement mechanisms to ensure compliance.

GLCC desires to protect all users of GLCC technology from illegal or damaging actions by individuals. The purpose of this policy is to inform users of requirements for using GLCC technology. This document is meant to ensure that GLCC System remains safe, secure, available and reliable and is used for purposes appropriate to GLCC's mission.

Effective information security and responsible use is a GLCC community effort involving the participation and support of every Great Lakes Christian College student, employee, and other users who interact with information and/or Information Technology. It is the responsibility of all Great Lakes Christian College constituents to know this policy and to conduct their activities accordingly.

## **B. Applicable Statutes**

The College and all users will comply with all federal state and local governing laws. These laws include, but are not limited to:

**FERPA** – Family Educational Rights and Privacy Act of 1974

**FTC Red Flag Rule** – Federal Trade Commission Identity Theft Prevention GLBA – Gramm-Leach-Bliley Act of 1999

**HIPAA** – Health Insurance Portability and Accountability Act of 1996 ADA – Americans with Disabilities Act of 1990

**PCI DSS** – Payment Card Industry Data Security Standard DMCA - Digital Millennium Copyright Act of 1998

## **C. Basic Principles**

The use of GLCC System resources is provided for the education and administrative functions necessary to conduct the mission and business of Great Lakes Christian College. Ethical standards which apply to other College activities (e.g. the Employee, the Faculty Handbook, or Student Handbook, contractual obligations, and all local, state and federal regulations and laws) apply equally to the use of GLCC System resources. As in all aspects of College life, GLCC System users must act honorable and in a manner consistent with commonly accepted ethical obligations. Stealing, deception, vandalism, harassment, and other unacceptable actions or behaviors are just as wrong in the context of the GLCC Systems as they are in all other domains of the College and life.

As stewards of the technology and information entrusted to the College, the following principles are to be upheld:

- Respect one another's need for access to GLCC Systems, and act in a manner that allows all users to flourish in the use of these resources.
- Do not waste GLCC System resources.
- Do not destroy GLCC System resources, either through neglect or purposeful acts.
- Communicate with respect and integrity.
- Respect others' tangible and intellectual property.
- Respect others' privacy.

## **D. General Use and Ownership**

The use of the College's technology resources, including, but not limited to, computers, fax machines, email, cell phones, printers/copiers, audio/visual equipment, software applications, and all forms of Internet/intranet access, is for College business and authorized purposes only.

Employees are permitted brief and occasional personal use of College technology resources if it does not result in expense or harm to the College, interfere with their job responsibilities, or otherwise violate this or any other College policy. Appropriate care must be exercised for technology resources issued to or used by students and employees.

Protected data (SSN, credit card, FERPA, HIPPA) or other confidential information maintained by the College shall not be stored on non-College systems or any mobile device. Secure communication channels must be used whenever such data is accessed. Use of the College's resources is a privilege granted by the College that may be revoked at any time for inappropriate conduct. Disciplinary action may be imposed as well.

1. Passwords, codes, and the contents stored on any GLCC System asset, including, but not limited to, Google Apps, Microsoft 365, network, computer, removable media, telephone, and voicemail systems are the property of Great Lakes Christian College (except where amended by the Employee Handbook).
2. Great Lakes Christian College-provided computing devices (e.g., PCs, laptops, smartphones, tablets, etc.) are owned by Great Lakes Christian College and are only to be used by the person who signed for the device. The person to whom the device is assigned is responsible for the condition of the device. The computing device is provided to ensure the employee and/or student has the tools necessary to complete their work. It is not allowed to be the "family computer" or used by others in or out of the student/employee's household.
3. Great Lakes Christian College allows for the use of personal devices for work purposes relating to non-confidential data. Privacy protected data must only be used or accessed on a Great Lakes Christian College issued device. Great Lakes Christian College data is not to be stored on a personal device. The only authorized "Cloud Storage" service allowed is Great Lakes Christian College's Google Drive. The Google Drive app is not to be installed for use with Great Lakes Christian College accounts on personal computers.
4. While Great Lakes Christian College desires to provide a reasonable level of privacy, users must be aware that the data they create on GLCC System devices remains the property of Great Lakes Christian College. Intellectual Property as protected by the Employee Handbook or by contract with Great Lakes Christian College is exempted. Because of the need to protect and monitor GLCC Systems, a guarantee of confidentiality of information stored on any technology asset cannot be made.
5. Users are responsible for exercising sound judgment in the personal use of GLCC System assets.
6. Final determination of responsible use and of use not covered by this policy by any user of any GLCC system resource lies solely with the College Vice President of Finance and Operations.
7. For security, compliance, and network maintenance purposes, Great Lakes Christian College reserves the right to monitor equipment, systems, network traffic, and data without prior notification.

8. Great Lakes Christian College reserves the right to audit networks, systems, and data to ensure compliance with this policy, to address technical problems, and in response to official investigations.

## **E. Security and Proprietary Information**

1. Reasonable steps must be taken to ensure the security of confidential information. Examples of confidential information categories include, but are not limited to, private College communiqué, College strategies, competitor-sensitive data, student/employee personal information, grades, employment files, registration and student files, and research data. Users must take all necessary steps to prevent unauthorized access to this information.

2. User login information is never to be shared. Authorized end users are responsible for the security of their passwords and accounts. All passwords will be changed at a time designated by the College.

3. Users must never leave a logged in device unattended at or outside of GLCC. All devices must be secured with a password-protected screensaver with the automatic activation feature set at 10 minutes or less, or by logging-off or locking the computer when unattended. This applies to any device (a GLCC System or personal) when a GLCC Login ID is in use.

4. HIPAA or FERPA-mandated confidential information shall not be transmitted or stored in Google Apps, or on PCs, laptops, portable storage devices, DVDs, CDs, or any other easily portable storage medium. It must be maintained on officially sanctioned and supported systems designed for storing and managing this data

5. In the event of a suspected security breach or a known security breach, the Technology department must be notified. This is to facilitate compliance with state law and ensure prompt emergency response to a potentially critical situation. If the IT Director is unavailable go to the Vice President of Finance and Operations.

6. Online posting of content of any kind (e.g., blog, user forums, comments, video, etc.) is not to be posted with Great Lakes Christian College credentials (e.g., user@glcc.edu), unless being done as official Great Lakes Christian College correspondence. The Vice President of Institutional Advancement must pre-authorized all posts to the GLCC Facebook page.

7. All GLCC-provided assets are required to run anti-virus/malware software that is kept up to date. GLCC-provided devices will have this software and all recent updates installed by default. End users are prohibited from disabling or uninstalling this software.

8. Email attachments received from unknown or untrusted sources should be deleted without opening.

9. Caution must be exercised when responding to emails appearing to come from official sources. GLCC's staff will not request your password, or any other confidential information through email. Any such request must be denied as fraudulent and reported to the tech department.

## **F. Third party applications**

Great Lakes Christian College retains the right to activate or deactivate any of the individual services provided under Google Apps and Microsoft 365.

## **G. Email**

All staff and students are issued a GLCC email for personal use and may be retained when leaving the college. All departments and executives will be assigned to a separate email for GLCC related communications. These email accounts are the property of Great Lakes Christian College and will remain with the college when individuals in those positions leave. All GLCC related material and emails will be given to the next person in that position to assist in a smooth transition.

## **H. Unacceptable Use**

The following activities are prohibited while using any GLCC Systems unless expressly exempted from these restrictions during the course of legitimate job responsibilities. Any behavior that is in violation of this policy, the Employee Handbook, the Faculty Handbook, or the Student Handbook is considered unacceptable use. The lists below, while not exhaustive, provide a framework for activities that are considered unacceptable use. Final determination of acceptable and unacceptable use lies within the authority of the Vice President of Finance and Operations.

### **System and Network Activities**

1. Utilizing GLCC System or technology to engage in activity that is illegal under local, state, federal, or international law, including those listed in section III.B.
2. Use of personal or private networking equipment, except where approved by the Technology department. This includes wireless routers, network hubs, network switches, and routers. Requests for approval must be submitted to the Director of Technology.
3. Violations of the rights of any person or company protected by copyright, trade secret, patent, or other intellectual property, or similar laws or regulations, including, but not limited to, the installation, distribution, or sharing of “pirated” or other software products that are not appropriately licensed for use by Great Lakes Christian College.
4. Unauthorized copying of copyrighted material including, but not limited to, digitization and distribution of photographs from magazines, books, or other copyrighted sources, copyrighted music, and the installation of any copyrighted software for which Great Lakes Christian College or the user does not have an active license.
5. Exporting software, technical information, encryption software, or technology, in violation of international or regional export control laws. The Technology department must be consulted prior to export of any material that is in question.

6. Willful introduction of malicious programs into the GLCC Network (e.g., viruses, worms, spyware, malware, etc.) or any other network or server.
7. Revealing any GLCC System account and/or password to others or allowing the use of your account by others. This includes, but is not limited to, family, friends, co-workers, and other students.
8. Using a GLCC System asset to actively engage in procuring or transmitting material that is in violation of sexual harassment, hostile or harassment workplace laws.
9. Using a GLCC System asset to create and/or distribute defamatory or threatening communications.
10. Using a GLCC System asset to access, create, or distribute any obscene, sexually explicit, or pornographic materials.
11. Making fraudulent offers of products, items, or services originating from any GLCC System asset.
12. Making statements about warranty, expressly stated or implied, unless it is a part of one's normal job duties.
13. Effecting security breaches or disruptions of network communication. Security breaches include, but are not limited to, accessing data of which the user is not an intended recipient or logging into a GLCC System asset that the user is not expressly authorized to access, unless these duties are within the scope of regular duties. For purposes of this section, "disruption" includes, but is not limited to, network sniffing, ping floods, packet spoofing, denial of service attacks, and forged routing information for malicious purposes.
14. Port scanning or security scanning.
15. Executing any form of network monitoring which will intercept data not intended for the user, unless this activity is part of an employee's normal job/duty.
16. Circumventing user authentication or security of any GLCC System technology.
17. Using email to attempt, through social engineering, to fraudulently misrepresent oneself in an effort to acquire protected information (phishing).
18. Using any program/script/command or sending messages of any kind with the intent to interfere with or disable a user's session, by any means, locally or via the network.
19. Intentionally creating, modifying, reading, accessing, or copying data to or from any areas to which the user has not been granted access. This includes accessing, copying, or modifying the files of others without their explicit permission unless done as part of system administration by authorized employees.

20. The establishment of any function that provides unauthorized access, via the Internet connection or otherwise, to any GLCC System asset without the express written permission of the Director of Technology. This includes peer-to-peer applications that bypass normal network authentication protocols.
21. The use of any GLCC System asset to gain unauthorized access to any Great Lakes system or off-campus computer system.
22. The use of GLCC System assets for commercial purposes (e.g., running a personal or private business, conducting business for another employer).

### **Email and Communication Activities**

1. Sending or forwarding unsolicited email messages, including the sending of “junk mail” or other advertising material to individuals who did not specifically request such material (e.g., email spam). Official communiqués of the College do not constitute unsolicited email.
2. Any form of harassment via email, telephone, or paging, whether through language, frequency, or size of messages.
3. Unauthorized use, or forging, of email header information.
4. Solicitation of email for any other email address, other than that of the poster’s account, with the intent to harass or to collect replies.
5. Creating or forwarding chain letters, “Ponzi” schemes, or other “pyramid” schemes of any type.
6. Use of unsolicited email originating from within Great Lakes Christian College’s network or other network service providers on behalf of, or to advertise, any service hosted by Great Lakes Christian College or connected via Great Lakes Christian College’s network.

### **I. Authorized Monitoring and Access to Technology Resources**

This statement serves notice to GLCC System users that the GLCC System is considered a private network of Great Lakes Christian College and that regular monitoring of system activities does occur. Only those persons who are expressly authorized by the IT Director or Vice President of Finance and Operations may engage in system monitoring.

The following are likely to be monitored on a regular basis.

- System log files that contain information pertaining to processes executed on a GLCC System asset

- System directories
- Temporary and permanent storage areas
- System security logs
- GLCC System assets associated with reported incidents of harassment or other violations of this policy
- Any GLCC System asset that must be monitored to comply with local, state, and/or federal law and/or court orders
- Any activity that appears to compromise the security or integrity of the GLCC System
- Web site access logs

#### **J. Personal Electronic Equipment**

Any user connecting a personal computing device, data storage device, or image recording device to any College-owned computer or network resources assumes all risks associated with such connection and accepts responsibility for any damages or loss (to the user, the College, or any third party) resulting from such connection.

The College is not responsible for the repair or replacement of non-College hardware.

#### **K. Student Computing**

College computer labs and devices/equipment for checkout from the Library and the Technology department are available on campus for students to complete their course work. Students are expected to follow the rules of any lab or the department which houses the computer they use.

Failure to follow this policy will be considered a violation of the Student Code of Conduct and will be reported to the Dean of Students.

#### **L. Indemnification Provision**

The College makes absolutely no warranties of any kind, either express or implied, for the Internet services it provides. The College is not responsible for any damages suffered by users, including, but not limited to, any loss of data resulting from delays, non-deliveries, user errors, or service interruptions.

The College is not responsible for the accuracy or quality of information obtained through its Internet services, including email. Users assume responsibility for any damages suffered as a result of information obtained through these sources.

The user agrees to indemnify and hold harmless the College, the Board of Trustees, and College employees from and against any claim, lawsuit, cause of action, damage judgment, loss, expense, or liability resulting from any claim, including reasonable attorneys' fees, arising out of or related to the use of the College's hardware, software, and network facilities. This indemnity shall include, without limitation, those claims based on trademark or service mark infringement, trade name infringement, copyright infringement, defamation, unlawful discrimination or harassment, rights of publicity, and invasion of privacy.

### **M. Privacy**

All users, including the staff of the Technology department, must respect the privacy of other authorized users. This includes respecting the rights of others' security of files, confidentiality of data, and ownership of their work as prescribed by other College policies.

In order to enforce the policies set herein and to maintain the functionality and integrity of GLCC Systems, the Technology department is permitted to monitor activity on any GLCC Systems in accordance with guidelines established by the Director of Information Technology. Audits of GLCC Systems assets (applications, networks systems, servers, and PCs) for potential violations of these policies can be initiated at any time. The College's Technology department may view users GLCC Systems files, monitor keystrokes, and otherwise monitor users activities, including user email.

If a member of the College community outside the Technology department reports activities in apparent violation of College policy, they must notify the IT Director who will then contact other College authorities as necessary. Upon authorization of an investigation into a user's use of GLCC Systems, Information Technology staff, at the direction of the Director of Technology, may initiate activities and review data. All such investigations shall be kept on file by the Director of Technology and shall be considered confidential with access only by authorized agents of the College. In the course of an investigation, evidence of violations of law will be referred to the appropriate law enforcement officials.

Great Lakes Christian College is under no obligation to inform any user of system monitoring or access to user information in the course of an investigation.

### **N. Enforcement**

Violation of this policy may result in disciplinary action by the College's administration up to and including termination. Violation of State or Federal statutes may result in civil or criminal proceedings as well.

System administrators, with due regard for the privacy of users and the confidentiality of their data, have the authority to suspend or modify GLCC System access privileges and examine files, data, and any other materials that may aid in maintaining the integrity and efficient operation of the system. Users whose activity is viewed as a threat to the operation of a GLCC System asset, who abuse the rights of other users, or who refuse to cease improper behavior, may have disciplinary action taken against them up to and including dismissal from the College.

Violation of the policies herein may result in one or more of the following, plus any additional actions deemed appropriate by the Vice President of Finance and Operations:

- Suspension of one's ability to perform interactive logins on relevant GLCC System assets.
- Suspension of one's ability to send or receive email.
- Increased monitoring of further GLCC System activity.

Upon taking action, the College will issue a written notification to the user. The notice will clearly state which policies are in violation. The notification will also identify the Vice President of Finance and Operations as the one who enacted the suspension.

#### **O. Violation**

Penalties for violation of this Policy include, but may not be limited to, the following:

- **Warning:** Alerting an account holder to a regulation with the understanding that any recurrence of the behavior will result in disciplinary action.
- **Loss of computer privileges:** Limitation or removal of computer privileges, including restriction from the use of computer facilities for a period specified by College officials.
- **Reimbursement for damages:** Reimbursement for repairs to computer-related material, equipment, hardware, software, and/or facilities.

#### **P. Responsibility / Authority**

The Vice President of Finance and Operations is responsible for ensuring compliance with this policy.

## Section G: Other Policies

---

### Alcohol and Other Drug Policy

Great Lakes Christian College has implemented a program to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees. This program incorporates the certification requirements of the Drug-Free Schools and Communities Act (DFSCA) of 1989, as articulated in the Education Department General Administrative Regulations (EDGAR) Part 86.

#### Standard of Conduct and College Sanctions

Great Lakes Christian College prohibits the unlawful possession, use, or distribution of drugs and alcohol by faculty, staff, and students on College property or at any College activity. The Employee Handbook, Faculty Handbook, and Student Handbook contain such prohibitions and provide sanctions for violation, up to and including termination for employees and expulsion for students.

#### Legal Sanctions

Municipal, state, and federal laws strictly outline penalties—including fines and jail terms—for the illegal use, possession, or distribution of alcohol and drugs. Specific references to laws appear below.

#### Health Risks

The use of illicit drugs and the abuse of alcohol present major health risks, such as addiction, acute and chronic illness, and death. Other risks associated with alcohol and drug use include impaired learning, violence, injuries, accidents, drunk driving, acquaintance rape, unplanned pregnancies, and sexually transmitted diseases.

#### Treatment Programs

Alcohol and drug information, referral, counseling, treatment, and rehabilitation programs are available to faculty, staff, and students through a variety of on- and off-campus resources. Some of these services and programs are without charge; others are covered by insurance or based on ability to pay. Students may obtain further information about available services by calling University of Michigan Health - Sparrow - Michigan Medicine, Lansing, MI, (800) SPARROW.

All faculty, staff, and students with questions, concerns, or problems related to the use of illicit drugs or the abuse of alcohol are urged to take immediate advantage of the available help. All members of the College community, however, must clearly understand that they jeopardize their education, their jobs, their health, and their future if they unlawfully possess, use, or distribute drugs or alcohol at Great Lakes Christian College. Sanctions for such misconduct will be consistently enforced.

The Federal Government and the State of Michigan decide if and how a drug should be controlled. Prescription drugs psychoactive (mind-altering) are categorized according to a Schedule IV which

explains under what conditions a physician can prescribe the drug. This schedule also includes a drug's known and potential value, its potential for physical or psychological dependence, and the risk to public health. Penalties for the illegal sale or distribution of a drug are established using Schedule IV.

Schedule I drugs have a high potential for abuse with no medical benefits. Production of these drugs is controlled. Examples include heroin, methaqualone, all hallucinogens (except phencyclidine-PCP), marijuana and hashish. Tetrahydrocannabinol (THC), depending on its form, can also be a Schedule I drug.

Schedule II drugs have a high potential for abuse, they also have some medical uses. Production of these drugs is also controlled. Examples include opium, morphine, codeine, other narcotics, barbiturates, cocaine, amphetamines, and phencyclidine (PCP).

Penalties for selling Schedule I and II drugs vary with the quantity of the drug. Additionally, if death or serious injury is associated with the sale, or if it is a second offense, penalties are more severe. When establishing penalties for sale, marijuana and hashish are separated from this designation according to the schedule. The penalties are similar to those set for Schedule I and II drugs. Federal penalties for first offense sale of small amounts of Schedule I and II drugs are not less than five years and not more than 40 years. In the case of death or serious injury, the penalty is not less than 20 years and not more than life. The second offense incurs a fine of not more than \$2 million for individuals and \$5 million for other than individuals.

The state penalty for "delivery possession with intent to deliver, and manufacture" of less than 25 grams is mandatory one to 20 years; up to \$25,000 fine, or life probation. Possession of less than 25 grams incurs a penalty of up to four years, or a fine up to \$25,000, or both. Both offenses are felonies. Use of Schedule I and II drugs constitutes a misdemeanor which has a penalty of up to two years, \$2,000 fine, or both.

Schedule III, IV and V drugs have some potential for abuse, but less than I and II. The potential for abuse of Schedule IV drugs is less than Schedule III, and Schedule V is less than IV. All drugs in this category have medical uses, and their production is not controlled. Examples include some narcotics, chloral hydrate (IV), barbiturates (III), other depressants (III and IV), amphetamines (III), and other stimulants (III and V).

The federal penalty for a first-offense sale of a Schedule III drug is not more than five years, and a fine of not more than \$250,000 per individual, and \$1 million not individual. The penalty for first offense sale of Schedule IV drugs is not more than three years. The fine is the same as for Schedule III drugs. The penalty for first offense sale of Schedule V drugs is not more than one year and a fine of not more than \$100,000 per individual or \$250,000 not individual.

State penalty for the sale of some Schedule III drugs constitutes a felony and carries a penalty of up to seven years, or a fine of up to \$5,000, or both. The penalty for the sale of Schedule IV drugs is also a felony and has a penalty of up to four years, or a fine up to \$2,000, or both. The sale of Schedule V drugs is a felony too and has a penalty of up to two years, or a fine up to \$2,000, or both.

## Michigan Ordinances

- I. Operating Under the Influence of Alcohol (OUIL)
  - A. Description: A person, licensed or not, under the influence of alcohol, or drugs, or both.
  - B. Penalty: First arrest - not more than 90 days, or \$100-\$500 fine, or both.
- II. Permitting Person Under the Influence to Drive
  - A. Description: Allowing intoxicated persons to drive in an area open to the public.
  - B. Penalty: Not more than 90 days, or \$100-\$500 fine, or both.
- III. Minor Possessing or Transporting in a Motor Vehicle
  - A. Description: Persons under 21 may not possess or transport alcohol in a vehicle.
  - B. Penalty: Not more than 90 days, or a fine of not more than \$100. The vehicle can be impounded.
- IV. Purchase/Possess/Consume by Minor
  - A. Description: Persons under 21 may not purchase, possess, or consume alcohol.
  - B. Penalty: Civil infraction: first arrest - \$25, second arrest - \$50, and third arrest - \$100.
- V. Impaired Driving
  - A. Description: A person driving in a public area while impaired from alcohol, drugs, or both.
  - B. Penalty: Not more than 90 days, or a fine of not more than \$300, or both.

## Alcohol Policy

The standards of the Great Lakes Christian College community regarding the use of alcoholic beverages are listed below. The context for these community standards is that Great Lakes Christian College expects all faculty, staff, and students to comply with the state of Michigan laws about alcoholic beverages. In the state of Michigan, persons under the age of 21 shall not purchase, consume, or possess alcoholic beverages. In addition, it is against Michigan law to sell or furnish alcoholic beverages to persons under 21 years of age. The community goal is that faculty, staff, and students will make responsible choices about whether to use alcoholic beverages. A responsible choice will vary from individual to individual. Because most Great Lakes Christian College students are under the legal drinking age, their choice should be abstinence. For those of legal drinking age, it should be abstinence or moderation. Some must choose abstinence because of their high risk for alcoholism. Everyone in our community, before consuming alcohol, should carefully consider their witness to others and the possible impact on others' decision of whether to consume alcohol. The laws of the State of Michigan and the community standards ought to guide our community in decisions about alcoholic beverage use. Those who fail to respect these laws and standards risk the sanctions of this community.

1. Possession and Consumption:

Great Lakes Christian College prohibits the possession and consumption of alcoholic beverages on College premises and at authorized College activities off College premises. College employees are prohibited from consuming alcohol at events where students are

interacting socially with College employees. College employees may not attend any school-related event within eight hours of consuming alcohol. The College also expects students who are underage to comply with state of Michigan laws regarding the possession and consumption of alcoholic beverages.

2. Alcohol Containers:

Great Lakes Christian College prohibits the possession of any alcoholic beverage containers anywhere on college premises including vehicles.

3. Drunkenness:

Great Lakes Christian College expects faculty, staff, and students of legal drinking age who choose to drink alcoholic beverages to be moderate in their consumption. Any consumption of alcoholic beverages that results in impairment or intoxication is a violation of community standards.

4. Relationship to Alcohol: Employees will avoid talking casually with students or when students are present, about their fondness for alcohol. Staff are prohibited from displaying alcohol memorabilia, paraphernalia, or any logos for alcoholic beverages in their offices or on their person or possessions.

5. Classroom Discussion: If questions about alcohol come up in the classroom, staff may respond by explaining how the Bible talks about the subject and how Christians in general might behave in a way that is consistent with how the Bible talks about the subject.

### Tobacco Policy

Great Lakes Christian College is a tobacco free-campus. Possession and use are prohibited while on campus or at a College sponsored event or trip. Violations of this policy will be turned over to the Dean of Students.

### Employees Sanctions for Controlled Substances

Great Lakes Christian College holds a zero-tolerance policy for the abuse of controlled substances (in line with the Drug Free Schools and Communities Act and the Department of Education's supporting regulations EDGAR Part 86 Subpart A 86.3). Most importantly, the intellectual, spiritual, and personal growth and well-being of both the individual and community is best served by holding everyone accountable for the use of such substances.

Sanctions for violation of the controlled substances policy:

1. Zero tolerance means that misuse of a controlled substance will result in automatic termination.
2. Employees will be given 24 hours to remove their belongings from campus depending on the severity of the issue. In some cases, employees may be asked to leave campus immediately and arrangements will be made to retrieve their belongings.
3. Possession of a controlled substance on campus property will be reported to and dealt with

by the local authorities.

### Alcohol and Tobacco

The severity of the sanction will reflect the seriousness of the incident, employee's history of previous violations, and work evaluations. Sanctions may include the following:

1. Warning
2. Probation
3. Termination

### Medical Marijuana Policy

Medical marijuana, which is prescribed for healing purposes, is prohibited at Great Lakes Christian College even though there may be state and local laws that permit its use.

Great Lakes Christian College receives federal funding through Title IV in the form of student financial aid (grants, loans, and work-study programs). As a condition of accepting this money, Great Lakes Christian College is required to certify that it complies with the Drug-Free Schools and Communities Act (DFSCA) of 1989, as articulated in the Education Department General Administrative Regulations (EDGAR) Part 86. The federal government regulates drugs through the Controlled Substances Act (CSA) (21 U.S.C. A 811) which does not recognize the difference between medical and recreational use of marijuana. To comply with the Federal Drug Free School and Communities Act and avoid losing federal funding, Great Lakes Christian College must prohibit all marijuana use, including medical marijuana, and provide sanctions for its use.

## **Primary Prevention Plan**

### Environmental Management

1. Provide drug-free social gatherings and service opportunities.

GLCC's Department of Student Development is committed to providing weekly floor events, large on-campus events each month, and trips throughout each semester that provide an opportunity for students to create friendships and build a sense of belonging without the consumption of alcohol.

2. Promote health-conscious living.

Coordinating with Creative Dining services, Great Lakes Christian College works to provide students with nutritional information and advice for healthy living. Using a variety of programs, including men's and women's health months, residence hall fitness challenges, healthy vending, and intramural sports, Great Lakes Christian College works to encourage students to live an active life and make wise choices regarding their personal health.

3. Limit the availability of drugs on campus.

In accordance with Federal and State of Michigan standards Great Lakes Christian College is committed to enforcing a drug free campus. Students who violate any campus drug standards risk being suspended or expelled from GLCC.

### Preventative Education

#### 1. New Student Orientation

The communication of our core values is included in our week of new student orientation and in the student handbook. The main purpose of this is to communicate to students the campus identity GLCC is working to create. Part of our identity is valuing responsible consumption of alcohol and prohibiting the consumption of alcohol by minors. Students are exposed to many statistics and national trends regarding alcohol consumption and binge drinking and are provided the names and contact information of staff that can be reached if they ever need assistance.

#### 2. All Hall Meetings

At the beginning and end of each semester residential on-campus students are required to attend an all-hall meeting. One of the purposes of these meetings is to discuss the expectations residence life personnel have for our on-campus student community. These meetings also address issues that arise throughout the semester. All-hall meetings provide an opportunity to explain to students why we are an alcohol-free campus and the risks associated with consuming alcohol. It also serves to remind students of the staff who are always willing to support them if they need assistance in dealing with addiction or abuse of alcohol.

#### 3. Men's and Women's Health Month Programming

Great Lakes Christian College sets aside October and November to focus on health issues that affect respective genders, such as breast cancer and testicular cancer. The larger purpose of these months is to focus on the importance of holistic personal health and provide students with educational-based programming. The programming includes lectures from visiting doctors, health challenges, daily health facts, panel discussions on current health issues, and fundraisers for foundations related to specific health causes. The programs include all aspects of personal health including the damage of alcohol and drug addiction and abuse.

### Student Support

#### 1. Amnesty Policy

Students who are struggling with alcohol abuse, addiction, or binge drinking and seek assistance and help on their own accord will not be punitively disciplined by the Student Conduct Council. Great Lakes Christian College strongly encourages students to seek help when they need it. So, when a student comes forward asking for help, he or she will receive it. The Amnesty Policy carries the expectation that a student seeking help truly wants to

change and will do his or her part to make it happen. If the Dean of Students and the Student Conduct Committee determine a student is not making notable improvements in the habits regarding alcohol, the student may receive sanctions from the Student Conduct Committee.

## 2. Counseling

A GLCC counseling intern is willing to meet free of charge with any student who desires it. If the student isn't comfortable meeting with the intern, the Dean of Students, Campus Life Coordinator, and many other staff and faculty are willing to meet with students to provide counsel, accountability, and guidance.

### Annual Notification

Great Lakes Christian College will provide written notification to students and employees on an annual basis of the College's Alcohol and Illegal Drug Policy as required by EDGAR Part 86 Subpart A 86.3 GLCC will make every effort to ensure distribution (opposed to simply making them available) to every student and employee. The notification will include the entire policy with the following requirements:

1. Standards of conduct that clearly prohibit the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees,
2. A list of applicable legal sanctions under federal, state, or local laws for the unlawful possession or distribution of illicit drugs and alcohol,
3. A description of the health risks associated with the abuse of alcohol or use of illicit drugs,
4. A list of drug and alcohol programs (counseling, treatment, rehabilitation, and re-entry) that are available to employees or students,
5. A clear statement that GLCC will impose disciplinary sanctions on students and employees for violations of the standards of conduct and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution.

# Policy on Sex, Sexuality, and Gender Identity

## Affirming the dignity of every person and response as a Christian community

Great Lakes Christian College affirms the full humanity and dignity of every human being, regardless of his or her sexual orientation or gender identity. Among the sins that the Bible clearly condemns are sexual immorality and homosexual behavior (1 Corinthians 6:9-11). We recognize that there are individuals within our community who experience same-sex attraction, and/or confusion about gender. They are loved and valued, and we condemn any malice directed toward them.

As an institution of higher education, we encourage the vigorous pursuit of truth. As a Christian institution, we believe the Bible, as illuminated by the Holy Spirit, is true and reliable. We recognize that there are Christians inside and outside our community who have different interpretations of Scripture. The Great Lakes Christian College statement concerning sexuality is in line with the teachings of the Christian Churches/Churches of Christ. Regardless of one's perspective or tradition, we encourage all our community members to engage this issue with civility and respect.

## Great Lakes Christian College's position, as communicated in the Great Lakes Christian College Student Handbook

We believe that human families were established by God to perpetuate humankind and to provide a stable community for nurturing children in faith and righteous living. Marriage between one man and one woman is the instruction of Scripture and sexual expression is to be confined to the marriage relationship.

## The student community standard regarding sexual expression

All students, regardless of age, residency, or status, are required to abstain from cohabitation, any involvement in premarital or extramarital sexual activity, or homosexual activity (including same-sex dating behaviors). This includes the promotion, advocacy, and defense of the aforementioned activities.

We recognize that this belief and instruction may conflict with the practice or vision of the larger culture, as Christian beliefs have been in other times and places. That said, we hold to the Biblical Christian position on this issue while being respectful of those who disagree with us. Students who violate our community standards regarding sexual expression will meet with the Student Conduct Council and be treated in a loving, redemptive manner throughout the accountability process.

Great Lakes Christian College understands gender to be a matter of primary, overt sexual characteristics at birth, other than in cases in which these characteristics are ambiguous. We intend to allow the Bible to guide us to reaffirm the birth gender of individuals (Matthew 19:4, Mark 10:6).

We acknowledge that there are people who genuinely experience gender confusion. We regard such confusion as evidencing at least some degree of spiritual confusion warranting pastoral care, though not necessarily any greater spiritual need than presents itself in other forms among our student and employee populations. That said, the actions and behaviors that sometimes result from gender

confusion can be disruptive and contrary to a community seeking to encourage persons in our care towards an understanding of personal identity and holiness rooted in the truth of Christ.

Therefore, since college is traditionally a time of personal exploration, growth, and change, we do not seek to exclude persons for whom sexual identity is an issue. However, we do reserve the right to terminate or deny enrollment of those whose influence upon our community is determined to be, in our judgment, contrary to the best interests of our students and commitments to our college and to our Lord. Therefore, Great Lakes Christian College will not support persistent or conspicuous examples of cross-dressing or other expressions or actions that are deliberately discordant with birth gender and will deal with such matters within the appropriate pastoral and accountability process.

Great Lakes Christian College reserves the right to examine situations on an individual basis, taking into consideration the unique characteristics of a given issue or person while upholding the teaching of the Christian Churches/Churches of Christ, Great Lakes Christian College's doctrinal statement of faith, and the community standards addressed in the faculty, employee, and student handbooks. The Great Lakes Christian College Board of Trustees has the final authority and responsibility for the interpretation of our doctrinal statement of faith, community standards, and of the Biblical principles that serve as their foundation.

# Title IX – Sexual Misconduct Policy

Adopted 6/2014; Revised 8/23; Revised 8/24

## Sexual Misconduct Policy – Title IX – Violence Against Women Act

### Introduction

*“No person in the United States shall, on the basis of sex, be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any educational program or any activity receiving Federal financial assistance.” 20 U.S.C. § 1681(a).*

Great Lakes Christian College is a Christ-centered institution of higher education that is committed to the Biblical principle that all human beings are created in the image of God. Because of that belief, the College is committed to basing judgments concerning the admission, education, and employment of individuals upon their qualifications and abilities.

Great Lakes Christian College is also committed to maintaining and strengthening an educational, working, and living environment founded on the Biblical principles of love and mutual respect. The College seeks to provide programs, activities, and an educational environment free from sex discrimination. In accordance with this policy and as delineated by federal and Michigan law, Great Lakes Christian College does not discriminate on the basis of sex in education programs or activities, including but not limited to recruitment, admissions, housing, athletic and extracurricular activities, discipline, distribution of financial assistance, distribution of institutional resources, hiring practices, employment, promotion, and policies.

The College is committed to promoting respect for the bodily integrity of all persons, the virtues of chastity, and the sacredness of human sexuality. The College affirms that sexual relationships are designed by God to be expressed solely within a marriage between husband and wife. Sexual acts of any kind outside the marriage bond are inconsistent with Biblical principles and are prohibited by College policies.

“Sexual Misconduct”, as that term is used in this policy, means any form of sex discrimination or violence prohibited by Title IX and the Violence Against Women Act. Great Lakes Christian College prohibits any and all forms of *quid pro quo* arrangements, dating violence, domestic violence, sexual assault, and stalking. Great Lakes Christian College recognizes the spiritual, moral, legal, physical, and psychological seriousness of all sexual misconduct, regardless of the level of acquaintance between the perpetrator and the victim. Great Lakes Christian College aims to eradicate sexual misconduct through education, training, clear policies, and serious consequences for violations of these policies.

In addition, the College recognizes that sex discrimination, in any form, is a violation of College regulations and policies. Sex discrimination includes all forms of sexual violence and sexual harassment. Further, the College recognizes that sexual violence is a serious threat to the College community, is prohibited by Title IX, and is a criminal act. Therefore, the College will provide the following to the members of the College community:

1. A statement of expectations for behavior with regard to community standards pertaining to sex discrimination.
2. Resources aimed at reducing the risk of sexual violence, including educational programs for men and women.
3. Procedural intervention to offer support and information following the report of sex discrimination.
4. Student conduct and employee disciplinary procedures that address the needs of complainants and protect the rights of respondents.

The College will take immediate action to address sex discrimination promptly and to equitably investigate complaints to resolve the situation, prevent its reoccurrence, and address its effects by implementing awareness and/or preventative measures.

## Definitions

### College

College means Great Lakes Christian College, Lansing, Michigan.

### College Community

For the purposes of this policy, “College Community” includes all students, staff, faculty, administration, trustees, interns, volunteers, and visitors.

### College Student

College Student means any person who is registered or enrolled at the College at the time of the alleged sex discrimination.

### Dating Violence

Dating Violence refers to violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship will be determined based on the reporting party’s statement and with consideration of the length of the relationship, and the frequency of the interaction between the persons involved in the relationship. This includes but is not limited to sexual or physical abuse or the threat of such abuse, psychological and emotional abuse such as public shaming or bullying, keeping someone from friends and family, or posting photos online without consent.

### Domestic Violence

Domestic Violence can be any of the acts that constitute “dating violence” but are regarded as a misdemeanor or felony act. A current or former spouse commits this violence or intimate partner of the victim, by a person the victim shares a child with, who is cohabitating with or has cohabitated with. It also can refer to violence against those living with the victim or in the victim’s care.

### Consent

As a matter of federal and state law, sexual activity requires the consent of both parties. Such consent is defined as a clear, unambiguous, and voluntary agreement between the parties.

Consent cannot be obtained from someone who is under 18 years of age, asleep, or otherwise mentally or physically incapacitated, whether due to alcohol, drugs, or some other temporary or permanent, physical or mental disability or condition. Consent cannot be obtained by threat, coercion, or force. Agreement given under such conditions does not constitute consent.

### Educational Program or Activity

This policy applies to any educational program or activity of the College. This would include locations, events, or circumstances over which the College exercises substantial control over the respondent and the context in which the alleged sexual harassment occurs, such as residence halls, dining halls, classrooms, and the gym. Locations, events, or circumstances *without* substantial control would include anything outside the United States, privately owned off-campus apartments (at which students may reside). Note: foreign nationals in the United States are covered by Title IX as they participate in educational programs or activities of the College.

### Employee

Employee means any person employed by the College, whether as a trustee member, administrator, faculty, adjunct faculty, or staff member, whether full-time, part-time, or volunteer.

### Fondling

The touching of the private body parts of another person forcibly and/or against that person's will.

### Force

Force means physical force, violence, threat, intimidation, or coercion.

### Hostile Environment

When sex harassment is so severe, pervasive, and objectively offensive it effectively denies a person's equal access to the school's education program or activity or employment.

### Rape

Penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.

### Respondent

A person alleged to have committed a violation of the College Title IX policy. The term may be also used to designate persons with direct responsibility for a particular action or to those persons with supervisory responsibilities for conduct, procedures, or policies in those areas covered by the complaint.

### Sex Discrimination

For the purposes of this policy, “sex discrimination” shall include, but not be limited to, any acts of sexual violence, sexual assault, and sexual harassment. In compliance with Title IX of the Educational Amendments of 1972, sex discrimination applies to, but is not limited to: recruitment, admissions, housing, athletic and extracurricular activities, rules and regulations, discipline, class enrollment, access to programs, courses, and internships, distribution of financial assistance, distribution of institutional resources, hiring practices, employment, promotion, and policies.

### Sexual Assault

Sexual assault is the commission of sexual contact or a sexual act, whether by an acquaintance or by a stranger that occurs without indication of consent of both individuals or that occurs under threat or coercion.

When there is a lack of mutual consent about sexual activity, where there is ambiguity about whether consent has been given, or where the victim cannot consent, an individual can be charged with, and found to have committed sexual assault.

Much sexual misconduct includes nonconsensual sexual contact, but contact is not a necessary component. Threatening speech which is sufficiently serious to constitute sexual harassment, for example, will constitute sexual misconduct. Photographs, videos, or other visual or auditory records of sexual activity made without explicit consent constitute sexual misconduct, even if the activity documented was consensual. Similarly, sharing such recordings without explicit consent is a form of sexual misconduct. For example, forward harassing electronic communication may also constitute an offense.

In addition to being prohibited by federal and Michigan law, including Title IX of the Education Amendments of 1972, sexual assault could result in criminal prosecution or civil liability.

Reports of sexual assault will be reported to local law enforcement for appropriate action, including investigation and prosecution as appropriate. Such criminal prosecution will proceed separately and apart from a College investigation and disciplinary proceeding under the guidelines of the Student Handbook. The College will cooperate to the fullest extent possible, with any criminal investigation or prosecution of sexual assault incidents involving any member of the Great Lakes Christian College community. The College will not ordinarily wait for the conclusion of any criminal investigation or proceedings to commence its own investigation and may take interim measures to protect members of the College community.

All sexual assault reports shall be treated with gravity, dignity, and justice throughout the process. Members of the College community should not do any of the following:

1. Pressure anyone to suppress a report of sexual assault;

2. Cause anyone to believe that he or she is responsible for the commission of any crime against him or her;
3. Communicate to anyone that he or she was negligent or assumed the risk of being assaulted by reason of circumstance, dress, behavior; or
4. Communicate to anyone that the College would incur unwanted publicity as a result of a report of sexual assault.

### Sexual Contact

Sexual contact means the deliberate touching of a person's intimate parts (including genitalia, groin, breast or buttocks, or clothing covering any of those areas) for the purpose of sexual gratification, or using force to cause a person to touch his or her own or another person's intimate parts.

### Sexual Harassment

Sexual harassment is a matter of particular concern to an academic community in which students, faculty, and staff are related by strong bonds of intellectual and spiritual interdependence and trust. Accordingly, if the College has actual knowledge of sexual harassment in its educational programs or activities against a person in the United States, it must respond in a manner that is not deliberately indifferent.

Sexual harassment consists of nonconsensual sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when one of the following is true:

1. [Quid pro quo] An employee, agent, or other person authorized by the recipient explicitly or implicitly conditioning the provision of aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct; or
2. [Hostile environment] Unwelcome conduct determined by a reasonable person to be sufficiently severe or pervasive, that it effectively denies a person equal access to the recipient's education program or activity; or
3. [Clery crimes] Sexual assault, dating violence, domestic violence, or stalking.

Sexual harassment may be found in a single episode as well as persistent behavior. Conduct that occurs in the process of application for admission to a program or during selection for employment, and conduct directed toward a member of the College Community is covered by the policy. In addition, conduct by third parties (i.e. individuals who are neither students nor employees, including but not limited to invited guests and consultants) is covered by this policy if the College exercises substantial control over that individual and over the context in which they interacted with the College community.

### Sexual Violence

Sexual violence is a form of sexual harassment prohibited by Title IX. Sexual violence includes any physical sexual act perpetrated against a person's will or where the person is incapable of giving consent. Sexual violence includes but is not limited to, rape, sexual assault, sexual battery, and sexual coercion.

### Stalking

Stalking means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.

### Standards of Conduct

Standards of conduct means the College's standards of conduct as approved by the College's Administrators and/or Board of Trustees and published in the appropriate College handbooks.

### Statutory Rape

Non-forcible sexual intercourse with a person who is under the statutory age of consent.

### Third-Party

Third-party means any individual, including a contractor or invited guest, who is alleged to have committed sexual misconduct against a College community member.

## Teacher – Student Consensual Relations

The integrity of the teacher-student relationship is the foundation of the College's educational mission. This relationship vests considerable trust in the teacher, who in turn, bears authority and accountability as a mentor, educator, and evaluator. The unequal institutional power inherent in this relationship heightens the vulnerability of the student and the potential for coercion. The pedagogical relationship between teacher and student must be protected from influences or activities that can interfere with learning and personal development.

Whenever a teacher is (or in the future might reasonably become) responsible for teaching, advising, or directly supervising a student, a romantic and/or sexual relationship between them is prohibited. In addition to creating the potential for coercion, any such relationship jeopardizes the integrity of the educational process by creating a conflict of interest and may impair the learning environment for other students. Such situations also expose the College and the teacher to liability for violation of laws against sexual harassment and discrimination.

For purposes of this policy, "direct supervision" includes the following activities (on or off campus): course teaching, examining, grading, advising, research, supervising other academic and social activities, and recommending for admissions, employment, internships, or awards.

"Teachers" includes, but is not limited to all full-time, part-time, and adjunct faculty of the College. It also refers to those serving as guest or substitute instructors.

"Students" refers to those enrolled in any educational and training programs of the College.

Additionally, this policy applies to members of the College community who are not teachers as defined above, but have authority over or mentoring relationships with students, including athletic coaches, supervisors of student employees, advisors, directors of student organizations, residential

advisors, as well as others who advise, mentor, or evaluate students.

Where a romantic relationship predates the enrollment of the student or employment of the employee, the employee or prospective employee must immediately disclose the relationship to their supervising administrator. The administrator shall consult with the Administrative Cabinet who will review the circumstances surrounding each relationship on a case-by-case basis. If permitted, a management plan will be developed. This plan must be evaluated annually between the administrator and the employee.

Teachers or students with questions about this policy are advised to consult with the College's Title IX Coordinator, the Dean of Students, or their supervising Vice President.

## Other Related Misconduct

In accordance with this policy, the College is empowered to investigate allegations of and to impose sanctions for, sex discrimination, sexual harassment, or any other violations of the College's standards of conduct directly related to the allegations brought under this policy. Such related misconduct may include, without limitation, incidents of domestic violence, dating violence, and stalking as those terms are defined by state and federal laws. Violations of the rules of confidentiality as articulated herein, violations of any interim measures imposed under this policy, and/or violations of other Standards of Conduct that occur in connection with the alleged sexual misconduct may also implicate the use of this policy.

The College cannot impose disciplinary action against a Complainant or witness of his or her improper use of alcohol or drugs, provided that such person is acting in good faith as a Complainant or witness to the events of the alleged sexual misconduct.

## Title IX Staff

- A. The Title IX Coordinator is the individual designated by the College to coordinate the College's efforts to comply with and enforce the responsibilities of the College under this policy in accordance with pertinent Title IX regulations. The College's Title IX Coordinator is the Dean of Students. 6211 West Willow Highway, Lansing MI 48917, phone (517) 321-0242, ext. 400. The College has designated the duties and responsibilities of the Title IX Coordinator to:
  - a. Ensure coordination with appropriate staff with relevant responsibilities for such activities on campus as housing, counseling services, and campus safety.
  - b. Prepare and arrange for a preventative education program. Such a program will include information designed to encourage students to report incidents of sexual violence to the appropriate College and law enforcement authorities.
  - c. Develop specific sexual violence materials that include the College's policy, rules, and resources for students, faculty, coaches, and administrators and arrange for such materials to be included in all appropriate handbooks. These materials would include:
    - i. What constitutes sexual harassment or violence;

- ii. What to do if a student has been the victim of sexual harassment or violence;
  - iii. Contact information for counseling and victim services on and off College grounds;
  - iv. How to file a complaint with the College;
  - v. How to contact the College's Title IX Coordinator(s);
  - vi. What the College will do to respond to allegations of sexual harassment or violence, including interim measures that can be taken as outlined in the Grievance Procedure.
- d. Analyze periodically any trends or patterns of sexual misconduct on campus and assess the efficacy of campus-wide response to sexual misconduct.
  - e. Disseminate to members of the College community information regarding Title IX protections, the College's Title IX policy, including the Complaint Resolution Process therein, and assistance for all persons who have been subjected to sexual harassment or violence.
  - f. Conduct an annual review of all Title IX complaints brought to the College Title IX Coordinator.
  - g. Communicate with students, staff, and faculty regarding the College's obligations under Title IX and serve as a resource regarding Title IX matters.
  - h. Develop the protocols and regulations of the College's Title IX Policy.
  - i. Annually assess the College's overall Title IX compliance efforts. In addition, the Title IX Coordinator will arrange for and conduct training (at least annually) for the College administration, faculty, and staff.
  - j. Ensure that the Title IX Process is followed from the time of initial notice until the investigation is completed and the decision is rendered. The Coordinator shall give notice of the decision to all parties and their advisors simultaneously.
- B. The College's two Title IX Investigators are the Men's Resident Director and the Women's Resident Director - 6211 West Willow Highway, Lansing, MI 48917. The duties of the Title Investigator include, but are not necessarily limited to,
- a. Perform the initial intake of a Title IX Complaint.
  - b. Obtain evidence that may be relevant to a Title IX investigation.
  - c. Interview the complainant, respondent, and potential witnesses.
  - d. Write Title IX Investigative Reports.
  - e. Assist students and staff in navigating the Title IX process outlined below.
- C. The College's Title IX Decision-Maker is the Dean of Students. 6211 West Willow Highway, Lansing MI 48917, phone (517) 321-0242, ext. 400. The duties of the Decision-Maker include, but are not necessarily limited to, reports to
- a. Conduct Title IX Cross-Examination Hearings, and instruct advisors in their duties
  - b. Determine the relevance of all questions (in hearings), evidence, and testimony and use that material in a written decision on the matter should it be within the Title IX jurisdiction of the College.
  - c. Appoint Deputy Title IX Coordinators as needed.
  - d. Recommend sanctions or termination for Staff/Faculty found to have violated this Title IX Policy.

## Grievance Process

### Conditions and Definitions

#### A. Confidentiality

- a. The College shall protect the privacy of individuals involved in a report of sex discrimination to the extent allowed by law and College policy. Communications to health and counseling professionals may be privileged and confidential. Because the content of discussions with confidential resources is not reported to the College office of record, such discussions do not serve as notice to the College to address the alleged discrimination or sexual misconduct.
- b. In the event of a report of sex discrimination being received by other College officials including administration, faculty, and staff, such officials are required by law to relay such reports to the Title IX Coordinator and, in some instances, to law enforcement officials. In such cases, the College will balance the needs of the parties for privacy with the College's responsibility to ensure a safe educational environment and workplace. In some cases, strict confidentiality may not be possible or appropriate. An individual's request regarding the confidentiality of reports of discrimination or sexual misconduct will be considered in determining an appropriate response; however, such a request will be considered in the dual context of the College's legal obligation to ensure a working and learning environment that is free from discrimination or sexual misconduct and the rights of the accused to be informed of the allegations and their source. Some level of disclosure may be necessary to ensure a complete and fair investigation.

#### B. Definitions of Parties

- a. Complainant: A student (including a former student if the alleged discrimination occurred while enrolled at the College), employee, or other member of the College community defined above, who contemplates filing or actually files a complaint based on sex discrimination.
- b. Respondent: A person alleged to have committed a violation of the College Title IX policy. The term may be also used to designate persons with direct responsibility for a particular action or to those persons with supervisory responsibilities for conduct, procedures, or policies in those areas covered by the complaint.

#### C. Timeline.

- a. The College is obligated to complete the Grievance Process promptly in a manner that is not deliberately indifferent. Typically (but not always), investigations are completed within four to six weeks.

## Steps in the Grievance Process

#### A. Preliminary Stage

- a. A member of the College Community who believes that he or she has experienced or is experiencing sexual harassment may initially wish to discuss the situation with a trusted friend, advisor, colleague, or the College official to whom the alleged Respondent reports or is responsible. The College strongly recommends that the potential Complainant not contact the Respondent without being accompanied by

another person, ideally a member of the Title IX staff.

**B. Report to the Title IX Coordinator**

- a. Any member of the College community who believes that he or she has experienced or is experiencing sexual harassment should immediately contact the College Title IX Coordinator to report the alleged act or acts of sex discrimination.
- b. Only a complainant can create a complaint.

**C. Response of the Title IX Coordinator**

- a. Should the Title IX Coordinator determine that a reasonable request to investigate and make a determination about alleged sexual discrimination has been made, the Title IX Coordinator will begin the grievance procedures outlined below:
  - i. Create a Title IX Complaint File including the ID of parties, place(s), and time(s) of the alleged Title IX policy violation, and a timeline of the investigation. This may include a written complaint should the complainant request one.
    1. Notice of allegation: must include ID of parties, place, and time of the alleged Title IX policy violation.
  - ii. Meet with the Complainant in order to provide the Complainant a general understanding of this policy (and a copy of the policy) and to identify the range of supportive measures available to the Complainant, such as health services, mental health services, crime victim services, or services of a local rape crisis center.
  - iii. Advise the Complainant of his or her rights. These rights include:
    1. The right to contact the appropriate law enforcement personnel to pursue criminal charges under state, local, or federal law, concurrent with or after the College's Title IX investigation. The College investigation will not be suspended or delayed in the event of an investigation of possible criminal charges by law enforcement personnel.
    2. The right to file a civil action against the alleged Respondent.
    3. The right to file a complaint with the Equal Employment Opportunity Commission and/or the Michigan Civil Rights Commission.
    4. The right to an advisor of choice.
    5. The right to timely communication from the Title IX Coordinator.
  - iv. Notify the Respondent of the Title IX complaint. At this time, the Respondent will also be advised of his or her rights. These rights include:
    1. The right to due process and following this Grievance process in an orderly and timely manner.
    2. The right to not be presumed responsible for the alleged conduct until a determination regarding responsibility is made through the grievance process.
    3. The right to an advisor of choice.
    4. The right to timely communication from the Title IX Coordinator.

- v. Provide a range of supportive measures in order to preserve the educational access of **both parties** as appropriate, at any stage of the process. The full range of these measures could include:
  - 1. Providing a “no contact” order, which will typically direct that the parties refrain from having contact with one another, directly or through proxies, whether in person or via electronic means.
  - 2. Altering the student’s academic, housing, or employment arrangements, such as switching sections of a class or designating mealtimes for both parties.
  - 3. Procuring needed medical or hospital treatment, counseling, and plans to protect the personal safety of either party, such as a security escort.

D. Optional Pre-Complaint Meeting

- a. Following contact with the Title IX Coordinator, but prior to the beginning of a formal grievance procedure, the Complainant may request a meeting with the Respondent or with the person who has immediate supervisory authority related to the complaint (such as a Coach). Such a meeting shall be in the presence of the Title IX Coordinator.
- b. Respondents may discuss the allegations of the Complainant with the Title IX Coordinator or the Title IX Investigator.
- c. The purpose of any pre-complaint contact will be for the Complainant to request a proposed course of action in order to resolve the matter in a manner consistent with Biblical principles of dispute resolution. Such pre-complaint meetings shall be solely at the option of the Complainant.
- d. At no time will the Complainant be required to confront the Respondent. If the matter cannot be resolved as the result of any pre-complaint meeting, then the Complainant may submit to the Title IX Coordinator a formal, written complaint.
- e. If it is alleged that the Title IX Coordinator is involved in any potential violation of this Title IX policy, then the complaint shall be submitted to a Deputy Title IX Coordinator or another individual appointed by the Title IX Decision-Maker.
- f. No pre-complaint meeting shall take place under the following conditions:
  - i. In cases involving sexual assault, such a meeting shall not occur.
  - ii. In cases where the contact is (or is seen to be) a condition for the submission of a written complaint to the Title IX Coordinator.

E. Written Complaint

- a. The complainant shall have the right to file a written complaint with the Title IX Coordinator which shall contain the following information:
  - i. The name and address of the Complainant.
  - ii. The name or names of the person or persons alleged to be responsible for the act of discrimination, if known.
  - iii. Specific acts of discrimination alleged including the dates, times, and locations.
  - iv. Names, addresses, and telephone numbers of potential witnesses who may be called in support of the complaint.

- v. A description of any actions taken by any party in an effort to address the alleged discrimination.
- vi. The complaint shall be signed and dated by the Complainant. Such date shall be the “date of the complaint.”

F. Informal resolution process

- a. At any time after (and only after) a Formal Title IX complaint has been lodged, the Title IX Coordinator may inquire of the parties if they wish to participate in an informal resolution of the grievance.
- b. If both the complainant and the respondent agree to do so, the Title IX Coordinator will meet with them to attempt to resolve the grievance.
- c. If a resolution of the grievance is reached between the parties, the agreement shall be reduced to writing and signed by the complainant and the respondent, the grievance will be considered resolved and no further disciplinary action will be taken in regard to the complaint.

G. Dismissal of Complaints

- a. The Title IX Coordinator, in conjunction with the Investigators, may determine that the alleged behavior *even if true* does not meet *all* of the following conditions for Title IX violations under the 2020 Federal guidelines.
  - i. The alleged behavior occurred on U.S. soil.
  - ii. The alleged behavior occurred through the educational program or activity of the College over which the College exercises substantial control.
  - iii. The alleged behavior if true would constitute sexual harassment.
- b. The complaint may be dismissed at this point if the complaint does not satisfy any one of these three requirements.

H. Title IX Investigation

- a. The Title IX Investigators will gather evidence and interview witnesses as necessary. They may request documentation from the appropriate departments and offices at the College, as needed.
- b. The Title IX Coordinator will direct the Respondent to provide a written response to the complaint. The Complainant shall be entitled to receive and review such responses.
- c. If the Respondent or any witness refuses or fails to respond to the Title IX Coordinators request for a response to the complaint, request for information, or otherwise fails to cooperate, the Title IX Coordinator may nevertheless continue the investigation.

I. Cross-Examination Hearing

- a. Goals of Cross-Examination (For the parties)
  - i. Obtain factual admissions helpful to your party’s case.
  - ii. Corroborate the testimony of your party’s witnesses.
  - iii. Minimize the other party’s case by the impeachment of witnesses being questioned.
  - iv. Minimize the other party’s case by the impeachment of other witnesses through the witnesses being questioned.
  - v. Reduce confusion and seek the truth.
- b. Process for Cross-Examination Hearing

- i. Each party will have the opportunity to propose questions to the Decision-Maker for either party or their witnesses. Questions are to be submitted in writing three days prior to the hearing.
- ii. Each party's advisor will have the opportunity to propose questions to either party or their witnesses. Questions are to be submitted in writing three days prior to the hearing.
- iii. The Decision-Maker will preside and must evaluate each question for *relevance* before the hearing party being questioned will be allowed to respond. Only relevant cross-examination and other questions may be asked of a party or witness. Only the Decision-Maker will be permitted to ask questions during the hearing.
- iv. The Decision-Maker has the right to decide on all matters of decorum and may ask parties to leave, schedule breaks, etc.
- v. The hearing will be recorded.
- vi. Questions of relevancy for Decision-Maker:
  1. Does this help me in deciding if there was more likely than not a violation?
  2. Does it make it more or less likely?
  3. Why or why not?
- vii. Examples of non-relevant questions
  1. Questions about the sexual behavior or predisposition of any party
  2. Questions about information protected by a legal privilege (such as medical records) that have not already been waived by the party

J. A Title IX Decision

- a. After the hearing and investigation are complete, the Title IX Decision-Maker will render a decision as to whether, *by a preponderance of the evidence*, it has been determined that a violation of this Title IX policy has or has not occurred. Such a decision shall be supported by a written report containing findings of fact, along with a recommendation by the Decision-Maker of the remedial and/or disciplinary action(s) to be taken.
- b. Within five (5) days of the date of the decision, the Title IX Coordinator or Decision-Maker shall notify in writing the Complainant, the Respondent, and the Vice President of Enrollment Management of that decision.
- c. What factors go into a Title IX decision:
  - i. Identifying consistency, accuracy, memory, and credibility (50%)
  - ii. Identifying implausibility, inconsistency, unreliability, ulterior motives, and lack of credibility (50%)
- d. The Title IX Decision-Maker must determine:
  - i. What evidence to believe
  - ii. The importance of the evidence
  - iii. Conclusions to draw from that evidence

K. Appeal of Findings of Investigation

- a. All parties to the complaint may appeal the findings and recommendation of the Title IX Coordinator. All grounds for appeal should be based on the emergence of new evidence that was previously unavailable, on the grounds that some aspect of this policy or procedure was not adequately followed, or evidence of bias on the part of the Title IX Team.

- b. The final appeal shall be the impartial review and decision by the Administrative Cabinet, provided that no member was involved as a party or witness to the investigation, in which case the appeal shall be reviewed by the Chairman of the Board of Trustees.
- c. Any appeal must be filed within ten (10) days of the Title IX Decision-maker's decision. The Cabinet shall render a decision on the appeal within ten (10) days of receipt of the appeal.

L. Determination of Disciplinary Action

- a. In the event the Title IX Coordinator finds that the Respondent has committed an act of sex discrimination as defined by this policy the matter will proceed as follows:
  - i. Students: If the Respondent is a student, the Dean of Students or Title IX Coordinator will determine and administer the appropriate disciplinary action. If the College student is found to have committed sexual assault the Dean or Title IX Coordinator may initiate expulsion proceedings pursuant to the Student Handbook.
  - ii. Staff: If the Respondent is a staff member, the Title IX Coordinator will recommend the appropriate disciplinary action to the Vice President of Finance and Operations. If a staff member is found to have committed a policy violation, then his or her employment may be terminated in accordance with the Employee Handbook.
  - iii. Faculty: If the Respondent is a faculty member and his or her conduct warrants discipline that is less severe than discharge or suspension, the Title IX Decision-Maker will recommend sanctions to the Vice President of Academic Affairs. In cases where the faculty member's actions warrant discharge or termination of employment, the Title IX Decision-Maker will recommend to the President that termination proceedings be initiated. If the President accepts the recommendation, the matter will proceed in accordance with the terms of the College's Faculty Handbook providing for "Dismissal for Cause."
  - iv. Administration: If the Respondent is a member of the administration (and not the President) the matter will be referred to the President for appropriate action. If the Respondent is the President, the matter will be referred to the Chairman of the Board of Trustees for appropriate action.
  - v. Trustees: If the Respondent is a member of the Board of Trustees (and not the Chairman) the matter will be referred to the Chairman of the Board. If the Respondent is the Chairman of the Board, a committee of the Board of Trustees will be called by the Vice Chairman of the Board for appropriate action.

M. Any appeal of the Title IX Coordinator's decision and recommendation shall stay the imposition of disciplinary action under this section but only during the pendency of the appeal. If the disposition of the appeal does not alter the recommended sanction, disciplinary action pursuant to this section shall proceed.

N. Complaints Initiated by Administration

- a. The College President, Vice Presidents, Deans, or supervisors may request the Title IX Coordinator investigate allegations of sex discrimination with or without the consent of the alleged victim. Such administrator requesting the investigation will act as the Complainant and must specify the person or persons responsible for exhibiting the alleged discriminatory conduct. The Title IX Coordinator will use the same notification and procedural guidelines outlined in the foregoing complaint process.

## Retaliation; False Complaints

### A. Retaliation

It is a violation of this policy to retaliate against a person making a complaint alleging a violation under this policy or against any person cooperating or participating in an investigation under this policy. Retaliation should be reported promptly to the Title IX Coordinator and may result in appropriate disciplinary action independent of other sanctions or interim measures administered under this policy.

### B. Filing a False Complaint

Any Complainant who knowingly makes false charges alleging violations of this policy may be subjected to disciplinary action.

## Section H: Appendix

---

### Christian Church and Church of Christ Colleges & Universities Intercollegiate Tuition Waiver Program (ITWP)

**Compiled in 2007 by**  
**Association of Christian Church Colleges & Universities**  
**(Last Updated 2025)**

#### **Participating Colleges & Universities**

Blueridge College of Evangelism	Louisville Bible College Manhattan
Boise Bible College	Christian College Mexico Christian
Carolina Christian College	University
Central Christian College of the Bible	Mid-Atlantic Christian University
Colegio Biblico	Mid-South Christian College Milligan
Dallas Christian College	University
Great Lakes Christian College	Ozark Christian College Point
Hope International University	University
Johnson University	Summit Christian College
Kentucky Christian University	William Jessup University
Lakeview Bible College and Seminary (India)	

# **Presidents Association of Christian Colleges and Universities Intercollegiate Tuition Waiver Program Guidelines**

## **PURPOSE**

In an effort to promote cooperation and collaboration among the independent Christian colleges and universities of the Stone-Campbell Movement, the Presidents Association of Christian Colleges & Universities has established an Intercollegiate Tuition Waiver Program (ITWP) for qualified dependents of full-time employees at participating institutions. The intention of this program is to expand the educational opportunities and tuition waiver benefits already provided to employees by their respective institutions. Institutional participation in ITWP is voluntary and by formal agreement based on the terms and conditions detailed herein.

## **PROGRAM DESCRIPTION**

The Intercollegiate Tuition Waiver Program is a benefit extended to the dependents of all full-time employees of participating Christian colleges and universities. (A complete list of participating institutions is attached.) Under the terms of this agreement, participating colleges and universities will accept a limited number of tuition waiver students based on the standard admission requirements of the receiving institution. ITWP is a tuition waiver program only and unless otherwise noted, applies only to undergraduate degrees. The student is fully responsible for all other expenses associated with the cost of attending the participating college or university.

Dependent students benefit significantly from this exchange. ITWP increases their college and university options, expands their menu of preferred geographic venues, and increases the number of degree programs and career preparations available.

Participating institutions benefit financially. Assuming the availability of space in residence halls, the receiving institution will benefit from earned income on room and board and other fees. Since the participating institutions already have tuition waiver programs for the dependents of their own full-time employees, the income gained from this program is coming from students that would probably not have enrolled at the receiving institution without ITWP.

## **TERMS AND CONDITIONS OF THE PARTICIPATING RECEIVING INSTITUTIONS**

1. Each participating receiving institution must designate the number of new tuition waiver positions it will make available in any one academic year.
2. Institutional commitment to an ITWP student is automatically renewable for up to five years or the average time it takes to complete a degree.
3. The receiving institution's financial commitment to an ITWP student may be up to full tuition only.
4. The receiving institution applies standard admissions policies to all ITWP applicants. Exceptions are not expected or encouraged.
5. The receiving institution will designate an official ITWP contact person/position, probably the Director of Admissions or the Director of Financial Aid.
6. The contact person at the receiving institution will inform all ITWP applicants of their admission and tuition waiver status.

# Presidents Association of Christian Colleges and Universities Intercollegiate Tuition Waiver Program Guidelines

## TERMS AND CONDITIONS OF THE PARTICIPATING SENDING INSTITUTIONS AND STUDENTS

1. Applicant ITWP students will follow the normal application procedures required by the receiving institution.
2. Applicant students will obtain and complete an ITWP application form available from the official contact person at the sending institution, (i.e. the participating college at which the dependent's parent or guardian is employed full time.)
3. The contact person at the sending institution will review, sign and send the ITWP application to the contact person at the receiving institution.
4. Only dependent students of full-time employees are eligible for ITWP. If the employment status changes (e.g. no longer employed or employed only part time), the tuition waiver benefit is canceled. If a change in employment status occurs during a semester in progress, the benefit will continue to the end of the semester but will not be continued thereafter.
5. If a full-time employee relocates to a full-time position at another participating institution, the ITWP benefit is transferable to the employee's new location. In such case, the employee is responsible for notifying the contact person at the new sending institution who will validate the employment status with the receiving institution.
6. Students accepted into the ITWP program must remain in good standing with the receiving institution, (i.e. students must maintain the same academic requirements and institutional standards of conduct expected of all students at the receiving institution). Students placed on academic or social probation lose their ITWP benefit during the period of their probation. Students placed on academic or social suspension (i.e. expelled from the receiving institution) are dropped immediately from the ITWP program.
7. ITWP applicants, if required by the receiving institution, must agree to apply for all specified forms of additional financial aid. Additional financial aid awards will be applied to the student's account in keeping with the policies established by the outside grantor and/or the receiving institution.
8. Except where otherwise noted the ITWP applies only to undergraduate programs.

## Conditions and Contacts

### Blueridge College of Evangelism

**Special Conditions:**

Six scholarships are available.

**Contact Person/Position:**

Director of Admissions

### Boise Bible College

**Special Conditions:**

Three tuition scholarships are available.

**Contact Person/Position:**

Admissions Department

### Carolina Chr College

**Special Conditions:**

Five scholarships are available.

**Contact Person/Position:**

Director of Admissions

### Central Christian College of the Bible

**Special Conditions:**

A 100% tuition waiver will be offered to undergraduate degree-seeking dependents (as determined by FAFSA status) of full-time employees as long as the student resides on campus. A 50% waiver will be offered for graduate students or undergraduates who are not living on campus. The tuition waiver replaces all other CCCB institutional scholarships and/or grants.

**Contact Person/Position:**

Executive Director of Admissions ([admissions@cccb.edu](mailto:admissions@cccb.edu))

### Colegio Biblico

**Special Conditions:**

Five scholarships are available.

**Contact Person/Position:**

Director of Admissions

### Dallas Christian College

**Special Conditions:**

Four scholarships are available for traditional students. No Intercollegiate scholarships are currently available for online or degree completion programs, but the student should contact DCC to see if any new scholarships have become available. The employee must have worked at the institution for at least one year. The recipient is not eligible for any other forms of institutional financial assistance.

**Contact Person/Position:**  
Director of Admissions

### Great Lakes Christian College

**Special Conditions:**  
Two scholarships per year are available. The student is not eligible for any other GLCC Scholarships. Recipients must apply for State and Federal Financial Aid.

**Contact Person/Position:**  
Vice President of Enrollment Management

### Hope International University

**Special Conditions:**  
Three full tuition scholarships are available for Traditional Undergrad students. The recipient is not eligible for any other forms of institutional financial assistance. Any institution that is a member of the CCCU Tuition Exchange Program would be required to use that tuition waiver program.

**Contact Person/Position:**  
Director of Admissions

### Johnson University

**Special Conditions:**  
Johnson University offers three full-tuition scholarships for undergraduate programs for employees, their spouses, and dependents from ITWP institutions.

**Contact Person/Position:**  
Director of Financial Aid

### Kentucky Christian University

**Special Conditions:**  
Two scholarships per year are available.

**Contact Person/Position:**  
Director of Financial Aid

### Louisville Bible College

**Special Conditions:**  
An unlimited number of scholarships are available. Faculty/staff, their spouses, and their dependent children will be considered eligible as long as they are “permanent, full-time employees”. Students will be given full-tuition scholarships for up to eight semesters. No other scholarships or grants will apply. Modules, Outreach Classes, Home Study Courses, etc., will not apply unless a part of a regular semester load.

**Contact Person/Position:**  
Registrar

## **Manhattan Christian College**

### **Special Conditions:**

Two scholarships per year are available. The student is not eligible for any other MCC Scholarships. The scholarship is renewable for 4 years. If a student is in a 5-year academic program, then the student will need to apply for a Special-Need Based Scholarship.

### **Contact Person/Position:**

Director of Financial Aid

## **Mid-Atlantic Christian University**

### **Special Conditions:**

An unlimited number of scholarships are available. Faculty/staff, their spouses, and their dependent children will be considered eligible as long as they are “permanent, full-time employees.” Students will be given full-tuition scholarships for up to eight semesters of undergraduate studies as long as the student resides on campus. No other scholarships or grants will apply.

### **Contact Person/Position:**

VP of Enrollment Services

## **Mid-South Christian College**

### **Special Conditions:**

Two scholarships are available.

### **Contact Person/Position:**

Director of Admissions

## **Milligan University**

### **Special Conditions:**

One new scholarship each year is available. Scholarship is renewable for a total of eight semesters. Any institution that is a member of the Tuition Exchange Program would be required to use that tuition waiver program.

### **Contact Person/Position**

Administrative Assistant to the Academic Dean

## **Ozark Christian College**

### **Special Conditions:**

Two scholarships per year are available for up to 12 credit hours of tuition per semester (24 credit hours per academic year). These scholarships are available for the dependent children of full-time faculty, administrators and staff. They are awarded on a first-come, first-served basis.

### **Contact Person/Position:**

Executive Director of Admissions

## **Point University**

### **Special Conditions:**

Six scholarships are available. Regular Financial Aid policies and procedures apply.

Contact Person/Position:

Director of Financial Aid

## **Summit Christian College**

### **Special Conditions:**

Two new ITWP scholarship waivers are available annually for ITWP Freshman through Junior candidates. (SCC's normal full tuition "Senior Scholarships" are available for all Seniors who meet Senior Scholarship academic qualifications). Regular Financial Aid policies and procedures apply.

**Contact Person/Position:**

Registrar

## **William Jessup University**

### **Special Conditions:**

Four scholarships are available annually for a residential traditional undergraduate student. Must meet all admissions requirements and submit a FAFSA.

**Contact Person/Position:**

Director of Student Financial Services