

## 2024 CCS Annual Campus Security and Fire Safety Report



<b>Table of contents</b>	<b>Page</b>
About the Report	3
Campus Maps – Safety Patrol Area	4
Procedure for Gathering Crime Statistics	5
Clery Geographic Definitions	6
Definition of Reportable Crimes	6
Campus Safety Daily Crime and Fire Log	9
Crime Statistics – Ford and Taubman Campus Combined	10
Crime Statistics – Ford Campus	11
Crime Statistics – Taubman Center	12
Hate Crimes	13
Office of Campus Safety & Security	13
Emergency Blue Light Phones	13
Automated External Defibrillators (AED)	15
Off Campus Assistance	16
Reporting Criminal and Other Serious Incidents	16
Campus Security Authorities	16
Maintenance and Security of Campus Grounds and Facilities	17
Card Access to Campus Facilities	17
Emergency Notification	18
Timely Warnings Reports (Safety Alerts)	18
Wayne State University Police and Emergency Notification/Timely Warnings	19
Behavioral Intervention Team (BIT)	19
Emergency Response and Crisis Management Plan	19
Emergency Evacuation Procedures	21
Security Awareness and Crime Prevention	21
Policies	
Alcohol and Other Drug Policy for Students, Faculty, and Staff	24
Weapons Policy	30
Missing Student Notification Policy and Procedures	31
Violence Against Women Act (VAWA)	33
Title IX Policy Prohibiting Sex Discrimination	33
Sex Offender Registry	56
Motor Vehicle Assistance	56
Fire Safety Policies, Statistics, and Logs	57

## About the Report

The College publishes this report to inform the College for Creative Studies (CCS) community about campus safety policies, initiatives to prevent and respond to crime and emergencies, and the occurrence of crime on campus. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act requires the College to prepare this report. The report uses information maintained by several sources, including the Office of Campus Safety & Security, Office of Student Affairs, Title IX Coordinator, and the Detroit Police Department. It provides statistics on reported crimes that occurred during the previous three years on campus, in certain off-campus buildings or on property owned, leased or controlled by CCS. This report also includes institutional policies concerning campus security, sexual assault, missing students, and the use of alcohol and other drugs.

CCS publishes and distributes this Annual Campus Security and Fire Safety Report to all enrolled students and current employees by October 1 of each year. When the College distributes the report, the College provides notice to enrolled students and current employees of the exact electronic address at which the report is posted, attaches a digital copy of the report to notification email, and notifies recipients that the College will provide a paper copy of the report on request. The College also provides a similar notice to prospective students and prospective employees that includes a statement of the report's availability, a description of its contents, a direct link to the digital version of the report, and an opportunity to request a paper copy. Electronic copies of the report are available on internal portal under Campus Offices > Campus Safety and on the College's public website. Paper copies of the report are available in the Office of Campus Safety & Security or by calling 313-664-1441 (Taubman Center) or 313-664-7851 (Ford Campus)

Regular training is provided in the following topics:

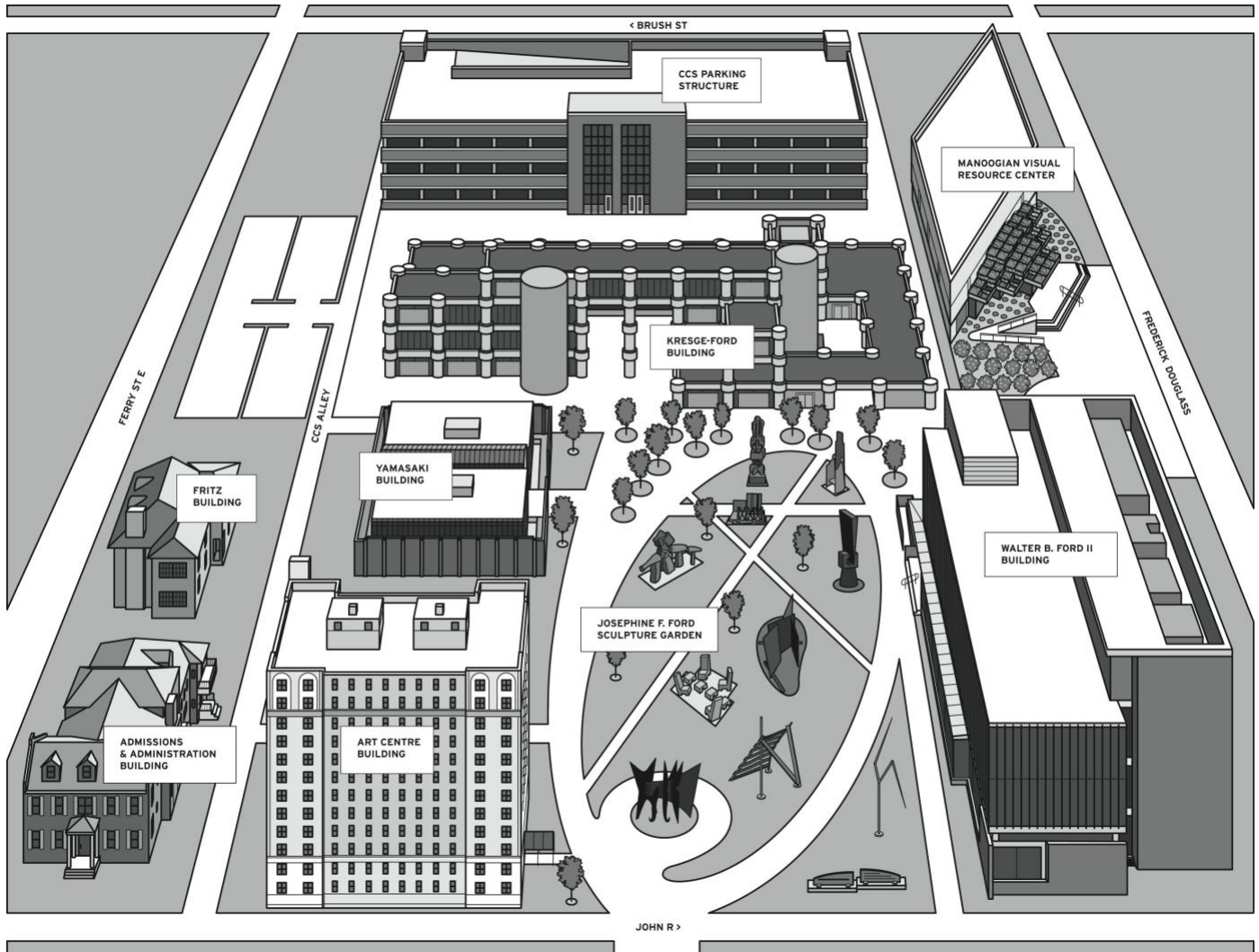
- Continuing refresher training of 30 emergency response coordinators
- Active Shooter training for all CCS community
- CPR/AED avert training
- Fire Extinguisher training

Amanda Gillette  
Director of Campus Safety & Security – Ford Campus

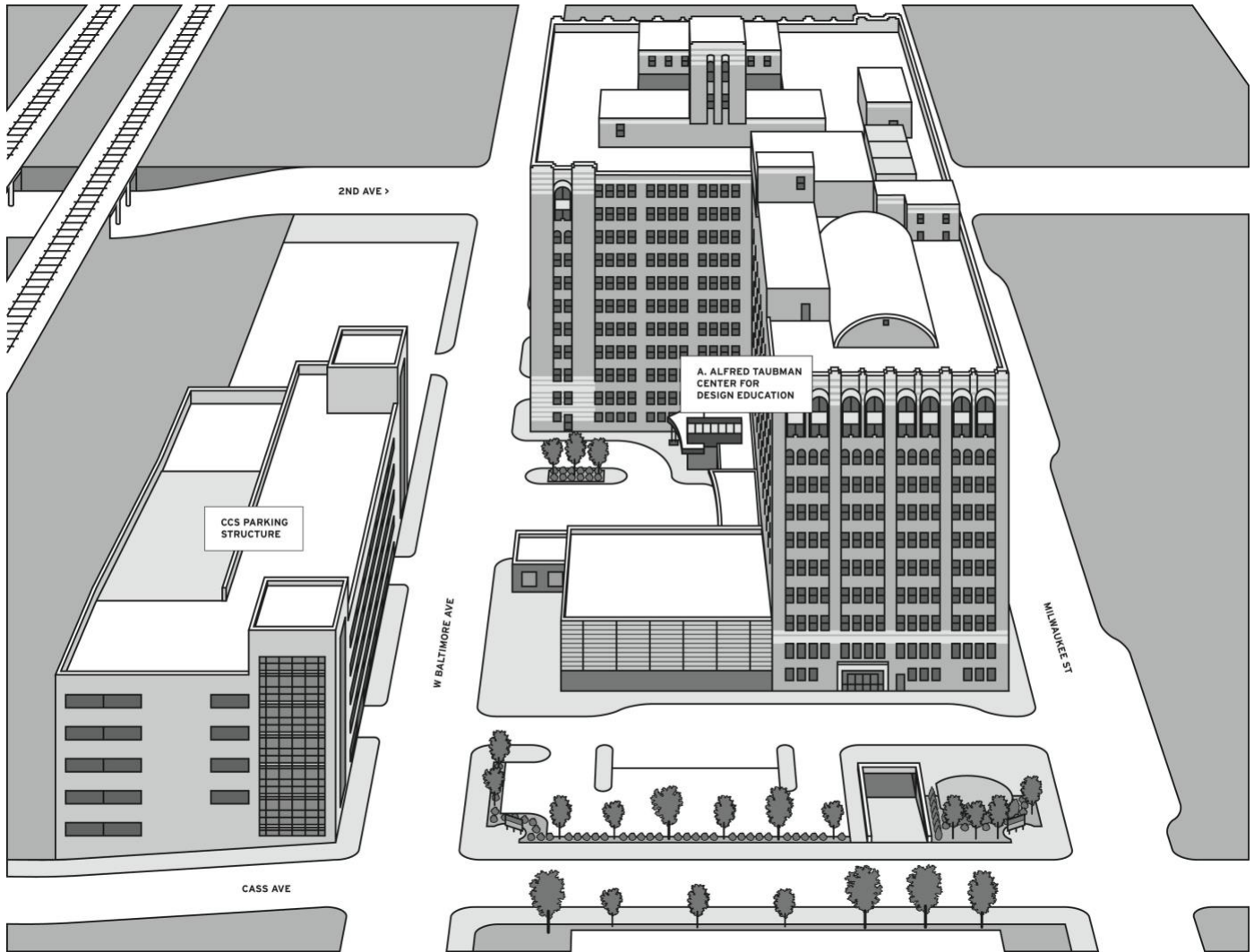
Dena Ryniak  
Director of Campus Safety & Security – Taubman Center

# Campus Safety Patrol Areas

## Ford Campus



# Taubman Center



# Procedure for Gathering Crime Statistics

Each calendar year, Campus Safety & Security, the Institutional Reporting and Compliance Manager, and the Asst. Vice President of Campus Life completes an analysis of all crimes reported to CCS Campus Security Authorities. The Institutional Reporting and Compliance Manager also makes a reasonable, good-faith effort to obtain from the Detroit Police Department statistics for crimes that occurred on or within the College's Clery Geography (see definition below). Data about crimes reported to CCS Campus Security Authorities is combined with data about crimes reported to and collected from the Detroit Police Department, and those combined crime statistics are reflected in this annual report. Crime statistics are reported for crimes in the College's "Clery Geography," which encompasses on-campus, residence hall, non-campus and public property as those terms are defined in this report. In addition to disclosing crime statistics in this annual report, the College reports the crime statistics to the U.S. Department of Education through the annual Campus Safety & Security Survey.

The College's Institutional Reporting and Compliance Manager, in collaboration with the Asst. Vice President of Campus Life and the Directors of Campus Safety & Security, is charged with preparing and distributing the Annual Campus Security and Fire Safety Report.

## Clery Geographic Definitions

### Clery Geography

For the purposes of collecting crime statistics, an institution's Clery Geography includes: buildings and property that are part of the institution's campus ("On Campus"); the institution's non-campus buildings and property ("Non-Campus Building or Property"); and public property within or immediately adjacent to and accessible from the campus ("Public Property"). For the purposes of maintaining a campus crime log, Clery Geography also includes areas within the patrol jurisdiction of Campus Safety.

### On-Campus

Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls; and any building or property that is within or reasonably contiguous to that area that is owned by the institution but controlled by another person, is frequently used by students and supports institutional purpose. Pages three and four of this report provide a map of CCS on-campus property.

### Non-Campus Building or Property

Any building or property owned or controlled by a student organization that is officially recognized by the institution, or any building or property owned or controlled by the institution that is used in direct support of, or in relation to, the institution's educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.

### Public Property

All public property, including thoroughfares, streets, sidewalks and parking facilities, that is within the campus or immediately adjacent to and accessible from the campus. Pages three and four of this report provide a map of the public property included in the CCS Crime Statistics.

### Residence Hall

Those reportable statistics that occur within a college-owned or controlled residence hall or apartment are reported in both "On Campus" and "Residence Hall" categories. The purpose of this category is to specifically list those reportable crimes occurring on campus that take place within a residence hall or apartment.

## Definitions of Reportable Crimes

### Criminal Offenses

**Murder/Nonnegligent Manslaughter** – the willful (no negligent) killing of one human being by another.

**Negligent Manslaughter** – the killing of another person through gross negligence.

**Sexual Assault** – An offense that meets the definition of rape, fondling, incest, or statutory rape.



**Rape** – The 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.

**Fondling** – The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.

**Incest** – Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

**Statutory Rape** – Sexual intercourse with a person who is under the statutory age of consent.

**Robbery** – taking or attempting to take anything of value from the car, custody or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.

**Aggravated Assault** – an unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm. It is not necessary that injury result from an aggravated assault when a gun, knife, or other weapon is used which could and probably would result in seriously personal injury if the crime were successfully completed.

**Burglary** – unlawful entry of a structure to commit a felony or a theft. For reporting purposes, this definition includes: unlawful entry with intent to commit a larceny or felony; breaking and entering with intent to commit a larceny; housebreaking; safecracking; and all attempts to commit any of the aforementioned.

**Motor Vehicle Theft** – the theft or attempted theft of a motor vehicle. For reporting purposes, this includes all cases where automobiles are taken by persons not having lawful access even though the vehicles are later abandoned, including joyriding.

**Arson** – any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.

## **Hate Crimes**

A crime reported to local police agencies or to a Campus Security Authority that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. Hate crimes include all of the criminal offenses mentioned above, plus those listed in this section.

For reporting purposes, the categories of bias include the victim's actual or perceived race, religion, gender, gender identity, sexual orientation, ethnicity, national origin, and disability:

**Categories of Bias** – Although there are many possible categories of bias, under the Clery Act, only the following categories are reported:

**Race** – A preformed negative attitude toward a group of persons who possess common physical characteristics genetically transmitted by descent and heredity that distinguish them as a distinct division of humankind.

**Gender** – A preformed negative opinion or attitude toward a group of persons because those persons are male or female.

**Gender identity** – A preformed negative opinion or attitude toward a group of persons because of the person's sense of oneself as male, female, or transgender.

**Religion** – A preformed negative opinion or attitude toward a group of persons who share the same religious beliefs regarding the origin and purpose of the universe and the existence or nonexistence of a supreme being.

**Sexual Orientation** – A preformed negative opinion or attitude toward a group of persons based on their sexual attraction toward, and responsiveness to, members of their own sex or members of the opposite sex.

**Ethnicity** – A preformed negative opinion or attitude toward a group of persons based on their identification with Hispanic culture and origin, regardless of race.

**National Origin** – A preformed negative opinion or attitude toward a group of persons based on the persons', or their ancestors', country of birth or origin, or the persons' possession of the physical, cultural or linguistic characteristics commonly associated with a particular country.

**Disability** – A preformed negative opinion or attitude toward a group of persons based on their physical or mental impairments/challenges, whether such disability is temporary or permanent, congenital or acquired by heredity, accident, injury, advanced age or illness.

**Larceny/Theft** – unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another. Attempted larcenies are included. Embezzlement, confidence games, forgery, worthless checks, etc., are excluded.

**Simple Assault** – an unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration or loss of consciousness.

**Intimidation** – to unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct but without displaying a weapon or subjecting the victim to actual physical attack.

**Destruction/Damage/Vandalism of Property (except Arson)** – to willfully or maliciously destroy, damage, deface or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

## **Violence Against Women Act (VAWA) Offenses**

**Domestic Violence** – a felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common; by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner; by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or by any other person against an adult or youth victim who is protected from the person's act under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

**Dating Violence** – 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 shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. For purposes of this definition, dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence.

**Stalking** – a course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or the safety of others or to suffer substantial emotional distress. A "course of conduct" 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. A "reasonable person" means a reasonable person under similar circumstances and with similar identities to the victim. "Substantial emotional distress" means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

## **Arrests and Referrals for Disciplinary Action**

**Weapons Violation** – the violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices, or other deadly weapons.

**Drug Abuse Violations** – the violation of laws prohibiting the production, distribution, and/or use of certain controlled substances and the equipment or device utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation, or importation of any controlled drug or narcotic substance. Arrests for violations of State and local law, specifically those relating to unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs.

**Liquor Law Violations** – the violation of State or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages, not including driving under the influence and drunkenness.



## **Campus Safety Daily Crime and Fire Log**

The Office of Campus Safety & Security maintains a written, easily understood daily crime and fire safety log that meets all Clery Act requirements. The daily crime log records, by the date the crime was reported, any crime that occurred within the relevant Clery Geography and that is reported to Campus Safety & Security. The log includes the nature, date, time, and general location of each crime and the disposition of the complaint, if known. As required by regulation, the Office of Campus Safety & Security makes an entry or an addition to an entry to the log within two business days of the report of the information to Campus Safety & Security, unless that disclosure is prohibited by law or would jeopardize the confidentiality of the victim. CCS may withhold information from the daily crime log if there is clear and convincing evidence that the release of the information would jeopardize an ongoing criminal investigation or the safety of an individual, cause a suspect to flee or evade detection, or result in the destruction of evidence. CCS will not disclose information that would cause an adverse effect, and CCS will disclose any information withheld once the adverse effect is no longer likely to occur.

A log covering the past 60 days is available for public inspection upon request, by contacting the Director of Campus Safety & Security – Ford Campus at 313-664-7851 or Director of Campus Safety & Security – Taubman Center at 313-664-1441 during normal business hours. Campus Safety & Security will make any portion of the log that is older than 60 days available for inspection within two business days of a request. For purposes of this section, “business day” means Monday through Friday, excluding any day when the institution is closed.

# Crime Statistics

The College reports to the U.S. Department of Education via the Campus Safety and Security Survey and discloses in this report, statistics for the three most recent calendar years concerning the number of each of the following crimes that occurred on or within its Clery Geography and that are reported to local police agencies or to a CCS Campus Security Authority.

## Ford Campus and Taubman Center combined

Criminal Offenses	On-Campus			On-Campus Residence*			Non-Campus			Public **			Unfounded Cases***		
	2023	2022	2021	2023	2022	2021	2023	2022	2021	2023	2022	2021	2023	2022	2021
Murder/Non-negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fondling	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0
Burglary	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Violence Against Women</b>															
Domestic violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Dating violence	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0
Stalking	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Arrests</b>															
Weapons: carrying, possessing, etc.	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Disciplinary Actions</b>															
Weapons: carrying, possessing, etc.	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0
Drug abuse violations	0	1	4	0	0	4	0	0	0	0	0	0	0	0	0
Liquor law violations	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0

\* On-Campus Residence crimes are included in On-Campus numbers

\*\* Public - For 2023, Detroit Police Department did not respond to request for crime statistics for our Clery geography

\*\*\* The College may withhold, or subsequently remove, a reported crime from its crime statistics in the rare situation where sworn or commissioned law enforcement personnel have fully investigated the reported crime and, based on the results of its full investigation and evidence, have made a formal determination that the crime report is false or baseless and therefor "unfounded." Only sworn or commissioned law enforcement personnel may "unfound" a crime report. The recovery of stolen property, the low value of stolen property, the refusal of the victim to cooperate with criminal prosecution, or the failure to make an arrest do not "unfound" a crime report.

## Ford Campus

Criminal Offenses	On-Campus			On-Campus Residence*			Non-Campus			Public **			Unfounded Cases***		
	2023	2022	2021	2023	2022	2021	2022	2021	2020	2023	2022	2021	2023	2022	2021
Murder/Non-negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Violence Against Women</b>															
Domestic violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Dating violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Stalking	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Arrests</b>															
Weapons: carrying, possessing, etc.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Disciplinary Actions</b>															
Weapons: carrying, possessing, etc.	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	1	0	1	1	0	1	0	0	0	0	0	0	0	0	0

\* On-Campus Residence crimes are included in On-Campus numbers

\*\* Public - For 2023, Detroit Police Department did not respond to request for crime statistics for our Clery geography

\*\*\* The College may withhold, or subsequently remove, a reported crime from its crime statistics in the rare situation where sworn or commissioned law enforcement personnel have fully investigated the reported crime and, based on the results of its full investigation and evidence, have made a formal determination that the crime report is false or baseless and therefore "unfounded." Only sworn or commissioned law enforcement personnel may "unfound" a crime report. The recovery of stolen property, the low value of stolen property, the refusal of the victim to cooperate with criminal prosecution, or the failure to make an arrest do not "unfound" a crime report.

**Taubman Center**

Criminal Offenses	On-Campus			On-Campus Residence*			Non-Campus			Public **			Unfounded Cases***		
	2023	2022	2021	2023	2022	2021	2023	2022	2021	2023	2022	2021	2023	2022	2021
Murder/Non-negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fondling	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Violence Against Women</b>															
Domestic violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Dating violence	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0
Stalking	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Arrests</b>															
Weapons: carrying, possessing, etc.	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Disciplinary Actions</b>															
Weapons: carrying, possessing, etc.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Drug abuse violations	0	1	4	0	0	4	0	0	0	0	0	0	0	0	0
Liquor law violations	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0

\* On-Campus Residence crimes are included in On-Campus numbers

\*\* Public - For 2023, Detroit Police Department did not respond to request for crime statistics for our Clery geography

\*\*\* The College may withhold, or subsequently remove, a reported crime from its crime statistics in the rare situation where sworn or commissioned law enforcement personnel have fully investigated the reported crime and, based on the results of its full investigation and evidence, have made a formal determination that the crime report is false or baseless and therefor "unfounded." Only sworn or commissioned law enforcement personnel may "unfound" a crime report. The recovery of stolen property, the low value of stolen property, the refusal of the victim to cooperate with criminal prosecution, or the failure to make an arrest do not "unfound" a crime report.

# Hate Crimes

The College discloses in its annual security report statistics for the three most recent calendar years concerning the number of hate crimes that occurred on or within the College's Clery Geography and that are reported to local police agencies or to a CCS Campus Security Authority. The College discloses the number of the following crimes that are determined to be hate crimes: murder and nonnegligent manslaughter; negligent manslaughter; rape; fondling; incest; statutory rape; robbery; aggravated assault; burglary; motor vehicle theft; arson; larceny-theft; simple assault; intimidation; destruction/damage/vandalism of property; dating violence; domestic violence; and stalking. If any such crimes are determined to be hate crimes, the College will (1) identify by type of crime the number of crimes that are determined to be hate crimes and (2) identify the category of bias that motivated the crime (i.e., the victim's actual or perceived race, gender, gender identity, religion, sexual orientation, ethnicity, national origin, or disability).

2023: No crimes determined to be hate crimes

2022: No crimes determined to be hate crimes

2021: No crimes determined to be hate crimes

## Office of Campus Safety & Security

The CCS campus consists of the Ford Campus and the Taubman Center. The same campus safety policies and procedures apply to the Ford Campus and the Taubman Center. Uniformed Campus Safety officers patrol the interior of all buildings, the campus grounds and contiguous roadways. Campus Safety Officers are non-sworn officers and have no powers of arrest. Services provided by Campus Safety also include Emergency and Crisis Management, First Aid services, arrangements for emergency medical transport, parking management, safety, crime prevention programs and safety education.

Working closely with both the Detroit Police Department and the Wayne State University Police Department, we maintain a safe community and a quality of life that supports the educational mission of the College. CCS falls under the jurisdiction of the Detroit Police Department. The College does not have a formal memorandum of understanding with these local law enforcement agencies; however, they will be contacted to report that a crime is occurring or has occurred on campus.

The Office of Campus Safety & Security receives Wayne State Police Campus Security Bulletins. Bulletins are issued for severe weather, power outages, and immediate emergency threats to Health & Safety of the CCS Community. Because CCS is located inside of the Wayne State University footprint, all Wayne State Police Security bulletins are re-issued to all of the CCS students, staff & faculty for awareness purposes. In addition, the Wayne State Police have access to the security cameras on the Ford Campus and the Taubman Center.

Campus Safety personnel are stationed at the following campus locations:

### **Ford Campus – 313-664-7444**

Kresge Ford Building – first floor B side of building (24 hours a day, 7 days a week, 365 days a year)

Art Centre Building – first floor lobby (24 hours a day, 7 days a week, 365 days a year)

Walter B. Ford II Building – first floor atrium (hours vary)

### **Taubman Center – 313-664-1444**

First floor east entrance (24 hours a day, 7 days a week, 365 days a year)

First floor south entrance lobby (24 hours a day, 7 days a week, 365 days a year)

These Campus Safety personnel can summon other CCS Campus Safety officers, Wayne State Police, Detroit Police, or EMS to respond to any emergency. In an emergency you may flag down any of these officers, Wayne State Police, or Detroit Police whose patrol areas overlap portions of CCS's campus and the surrounding area. If you need help from an officer from an agency other than Campus Safety, please let them know you are a member of the CCS community and ask them to contact CCS Campus Safety for you.

CCS Campus Safety officers patrol campus at all times and in all weather conditions. Minimum staffing levels are maintained through any weather emergency either by holding over previous shifts to cover for officers who cannot reach campus, or by assisting with transportation arrangements for Campus Safety personnel who cannot otherwise reach campus for their shift.

# Emergency Blue Light Phones

CCS offers an emergency communication system on campus identified as Emergency Blue Light Phones. The Emergency Phones comprise an electronic, interactive, voice communication system. This system provides quick, reliable incident response to emergency situations. The units have been prominently deployed throughout the campus. Any member of the CCS community can use them to request services or report suspicious activity or people or crimes in progress. The intercoms have a prominent red button and with the words "Push For Help" also prominently displayed. The placement of these phones alert would-be criminals that the area is well secured. Each Emergency Intercom is tested monthly by CCS Campus Safety.

## Location of Emergency Intercoms

### Ford Campus

- Art Center Building Elevators North 1 & 2
- Art Center Building Elevators South 1 & 2
- Administration Building east entry door
- Art Centre Building Fitness Center 1st Floor
- Fritz Garage Parking Lot Side
- Kresge-Ford Building fire lane north
- Kresge-Ford Building rear of glass shop
- Kresge-Ford Building B side elevator
- Kresge-Ford Building C side elevator
- Manoogian Visual Resource Center Lobby Doors
- Manoogian Visual Resource Center outside rear door
- Manoogian Visual Resource Center elevator
- Parking Deck Elevator
- Parking Deck 1st level Elevator area
- Parking Deck 1st level north stairwell
- Parking Deck 2nd level Elevator area
- Parking Deck 2nd level south stairwell
- Parking Deck 2nd level north stairwell
- Parking Deck 3rd level Elevator area
- Parking Deck 3rd level south stairwell
- Parking Deck 3rd level north stairwell
- Parking Deck 4th level Elevator area
- Parking Deck 4th level south stairwell
- Parking Deck 4th level north stairwell
- Walter B. Ford II Building north emergency door
- Walter B. Ford II Building elevator 1 & 2
- Yamasaki Building inside rear gate area
- Yamasaki Building elevator

### Taubman Center

- A Elevator Cabs 1,2 & 3
- B Elevator Cabs 1,2 & 3
- C Elevator Cabs 1,2 & 3
- Fitness Center 8th Floor East Side Kitchen Elevator
- Freight Elevator
- Underground parking, Rollup Door
- Underground Parking, near G stairwell
- Underground Parking, Northwest Wall
- Underground Parking, near E stairwell
- Parking Deck 1st level Elevator Lobby
- Parking Deck 2nd level Elevator Lobby
- Parking Deck 2nd level west stairwell
- Parking Deck 3rd level Elevator Lobby
- Parking Deck 3rd level west stairwell



Parking Deck 4th level Elevator Lobby  
Parking Deck 4th level west stairwell  
Parking Deck 5th level Elevator Lobby  
Parking Deck 5th level west stairwell  
Parking Deck 6th level Elevator Lobby  
Parking Deck 6th level west stairwell  
Parking Deck Elevator Cab 1 & 2  
Woodward Lot, Northwest Corner  
South Entrance Intercom  
West Entrance Intercom  
Northwest Entrance Intercom  
East Entrance Intercom  
Loading Dock Intercom  
D Stairwell 6th Floor Intercom  
D Stairwell 7th Floor Intercom  
D Stairwell 9th Floor Intercom  
Woodward Lot, Entrance Intercom  
Woodward Lot, Exit Intercom  
Underground Parking Entrance Intercom  
Underground Parking, Exit Intercom

## **Operation of Emergency Intercoms**

In the event of an emergency, the Emergency Intercoms can be activated with a single touch of the red button labeled “Push for Help.” The Emergency Intercom will immediately and automatically dial the Campus Safety Office. Once communication is established, the dispatcher can identify the specific emergency phone being activated and will immediately dispatch an officer for assistance. Campus Safety & Security tests these intercoms quarterly.

## **Automated External Defibrillators (AED) & Control the Bleed Kits**

CCS has several Automated External Defibrillators (AED) and Control the Bleed Kits in the following locations:

### **Ford Campus**

Admissions and Administration Building - 2nd floor copier room  
Art Center Building - Security Front Desk  
Fritz Building - 1st floor copier room  
Kresge-Ford Building - Outside Campus Safety Office  
Kresge-Ford Building – 2nd floor outside computer lab  
Manoogian Visual Resource Center - 1st floor Atrium near library  
Walter B. Ford II Building - 1st floor kitchen  
Yamasaki Building - 1st floor kitchen

### **Taubman Center**

1st floor - Campus Safety Office  
6th floor – Hub (near the A Elevators)  
7th floor – Hub (near the A Elevators)  
8th floor – Hub (near the A Elevators)  
9th floor – Hub (near the A Elevators)  
10th floor – Hub (near the A Elevators)  
11th floor – Hub (near the A Elevators)

## Off-Campus Assistance

If you are experiencing an emergency off campus, call 911 and ask for local agencies to respond. After calling 911 please contact CCS Campus Safety at 313-664-7444 or 313-664-1444 to let us know about your situation (or ask the local agency officials who are assisting you to contact Campus Safety at CCS).

## Reporting Criminal and Other Serious Incidents

Should a member of the CCS community observe or suspect criminal or suspicious activity, we ask that this information be promptly reported to Campus Safety office located on the first floor of the Taubman Center or the first floor of the Kresge Ford Building on the Ford Campus. Our officers can accept reports in person or by telephone.

Campus Safety's phone number for routine calls is 313-664-7444 on the Ford Campus and 313-664-1444 at the Taubman Center. Both lines are in operation 24 hours a day, seven days a week. Campus Safety Officers are non-sworn officers and have no powers of arrest. They may investigate incidents and detain individuals until the arrival of police. Victims or witnesses may report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics by informing Campus Safety that you wish this information to remain confidential.

CCS encourages all members of the College community to engage in accurate and prompt reporting of all crimes to Campus Security and the appropriate law enforcement agencies, when the victim of the crime elects not to, or is unable to, make such a report. Prompt reporting is important as it facilitates immediate investigation and the preservation of evidence. Reports may form the basis of criminal charges (violations of state or federal law) and/or college discipline cases (violations of the Code of Student Conduct).

Complainants may also file criminal reports directly with the Wayne State Police Department at 313-577-2222 or the Detroit Police Department at 313-224-1212. Complainants wishing to file a criminal report with the Wayne State or Detroit Police Departments may request assistance with initial procedures from CCS Campus Safety. Once a criminal report is filed with the Wayne State or Detroit Police, the decision to prosecute is made at the discretion of the Wayne County Prosecutor's Office. The Wayne County Prosecutor's Office is also responsible for providing follow-up communication with the complainant.

## Campus Security Authorities

Campus Security Authorities include officials whose functions involve relationships with students. If someone has significant responsibility for student and campus activities, he or she is a Campus Security Authority.

The following are defined by the Jeanne Clery Act as Campus Security Authorities:

- Office of Campus Safety & Security personnel.
- Other Individuals with responsibility for campus security but are not Office of Campus Safety & Security personnel, i.e., those responsible for monitoring entrance into institutional property, such as parking enforcement staff, event security staff and patrol staff.
- Officials who have significant responsibility for student and campus activities, included but not limited to those involved in student housing, student discipline and campus judicial proceedings, students who serve as judicial affairs officials, officials who oversee student extracurricular activities, faculty advisors and those who oversee student programs.
- Individuals Designated by CCS—Any individual or organization specified in an institution's statement of campus security policy as one to which students and employees should report criminal offenses. CCS-designated Campus Security Authorities include:
  - Campus Safety Directors, and Officers
  - Asst. Vice President of Campus Life
  - Residence Life Staff

- Resident Assistants (RA)
  - Student Engagement Staff
  - Institutional Equity and Inclusion Staff – including Title IX Coordinator
  - Academic Advisors
  - Human Resource Staff
  - Faculty and Staff who act as advisors to student organizations
- Campus Security Authorities are required to complete an online training module each year prior to the start of the academic year.
  - CCS Personal Counseling staff maintain a high level of confidentiality in all areas of their work with students. If a student provides a member of the Counseling staff with information regarding being a victim of a crime, confidentiality will be maintained with the exception of limited situations as outlined below:
    - The crime includes information that would be indicative of the student's plan to harm either themselves or another person
    - First-hand information regarding the abuse of a child or incapacitated person
    - Under Michigan Mental Health Law, counselors are obligated to directly report this information to the appropriate authority.
  - Campus Security Authorities will document all reports of a student being a victim of a crime by completing the [Incident Reporting Form](#) and this form will be routed to the appropriate campus administrator. Depending on the nature of the crime, the Campus Security Authority may also contact 911 or Wayne State Police.

## Maintenance and Security of Campus Grounds and Facilities

The College maintains a strong commitment to campus safety and security. Exterior lighting is an important part of this commitment. Campus Safety conducts periodic lighting surveys. Parking areas, walkways, and building exteriors are lighted. Members of the campus community are encouraged to report any exterior lights that need replacement. The Facilities Department maintains campus buildings and grounds. Needed repairs may be reported directly to the Facilities Department at 313-664-7408. After business hours, please report important or emergency maintenance needs to Campus Safety Dispatch at 313-664-7444 or 313-664-1444.

## Card Access to Campus Facilities

CCS's SmART Card for academic and residential buildings is intended to provide greater security and access control throughout the campus. Students, faculty and staff are required to present a CCS identification card directly in front of a proximity reader or, during regular business hours, must show the identification card to Campus Safety personnel upon request. Authorized cardholders will be granted access. Proximity readers can detect when a reader-controlled door is forced or held open. If a door is forced or held open for too long, it will alert Campus Safety. Card access falls under the umbrella of Campus Safety and is subject to the rules and regulations of Campus Safety relative to access privileges.

The CCS campus is designed to serve the needs of the CCS community, and several areas of the campus are open to the public as well. These areas include the CCS galleries, the CCS Bookstore, and certain dining facilities among other locations. The Conference Center located on the 11th floor of the Taubman Center is often used as a public venue, in which case a member of the safety staff is stationed in the lobby to monitor entry and exit by members of the public.

Building security is the responsibility of the entire community; please do not treat it lightly. If you observe a door that is propped open, close it and advise the Campus Safety Dispatch Office at 313-664-7444 (or 1444). If you are issued keys, be aware of the responsibility that comes with them. A missing key could be used by anyone at any time. CCS residence halls and campus buildings are accessible with a CCS ID card. If your CCS ID card is lost or stolen, please report it to Campus Safety immediately. Your missing card will need to be deactivated to prevent someone who finds it from gaining unauthorized access to CCS buildings. Campus Safety will issue you a new card to replace your lost or stolen card.

# Emergency Notification

Upon confirmation that a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees is occurring on campus or on nearby city streets, CCS will provide notification to the campus community. Any such notification will be provided by the following methods:

- The College for Creative Studies uses an electronic emergency notification system called Everbridge. This system has the capability of sending electronic emergency notices regarding severe weather, school closings and emergency situations to all students, staff, and faculty via their CCS email account and cell phone that is automatically included in the alert system. CCS will automatically create accounts for all students, staff, and faculty in the Everbridge system using their campus email address and cell phone number if available in the College's records. Students, staff, and faculty will be sent an invitation to edit their profile once created to add additional cell phone numbers or change their email address. The College encourages all community members to ensure the accuracy of the cell phone number in their [profile](#). In the event of an emergency situation on campus, the message will include the location of the emergency and instructions on what action to take.
  - All students, faculty and staff are urged to provide current personal cell phone so that we can contact you as quickly as possible in the event of an actual emergency. Cell phone numbers are especially important as these devices provide the fastest and most effective way for users to receive information. Your personal cell phone number will only be used for emergency notification purposes. While your profile is automatically created, it is important that you update your [profile](#) information to keep the most current forms of contact for the alert system.
- CCS's website—when it is deemed necessary, the College will also utilize the website's home page to inform and update community members about an emergency occurring on campus. The web alert will contain information about the nature of the emergency and the steps being taken to address the situation.

## Timely Warnings Reports (Safety Alerts)

Campus Safety and/or the Asst. Vice President of Campus Life is responsible for issuing timely warnings in compliance with the Clery Act.

These warnings alert students, faculty and staff to crimes that may present an ongoing threat to the campus community. CCS issues timely warnings in a manner that is timely and that withholds as confidential the names and other identifying information of victims and that will aid in the prevention of similar crimes. CCS will issue timely warnings to the campus community on crimes that are:

1. Crimes required to be reported to the U.S. Department of Education and disclosed in this annual security report,
2. Reported to Campus Security Authorities, and
3. Considered by CCS to represent a threat to students and employees.

Whether or not a situation represents a threat that requires a timely warning will be decided on a case-by-case basis considering the facts surrounding an incident, such as the nature of the crime, the continuing threat to the campus community and the possible risk of compromising law enforcement efforts. Timely warnings are issued to students, faculty and staff via a campus-wide email and/or the Everbridge Emergency Notification System.

Information included in a timely warning may include:

- A succinct statement of the incident.
- Possible connection to previous incidents, if applicable.
- Physical description of the suspect.
- Date and time and general location where the incident occurred.
- Other relevant crime prevention tips and information

If a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees is occurring on campus, CCS is required to follow its emergency notification procedures. If CCS follows its emergency notification procedures, it is not required also to issue a "timely warning" based on the same circumstances; however, CCS will provide adequate follow-up information to the campus community as needed.

# Wayne State University Police and Emergency Notifications/Timely Warnings

The CCS Ford Campus and Taubman Center are located within the Wayne State University Police boundaries and as a result, the CCS Campus Safety team receives all emergency notifications and timely warnings from the Wayne State Police Alert System. If applicable, these warnings are rebroadcast to the CCS community via the Everbridge system.

In addition, CCS has given the Wayne State University Police Department access to the 365 cameras on both campuses in the event of an emergency, special events, traffic, criminal activity, or any other situation that may be warranted.

## Behavioral Intervention Team (BIT)

Concerns acted on by the Behavioral Intervention Team (BIT) are considered crisis situations that require immediate intervention and action. Situations requiring a response from the BIT team may include imminent threats of suicide or violence, emotional or mental health crisis, or similar situations that require immediate and intense intervention by campus personnel.

The BIT members include the Asst. Vice President of Campus Life, Dean of Undergraduate Studies, Assistant Dean of Students, Campus Safety & Security Directors, and the Director of Wellness and Counseling Services, and additional staff as necessary due to the nature of the situation.

To raise a concern with BIT, contact either the Assistant Dean of Students, at 313-664-7678 or rharrison@ccsdetroit.edu or Director of Wellness and Counseling Services, Val Weiss at 313-664-7852 or vweiss@ccsdetroit.edu.

## Emergency Response and Crisis Management Plan

It is the policy of the College for Creative Studies (CCS) to be prepared for and respond to any emergency in accordance with federal, state and local laws; and to ensure the protection of its students and personnel, the general public, college property, assets and the environment.

In the event of a crisis situation, the College for Creative Studies' primary concern is to bring the situation under control as quickly as possible in order to reduce or eliminate injury to the students, staff, faculty and general public and to return the College to normal operations.

### Operational Emergencies

An emergency may be the result of a significant fire or explosion, a natural disaster such as a tornado, earthquake or flood, man-made disasters, criminal act, or a terrorist attack.

An emergency is defined as any incident that:

- has caused or has the potential to cause serious injury or death
- presents danger to the health and safety of the public
- has caused or has the potential to cause significant property damage
- has caused or has the potential to cause significant harm to the environment

## Operational Emergency Classifications/Levels

Emergencies, which occur during daily operations, frequently demand immediate and decisive action. For catastrophic events, the [Emergency Response and Crisis Management Plan](#) may require the activation of the Crisis Management Team.

Three emergency response levels have been defined to assist with crisis management:

**Level 1:** The emergency can be managed using internal College resources and response operations.

**Level 2:** The emergency requires limited outside assistance to manage or assist with managing the incident. Required assistance may include, but not be limited to, police, fire, or EMS services.

**Level 3:** The emergency cannot be managed using normal College Resources and requires activation of the Crisis Management Team.

Any member of the CCS community who becomes aware of a possible or actual emergency should notify the Office of Campus Safety & Security. The primary responsibility for monitoring emergency threats and events resides within the Office of Campus Safety & Security. The office operates on a continuous 24/7/365 basis and is always available to receive emergency communications from a variety of official and public sources.

## Emergency Numbers

Immediate help - Dial 911

Anyone with knowledge of an emergency should contact: CCS Office of Campus Safety & Security ext. 7444 (Ford campus) or ext. 1444 (Taubman Center) from any College phone and 313-664-7444 Or 313-664-1444 (from off campus)

Facilities ext. 7408 (from any College phone) 313-664-7408 (from off campus)

Main CCS Phone 313-664-7400 – This number will have a recording of up-to-date information during any emergency

## Crisis Management Team

If an emergency escalates into a situation which exceeds the capacity of existing college resources, or is of such proportion that personal injury, significant damage or loss of life is encountered; the Crisis Management Team may be activated by the President of the College, or his designee, to manage the situation.

Every emergency requires preparedness and appropriate response. The Crisis Management Team (CMT) is designed to ensure that:

- The College for Creative Studies is prepared to respond to, and manage, a wide variety of crisis situations.
- A defined crisis management structure is in place with clearly assigned roles and responsibilities.
- Actions are outlined to ensure prompt and accurate communication both internally and externally with the community, the media, and outside agencies.
- Effective procedures and processes are in place to enable and facilitate resumption of regular services as soon as possible

## Scope of Crisis Management Team

The scope and leadership of the Crisis Management Team will provide the College for Creative Studies with the ability to assess, respond to, and provide support for critical incidents in a rapid and effective manner.

While most incidents will not escalate to a crisis situation, every incident has the potential to become a crisis. The [Emergency Response and Crisis Management Plan](#) is designed to cover primarily incidents of a physical nature including, but not limited to:

- Fatality involving an employee, student, or contractor
- Multiple injuries resulting from the same incident
- Uncontrolled fire or explosion
- Natural disaster; incidents that involve or potentially endanger the local community, or are highly visible to the news media

The College for Creative Studies' overall emergency and crisis management structure is designed to reflect three primary activities which must be performed in response to an incident, which has the potential to result in a crisis. These activities are:

- On-site and immediate management of the emergency
- Business continuity requirements
- Management of the incident's impact and/or consequences (mitigation)

## Crisis Management Team Members

The Crisis Management Team (CMT) is activated and directed by the President of the College, Donald L. Tuski, PhD along with the following list of administrators. If President Tuski is unavailable, Tim Flattery, the Chief Academic Officer will activate and direct the team.

- Don Tuski, President
- Amanda Gillette, Director Campus Safety & Security – Ford Campus
- Dena Ryniak, Director Campus Safety & Security – Taubman Center
- Olga Stella, Vice President of Strategy and Communications
- Dan Long, Asst. Vice President of Campus Life



- Raquel Diroff, Chief Human Resources Officer
- Greg Fraser, Chief Information Technology Officer
- Carla Gonzalez, Dean of Enrollment
- Tim Flattery, Provost/Vice President of Academic Affairs/Chief Academic Officer
- Tracy Muscat, Vice President of Institutional Advancement
- Kerri McKay, Vice President of Finance
- Val Weiss, Director Wellness Center

All critical decisions concerning the incident, safety, and business continuity will be made by the President of the College, or his designee, in consultation with the CMT.

## Notification Procedures for Emergency Situations

The President of the College, or his designee, will be notified by the Asst. Vice President of Campus Life, Director of Campus Safety & Security, or the on-duty security supervisor of any emergency that may require activating the Crisis Management Team. The President of the College or his designee will determine, if necessary, to activate the Crisis Management Team. During normal college business hours (7:00 am – 6:00 pm EST) the Director of Campus Safety & Security will respond directly to the scene to assess the situation and determine the proper corrective action and notifications.

If the emergency occurs after normal college business hours, the Campus Safety & Security department's on-duty supervisor will respond directly to the scene to evaluate the situation and determine appropriate action. After stabilizing the situation, the on-duty security supervisor will immediately notify the Director of Campus Safety & Security for further direction and notifications.

If an operational emergency escalates into a situation that exceeds available staff resources (e.g. a natural disaster), or results in serious injury or death, the President of the College, or his designee, has the option of activating the Crisis Management Team to help manage the incident, mitigate losses, save lives, and to facilitate resumption of normal business activities and institutional continuity. These emergency situations require immediate decisions and action. Case by case circumstances will dictate any immediate decisions and action. The President of the College or the Director of Campus Safety & Security, or their designee, will make immediate decisions based on circumstances. The objective is to communicate an emergency message through Alert Emergency Notification System within ten (10) minutes.

## Emergency Evacuation Procedures

Not all emergencies require the evacuation of a building. In the event of a building evacuation, persons are to follow the emergency evacuation routes posted throughout the buildings. The Campus Safety & Security Department will provide assistance to all occupants evacuating a building and special attention will be given to any person who is physically challenged. Persons being evacuated from a building will be directed to an alternate site on campus away from the hazard.

Authority to evacuate a building will be made by the following individuals in the priority indicated:

1. Donald L. Tuski, PhD President of the College, or his designee
2. Wayne State University Police Department, Detroit Police/Fire Departments

The Asst. Vice President of Campus Life, Director of Campus Safety & Security, or the on-duty Security Supervisor, will communicate building evacuations and where to report using Alert Emergency Notification System to designated Alert Emergency Notification System personnel and security and facility staff.

The entire [Emergency Response and Crisis Management Plan](https://campus.collegeforcreativestudies.edu/policy/emergency-response-and-crisis-management-plan/) is available in the CCS Policy Database at the following link:

## Security Awareness and Crime Prevention

Campus Safety & Security provides security awareness programs designed to inform students and employees about campus security procedures and practices and to encourage students and employees to be responsible for their own security of others. Programs designed to inform students and employees about the prevention of crimes include orientation, where students and employees are informed of campus security programs offered by Campus Safety & Security. The Campus Safety & Security website provides additional crime prevention suggestions.

A common theme of all awareness and crime prevention programs is to encourage students and employees to be aware of their responsibility for their own security and the security of others. Information is also presented to students and employees through crime prevention awareness packets, security alert posters and emergency response plans.

## **Sexual Misconduct Prevention Strategies**

Each year the College utilizes the following strategies to help prevent incidences of sexual misconduct. At New Student Orientation, which occurs in the Fall and Winter semesters, students attend a presentation on the prevention of sexual assault and sexual harassment in addition to information on reporting procedures and bystander intervention as well as complete an asynchronous pre-orientation educational module on this topic. The College's Office of Institutional Equity & Inclusion, under the guidance of the Title IX Coordinator conducts this presentation. In addition, sexual assault awareness and prevention strategies are provided during the Meet & Eat event during Welcome Week.

New students are required to complete Sexual Assault Awareness and Prevention training through Canvas instructional portal. In addition, awareness and prevention strategies are provided during Peacock Palooza, an event at the beginning of the fall semester for all students.

The Student Activities Board in collaboration with the Title IX Coordinator offer programming for students during Sexual Assault Awareness Month in April.

Resident Assistant staff is trained in Bystander Intervention as a way to provide additional support to the student population and to also prepare them for resident programming during the year. Educational programming is provided at a minimum of once a semester through the Student Engagement Office (targeting all students) and through staff in the Department of Residence Life (targeting students living on campus). The effectiveness of these interventions are assessed by the Title IX Coordinator and will be modified based on trends observed by the Coordinator. All students are emailed a copy of the Title IX Policy at the start of each Fall semester and students enrolling for the first time in the Winter semester are emailed a copy of the policy at the start of the Winter semester.

The College's Title IX Coordinator conducts a Sexual Misconduct Prevention training module asynchronously. All employees are required to participate in the online training. The training module software will record which employees have viewed the information. As new employees are hired, they will be required to participate in the Sexual Misconduct Prevention training as part of their orientation process.

The Title IX Coordinator provides Title IX training for the Precollege Summer Experience Mentors prior to the start of this summer residential program for high school students. In addition, all Precollege Summer Experience teachers receive mandatory Title IX training.

## **Drug and Alcohol Abuse Prevention Strategies**

The College utilizes the following strategies to help prevent incidences of drug and/or alcohol abuse. The College is a drug free and alcohol-free campus, which is seen as a primary prevention strategy. The only exception to this Policy is that individuals of legal age may consume alcohol on College property in a manner consistent with College policy and State of Michigan law within the approved designated area of events coordinated by or approved by the President of the College.

Educational programming is provided at a minimum of once a semester through staff in the Department of Residence Life targeting all students living on campus; however, this programming is available to all students. The effectiveness of these interventions are assessed by a committee of student services personnel annually and will be modified or added to based on trends observed.

All current and prospective students and employees are given information on the College's Alcohol and Other Drug Policy for Students, Faculty, and Staff. This policy includes prevention strategies and available assistance. New students receive additional educational materials, an explanation of the Drug and Alcohol policy, and substance use resources as part of the pre-orientation process.

## **New Student and Family Orientation**

During New Student Orientation, the Campus Safety & Security Directors provide information on the services provided, building access, and current crime statistics. New student orientation is offered each August. Information related to campus safety is prepared by the Campus Safety & Security staff.

## **CPR, Standard First Aid and Stop the Bleed Training**

Each year Resident Assistant staff members, professional staff in Residence Life, and members of the CCS Campus Safety & Security Office either renew or receive their CPR and Automated External Defibrillator usage certified endorsements. The training is provided by a certified independent contractor to train our staff members as a first line of response to students/staff that experience a medical

emergency. The training of our staff is meant to augment existing emergency personnel, not replace the usage of 911 medical emergency services. Other professional staff members in the Student Affairs Office receive similar training as funding is available.

### **Active Shooter Training Course**

This training is designed to teach proactive survival strategies in violent intruder situations to bridge the gap between the moment a violent event begins and the moment that law enforcement arrives. The [Campus Safety page](#) under Campus Offices contains an [Active Shooter training video](#) produced by Wayne State University Police. In addition, CCS Campus Safety & Security will offer a session on Active Shooter Training for faculty, staff, and students.

### **Resident Life Staff Training**

Resident Assistants receive extensive training each year prior to the start of the Fall semester. Training the RA staff is conducted over a two-week period and includes: First Aid/CPR/AED, empathy, fire and emergency response, policy enforcement documentation, diversity, LGBT, conflict mediation, suicide/depression, mental health referral, sexual harassment/assault reporting requirements, community building, and other related topics. RA's are trained to enhance the living community by providing a resource to students whether their needs are related to academics, personal, emotional, or mental health needs.

Starting in the summer 2017 and conducted annually, the Office of Campus Safety & Security trained the RA's on being an Emergency Response Coordinator. They covered their roles as an emergency coordinators, emergency evacuation, emergency notification, fire extinguisher demonstrations, first aid, and emergency stairwell evacuations of handicapped. In addition, the RA's receive training to their role as a Campus Security Authority and the reporting requirements that go along with this role.

### **New Employee Orientation**

Human Resources provides an orientation program for new employees each time an employee is hired. The orientation program educates new employees on a wide range of College policies and procedures, including an overview of the Title IX program, Drug and Alcohol Policy, Weapons Policy, emergency procedures, and the emergency notification system. Each new employee is given provided with a link to the Annual Campus Security and Fire Safety Report.

# Alcohol and Other Drug Policy for Students, Faculty and Staff

(Updated July 2023)

## Introduction

The College for Creative Studies is committed to providing a safe, healthy learning community for all its members. The College recognizes that the improper and excessive use of alcohol and other drugs may interfere with the College's mission by negatively affecting the health and safety of students, faculty and staff. Due to the harm caused by excessive and illegal use of alcohol and other drugs, the College has a vested interest in establishing policies to prohibit unlawful behavior and sanctions to address policy violations by members of the CCS community.

Under the **Drug-Free Workplace Act** and the **Drug-Free Schools and Communities Act**, the College is required to have an alcohol and other drug policy and must distribute this policy annually to all employees and students. This Policy must outline the College's prevention, education and intervention efforts, and consequences that may be applied by both the College and external authorities for policy violations. The law also requires that individuals be notified of possible health risks associated with the use and abuse of alcohol and other drugs, and sources of assistance for problems that may arise as a result of use.

## Scope

This policy applies to all faculty and staff, as well as students enrolled in credit bearing and non-credit bearing courses at CCS, including any and all programs located off site. Guests, on campus or at College events, who are violating a College policy, may be asked to leave campus/the event and their CCS host will be held responsible for their guest's actions.

Students visiting other countries to attend academic programs are reminded that they may be subject to arrest and legal sanctions for alcohol and drug offenses under the laws and regulations of that particular country or institution in addition to the judicial process of the College.

## Definitions

The following terms are defined for the purposes of this policy and are important for purposes of expressing the College's policy on a drug and alcohol-free environment:

**College** refers to the College for Creative Studies.

**College activities** include programs affiliated with the College, including study-abroad programs, and any on-campus or off-campus event or function conducted, approved, sponsored or funded, in whole or in part, by the College or any officially recognized student organization.

**College premises** includes all buildings and land owned, leased, or used by the College (including adjacent streets and sidewalks), and motor vehicles operated by employees, including personal motor vehicles, when used in connection with work performed for or on behalf of the College.

**Controlled Substance** means a controlled substance in schedules I through V of section 202 of the Controlled Substances Act (21 U.S.C. 812), as further defined by regulations at 21 CFR 1300.11 through 1300.15.

**Contract** means a legal instrument reflecting a relationship between the federal government and a recipient whenever the principal purpose of the instrument is the acquisition by purchase, lease, or barter, of property or services for the direct benefit or use of the federal government; or whenever an executive agency determines in a specific instance that the use of a type of procurement contract is appropriate.

**Conviction** means finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the federal or state criminal drug statutes.

**Criminal drug statute** means a federal or non-federal criminal statute involving the manufacture, sale, distribution, dispensation, use, or possession of any controlled substance.

**Drug** For the purpose of this Policy, the term "drug" includes:

- controlled substances, as defined in 21 USC 812, which cannot be legally obtained
- legally obtainable controlled substances which were not legally obtained, including:

- Prescribed drugs when prescription is no longer valid (e.g. use of medication after a course of treatment is completed);
- Prescribed drugs used contrary to the prescription;
- Prescribed drugs issued to another person.

**Federal agency or agency** means any United States executive department, military department, government corporation, government-controlled corporation, or any other establishment in the executive branch, or any independent regulatory agency.

**Guest** means a person who is not a direct member of the College community, such as a student or employee.

**Host** means the person who is responsible for a guest being on campus or at a College event.

**Illicit drug use** means the use, manufacture, sale, distribution, dispensation, or possession of illegal drugs.

**Over the Counter Substances** means items that are available for purchase from retailers that do not need a prescription.

**Prescribed Drug** means any substance prescribed for use by a licensed medical practitioner.

**Student** means an individual registered or enrolled for a credit or non-credit course or program offered by the College.

## CCS Alcohol and Drugs Policy

All members of the CCS community also are governed by laws, regulations and ordinances established by the state and local municipalities and will be held accountable by law enforcement representatives of those entities for any illegal activity. It is the responsibility of all campus members to be aware of these laws.

### Alcohol

Employees, students, and campus guests, regardless of age, are expected to refrain from the possession, consumption or transportation of alcoholic beverages while on any part of the campus or at College-sponsored/supported events, while driving a College vehicle or while otherwise engaged in College business. Possession of an empty container of an alcoholic beverage will be dealt with as though the individual responsible for the empty container consumed the contents.

The only exception to this Policy is that individuals of legal age may consume alcohol on College property in a manner consistent with College policy and State of Michigan law within the approved designated area of events coordinated by the President of the College. To request an exception to this Policy for events not coordinated by the President, approval must be obtained from the employee's Vice President or Dean with final approval given by the President of the College using the Request for Approval to Serve Alcohol at a CCS Sponsored Event form (see link at the end of this paragraph). For all College related events involving alcohol, a licensed, third-party bartender must be present to serve the alcohol and the bartender must refrain from using a tip jar.

[CCS Request Approval to Serve Alcohol – Revised Feb 2020](#)

### Drug/Controlled Substance

Students, CCS employees and guests are prohibited from using, possessing, transferring or selling any illegal drug, controlled substance, or related paraphernalia, including hookahs, while on any part of the campus or at College sponsored/supported events.

Any person taking prescription drugs or over-the-counter medication is personally responsible for ensuring that while taking such drugs or medications, he or she is not a safety risk to themselves and others while on College property, while driving a College or privately owned vehicle, or while otherwise engaged in College business. It is illegal to misuse prescription medication, i.e. continue to use medication when the prescription is no longer valid, use prescribed drugs contrary to the prescription, and give or sell prescribed drugs to another person. Misusing prescription drugs can result in conviction with jail time.

## CCS Alcohol and Other Drug Prevention Strategies

The College uses the following strategies to provide a positive influence on the campus culture regarding alcohol and drug abuse:

- Students, employees and campus guests, regardless of age, are expected to refrain from the possession, consumption or transportation of alcoholic beverages on campus. (see details and exceptions described in the above section)
- Alcohol and drug awareness education is provided to all new students during New Student Orientation
- Providing education and awareness activities
- All student social, extracurricular, and public service options are substance-free
- Prohibiting the marketing and promotion of alcohol and other drugs
- Developing and enforcing campus policies and enforce laws to address high-risk and illegal alcohol and other drug use
- Providing early intervention and referral for treatment

## Health Risks

The use or abuse of alcohol and other drugs increases the risk for a number of health-related and other medical, behavioral and social problems. Below is a general description of the health risks associated with drug use.

**ALCOHOL:** Can cause short-term effects such as loss of concentration and judgment; slowed reflexes; disorientation leading to higher risk of accidents and problem behavior; long-term effects include risk of liver and heart damage, malnutrition, cancer and other illnesses; can be highly addictive to some persons.

**AMPHETAMINES:** Can cause short-term effects such as rushed, careless behavior and pushing beyond your physical capacity, leading to exhaustion; tolerance increases rapidly; long-term effects include physical and psychological dependence and withdrawal can result in depression and suicide; continued high doses can cause heart problems, infections, malnutrition and death.

**CANNABIS:** Can cause short-term effects such as slow reflexes; increase in forgetfulness; alters judgment of space and distance; aggravate pre-existing heart and/or mental health problems; long-term health effects include permanent damage to lungs, reproductive organs and brain function; can interfere with physical, psychological, social development of young users.

**COCAINE:** (crack) Can cause short-term effects such as impaired judgment; increased breathing, heart rate, heart palpitations; anxiety, restlessness, hostility, paranoia, confusion; long-term effects may include damage to respiratory and immune systems; malnutrition, seizures and loss of brain function; highly addictive.

**DESIGNER DRUGS/SYNTHETIC CANNABINOIDS:** (bath salts, K2, spice) Can cause short-term effects such as elevated heart rate, blood pressure and chest pain; hallucinations, seizures, violent behavior and paranoia; may lead to lack of appetite, vomiting and tremor; long-term use may result in kidney/liver failure, increased risk of suicide and death.

**HALLUCINOGENS:** (PCP, LSD, ecstasy, dextromethorphan) Can cause extreme distortions of what is seen and heard; induces sudden changes in behavior, loss of concentration and memory; increases risk of birth defects in user's children; overdose can cause psychosis, convulsions, coma and death. Frequent and long-term use can cause permanent loss of mental function.

**INHALANTS:** (nitrous oxide, amyl nitrite, butyl nitrite, chlorohydrocarbons, hydrocarbons) Can cause short-term effects such as nausea, dizziness, fatigue, slurred speech, hallucinations or delusions; may lead to rapid and irregular heart rhythms, heart failure and death; long-term use may result in loss of feeling, hearing and vision; can result in permanent damage to the brain, heart, lungs, liver and kidneys.

**OPIATES/NARCOTICS:** (heroin, morphine, opium, codeine, oxycodone, china white) Can cause physical and psychological dependence; overdose can cause coma, convulsions, respiratory arrest and death; long-term use leads to malnutrition, infection and hepatitis; sharing needles is a leading cause of the spread of HIV and hepatitis; highly addictive, tolerance increases rapidly.

**SEDATIVES:** Can cause reduced reaction time and confusion; overdose can cause coma, respiratory arrest, convulsions and death; withdrawal can be dangerous; in combination with other controlled substances can quickly cause coma and death; long-term use can produce physical and psychological dependence; tolerance can increase rapidly.

**TOBACCO:** (cigarettes, cigars, chewing tobacco) Can cause diseases of the cardiovascular system, in particular smoking being a major risk factor for a myocardial infarction (heart attack), diseases of the respiratory tract such as Chronic Obstructive Pulmonary Disease (COPD) and emphysema, and cancer, particularly lung cancer and cancers of the larynx and mouth; nicotine is highly addictive.

For an extensive list of health-related risks please visit The National Institute on Drug Abuse: <http://www.drugabuse.gov/>



## **Counseling and Treatment Programs**

### **Students**

All students are encouraged to seek help early if they feel they have a problem with drugs and/or alcohol, and to learn how to assist others with substance abuse problems. With early assistance it is less likely that serious consequences will result from an alcohol or drug problem.

The College offers the following alcohol and drug abuse services:

### **Information and Referral**

All students are eligible to consult with the professional staff of the Wellness Center; personal counselors and/or health care professional, regarding the availability of drug abuse assistance programs. Drug and alcohol abuse counseling and rehabilitation program referrals are made to mutual help organizations, private hospitals, public treatment programs, and private drug treatment practitioners.

### **Individual Counseling**

Individuals are seen on a short-term basis for assistance with drug-related problems. However, it is likely that students will be referred out for alcohol and drug dependence. This service is available to students at no charge.

### **Contact Information**

Personal Counseling – 313-664-7852 or 313-664-7838

College Nurse – 313-664-7982

### **Employees**

Alcohol and drug abuse rehabilitation and assistance programs are available through the College's health benefit program and Ulliance (employee assistance program) with both in-patient and out-patient programs. Employees with alcohol or drug abuse problems are strongly encouraged to participate in these programs. Employees may contact the Office of Human Resources to seek counseling assistance and/or referral to an appropriate outside agency. All communications between employees and CCS or outside agencies are strictly confidential.

### **Contact Information**

Human Resources – 313-664-7652

Ulliance (Employee Assistance Program) – 888-333-6269

Blue Cross Blue Shield of Michigan – 800-637-2227

Blue Care Network – 800-662-6667

### **Community Resources**

Narcotics Anonymous - <http://www.na.org/>

Alcoholics Anonymous - <http://www.aa.org/>

Al-anon - <http://www.al-anon.alateen.org/>

For friends, relatives and domestic partners who are coping with a loved one's alcohol or drug use.

Free Rehab Centers – Detroit - <https://www.freerehabcenters.org/city/mi-detroit>

## **CCS Sanctions**

The use or abuse of alcohol and other drugs also increases the risks for behavioral and social problems such as negative effects on academic work performance; conflicts with co-workers, classmates, family, friends and others; conduct problems resulting in disciplinary action, including loss of employment or dismissal from an academic program; and legal problems resulting in ticketing, fines and imprisonment.

### **Students**

When a student is found responsible for violating the CCS Alcohol and Other Drug Policy, their case will be evaluated and an appropriate sanction will be implemented.

The sanctions described are minimum sanctions and do not limit the disciplinary power of the College in any matter involving Code of Conduct violations.

A **Warning** is a written notification that a particular action is not acceptable.

**Disciplinary Probation** is a formal written notice that a student is in poor judicial standing with the College.

**Loss of College Housing Eligibility** (if applicable) is the termination of a student's admissibility to live in College housing.

**Suspension** is the termination of an individual's status as a student, with the loss of all rights and privileges, for a specific time period.

**Dismissal** is the permanent termination of an individual's status as a student, with the loss of all rights and privileges.

**Community Service Hours** is a required number of hours to be worked in unpaid College or public service within a specific period of time.

**Educational Project** is a project that is focused on educating the student about a particular issue.

## **Employees**

CCS will take appropriate action, up to and including immediate termination, with employees in violation of this policy. Employees are notified that action under this policy may include requiring successful participation in an alcohol or drug rehabilitation or assistance program as a condition of continued employment.

## **External Sanctions**

### **Federal Law**

Violations of laws and ordinances may result in misdemeanor or felony convictions accompanied by the imposition of legal sanctions, which include, but are not limited to, the following:

- Fines as determined under local, state, or federal laws;
- Imprisonment, including up to life imprisonment, for possession or trafficking in drugs such as heroin, cocaine, marijuana and prescription drugs;
- Forfeiture of personal and real property;
- Denial of federal benefits such as grants, contracts and student loans;
- Loss of driving privileges;
- Required attendance at substance abuse education or treatment programs.

A full description of federal sanctions for drug felonies can be found at: <https://www.dea.gov/drug-information/drug-policy>. This section is not intended as legal advice; consult with an attorney regarding your specific legal issues.

### **Michigan Law**

**Alcohol:** Under Michigan law, it is illegal for anyone under the age of 21 to purchase, consume or possess, or have any bodily content of alcohol. A first-time conviction may result in a fine, substance abuse education and treatment, community service and court-ordered drug screenings. There also is a provision for possible imprisonment or probation for a second or subsequent offense. Use of false identification by minors in obtaining alcohol is punishable with a fine, loss of driver's license, probation and community service.

Individuals can be arrested and possibly convicted of Operating While Intoxicated with a blood alcohol concentration (BAC) level at .08 or higher, or the lesser offense of Operating While Visibly Impaired for BAC less than .08. Operating a motor vehicle with a BAC of .17 or higher may subject an individual to a charge of Operating While Intoxicated with a High BAC. All of these drunk driving charges are misdemeanors that carry potential jail time. If a student is under 21, there is a "zero tolerance" law in the state of Michigan and any blood alcohol level of .01 or higher can lead to a minor in possession (MIP) citation as well as being cited for Operating While Intoxicated, if applicable. All of these driving offenses can result in the suspension of driving privileges in the State of Michigan.

**Medical Amnesty as a result of alcohol intoxication:** To better ensure that minors at medical risk as a result of alcohol intoxication will receive prompt and appropriate medical attention, the State of Michigan provides for medical amnesty to remove perceived barriers to calling for or seeking help.

Michigan law continues to prohibit a minor from purchasing, consuming, or possessing, or attempting to purchase, consume, or possess, alcoholic liquor and from having any bodily alcohol content.

The medical amnesty law provides an exemption from prosecution for the following:

- A minor (under the age of 21) who, after consuming alcohol, voluntarily presents themselves to a health facility or agency for treatment or observation, including medical examination and treatment for any condition as a result of sexual assault (as defined in Michigan law).
- Any minor (under the age of 21) who accompanied an individual who, after consuming alcohol, voluntarily presented themselves to a health facility or agency for treatment or observation, including medical examination and treatment for any condition as a result of sexual assault (as defined in Michigan law).
- Any minor (under the age of 21) who initiated contact with law enforcement or emergency medical services personnel for the purpose of obtaining medical assistance in connection with a legitimate health care concern.

**Medical Amnesty as a result of an overdose of any controlled substance, including a prescription drug:** To better ensure that individuals at medical risk as a result of an overdose of any controlled substance, including a prescription drug, will receive prompt and appropriate medical attention, the State of Michigan provides for medical amnesty to remove perceived barriers to calling for or seeking help.

The medical amnesty law provides an exemption from prosecution for the following when the amount of the drug possessed is sufficient only for personal use:

- Any individual who voluntarily seeks medical assistance for themselves as a result of an overdose of any controlled substance, including a prescription drug.
- Any individual who accompanies or procures medical assistance for another individual as a result of an overdose of any controlled substance, including a prescription drug.
- Any individual who as a result of an overdose of any controlled substance, including a prescription drug, is presented for medical assistance by a third party.

The College for Creative Studies maintains the discretion to refer the individual for appropriate educational intervention(s).

**Marijuana:** On November 6, 2018, Michigan voters passed Proposal 18-1, which legalizes possession and use of limited amounts of recreational marijuana by individuals 21 years and older. Neither this new state law, nor the Michigan Medical Marijuana Act, authorize the use or possession of marijuana on any property owned or managed by CCS and by CCS' faculty, staff, or students on any CCS property or during off-campus CCS business or events.

Marijuana possession and use remains illegal under federal law and is categorized as an illicit substance under the Drug-Free Workplace Act of 1988 and the Drug-Free Schools and Communities Act Amendment of 1989. Therefore, even though the State of Michigan has legalized limited amounts of marijuana for recreational or medicinal use for some individuals, the possession, use, storage, and cultivation of marijuana remains prohibited for all faculty, staff and students under CCS policy.

Employees and students who violate CCS policy prohibiting the use or possession of illegal drugs on campus will continue to be subject to disciplinary action.

### **Sanctions for Illegal Use, Possession and/or Delivery of Controlled Substances**

A full description of the State of Michigan sanctions for the controlled substances (Public Health Code Act 368 of 1978) can be found at: [Public Health Code Act 368 of 1978 Part 74 Offenses and Penalties](#). This section is not intended as legal advice; consult with an attorney regarding your specific legal issues.

## **Employee Reporting Requirement**

Under the Drug-Free Workplace Act, in addition to the other requirements of this Policy, the College requires all employees who work in any capacity under a federal grant or contract to notify his or her supervisor or department head in writing of his or her conviction for a violation of any criminal drug statute occurring in the workplace or on work-related activities no later than five (5) calendar days after such conviction. The supervisor or department head will notify the Office of Human Resources.

## **Distribution of Policy**

A copy of this Policy statement will be distributed to all faculty, staff and students annually via email at the beginning of fall and winter semesters. New employees will receive this information from Human Resource when they are hired. Prospective students and employees are made aware of this policy upon their initial connection to the College.

## **Review of the College's Prevention Program and Policy**

Annually, the College shall review its Alcohol and Other Drug Policy and prevention strategies to determine effectiveness and to ensure that the College's disciplinary sanctions are consistently enforced. This annual review will be conducted in May and the minutes from the review are available to students and employees upon request.

## **For More Information**

For more information concerning this Policy, employees should contact the Office of Human Resources at 313-664- 7652 and students should contact the Office of Student Affairs at 313-664-7879.

## **Weapons Policy**

Engaging or participating in unauthorized possession or use of explosives, firearms, dangerous weapons, or other hazardous objects or substances on College premises is expressly prohibited. Weapons, explosives, and other hazardous objects or substances covered by this regulation shall include, but not be limited to, the following:

- all handguns, rifles, and shotguns;
- all longbows, crossbows, and arrows;
- all knives having a blade length of three inches or more that are not solely used for the purpose of creating art or for the preparation and eating of meals;
- all BB guns, pellet guns, air/CO2 guns, blow guns, paint guns, splat balls and altered toy guns;
- all fireworks;
- all explosives, laboratory chemicals, dangerous compounds, gunpowder, firearm ammunition, and flammable petroleum fuels;
- any martial arts weapons, e.g., numb chucks and throwing stars;
- any substance that is considered poisonous:
- any item used as a weapon in the commission of a crime; and
- any operative animal trap or other device that is used to ensnare animals
- any improper use of prop or model weapons in a manner that is intended to threaten, intimidate, or harass.

# Missing Student Policy

(Updated September 2023)

The College for Creative Studies (CCS) takes student safety seriously and has established the following policy if a currently enrolled student living in campus housing is reported missing. This policy is a good faith effort to comply with the Higher Education Opportunity Act (HEOA), 20 USC, § 1092 (j).

A student will be deemed missing when it has been established that they have been absent from the College and have been reported by an individual to be missing for a period of 24 hours or more. Reports of students missing should be directed to the Office of Student Affairs or Campus Safety. After a missing student report has been made, the College will attempt to locate the student. If the student cannot be located, the Confidential Missing Person Contact or the emergency contact person will be notified. If the student is under the age of 18, and not an emancipated individual or they have failed to provide a Confidential Missing Person Contact or emergency contact information, their parent or guardian will be notified. In addition, local law enforcement will be notified that the student is missing within 24 hours of the initial report. Students also have the option to declare a Confidential Missing Person Contact to be used if they are reported missing and can do so through the Office of Student Affairs.

## Student Contact Information

- Residential students are asked to provide two emergency contact names each year as part of their housing application. This information is protected by FERPA and is accessible by the Office of Student Affairs and other appropriate officials in an emergency.
- Students may designate a Confidential Missing Person Contact to notify in a missing person investigation, by visiting the Office of Student Affairs. This information would only be used if the student is deemed to be missing.

## Procedure

Notification:

Anyone who suspects a student may be missing should notify Campus Safety and/or the Asst. Vice President of Campus Life immediately.

The following information will be collected:

- Contact Information and relationship to the missing student
- Name and vital information about the student reported to be out of contact.
- The date, time, and location the missing student was last seen.
- The general routine or habits of the suspected missing student (e.g. – visiting friends who live off-campus, working in a job away from campus) including any recent changes in behavior or demeanor.
- The missing student's cell phone number (if known).

Once a report has been made that a student is missing, Campus Safety and the Asst. Vice President of Campus Life will work together to investigate the situation.

When a student is reported missing the two offices shall:

- Initiate an investigation to determine the validity of the missing person report that may include:
  - Call the student's cell phone number
  - Go to the student's room
  - Talk to the student's Resident Assistant, roommate, and floor mates to see if anyone can confirm the student's whereabouts and/or confirm the date, time, and location the student was last seen.
  - Secure a picture of the student.
  - Call student at any other numbers on record.
  - Send the student an email.
  - Check all possible locations mentioned by reporting parties including, but not limited to: library, residence hall, fitness center, studios, classrooms, and cafeteria.
  - Contact any other known friends to see if student has made contact with them. This could also include social networking sites.
  - Contact instructors regarding recent class attendance/absences and any recent questionable behaviors.
  - Determine if the student has a car and if it is currently parked in the parking structure.

- Have security investigate if the ID has been used since the student was reported missing.
- Contact student's Confidential Missing Person Contact or emergency contact to see if they have been in contact with the student
- Notify the President and Provost.
- Notify the Confidential Missing Person Contact or emergency contact of the missing student within 24 hours of the initial report that the student is missing.
- If the student is under the age of 18, and not an emancipated individual or has failed to provide specific the Confidential Missing Person Contact or emergency contact information, notify the student's guardian or parent as listed in the college's records within 24 hours of the determination that the student is missing.
  
- Notify the Detroit Police Department within 24 hours after determining that the student is missing.

## **Student Notification of this Policy**

The CCS Missing Student Policy will be:

- Posted on the College's website.
- Discussed during the mandatory housing meetings in the beginning of the semester.
- Included in the Housing Information Packet.
- Included in the College's online Student Handbook.
- Sent to all students, faculty, and staff via CCS email in September of each year through the CCS Annual Campus Security and Fire Safety Report and Consumer Information Disclosure.



# Violence Against Women Act (VAWA)

The College's statements, definitions, and policies related to the Violence Against Women Act (VAWA) can be found within the following Prohibited Discrimination, Harassment, and Sexual Misconduct Policy.

## Title IX Policy Prohibiting Sex Discrimination

Updated: August 1, 2024

### INTRODUCTION

#### [Statement Of Nondiscrimination](#)

The College for Creative Studies ("College") does not discriminate and prohibits discrimination against any individual based on any category protected under applicable federal, state, or local laws.

Accordingly, the College does not discriminate, and strictly prohibits unlawful discrimination on the basis of race (including traits historically associated with race, such as hair texture and protected hairstyles), color, religion, creed, national origin, ancestry, sex (including pregnancy, childbirth, or related medical conditions), gender, gender identity or expression, age, sexual orientation, physical or mental disability, citizenship, genetic information or predisposing genetic characteristics, marital status, familial status, domestic violence victim status, caregiver status, military status, including past, current, or prospective service in the uniformed services, height, weight, or any other category or characteristic protected by applicable law. When brought to the attention of the College, sex discrimination will be appropriately addressed by the College according to the procedures below, and discrimination on the basis of any other protected category will be addressed in accordance with the [Anti-Harassment and Discrimination Policy](#) and any collective bargaining agreements.

#### [Title IX of the Education Amendments of 1972](#)

The College does not discriminate in its admissions practices except as permitted by law, in its employment practices, or in its educational programs or activities on the basis of sex. As a recipient of federal financial assistance for education activities, the College is required by Title IX of the Education Amendments of 1972 to ensure that all of its education programs and activities do not discriminate on the basis of sex. Discrimination on the basis of sex includes discrimination on the basis of sex stereotypes, gender identity, gender expression, sexual orientation, and pregnancy or related conditions.

College has obligations under Title IX to provide certain support and modifications to people experiencing pregnancy or related conditions in order to ensure their equal access to College's program or activity. For example, the College must treat pregnancy or related conditions in the same manner and under the same policies as any other temporary medical conditions and must allow voluntary leaves of absence. Students, employees, or applicants should contact the Title IX and Equity Services Coordinator for more information. Employees or applicants may also contact the Office for Human Resources for more information, because additional workplace laws and policies apply.

Pregnancy or related conditions include pregnancy, childbirth, termination of pregnancy, lactation; medical conditions related to pregnancy, childbirth, termination of pregnancy, or lactation; and recovery from pregnancy, childbirth, termination of pregnancy, lactation, or related medical conditions.

The College also prohibits retaliation against any person opposing sex discrimination or participating in any sex discrimination investigation or complaint process, whether internal or external to the institution. Sex-based harassment, sexual assault, dating and domestic violence, and stalking are forms of sex discrimination, which are prohibited under Title IX and by College policy.

#### [Application of Section 504/Americans with Disabilities Act to this Policy](#)

In both practice and policy, College adheres to the requirements of the Americans with Disabilities Act of 1990, as amended 2008 (ADAAA); Sections 504 and 508 of the Rehabilitation Act of 1973, as amended; and all other federal and state laws and regulations prohibiting discrimination on the basis of disability. The College is committed to providing individuals with disabilities equal access and opportunity, and strives in its policies and practices to provide for the full participation of individuals with disabilities in all aspects of College life.

Parties may request reasonable accommodations for disclosed disabilities to the Title IX and Equity Services Coordinator at any point relating to the implementation of this policy, including making a disclosure or report, and initiating a resolution procedure. Accommodations will be granted if they are appropriate and do not fundamentally alter the process. The Title IX and Equity Services Coordinator will not affirmatively provide disability accommodations that have not been specifically requested by the parties, even where the parties may be receiving accommodations in other College programs and activities. With the consent of the impacted student or employee, the Title IX and Equity Services Coordinator will work collaboratively with the [appropriate offices/roles for students and/or employee accommodations] to ensure that approved reasonable accommodations (disability-related) are honored as applicable

throughout any process related to this policy.

### Purpose of this policy

This policy identifies and defines conduct prohibited under this policy and the process that will be used to respond to allegations of Prohibited Conduct.

The College will act on all notices of allegations of sex discrimination or retaliation. It will take necessary measures to end conduct that is in violation of this policy, prevent its recurrence, and remedy its effect on individuals and the community. Within any process related to this policy, the College provides reasonable accommodations to persons with disabilities and reasonable religious accommodations, when that accommodation is consistent with state and federal law.

Situations involving other conduct that may be in violation of other College student or employee conduct policies should be reported to the Assistant Dean of Students for matters involving students, or Human Resources for matters involving faculty or staff. Situations involving other conduct relating to nonaffiliates should be reported to Human Resources.

### TO WHOM THIS POLICY APPLIES

This policy applies to the entire College community, including, but not limited to, students, student organizations, faculty, administrators, and staff, whether on or off campus, and third parties such as guests, visitors, volunteers, invitees, and alumni when they are on campus or participating in College-sponsored activities. This policy may also pertain to instances in which the conduct occurred outside of the campus or College-sponsored activity if the College determines that the off-campus conduct affects a substantial College interest, including access to the educational program or activity, safety and security, compliance with applicable law, and meeting its educational mission. Any member of the campus community, guest, or visitor who acts to deny, deprive, or limit the educational or employment opportunities and/or benefits of any member of the College community on the basis of sex is in violation of this policy.

Members of the College community are expected to provide truthful information in any report, meeting, or proceeding under this policy.

Any respondent who is not a College student, faculty member, or staff member is generally considered a third party. The College's ability to take appropriate corrective action against a third party may be limited and will depend on the nature of the third party's relationship, if any, to the College. When appropriate, the Title IX and Equity Services Coordinator will refer such allegations against third-party respondents to the appropriate office.

The status of a party may impact which resources and remedies are available to them, as described in this policy.

### PROHIBITED BY THIS POLICY

This policy prohibits sex discrimination, including sex-based harassment, and retaliation as defined below. These acts shall also be referred to as Prohibited Conduct under this policy:

#### Discrimination on the Basis of Sex:

Discrimination is defined as treating members of a protected category less favorably because of their actual or perceived membership in that category or as having a policy or practice that adversely impacts the members of one protected category more than others. Discrimination on the basis of sex includes discrimination on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity.

#### Sex-Based Harassment:

A form of sex discrimination and means sexual harassment and other harassment on the basis of sex, including on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity. Sex-Based Harassment includes the following:

- a. Quid pro quo harassment: An employee, agent, or other person authorized by the College to provide an aid, benefit, or service under the College's education program or activity explicitly or impliedly conditioning the provision of such an aid, benefit, or service on a person's participation in unwelcome sexual conduct.
- b. Hostile environment harassment: Unwelcome sex-based conduct that, based on the totality of the circumstances, is subjectively and objectively offensive and is so severe or pervasive that it limits or denies a person's ability to participate in or benefit from the College's education program or activity (i.e., creates a hostile environment). Whether a hostile environment has been created is a fact-specific inquiry that includes consideration of the following:
  - The degree to which the conduct affected the complainant's ability to access the College's education program or activity;
  - The type, frequency, and duration of the conduct;
  - The parties' ages, roles within the College's education program or activity, previous interactions, and other factors about a party that may be relevant to evaluating the effects of the conduct;
  - The location of the conduct and the context in which the conduct occurred; and

- Other sex-based harassment in the College's education program or activity.

#### Sexual Assault:

An offense classified as a forcible or non forcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation. Specifically, this includes:

Rape—The 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.

Fondling—The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental incapacity.

Incest—Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Statutory Rape—Sexual intercourse with a person who is under the statutory age of consent.

#### Dating Violence:

Violence committed by a person:

- Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- Where the existence of such a relationship shall be determined based on a consideration of the following factors:
  - The length of the relationship;
  - The type of relationship; and
  - The frequency of interaction between the persons involved in the relationship.

Emotional and psychological abuse do not constitute violence for the purposes of this definition.

#### Domestic Violence:

Felony or misdemeanor crimes of violence committed by a person who:

- Is a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction of the College, or a person similarly situated to a spouse of the victim;
- Is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
- Shares a child in common with the victim; or
- Commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction.

Emotional and psychological abuse do not constitute violence for the purposes of this definition.

#### Stalking:

Engaging in a course of conduct, on the basis of sex, directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others; or suffer substantial emotional distress.

#### Sexual coercion:

The application of unreasonable pressure, including emotionally or physically manipulative actions or statements, or direct or implied threats, in order to compel the person to engage in sexual activity.

#### Sexual exploitation:

The abuse or exploitation of another person's sexuality without consent, for the perpetrators own advantage or benefit, or for the benefit or advantage of anyone other than the one being exploited. Sexual Exploitation includes, without limitation, causing or attempting to cause the incapacitation of another person in order to gain a sexual advantage over that person; causing the prostitution of another person; electronically recording, photographing, or transmitting intimate or sexual utterances, sounds or images of another person; allowing third parties to observe sexual acts; engaging in voyeurism; distributing intimate or sexual information about another person; and/or knowingly transmitting a sexually transmitted infection, including HIV, to another person.

#### Retaliation:

Retaliation is any materially adverse action taken against an individual because they were involved in the disclosure, reporting, investigation, or resolution of a report of Prohibited Conduct. Retaliation includes threats, intimidation, harassment, coercion,

discrimination, violence, or any other conduct against any person by the College, a student, or an employee or other person authorized by the College to provide aid, benefit, or service under the College's education program or activity, for the purpose of interfering with any right or privilege secured by this policy or by law, including Title IX or its regulations. Adverse action does not include perceived or petty slights, or trivial annoyances.

The prohibition against retaliation applies to any individuals who participate (or refuse to participate) in any manner in an investigation, or hearing, and to any student who refuses to participate in an investigation, proceeding, or hearing.

Retaliation may occur even where there is a finding of "not responsible" under this policy. Good faith actions lawfully pursued in response to a report of Prohibited Conduct are not Retaliation.

## **ACADEMIC FREEDOM**

The College is dedicated to an uncompromising standard of academic excellence and an unwavering commitment to academic freedom, freedom of inquiry, and freedom of expression in the search for truth. This policy and procedures are not intended to inhibit or restrict free expression or exchange of ideas, abridge academic freedom, or prohibit educational content or discussions inside or outside of the classroom that includes germane but controversial or sensitive subject matters protected by academic freedom.

Members of the College community are free to express their views on any academic subject — regardless of whether those viewpoints are provocative or controversial. Before proceeding with or continuing an investigation of any report of harassment or retaliation that involves an individual's speech or other communication, the College will take care to distinguish between protected speech and hostile environment harassment. The Title IX and Equity Services Coordinator will take action as needed to restore or preserve a person's access to the College's education program or activity.

## **TITLE IX AND EQUITY SERVICES COORDINATOR**

The College is committed to promoting a diverse, equitable, and inclusive working and learning environment free from sex discrimination. The Title IX and Equity Services Coordinator is charged with monitoring compliance with Title IX; providing education and training; and coordinating the College's investigation, response, and resolution of all reports of Prohibited Conduct under this policy. The Title IX and Equity Services Coordinator acts with independence and authority and oversees all resolutions under this policy free from bias and conflicts of interest. The Title IX and Equity Services Coordinator is available to meet with any Student, Employee, or other individual to discuss this policy or the accompanying procedures and can be contacted at: [titleix@ccsdetroit.edu](mailto:titleix@ccsdetroit.edu).

### **Delegation of Duties Under This policy**

Obligations in this policy assigned to a particular title, such as the Title IX Coordinator, may be designated as appropriate by the College, including to external professionals.

### **Conflicts of Interest or Bias**

Any individual carrying out any part of this policy shall be free from any actual conflict of interest or demonstrated bias that would impact the handling of a matter. Should the Title IX and Equity Services Coordinator have a conflict of interest, the Title IX and Equity Services Coordinator is to immediately notify the Asst. Vice President of Campus Life and/or Chief Human Resources Officer who will either take, or reassign, the role of the Coordinator for purposes of carrying out the handling and finalization of the matter at issue. Should any investigator, Decisionmaker, or Appeals Officer have a conflict of interest, the investigator, Decisionmaker, or Appeals Officer is to notify the Title IX and Equity Services Coordinator upon discovery of the conflict so that the Title IX and Equity Services Coordinator may reassign the role as appropriate. This policy will note where parties have the opportunity to challenge the participation of any individual implementing this policy based on actual conflict of interest or demonstrated bias.

### **Crime and Incident Disclosure Obligations**

The Clery Act is a federal crime and incident disclosure law. It requires, among other things, that the College report the number of incidents of certain crimes, including some of the Prohibited Conduct in this policy, that occur in particular campus-related locations. The Clery Act also requires the College to issue a warning to the community in certain circumstances.

In the statistical disclosures and warnings to the community, the College will ensure that a complainant's name and other identifying information is not disclosed. The Coordinator will refer information to the Clery Officer when appropriate for a determination about Clery-related actions, such as disclosing crime statistics or sending campus notifications.

## **CONSENSUAL RELATIONSHIP AND CONFLICTS OF INTEREST**

The Faculty Handbook prohibits intimate relationships between a faculty member and a student, whether or not the student is in the faculty member's class or department and whether or not the relationship is consensual; intimate relationships are also prohibited

between teaching assistants and resident advisors and the students over which they have authority. Similarly, Section 3.2 of the Staff Handbook prohibits intimate relationships between a College official and a staff person under their control, as well as intimate relationships between administrative staff and students.

Consensual relationships between a non-supervisory official and a staff person, while not prohibited, must be disclosed to the Human Resources Director so that the Director can take any steps necessary to protect the parties involved and avoid even the appearance of favoritism.

In all circumstances in which intimate relationships are prohibited, there is an exception for preexisting relationships. For example, the prohibition would not apply where a faculty member's spouse or partner enrolls as a student under the College's tuition assistance program.

## **REPORTING SEX DISCRIMINATION, INCLUDING SEX-BASED HARASSMENT**

### **Employee Reporting Obligations**

The College believes it is important to be proactive in taking reasonable steps to identify and prevent incidents of sex discrimination. All employees, with limited exceptions as identified by the College, are required to promptly provide to the Title IX and Equity Services Coordinator all complaints or reports of sex discrimination, including sex-based harassment, to the Title IX and Equity Services Coordinator and share all information reported or made available to the employee. If an employee in a supervisory capacity has direct knowledge of an incident of harassment or discrimination on the part of, or directed toward, any employee of the Title IX and Equity Services Coordinator community, that supervisor is required to bring the matter to the attention of the Title IX Coordinator.

Researchers conducting an IRB-approved human subjects research study designed to gather information about sex discrimination are not required to report to the Title IX and Equity Services Coordinator disclosures made in the course of that study to the Title IX Coordinator.

The College also encourages employees who themselves experience sex discrimination to bring their concerns to the Title IX Coordinator, though they are not required to do so.

When providing this information to the Title IX Coordinator, the employee must include their own name and contact information, and all known details about an incident, which may include, if known, the dates, times, locations, names of involved individuals and the nature of the incident.

Aside from this reporting obligation, employees will, to the fullest extent possible, maintain the privacy of an individual's information, consistent with FERPA.

In addition, certain employees of the College are considered by law to be mandatory reporters of child abuse, elder abuse or abuse of persons with disabilities. The College's employees are required by law to report incidents of abuse to the appropriate Michigan Social Services Departments by calling 855-444-391. A fuller description of the mandatory child abuse reporting obligation and those covered by that obligation can be found at: <https://www.michigan.gov/mdhhs/adult-child-serv/abuse-neglect/childrens/report-process>.

### **Public Awareness Events**

Employees are required to report to the Title IX and Equity Services Coordinator information about sex discrimination they learn about at public awareness events such as awareness events such as "speak-outs". The Title IX Coordinator is not obligated to respond directly to any identified complainant in a report of sex-based harassment disclosed at a public awareness event that takes place on-campus or in a school-sponsored online platform unless there is an imminent and serious threat to someone's health or safety. In circumstances where a person discloses at an event, the Title IX and Equity Services Coordinator will not reach out to the speaker unless they request follow-up.

The Title IX and Equity Services Coordinator must respond to reports of conduct that could constitute sex discrimination other than sex-based harassment if disclosed at public awareness events, wherever they occur. In all cases the College must use the information to inform its efforts to prevent sex-based harassment, including by providing tailored training to address alleged sex-based harassment in a particular part of its education program or activity or at a specific location when information indicates there may be multiple incidents of sex-based harassment.

### **How to Make a Report to the College**

All complaints of violations of this policy will be taken seriously and in good faith. The Title IX and Equity Services Coordinator will provide information and guidance regarding how to file a complaint with the College and/or local law enforcement, as well as information and assistance about what course of action may best support the individual(s) involved and how best to address the complaint.

Every reasonable effort will be made to maintain the privacy of those making a report to the extent possible. In all cases, the College will give consideration to the party bringing forward a report with respect to how the matter is pursued. The College may, when

necessary to protect the community, initiate an investigation or take other responsive actions to a report, even when the person identifying a concern chooses not to participate in a resolution process and/or requests that the College not initiate an investigation.

Employees, students, guests, or visitors who believe that this policy has been violated should promptly contact the Coordinator or another member of the College's staff for assistance:

Jess Ettell Irvine, [titleix@ccsdetroit.edu](mailto:titleix@ccsdetroit.edu)  
Title IX and Equity Services Coordinator  
313.664.7676

#### Additional Resources:

Dan Long, [dlong@ccsdetroit.edu](mailto:dlong@ccsdetroit.edu)  
Asst. Vice President of Campus Life  
313.664.7675

Raquel Diroff, [rdiroff@ccsdetroit.edu](mailto:rdiroff@ccsdetroit.edu)  
Chief Human Resources Officer  
[Office of Human Resources](#)  
[313-664-7651](tel:313-664-7651)

There is no timeline for making a report of sex discrimination, however, the College encourages the prompt reporting of a complaint as the ability of the College to pursue the complaint to conclusion may be hindered by the passage of time.

#### Amnesty

When conducting the investigation, the College's primary focus will be on addressing sexual misconduct and not on other College Policy violations that may be discovered or disclosed. Fear of conduct or disciplinary violations should not be a deterrent for anyone to report an incident of sexual misconduct. Persons reporting sexual misconduct will be granted amnesty from the College disciplinary processes if the College alcohol or other non-violent Policy violations are discovered during a sexual misconduct investigation. This same amnesty will be granted to witnesses asked to participate in the complaint resolution process.

#### Privacy and Confidentiality

The College values the privacy of its students, employees, and other community members. Community members should be able to seek the assistance they need and access this policy without fear that the information they provide will be shared more broadly.

References made to privacy means College offices and employees who cannot guarantee confidentiality, but will maintain privacy to the greatest extent possible, relaying information as necessary to investigate or seek a resolution and to notify the Title IX and Equity Services Coordinator or designee, who is responsible for tracking patterns and spotting systemic issues. The College will limit the disclosure as much as practicable.

All activities under these procedures shall be conducted with the privacy interests of those involved. While the College will take all reasonable steps to protect the privacy of individuals involved in a complaint, it may be necessary to disclose some information to individuals or offices on campus in order to address a complaint or provide for the physical safety of an individual or the campus. Thus, the College cannot, and does not, guarantee that all information related to complaints will be kept confidential.

In order to maintain the privacy of evidence gathered as part of any resolution process, access to materials under the procedures in this policy will be provided only by a secure method and parties and advisors are not permitted to make copies of any documents shared or make use of the documents outside of the processes described in this policy. Parties may request to review a hard copy of materials, and the College will make that available in a supervised or monitored setting. Inappropriately sharing materials provided during this process may constitute retaliation under this policy.

Individuals may speak confidentially with a Confidential Resource. Confidential Resources (e.g., licensed mental health care providers, physicians, clergy) may not report to Title IX Coordinator any identifying information about conduct that may violate the College's policies against sex discrimination without the written consent of the individual who supplied the information, unless required by law. Such disclosures will not be reported to the Title IX and Equity Services Coordinator or initiate any process under this policy.

The College employs two types of employees who are not required to report information about sex discrimination to the Title IX Coordinator:

- Privileged and confidential employees whose communications are privileged or confidential under Federal or State law. The employee must be hired for and functioning within the scope of their duties to which the privilege or confidentiality applies. For example, physicians, clergy, and mental health counselors are all confidential employees. Disclosures made to these employees means that information cannot be disclosed to anyone internal or external to the university without the expressed permission from the individual disclosing the information.



- State law requires professional counselors to report: (i) when a patient is likely to engage in conduct that would result in serious harm to the patient or others; (ii) if there is reasonable cause to suspect that a minor has been sexually abused. Anyone, including a child, who suspects child abuse or neglect, can make a report by calling **855-444-3911**. In addition, the [Child Protection Law](#) requires certain professionals to report suspected child abuse or neglect. Individuals should call 911 if there is an imminent threat.
- Employees designated by the institution as exempt from reporting known sex discrimination to the Title IX Coordinator, and designated as such for the purpose of providing services to the campus community related to sex discrimination. Such employees must be acting in the scope of that role when they learn of the information about sex discrimination for this exemption to apply. For example, the ombudsperson and sexual violence response counselors may be designated as exempt from internal reporting. Disclosures made to these employees means that information will not be shared with the Title IX and Equity Services Coordinator or anyone within the College, but may be released under legal action or court order without the permission of the individual disclosing the information.

## Reporting to the Police

### [Wayne State Police](#)

[313.577.2222](#)

24 Hours

Some Prohibited Conduct may constitute a violation of both the law and College policy. The College encourages students to report alleged crimes promptly to local law enforcement agencies. All persons have the right to file with law enforcement, as well as the right to decline to file with law enforcement. The decision not to file shall not be considered as evidence that there was not a violation of College policy.

Criminal investigations may be useful in the gathering of relevant evidence, particularly forensic evidence. The standards for finding a violation of criminal law are different from the standards for finding a violation of this policy. Conduct may constitute Prohibited Conduct under this policy even if law enforcement agencies lack sufficient evidence of a crime and decline to prosecute.

Proceedings under this policy may be carried out prior to, simultaneously with, or following civil or criminal proceedings off campus. However, when a complaint is made to the College as well as to law enforcement, the College may delay its process if a law enforcement agency requests that the College delay its process for a reasonable amount of time to allow law enforcement to gather evidence of criminal misconduct. Criminal or legal proceedings are separate from the processes in this policy and do not determine whether this policy has been violated.

All investigations and hearings under this policy will be thorough, reliable and impartial, and will seek to collect evidence and names of witnesses to gather information that is directly or substantially relevant to whether the alleged policy violation occurred, and will not be based on the grounds that civil or criminal charges involving the same incident have been filed or that charges have been dismissed or reduced.

In the case of an emergency, where the physical well-being of a member of the College community or the safety of the College as an institution is threatened, any individual with such knowledge should promptly inform the Office of Campus Safety. The College may take any immediate steps as may be necessary and appropriate under the circumstances to ensure the well-being of the College community and the College as an institution.

## ROLE OF ADVISORS

All parties are entitled to an Advisor of their choosing to guide and accompany them throughout the resolution process. The Advisor may be a College employee, friend, mentor, family member, or any other person a party chooses to advise them. A list of College advisors can be provided to parties upon request.

The parties are entitled to be accompanied by their Advisor in all meetings and interviews at which the party is entitled to be present. In some circumstances, the College may meet with a party before they may have established an advisor, but will not require the party to answer questions and/or give a statement unless the party chooses to do so.

All Advisors are subject to the same campus policies and procedures. An advisor is not permitted to engage in the grievance process on a party's behalf or participate directly in any related meeting or proceeding. Advisors may quietly consult with their advisee during a related meeting that does not disrupt or interfere with it. Advisors should request or wait for a break in the proceeding if they want to have a longer or more involved discussion with their advisee or wish to interact with campus administrators.

All parties are expected to be the main source of communication with campus administrators. Advisors may not initiate communication with campus administrators on behalf of their advisee in person or via technology (i.e.: phone and/or email). Campus administrators will not be expected to communicate with the advisor whenever a communication is made to the party and expect each party to take responsibility to share communications with their advisor as appropriate.



Advisors should help their advisee prepare for each meeting, and are expected to advise ethically, with integrity, and in good faith. The College cannot guarantee equal advisory rights, meaning that if one party selects an advisor who is an attorney, but the other party does not, or cannot afford an attorney, the College is not obligated to provide one.

Advisors are expected to refrain from interference with the College investigation and resolution. Any Advisor who steps out of their role in any meeting under the campus resolution process will be warned once. If the Advisor continues to disrupt or otherwise fails to respect the limits of the Advisor's role, the Advisor will be asked to leave the meeting. When an Advisor is removed from a meeting, that meeting will typically end unless the party agrees to participate without their Advisor present. Subsequently, the Title IX and Equity Services Coordinator will determine whether the Advisor may be reinstated or will need to be replaced by a different Advisor.

Advisors are expected to maintain the privacy of the records shared with them by the College. These records may not be shared with third parties, disclosed publicly, or used for purposes not explicitly authorized by the College. The College may seek to restrict the role of any advisor who does not respect the sensitive nature of the process or who fails to abide by the College's privacy expectations.

The College expects an Advisor to adjust their schedule to allow them to attend College meetings when scheduled. The College does not typically change scheduled meetings to accommodate an Advisor's inability to attend. The College will, however, make provisions to allow an Advisor who cannot attend in person to attend a meeting by telephone, video and/or virtual meeting technologies as may be convenient and available.

A party may elect to change Advisors during the process and is not locked into using the same Advisor throughout. The parties must advise the College of the identity of their Advisor at least two (2) business days before the date of their first meeting.

## **SUPPORTIVE MEASURES**

Individualized measures offered as appropriate, as reasonably available, without unreasonably burdening a complainant or respondent, not for punitive or disciplinary reasons, and without fee or charge to the complainant or respondent to:

- Restore or preserve that party's access to the College's education program or activity, including measures that are designed to protect the safety of the parties or the College's educational environment; or
- Provide support during the College's resolution procedures or during an alternative resolution process.

Supportive measures may include but are not limited to: counseling; extensions of deadlines and other course-related adjustments; campus escort services; increased security and monitoring of certain areas of the campus; restrictions on contact applied to one or more parties; leaves of absence; changes in class, work, housing, or extracurricular or any other activity, regardless of whether there is or is not a comparable alternative; no-contact directives (which may be mutual or unilateral at the discretion of the Title IX Coordinator); and training and education programs related to sex-based harassment. Supportive measures are non-disciplinary and non-punitive. Supportive Measures will also be offered to respondents when they are notified of the allegations.

Any Supportive Measures put in place will be kept confidential, except when doing so impairs the ability of the institution to provide the Supportive Measures.

The College will offer and coordinate supportive measures as appropriate for the parties as applicable to restore or preserve their access to the College's program or activity or provide support during the College's alternative resolution process or resolution procedures. Prohibited Conduct under this policy have the right to request supportive measures from the College regardless of whether they desire to make a complaint or seek alternative resolution.

A party may challenge the College's decision to provide, deny, modify, or terminate supportive measures when such measures are applicable to them. An impartial employee will be designated to consider modification or reversal of the College's decision to provide, deny, modify, or terminate supportive measures. When the individual providing Supportive Measures is a Deputy Title IX Coordinator or other individual identified by the Title IX and Equity Services Coordinator to provide Supportive Measures, the Title IX and Equity Services Coordinator will be designated to consider the challenge regarding supportive measures. The impartial employee will typically respond to the challenge within five (5) days.

The Title IX and Equity Services Coordinator has the discretion to implement or modify supportive measures. Violation of the parameters of supportive measures may violate existing codes or handbooks.

## **RESPONDING TO A REPORT**

The following process will be used following the receipt of a report of sex discrimination.

### **Initial Contact**

Following receipt of a report alleging a potential violation of this policy, the Title IX and Equity Services Coordinator will contact the complainant to meet with the Title IX and Equity Services Coordinator for an initial intake and assessment meeting, and will provide the following:

- An invitation to meet to offer assistance and explain their rights, resources, and options under this policy;
- Access to this policy;
- Information regarding available campus and community resources for counseling, health care, mental health, or victim advocacy. Upon request, information regarding legal assistance, visa and immigration assistance, student financial aid and other available services may be provided;
- The availability of Supportive Measures regardless of whether a complaint is filed and/or any resolution is initiated;
- The options for resolution (no action, prevention, agreement, investigation) and how to initiate such resolution processes;
- The right to notify law enforcement as well as the right not to notify law enforcement;
- The importance of preserving evidence and, in the case of potential criminal misconduct, how to get assistance from Campus Safety or local law enforcement in preserving evidence;
- The right to an advisor of choice, if applicable, during College proceedings under this policy including the initial meeting with the Title IX Coordinator
- A statement that retaliation for filing a complaint, or participating in the complaint process, is prohibited.
- Information on how to initiate the Investigation or Resolution-Based Agreement process.

### Initial Intake & Assessment

The Initial Assessment process seeks to gather information about the nature and circumstances of the report to determine whether this policy applies to the report and, if so, which resolution process may be appropriate, as well as which section of the resolution procedures apply based on the conduct and the status of the parties. The Title IX and Equity Services Coordinator may also determine that the provision of supportive measures only is the appropriate response under the policy. The initial assessment is not a finding of fact or responsibility. If the individual bringing forward the complaint is not the actual complainant, the Title IX and Equity Services Coordinator will limit communication to general information on policies and processes.

Should the complainant wish to initiate a resolution process, the Title IX and Equity Services Coordinator will determine whether this policy applies and, if so, the appropriate process under this policy. The Title IX and Equity Services Coordinator will communicate to the complainant this determination.

If the information provided does not suggest a potential violation of this policy, the Title IX and Equity Services Coordinator will provide the complainant written notice that the matter is being referred for handling under a different policy, and/or to another appropriate office for handling.

### Requests for Confidentiality or No Further Action

When a complainant requests that the College not use their name as part of any resolution process, or that the College not take any further action, the College will generally try to honor those requests. However, there are certain instances in which the College has a broader obligation to the community and may need to act against the wishes of the complainant. In such circumstances, the Title IX and Equity Services Coordinator will notify the complainant in writing of the need to take action. The factors the Title IX and Equity Services Coordinator will consider when determining whether to act against the wishes of a complainant include:

1. The complainant's request not to proceed with initiation of a complaint;
2. The complainant's reasonable safety concerns regarding initiation of a complaint;
3. The risk that additional acts of Prohibited Conduct would occur if a complaint is not initiated;
4. The severity of the alleged Prohibited Conduct, including whether the discrimination, if established, would require the removal of a respondent from campus or imposition of another disciplinary sanction to end the discrimination and prevent its recurrence;
5. The age and relationship of the parties, including whether the respondent is an employee of the College;
6. The scope of the alleged discrimination, including information suggesting a pattern, ongoing sex discrimination, or sex discrimination alleged to have impacted multiple individuals;
7. The availability of evidence to assist a Decisionmaker in determining whether sex discrimination occurred; and
8. Whether the College could end the alleged sex discrimination and prevent its recurrence without initiating its resolution procedures under this policy.
9. Whether the conduct as alleged presents an imminent and serious threat to the health or safety of the complainant or other persons, or that the conduct as alleged prevents the College from ensuring equal access on the basis of sex to its education program or activity.

### Interim Actions

#### Emergency Removal

For sex discrimination and sex-based harassment, the College retains the authority to remove a respondent from the College's program or activity on an emergency basis, where the College (1) undertakes an individualized safety and risk analysis, (2) determines that an immediate and serious threat to the health or safety of a complainant or any student, employee, or other individual arising from the

allegations of sex discrimination justifies a removal, and (3) the College provides the respondent with notice of and an opportunity to challenge the decision immediately following the removal.

The respondent may challenge the decision immediately following the removal, by notifying the Title IX and Equity Services Coordinator in writing. The College will designate an impartial individual, not otherwise involved in the case, to consider the challenge to the removal and determine if the emergency removal was reasonable.

For all other Prohibited Conduct, the College may defer to its interim suspension policies for students and administrative leave for employees.

#### Administrative Leave

The College retains the authority to place an employee respondent on administrative leave during a pending complaint process under this policy, with or without pay as appropriate. Administrative leave may be a supportive measure, emergency removal, or consistent with applicable state laws and collective bargaining agreements. Administrative leave implemented as a supportive measure or as emergency removal is subject to the procedural provisions above, including the right to challenge the decision to implement that measure.

#### Dismissal of a Complaint

Before dismissing a complaint, the College will make reasonable efforts to clarify the allegations with the complainant.

The College may dismiss a complaint if:

- The College is unable to identify the respondent after taking reasonable steps to do so;
- The respondent is not participating in the College's education program or activity and is not employed by the College;
- The complainant voluntarily withdraws their complaint in writing and the Title IX and Equity Services Coordinator declines to initiate a complaint.
- The complainant voluntarily withdraws some but not all allegations in a complaint in writing, and the College determines that the conduct that remains alleged in the complaint would not constitute Prohibited Conduct under this policy; or
- The College determines the conduct alleged in the complaint, even if proven, would not constitute Prohibited Conduct under this policy.

Upon dismissal, the College will promptly notify the complainant in writing of the basis for the dismissal. If the dismissal occurs after the respondent has been notified of the allegations, then the College will notify the parties simultaneously in writing. If a dismissal of one or more allegations changes the appropriate decision-making process under these procedures, the Title IX and Equity Services Coordinator will include that information in the notification.

The College will notify the complainant that a dismissal may be appealed on the basis outlined in the Appeals section. If dismissal occurs after the respondent has been notified of the allegations, then the College will also notify the respondent that the dismissal may be appealed on the same bases. If a dismissal is appealed, the College will follow the procedures outlined in the Appeals section of these procedures.

When a complaint is dismissed, the College will, at a minimum:

- Offer supportive measures to the complainant as appropriate;
- If the respondent has been notified of the allegations, offer supportive measures to the respondent as appropriate; and,
- Take other prompt and effective steps, as appropriate, through the Title IX and Equity Services Coordinator to ensure that sex discrimination does not continue or recur within the College education program or activity.

A complainant who decides to withdraw a complaint or any portion of it may later request to reinstate it or refile it.

#### Referrals for Other Misconduct

The College has the discretion to refer complaints of misconduct not covered by this policy for handling under any other applicable College policy or code. As part of any such referral for further handling, the College may use evidence already gathered through any process covered by this policy.

Should there be a conflict between the provision of this policy and other College policies, procedures, rules, regulations, or terms or conditions of employment, the provisions of this policy will govern unless specifically stated otherwise.

This policy and these procedures are separate from the College's student disciplinary processes, by which College may bring a discipline charge against a student for violating College policy according to the provisions found in the College [Code Student of Conduct](#).

## Consolidation of Cases

The College may consolidate complaints under this policy as appropriate: for example, if there are multiple complaints where the allegations of Prohibited Conduct arise out of the same facts or circumstances, or there are multiple complaints with overlapping parties.

The College also reserves the right to use this policy to adjudicate other allegations and conduct charges as defined by policies outside of the scope of this policy in instances when the conduct is associated with an alleged issue of Prohibited Conduct under this policy. The Title IX and Equity Services Coordinator will address these consolidated complaints in collaboration and coordination with other appropriate offices, such as Student Services and Human Resources. Allegations of a violation of a separate policy are not required to be handled using the procedural requirements set forth in this policy.

## Student Withdrawal or Employee Resignation while Matters are Pending

If a student or employee respondent permanently withdraws or resigns from the College with unresolved allegations pending, the College will consider whether and how to proceed with the resolution process. The College will continue to address and remedy any systemic issues or concerns that may have contributed to the alleged violation(s) and any ongoing effects of the alleged Prohibited Conduct.

A student respondent who withdraws or leaves while the process is pending may not return to the College without first resolving any pending matters. Such exclusion applies to all College campuses and programs. Admissions will be notified that the student cannot be readmitted. They may also be barred from College property or events. If a student respondent withdraws or takes a leave for a specified period of time (e.g., one semester or term), the resolution process may continue remotely and that student is not permitted to return to the College unless and until the matter is fully resolved.

An employee respondent who resigns with unresolved allegations pending is not eligible for rehire with the College and the records retained by the Title IX and Equity Services Coordinator will reflect that status. All the College responses to future inquiries regarding employment references for that individual will include that the former employee resigned during a pending disciplinary matter.

An administrative registration hold will be placed on a student's record to prevent course registration prior to resolving the pending matters.

## OPTIONS FOR RESOLUTION

There are multiple ways to resolve a complaint or report of sex discrimination. Whenever possible, the College will utilize the resolution method chosen by the complainant. During the resolution of a complaint, the Title IX and Equity Services Coordinator will determine whether to implement reasonable supportive measures designed to assist all parties (complainants and respondents) and community members in maintaining access to and participation in College programs, services and activities during the resolution of the complaint.

This section includes information on Support-Based Resolution, Agreement-Based, and Investigation or investigation and Hearing procedures.

### Support- Based Resolution

A support-based resolution is an option for a complainant who does not wish the College to take any further steps to address their concern, and when the Title IX and Equity Services Coordinator determines that another form of resolution, or further action, is not required. Some types of support that may be appropriate include: adjustments or changes to class schedules; moving from one residence hall room to another; adjusted deadlines for projects or assignments; adjustments to work schedule or arrangements; escorts to and around campus; or counseling.

A support-based resolution does not preclude later use of another form of resolution, for example if new information becomes available to the College and the Title IX and Equity Services Coordinator determines there is need for additional steps to be taken, or the complainant later decides to pursue a Resolution Agreement or investigation, or investigation and hearing.

### Agreement-Based Resolution

Agreement-Based Resolution is an alternative to the investigation and decision-making procedures where the Parties each voluntarily agree to resolve the complaint in a way that does not include an investigation and does not include any finding of responsibility. Agreement-Based Resolution is a voluntary, structured interaction between or among affected parties that balances support and accountability. If the College offers Agreement-Based Resolution to the parties, and they voluntarily consent to engage in that process, the Title IX and Equity Services Coordinator must still take other prompt and effective steps as needed to ensure that sex discrimination does not continue or recur within the education program or activity.

Any party may design the proposed agreement between the parties. The Title IX and Equity Services Coordinator must approve of the use of the Agreement-Based Resolution process, and approve the final agreement between the parties. Agreement-Based Resolution

may be initiated at any time prior to the release of the final determination. Because Agreement-Based Resolution does not involve an investigation, there is not any determination made as to whether a respondent violated this policy.

The Title IX and Equity Services Coordinator has the discretion to determine that Agreement-Based Resolution is not an appropriate way to address the reported conduct, and that the matter must instead be resolved through the Investigation or Investigation and Hearing process.

### Initiating the Agreement-Based Resolution Process

Prior to the initiation of Agreement-Based Resolution, the Title IX and Equity Services Coordinator will provide the Parties written notice that includes:

- The specific allegation and the specific conduct that is alleged to have occurred;
- The requirements of the Agreement-Based Resolution process;
- Any consequences resulting from participating in the Agreement-Based Resolution process, including the records that will be maintained or could be shared, and whether the College could disclose such information for use in a future College resolution process, including an investigation and resolution process arising from the same or different allegations, as may be appropriate.
- Notice that an agreement resulting from the Agreement-Based Resolution process is binding only on the parties and is not subject to appeal.
- Notice that once the Agreement is finalized and signed by the Parties, they cannot initiate or continue an investigation procedure arising from the same allegations.
- A statement indicating that the decision to participate in the Agreement-Based Resolution process does not presume that the conduct at issue has occurred.
- A statement that the respondent is presumed not responsible for violating this policy, unless respondent admits to violations of this policy;
- An explanation that all parties may be accompanied by an advisor of their choice, who may be a parent, colleague, friend, or attorney;
- A statement that any party has the right to withdraw from the Agreement-Based Resolution process and initiate or resume resolution procedures at any time before agreeing to a resolution;
- The date and time of the initial meeting with staff or the Title IX Coordinator, with a minimum of 3 days' notice;
- Information regarding Supportive Measures, which are available equally to the parties; and
- The potential terms that may be requested or offered in an Agreement-Based Resolution agreement.

### Facilitating an Agreement

If all Parties are willing to explore Agreement-Based Resolution, the Title IX and Equity Services Coordinator will then meet separately with each party to discuss the Agreement-Based Resolution process and facilitate an agreement. If an agreement cannot be reached, either because the Parties do not agree, determine they no longer wish to participate in the Agreement-Based Resolution process, or the Title IX and Equity Services Coordinator does not believe that the terms of the agreement or continuing the Agreement-Based Resolution process is appropriate, the Title IX and Equity Services Coordinator may decide that the reported conduct will instead be addressed through the investigation or investigation and hearing process. The Title IX and Equity Services Coordinator will inform the parties of such a decision, in writing.

Agreement-Based Resolution processes are managed by facilitators who do not have a conflict of interest or bias in favor of or against complainants or respondents generally or regarding the specific parties in the matter. The Title IX and Equity Services Coordinator may serve as the facilitator, subject to these restrictions. The investigator or Decisionmaker for the matter may not facilitate an Agreement-Based Resolution in that same matter.

Any party may craft or create the terms of their agreement and will be asked for their suggestions or ideas. Examples of agreements may include but are not limited to:

- an agreement that the respondent will change classes or housing assignments;
- an agreement that the Parties will not communicate or otherwise engage with one another;
- an agreement that the Parties will not contact one another;
- completion of a training or educational project by the respondent;
- completion of a community service project by the respondent;
- an agreement to engage in a restorative justice process or facilitated dialogue; and/or
- discipline agreed upon by all parties.

In order to facilitate Agreement-Based Resolution, information shared by any party will not be used in any related resolution process of the same complaint under this policy. No evidence concerning the allegations obtained within the Agreement-Based Resolution process may be disseminated to any outside person, provided that any party to the Agreement-Based Resolution process may generally discuss the allegations under investigation with a parent, advisor, or other source of emotional support, or with an advocacy

organization. An admission of responsibility made during an Agreement-Based Resolution process, however, may not be incorporated into the investigation and adjudication proceeding.

#### Finalizing the Resolution Agreement

Once the final terms of the Resolution Agreement have been agreed upon by all parties, in writing, and approved by the Title IX Coordinator, the matter will be considered closed, and no further action will be taken. Once signed, no appeal is permitted. The Agreement-Based Resolution process is generally expected to be completed within thirty (30) days and may be extended by the Title IX and Equity Services Coordinator as appropriate. All parties will be notified, in writing, of any extension and the reason for the extension.

Records of an Agreement-Based Resolution process can be shared with other offices as appropriate.

Any violations of the terms of the Resolution Agreement may result in disciplinary action.

#### Investigation & Decision-making Resolution

##### Acceptance of Responsibility

If a respondent accepts responsibility for all or part of the Prohibited Conduct alleged, the Coordinator or designated sanctioning officer will issue an appropriate sanction or responsive action as to those violation(s) and continue processing any remaining allegations of Prohibited Conduct, if any.

##### Assignment of the Investigator and/or Decision-maker

The College will assign a trained investigator and/or Decisionmaker to conduct an adequate, reliable, and impartial investigation and hearing, if applicable, in a reasonably prompt timeframe. The College reserves the right to utilize internal or external investigators, Decisionmakers, or hearing officers.

All parties have the option to participate in the investigation and/or hearing, and each have the same rights during the resolution process including the right to an advisor, to submit relevant witness names and evidence, and to review the evidence gathered by the investigator prior to the investigator providing the final report to the Decision-maker. In cases where there is a hearing, all parties have the same rights at the hearing, including the right to review any evidence that will be considered by the Decisionmaker prior to the hearing.

The investigator will establish deadlines for submission of names of relevant witnesses and submission of evidence and communicate those deadlines to the parties in writing.

##### Conflict of Interest or Bias

After a Notice of Investigation is issued to all parties, any party may object to the participation of the Title IX and Equity Services Coordinator or designated investigator on the grounds of a demonstrated bias or actual conflict of interest. All parties will have three (3) days from the date of the Notice of Investigation to object to the selection of the investigator or the Title IX Coordinator. Objections to the Title IX and Equity Services Coordinator are to be made, in writing, to the Asst. Vice President of Campus Life. Objections to the appointment of the investigator are to be made in writing, to the Title IX Coordinator. All objections will be considered, and changes made as appropriate. If the objection is substantiated as to either the Title IX and Equity Services Coordinator or the Investigator, that individual shall be replaced. Any change will be communicated in writing.

##### Timeline

In those cases that do not include a hearing, the College strives to complete the investigation process within ninety (90) days from the date of the Notice of Investigation. In those cases that include a hearing, the College strives to complete the investigation process within sixty (60) days from the date of the Notice of Investigation, and complete the hearing within sixty (60) days of the Notice of Hearing.

The timeline for any part of the resolution process may be extended for good cause by the Title IX Coordinator. All parties shall be notified, in writing, of any extension to the timeline that is granted, the reason for the extension, and the new anticipated date of conclusion of the investigation and/or hearing. Good cause reasons for extension may include ensuring availability of witnesses and other participants and ensuring participants have sufficient time to review materials.

The College shall not unreasonably deny a student party's request for an extension of a deadline related to a complaint during periods of examinations or school closures.

The investigator and/or Title IX Coordinator shall provide the Parties with periodic status updates, in writing.



## Burden and Standard of Review

The College has the burden of conducting an investigation that gathers sufficient evidence to determine whether Prohibited Conduct occurred. This burden does not rest with any party, and any party may decide to limit their participation in part or all of the process, or to decline to participate. This does not shift the burden of proof away from the College and does not indicate responsibility. The standard of proof used in any investigation and decision-making process is the preponderance of the evidence standard, which means more likely than not.

## Written Notice of Meetings

The College will provide to a party or witness whose participation is invited or expected, written notice of the date, time, location, participants, and purpose of all meetings or proceedings with sufficient time to prepare to participate.

## Evidence Gathering

### Interviews

The investigator will interview all parties and relevant witnesses and gather relevant documentary evidence provided by the parties and any identified witnesses. Interviews may be conducted in person, or via video conference. When a party meets with an investigator, the investigator will ask questions related to the allegations in the complaint and a party is given the opportunity speak to the allegations and related events. Parties may identify fact witnesses and provide evidence that is relevant to the allegations and not otherwise impermissible. This will include inculpatory evidence (that tends to show it more likely that someone committed a violation) and exculpatory evidence (that tends to show it less likely that someone committed a violation). The investigator ultimately determines whom to interview to determine the facts relevant to the complaint.

### Impermissible Evidence

The following types of evidence, and questions seeking that evidence, are impermissible. This means this information will not be accessed or considered, except by the College to determine whether one of the exceptions listed below applies. This information will not be disclosed or otherwise used, regardless of relevance:

- Evidence that is protected under a privilege recognized by Federal or State law, unless the person to whom the privilege or confidentiality is owed has voluntarily waived the privilege or confidentiality;
- Evidence provided to an employee designated by the College as exempt from internal reporting under this policy, unless the person who made the disclosure or otherwise provided evidence to that employee has voluntarily consented to re-disclosure;
- A party's or witness's records that are made or maintained by a physician, psychologist, or other recognized professional or paraprofessional in connection with the provision of treatment to the party or witness, unless the College obtains that party's or witness's voluntary, written consent for use in its resolution procedures; and
- Evidence that relates to the complainant's sexual interests or prior sexual conduct, unless evidence about the complainant's prior sexual conduct is offered to prove that someone other than the respondent committed the alleged conduct or is evidence about specific incidents of the complainant's prior sexual conduct with the respondent that is offered to prove consent to alleged sex-based harassment. The fact of prior consensual sexual conduct between the parties does not by itself demonstrate or imply the complainant's consent to other sexual activity or preclude a determination that Prohibited Conduct occurred.

## Investigation & Decision-making Procedures

The following describes the investigation and decision-making procedures for matters of sex-based harassment in which a student is either a complainant or respondent, regardless of the status of the other party.

### Notice of Investigation

Prior to the start of an investigation, the Parties will be provided a written Notice of Investigation communicating the initiation of an investigation. Should additional allegations be brought forward, or information regarding location or date of the incident(s), a revised written Notice of Investigation shall be provided to all parties.

The Notice shall include, at a minimum:

1. The College investigation procedures, including the applicable determination procedure that will be used in this investigation and resolution, and a link to the relevant policies;
2. Information about the agreement-based, with a link to the full procedures.
3. Sufficient information available at the time to allow the parties to respond to the allegations, including the identities of the parties involved in the incident(s), a description of the facts alleged to constitute Prohibited Conduct, the type of Prohibited Conduct, and the date(s) and location(s) of the alleged incident(s);
4. A statement that retaliation is prohibited;



5. Whether the investigator, or another individual, shall serve as the Decisionmaker.
6. Expected length of the major stages of the resolution process, as well as any applicable deadlines.
7. The Notice will inform the parties that the investigator will establish and communicate, in writing, all investigation deadlines, including the final deadlines for submitting names of witnesses, evidence, and relevant questions to ask a party or witness. These deadlines may be extended by the Title IX and Equity Services Coordinator for good cause, and any changes will be provided, in writing, to the parties, along with the rationale for the revised deadline(s).
8. The process for raising a challenge to the appointed resolution officer or Title IX Coordinator, and the deadline for doing so.
9. A statement that the respondent is presumed not responsible for Prohibited Conduct until a determination is made at the conclusion of the resolution process. Prior to such a determination, the parties will have an opportunity to present relevant and not otherwise impermissible evidence to a trained, impartial Decision Maker;
10. A statement that the parties may have an advisor of their choice who may be a friend, parent, therapist, colleague, or attorney;
11. The parties are entitled to an equal opportunity to access the relevant and not otherwise impermissible evidence or an investigation report that accurately summarizes this evidence.
12. A statement that the College's Code of Conduct prohibits knowingly making false statements or knowingly submitting false information during resolution procedures during the resolution procedures.
13. The date and time of the initial interview with the Investigator, with a minimum of five (5) days' notice.

### Individual Interviews

The investigator will hold individual interviews with parties and witnesses to ask relevant and not otherwise impermissible questions and follow-up questions, including questions exploring credibility, and to request of the parties the names of relevant witnesses and relevant evidence. Only the investigator and the party or witness may attend each individual interview. A party's advisor may attend these meetings, subject to the rules described in this policy. Additional attendees may be permitted at the discretion of the Title IX and Equity Services Coordinator in connection with an approved disability-related accommodation. All persons present at any time during any part of the investigation or resolution process are expected to maintain the privacy of the proceedings and not discuss or otherwise share any information learned as part of the resolution process, and may be subject to further College discipline for failure to do so.

The investigator will then gather from parties, witnesses, and other sources, all relevant evidence.

The College will share expectations of decorum to be observed at all times in any meeting or proceeding under this policy. These expectations are applied equally to all parties and advisors. The College has the discretion to remove, with or without prior warning, from any meeting or proceeding an involved party, witness, or advisor who does not comply with these expectations and any other applicable College rules.

The individual interviews may be conducted with all participants physically present in the same geographic location, or, at the College's discretion, with all participants joining virtually through a video conferencing option. The investigator will determine, in their sole discretion, whether parties and witnesses are likely to provide relevant information about the allegations, and has the sole discretion to determine which parties and witnesses to call to an interview. The investigator may conduct follow-up interviews as they deem appropriate.

### Investigator Determination of Relevance

The investigator will determine whether parties and witnesses are likely to provide relevant information about the allegations, and has the sole discretion to determine which parties and witnesses to call to individual follow-up meetings.

The investigator will review all evidence gathered through the investigation and determine what evidence is relevant and what evidence is impermissible regardless of relevance. Character evidence that is not relevant will not be considered.

### Evidence Review

At the conclusion of all fact-gathering, the investigator will provide each party and their advisor the opportunity to review all relevant and not otherwise impermissible evidence gathered. In the event that an audio or audiovisual recording is shared, the recording will only be made available at an in-person and monitored meeting on campus, and will not otherwise be transmitted for review, so as to maintain the privacy of those participating in the process.

The purpose of the inspection and review process is to allow each party the equal opportunity to meaningfully respond to the evidence prior to conclusion of the investigation, to submit any additional relevant evidence, and the names of any additional witnesses with relevant information. This is the final opportunity to offer evidence or names of witnesses. Evidence not provided during the investigation process will not be considered by the Decision Maker. Given the sensitive nature of the information provided, the College will facilitate this review in a secure manner. None of the parties nor their advisors may copy, remove, photograph, print, image, videotape, record, or in any manner otherwise duplicate or remove the information provided. Any student or employee who fails to abide by this may be subject to discipline. Any advisor who fails to abide by this may be subject to discipline and/or may be excluded from further participation in the process.

The parties will have a minimum of 5 days to inspect and review the evidence and submit a written response in writing to the investigator. The Title IX and Equity Services Coordinator shall have the discretion to extend the evidence review period based on the volume and nature of the evidence.

When deemed appropriate by the investigator, the investigator shall then conduct any additional fact-gathering as may be necessary. If new, relevant evidence was submitted as part of evidence review, or is gathered during this second fact-gathering period, the new relevant evidence will be made available for review by the parties and their advisors. The parties shall have 5 days to provide a response to the newly-gathered evidence. No new evidence will be accepted as part of any response, except that the investigator shall have the discretion to accept relevant evidence that was not previously available or known to exist, and that was not previously discoverable with the exercise of reasonable diligence.

The investigator will consider the parties' written responses before finalizing the investigation report.

### Investigation Report

The investigator will prepare a written report summarizing all of the relevant evidence gathered and all steps taken during the investigation process. The investigator will also include as an attachment all relevant evidence gathered during the investigation, as well as all interview notes.

### Conclusion of Investigation, Notice of Hearing

Once the investigation report is final, the report together with all attachments shall be provided to each party and to their advisor, if any, in a secure manner (e.g., by providing digital copies of the materials through a protected, "read-only" web portal). Each party shall have ten (10) days to provide a response. The response, if any, shall be provided to the Hearing Officer.

Following conclusion of the investigation, each party shall be provided with a Notice of Hearing, which shall include information regarding the date of the hearing, the identity of the Hearing Officer, the process to be used at the hearing, deadlines for submission of evidence, names of witnesses, or questions to be reviewed by the Hearing Officer to ensure they are relevant to the allegations. The hearing shall be scheduled no less than ten (10) days from the date of the Notice of Hearing.

Within three (3) days of receipt of the Notice of Hearing, either party may object to the Hearing Officer on the basis of a demonstrated bias or actual conflict of interest. Any objection is to be in writing and sent to the Title IX Coordinator. Should the Title IX and Equity Services Coordinator determine that there is an actual bias or conflict of interest, the Title IX and Equity Services Coordinator shall remove the Hearing Officer and appoint another.

### Hearing Procedures

The purpose of a hearing is for a Hearing Officer to determine whether the conduct occurred as alleged, and if so, whether that conduct violates this policy. The College expects that all individuals who participate in the hearing process do so truthfully and that all who have a responsibility for carrying out one or more aspects of the hearing process do so fairly and without prejudice or bias. Hearings may be conducted in person or via videoconferencing. The Title IX and Equity Services Coordinator may determine that the hearing will continue in the absence of any party or any witness.

The College will appoint a Hearing Officer, who may be the same person as the Title IX and Equity Services Coordinator or investigator, who will determine whether a violation of College policy has occurred. The Hearing Officer shall have the authority to determine the relevance of evidence submitted, and of questions asked, to limit the time allotted to any phase of the hearing, and/or to limit the time allotted to the full hearing. The Hearing Officer shall not draw an inference about the determination regarding responsibility based solely on a party's absence from the hearing or refusal to answer questions posed.

Each hearing shall be recorded by the College and this recording will be considered the only official recording of the hearing. No other individual is permitted to record while the hearing is taking place. The recording is the property of the College but shall be available for listening until the conclusion of the appeals process to complainant, respondent, their respective advisors, Hearing Officer, and Appeal Officer by contacting the Title IX Coordinator.

### Prior to the Hearing

The parties and the Hearing Officer all have the right to call witnesses. Witnesses participating in the hearing must have information relevant to the allegations. Parties who wish to call witnesses must submit the name of the witness at least five (5) days in advance of the hearing.

Only witnesses who participated in the investigation will be permitted to participate in the hearing, unless the witness was otherwise unknown or not known to have relevant information during the course of the investigation. If the witness did not participate in the investigation, the party must also provide the reason the witness was not interviewed by the investigator, and what information the witness has that is relevant to the allegations. The Hearing Officer will then determine whether the witness has relevant information and

if there is sufficient justification for permitting the witness to participate. The Hearing Officer may instead send the case back to the investigator to interview the newly proffered witness prior to the hearing taking place.

A list of witnesses approved by the Hearing Officer will be provided to the parties at least three (3) days prior to the hearing.

Three (3) days prior to the hearing, each party shall submit to the Hearing Officer a preliminary list of questions they wish to pose to the other party, or to a witness. If the Hearing Officer determines that any questions are not relevant or seek otherwise impermissible evidence, the Hearing Officer shall exclude the question and explain the reason for the exclusion of the question at the hearing. Questions that are unclear or harassing of the party or witness being questioned will not be permitted. The Hearing Officer must give a party an opportunity to clarify or revise any question that the Hearing Officer has determined is unclear or harassing and, if the party sufficiently clarifies or revises a question, and the question is relevant, the question will be asked.

### *Advisor*

Each party is entitled to be accompanied by one advisor at the hearing. The role of the advisor is to assist the party with understanding and navigating the proceedings. The advisor may not advocate for, respond for, or otherwise speak on behalf of, a party during the hearing. In the event that a party does not appear for the Hearing, the advisor for that party may not participate in the hearing or submit questions to be asked on behalf of the party.

### *Hearing Participation Guidelines*

The Hearing Officer shall have the authority to maintain order and decorum at the hearing, including responding to disruptive or harassing conduct, and when necessary to adjourn the hearing or exclude the disruptive person. In the event the Hearing Officer removes an advisor, the Hearing Officer will have the discretion to appoint another advisor for the remainder of the hearing. The Hearing Officer also has the authority to determine whether any questions are not relevant, abusive, intimidating, or disrespectful, and will not permit such questions. The Hearing Officer cannot draw an inference about the determination regarding responsibility based solely on a party's absence from the live hearing.

### *Statements, Questioning and Presentation of Evidence*

During the hearing, each party will be permitted to provide an introductory statement. Following introductory statements, the Hearing Officer will call parties and witnesses for questioning. The order of questioning shall be determined by the Hearing Officer. The Hearing Officer will pose questions to the parties and witnesses including the questions the Hearing Officer approved to be asked that were submitted by each party prior to the hearing. Each party will then be provided an opportunity to submit follow-up written questions to the Hearing Officer for the Hearing Officer to pose to the other party or witnesses. If the Hearing Officer determines that any questions are not relevant to the allegations, or seek otherwise impermissible evidence, the Hearing Officer shall exclude the question and explain the reason for the exclusion of the question at the hearing and offer an opportunity to the party to reframe or resubmit the question. Questions that are unclear or harassing of the party or witness being questioned will not be permitted.

Only the Hearing Officer is permitted to ask questions of parties and witnesses. Neither party may directly question the other party or witness. Advisors are not permitted to directly or indirectly question the other party or witness.

Following the questioning of parties and witnesses, each party will be permitted to provide a closing statement. An advisor is not permitted to provide a closing statement on behalf of their party.

Parties are permitted to submit impact statements following the hearing.

### *Hearing Officer's Report*

Following the hearing, the Hearing Officer shall prepare a determination report. All findings shall be made by a preponderance of the evidence, meaning more likely than not. To the extent credibility determinations need to be made, such determinations shall not be based on a person's status as complainant, respondent, or witness.

The determination report will include:

- A description of the sex-based harassment and other allegations if applicable;
- A reference to the policies and procedures used to evaluate the allegations;
- Description of all procedural steps taken to date;
- The Hearing Officer's evaluation of the relevant and not otherwise impermissible evidence along with the finding of facts;
- Determinations for each allegation, with the rationale;
- Sanction determination (if applicable)
- Whether remedies will be provided;
- The procedures for an appeal.

The Hearing Officer's report shall be provided to the Title IX Coordinator. If the Hearing Officer determines that there is no finding of responsibility, the Title IX and Equity Services Coordinator shall communicate the findings to each party, and their advisor should the party wish the advisor to receive it, a written Notice of Outcome along with a copy of the Hearing Officer's report, to the parties, together with procedures for appeal.

If there is a finding of responsibility, the Title IX and Equity Services Coordinator shall contact the appropriate sanctioning officer who will determine the sanction and notify the Title IX and Equity Services Coordinator of the sanctioning determination. The Title IX and Equity Services Coordinator will then provide each party, and their advisor should the party wish the advisor to receive it, a written Notice of Outcome regarding the Hearing Officer's decision, including the Hearing Officer's report. The Title IX and Equity Services Coordinator will also provide written communication to the complainant regarding any appropriate remedies.

## APPEALS

Determinations may be appealed in writing by either party. Appeals will be sent to the Title IX Coordinator, who will then send the appeal to the Appeals Officer assigned to conduct a written review of the appeal(s) and to make a final determination. Appeals must be in writing and filed within ten (10) days following the issuance of the outcome letter.

When an appeal is filed, the other party shall be notified and provided with a copy of the filed appeal within one (1) day, and have five (5) days to respond to the appeal in writing. Any party's decision not to submit a reply to an appeal is not evidence that the non-appealing party agreed with the appeal.

Within three (3) days of an Appeal Officer being assigned, either party may provide written objection to the Appeal Officer on the basis of an actual bias or conflict of interest. Any objection is to be sent to the Title IX Coordinator. Should the Title IX and Equity Services Coordinator determine that there is an actual bias or conflict of interest, the Title IX and Equity Services Coordinator will appoint another Appeal Officer.

Appeals may be filed only on the following three grounds:

1. **Procedural Error:** A procedural error occurred would change the outcome. A description of the error and its impact on the outcome of the case must be included in the written appeal; or,
2. **New Evidence:** New evidence or information has arisen that was not available or known to the party during the investigation or hearing, that would change the outcome. Information that was known to the party during the resolution process but which they chose not to present is not considered new information. The new evidence, an explanation as to why the evidence was not previously available or known, and an explanation of its potential impact on the investigation findings must be included in the written appeal; or
3. **Actual Conflict of Interest or Demonstrated Bias:** The Title IX Coordinator, investigator, or others with a role in the process with an actual conflict of interest or demonstrated bias for or against complainants or respondents generally, or the individual complainant or respondent, that would change the outcome. Any evidence supporting the alleged conflict of interest or demonstrated bias must be included in the written appeal.

The Appeal Officer will make a determination regarding the appeal and communicate that decision, along with a rationale for the decision to the Title IX and Equity Services Coordinator who will communicate the Appeal Officer's decision to the parties. The decision of the Appeals Officer is final.

### Failure to Complete Sanctions/Comply with Responsive Actions

All responding parties are expected to comply with conduct sanctions/responsive actions/ corrective actions within the timeframe specified by the College. Responding parties needing an extension to comply with their sanctions must submit a written request to the Title IX and Equity Services Coordinator stating the reasons for needing additional time.

Failure to follow through on conduct sanctions/responsive actions/corrective actions by the date specified, whether by refusal, neglect or any other reason, may result in additional sanctions/responsive actions/corrective actions, such as suspension, expulsion, or termination.

Students who fail to comply will be referred to in accordance with the [College's Student Handbook](#).

Employees who fail to comply will be referred to Human Resources.

## RECORD RETENTION

In implementing this policy, records of all reports and resolutions will be kept by the Coordinator in accordance with the applicable College records retention schedule. All records will be afforded the confidentiality protections required by law, including but not limited to the Family Educational Rights and Privacy Act governing confidentiality of student information.

## ADDITIONAL ENFORCEMENT INFORMATION

The U.S. Equal Employment Opportunity Commission (EEOC) investigates reports of unlawful harassment and discrimination, including sex-based harassment, in employment.

The U.S. Department of Education, Office for Civil Rights (OCR) investigates complaints of unlawful discrimination and harassment of students and employees in education programs or activities.

For more information, contact the nearest office of the EEOC or OCR.

US Department of Education  
Office for Civil Rights  
3054 West Grand Boulevard,  
Suite 3-600

Fax: 313-456-3701  
Toll-Free: 800-482-3604

MDCRServiceCenter@michigan.gov  
Detroit, Michigan, 48202

313-456-3700  
MDCRServiceCenter@michigan.gov

U.S. Equal Employment Opportunity Commission (EEOC)  
<https://www.eeoc.gov/contact-eeoc>

## POLICY REVIEW & REVISION

These policies and procedures will be reviewed and updated regularly by the Title IX Coordinator. The Title IX and Equity Services Coordinator will submit modifications to this policy in a manner consistent with institutional policy upon determining that changes to law, regulation or best practices require policy or procedural alterations not reflected in this policy and procedure. Procedures in effect at the time of its implementation will apply. The policy definitions in effect at the time of the conduct will apply even if the policy is changed subsequently, unless the parties consent to be bound by the current policy.

This policy may be revised at any time without notice. All revisions supersede prior policy and are effective immediately upon posting to the College website.

## KEY DEFINITIONS

**Advisor:** Each party has the right to choose and consult with an advisor of their choice at their own expense. The advisor may be any person, including a friend, family member, therapist, union representative, or an attorney. The College will not limit their choice of advisor. Parties in this process may be accompanied by an advisor of choice to any meeting or proceeding to which they are required or are eligible to attend.

Except where explicitly stated by this policy, advisors shall not participate directly in the process. The College will provide the parties equal access to advisors; any restrictions on advisor participation will be applied equally.

The advisor may not represent, advocate, or speak on behalf of a complainant or respondent. An advisor may not disrupt or impede any resolution proceeding.

**Amnesty:** a provision whereby a student who makes a report or assists another in making a report to the College or who participates in the resolution of a complaint under this policy will not be subject to the College's policy concerning alcohol or drug use for actions that may have occurred at or near the time of the Prohibited Conduct defined within this policy, unless the alcohol or drug-related misconduct threatens the health or safety of another.

**Coercion/Force:** Consent cannot be procured by the use of physical force, compulsion, threats, intimidating behavior, or coercion. Sexual activity accompanied by coercion or force is not consensual.

- Coercion refers to unreasonable pressure for sexual activity. When someone makes it clear that they do not want to engage in sexual activity or do not want to go beyond a certain point of sexual interaction, continued pressure beyond that point can be considered coercive. The use of coercion can involve the use of pressure, manipulation, substances, or force. Ignoring objections of another person is a form of coercion.
- Force refers to the use of physical violence or imposing on someone physically to engage in sexual contact or intercourse. Force can also include threats, intimidation (implied threats), or coercion used to overcome resistance.

**Complaint:** A complaint means an oral or written request to Title IX Coordinator that objectively can be understood as a request for the College to investigate and make a determination about alleged sex discrimination under this policy. A complaint may be filed with the Title IX and Equity Services Coordinator in person, by mail, or by electronic mail (email), by using the contact information listed on the Title IX/Equal Opportunity website (LINK), or as described in this policy. Individuals who would like more information about filing a complaint are invited to contact the Title IX and Equity Services Coordinator for additional information.

**Complainant:** Any individual who has reported being or is alleged to be impacted by Prohibited Conduct as defined by this policy, and who was participating in a College program or activity at the time of the alleged misconduct.

**Confidential Resources:** any individual identified by the university who receives information about conduct prohibited under this policy in their confidential capacity and who are privileged under state law will not report prohibited conduct disclosed to them without written consent. Designation as a confidential resource under this policy only exempts such individuals from disclosure to the Title IX Coordinator. It does not affect other mandatory reporting obligations under state child abuse reporting laws, the Clery Act as a campus security authority, or other laws that require reporting to campus or local law enforcement.

**Consent** is knowing, voluntary and mutual decision among all participants to engage in sexual activity, expressed in words or actions. For consent to be valid, there must be a clear expression in words or actions that the other individual consented to that specific sexual conduct with that particular person or people.

Individuals may experience the same interaction in different ways. Therefore, it is the responsibility of each party to determine that the other has consented before engaging in the activity. If consent is not clearly provided prior to engaging in the activity, consent may be ratified by word or action at some point during the interaction or thereafter, but clear communication from the outset is strongly encouraged.

Consent to some sexual contact (such as kissing or fondling) cannot be presumed to be consent for other sexual activity (such as intercourse). Past consent does not imply future consent. A current or previous dating relationship is not sufficient to constitute consent.

The existence of consent is based on the totality of the circumstances, evaluated from the perspective of a reasonable person in the same or similar circumstances, including the context in which the alleged incident occurred. Silence or the absence of resistance alone is not consent. In Michigan, a minor (meaning a person under the age of 16 years) cannot consent to sexual activity except in limited circumstances dictated by law.

Consent can be withdrawn at any time during sexual activity through reasonable and clear communications through words or actions. When consent is withdrawn, sexual activity must stop.

Consent cannot be given if any of the following are present: Incapacitation, Force, or Coercion.

**Days:** any reference to days refers to business days when the College is in normal operation.

**Decisionmaker:** Trained professional designated by the College to decide responsibility, sanction, or appeals. A Decisionmaker may be one person or a panel of multiple people as determined by the College. When there is no hearing, the investigator may be appointed as the Decision Maker.

**Disclosure or Report:** A disclosure or report may be made by anyone, whether they learned about conduct potentially constituting sex discrimination under this policy, or whether they personally experienced such conduct. A person making a disclosure or report may or may not be seeking to initiate an investigation.

**Education Program or Activity:** The College's "education program or activity" includes all campus operations, including off-campus settings that are operated or overseen by the College, including, for example, field trips, online classes, and athletic programs; conduct subject to the College's disciplinary authority that occurs off-campus; conduct that takes place via College-sponsored electronic devices, computer and internet networks and digital platforms operated by, or used in the operations of, the College. Conduct that occurs outside of the education program or activity may contribute to a hostile environment within the program or activity.

**Finding:** a written conclusion by a preponderance of the evidence, issued by an Investigator, that the conduct did or did not occur as alleged.

**Incapacitation** occurs when someone cannot make rational, reasonable decisions because they lack the capacity to give knowing and informed consent (e.g., to understand the "who, what, when, where, why, and how" of their sexual interaction). Incapacitation is determined through consideration of all relevant indicators of a person's state and is not synonymous with intoxication, impairment, or being under the influence of drugs or alcohol. This policy also covers a person whose incapacity results from temporary or permanent physical or mental health condition, involuntary physical restraint, and/or the consumption of incapacitating drugs, or who are sleeping.

Under this policy, the College will consider whether a respondent knew or should have known the complainant to be incapacitated, based on an objective, reasonable person standard that assumes the reasonable person is both sober and exercising sound judgment.

The fact that the respondent was unaware of the complainant's incapacity due to the respondent's own drug or alcohol use shall not be considered as an excuse.

**No-Contact Directive:** A No Contact Directive is a document issued by a College administrator that is designed to limit or prohibit contact or communications between the parties. A No-Contact Directive may be mutual or unilateral, with the exception that a No-Contact Directive issued as either a sanction or remedy shall be unilateral, directing that the respondent not contact the complainant.

**Notice:** All notices under this policy are written and sent to the student or employee's assigned College email address or delivered via Certified Mail to the local or permanent address(es) of the parties as indicated in official College records, or personally delivered to the intended recipient.

**Party/parties:** Referring to complainant(s), respondent(s), or both/all complainant(s) and respondent(s).

**Remedies:** Remedies means measures provided, as appropriate, to a complainant or any other person the College identifies as having had their equal access to the College's education program or activity limited or denied by sex discrimination or other prohibited conduct covered by this policy. These measures are provided to restore or preserve that person's access to the education program or activity after a College determines that sex discrimination occurred. Only the complainant will be informed of any remedies pertaining to them. Some examples are academic support and/or opportunity to retake a class or resubmit work or time extensions on course or degree completion, or non-academic support such as counseling, or changes to work assignments or locations. The Title IX and Equity Services Coordinator is responsible for implementation of remedies.

**Respondent:** an individual, or group of individuals such as a student organization, who has been reported to be the perpetrator of conduct that could constitute Prohibited Conduct under this policy; or retaliation for engaging in a protected activity.

**Sanctions:** One or more of the sanctions or disciplinary steps listed here may be imposed on a respondent who is found responsible for a violation of the College's policies. Sanctions or disciplinary steps not listed here may be imposed in consultation with the Title IX Coordinator.

The form of sanction or discipline used will depend on the nature of the offense, as well as any prior disciplinary history. Such discipline or sanction will be imposed pursuant to and in accordance with any and all applicable College rules, policies, and procedures. Factors considered when determining a sanction/responsive action may include:

- The nature, severity of, and circumstances surrounding the violation.
- An individual's disciplinary history.
- Previous resolutions or allegations involving similar conduct.
- The need for sanctions/responsive actions to bring an end to the sex discrimination or retaliation.
- The need for sanctions/responsive actions to prevent the future recurrence of sex discrimination or retaliation.
- The need to remedy the effects of the sex discrimination or retaliation on the victim and the campus community.

Student sanctions imposed are implemented when the decision is final (after an appeal, or, if there was no appeal, after the appeals period expires).

Faculty found responsible for violating this policy may be referred to the appropriate academic official for any other applicable processes.

Possible sanctions and disciplinary steps for student respondents include, but are not limited to the following:

- Probation
- No contact orders
- Counseling
- Training or other developmental assignments
- Removal from class(es), housing, or suspension or dismissal from the institution

Sanctions for student respondents will be determined by the Assistant Dean of Students, or designee, and included in the Notice of Outcome to the extent permitted by FERPA.

Possible sanctions and disciplinary steps for employee respondents include, but are not limited to the following:

- Probation
- No contact orders
- Counseling
- Training or other developmental assignments
- Suspension or dismissal from termination

Remedies for the broader College population will be determined by the Asst. Vice President of Campus Life and Chief Human Resources Officer and can include, but are not limited, to developing educational materials on discrimination, harassment, and

retaliation and this Policy for students and/or employees; increased security; conducting bystander intervention and prevention programs; and/or issuing Policy statements.

The sanctions available for those found responsible for Policy violations whose definitions are equivalent to the definitions of crimes covered by the Violence Against Women Act amendments to the Clery Act are limited to the following:

When an individual is found responsible for sexual assault, the following sanctions are available:

- Expulsion or Termination
- Suspension of 1, 2, 3, 4, 5, 6, 7, or 8 semesters
- Deferred Suspension of 1, 2, 3, 4, 5, 6, 7, or 8 semesters
- Administrative Leave without Pay
- Revocation of Admission and/or Degree
- Withholding Degree
- Demotion or changes to job responsibilities
- University Housing Suspension, Expulsion, or Restrictions
- No-Contact Requirements
- Restrictions on participation with College programs or activities
- Social Restrictions
- Loss of Privileges
- Education Sanctions
- Mandated Assessment(s)
- Removal from Grants
- Revocation of Scholarship(s)
- Revocation of Award(s)

When an individual is found responsible for domestic violence, the following sanctions are available:

- Expulsion or Termination
- Suspension of 1, 2, 3, 4, 5, 6, 7, or 8 semesters
- Deferred Suspension of 1, 2, 3, 4, 5, 6, 7, or 8 semesters
- Administrative Leave without Pay
- Revocation of Admission and/or Degree
- Withholding Degree
- Demotion or changes to job responsibilities
- University Housing Suspension, Expulsion, or Restrictions
- No-Contact Requirements
- Restrictions on participation with College programs or activities
- Social Restrictions
- Loss of Privileges
- Education Sanctions
- Mandated Assessment(s)
- Removal from Grants
- Revocation of Scholarship(s)
- Revocation of Award(s)

When an individual is found responsible for dating violence, the following sanctions are available:

- Expulsion or Termination
- Suspension of 1, 2, 3, 4, 5, 6, 7, or 8 semesters
- Deferred Suspension of 1, 2, 3, 4, 5, 6, 7, or 8 semesters
- Administrative Leave without Pay
- Revocation of Admission and/or Degree
- Withholding Degree
- Demotion or changes to job responsibilities
- University Housing Suspension, Expulsion, or Restrictions
- No-Contact Requirements
- Restrictions on participation with College programs or activities
- Social Restrictions
- Loss of Privileges
- Education Sanctions
- Mandated Assessment(s)
- Removal from Grants
- Revocation of Scholarship(s)
- Revocation of Award(s)



When an individual is found responsible for stalking, the following sanctions are available:

- Expulsion or Termination
- Suspension of 1, 2, 3, 4, 5, 6, 7, or 8 semesters
- Deferred Suspension of 1, 2, 3, 4, 5, 6, 7, or 8 semesters
- Administrative Leave without Pay
- Revocation of Admission and/or Degree
- Withholding Degree
- Demotion or changes to job responsibilities
- University Housing Suspension, Expulsion, or Restrictions
- No-Contact Requirements
- Restrictions on participation with College programs or activities
- Social Restrictions
- Loss of Privileges
- Education Sanctions
- Mandated Assessment(s)
- Removal from Grants
- Revocation of Scholarship(s)
- Revocation of Award(s)

**Student:** Any person who has (or will have) attained student status by way of:

1. Admission, housing or other service that requires student status.
2. Registration for one or more credit hours.
3. Enrollment in any non-credit, certificate or other program offered by the university.

## RESOURCES

### On-Campus, Confidential

These reporting options will maintain confidentiality unless required by law to break confidentiality. Any parties involved in a complaint may speak with:

**Wellness Center**, 313.664.7852

### *Risk of Harm to Self or Others*

Mental health professionals are required to disclose information where there is an imminent threat of the person harming themselves or others.

### Local Support, Confidential

#### Hotlines

Confidential sexual assault hotlines can provide support as well as information on medical care, reporting, and legal options.

- **Turning Point** (24-hour crisis hotline), 586-463-6990
- **Avalon Healing Services**, *A person can request counseling services at any time during their healing process, whether it be immediately after their experience with assault or years later. All services provided by Avalon are free and confidential. To schedule an appt, please call our main office at 313-964-9701 Monday - Friday during business hours: 9am - 5pm.*

#### Crisis Hotline

- **Crisis Text Line** Text HOME to **741741** from anywhere in the United States, anytime.
  - Crisis Text Line is here for any crisis. A live, trained Crisis Counselor receives the text and responds, all from our secure online platform.
- **Suicide Prevention Lifeline**: 988

This line also offers free chat functions: <https://suicidepreventionlifeline.org/chat/>

## On-Campus, Non-Confidential

All CCS employees, excluding the confidential resources detailed above, are mandatory reporters under this policy and must share all the details of the reports they receive with designated College officials. Therefore, Complainants may want to consider carefully whether to share personally identifiable details with non-confidential employees.

Matters of concern can be shared with the designated Title IX Administrator below via email, phone or in person:

**Title IX Coordinator:** Jess Ettell Irvine, [titleix@ccsdetroit.edu](mailto:titleix@ccsdetroit.edu), 313.664.7676

### *Additional Reporting Options*

**Dan Long**, [dlong@ccsdetroit.edu](mailto:dlong@ccsdetroit.edu)  
Asst. Vice President of Campus Life  
Yamasaki Building, 2nd Floor  
313.664.7675

**Campus Safety**, 313.664.7444, 24 hours/day

**Assistant Dean of Students**, 313.664.7678

## Sex Offenders

In accordance to the "Campus Sex Crimes Prevention Act" of 2000, which amends the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act, the Jeanne Clery Act and the Family Educational Rights and Privacy Act of 1974, Campus Safety is providing a link to the Michigan State Police Sex Offender Registry. This act requires institutions of higher education to issue a statement advising the campus community where law enforcement information provided by a State concerning registered sex offenders may be obtained. It also requires sex offenders already required to register in a State to provide notice of each institution of higher education in that State at which the person is employed, carries a vocation, or is a student. In Michigan, convicted sex offenders must register with the Sex Offender and Crimes Against Minors Registry maintained by the Department of State Police.

The Sex Offender and Crimes Against Minors Registry (SOR) for VIOLENT SEX OFFENDERS is available via Internet pursuant to Section 19.2-390.1, (D), of the Code of Virginia. Registry information provided under this section shall be used for the purposes of the administration of criminal justice, screening of current or prospective employees, volunteers or otherwise for the protection of the public in general and children in particular. **Unlawful use of the information for purposes of intimidating or harassing another is prohibited and willful violation shall be punishable as a Class 1 misdemeanor.**

The Michigan State Police is responsible for maintaining this registry. Follow the link below to access the Michigan State Police website.

[http://www.communitynotification.com/cap\\_main.php?office=55242/](http://www.communitynotification.com/cap_main.php?office=55242/)

## Motor Vehicle Assistance Programs

Motor Vehicle Assistance Program Dead car battery? Don't worry.

The Campus Safety & Security Department has a portable battery pack capable of "jump starting" your vehicle in case your battery died. They will also fill your tires with air and provide free windshield washer fluid in the winter at no charge. To take advantage of this service, please call the Campus Safety office at 313-664-7444 (Ford Campus) or 313-664-1444 (Taubman Center).

# Fire Safety Policies, Statistics and Logs Policies

(Updated January 2021)

## Housing Facility Fire Systems

Both housing facility fire systems are housed in a central system monitored by the College for Creative Studies Campus Safety Office 24 hours a day, seven days a week.

The Art Centre Building is fully sprinkled with a fire pump and also includes fire hose risers and pull stations. There are fire extinguishers and horn/strobes in every suite, on each floor. The fire alarm system is inspected in accordance with NFPA 25 and maintained by Simplex Grinnell.

The Taubman Center's fire system was installed in 2009 and met all Life Safety System, State, and City Codes required when installed. The fire system is fully suppressed and has a sprinkler system. This fire system also includes smoke detectors in each room, annunciators, and strobe lights. Each floor has fire extinguishers and pull stations also found in the hallway. The fire alarm and sprinkler system is inspected in accordance with NFPA 25 and maintained by Simplex Grinnell.

Residents should not hang anything from sprinkler heads or in a manner that would block the coverage of the sprinkler water flow. Nothing should be stored within 18 inches of the ceiling according to NFPA code.

## Fire Safety Education

Each year at move-in, residents attend a housing orientation in which students are instructed on the fire evacuation procedures. For the students who have kitchens, they are also told that they have fire extinguishers to use if needed. Those who do not have kitchens are instructed where the extinguishers are located on the floor. They also hear an example of the alarm and are instructed to follow the evacuation procedures, call 911 and let Campus Safety know if there is an actual fire in their suites.

If a resident knows that their suite is responsible for the fire alarm, they are asked to notify the front desk of the cause and if the alarm is an active fire or a false alarm.

## Fire Policy Restrictions

The following restrictions have been put in place to ensure proper precautions to reduce fire in the residence halls.

### Smoking

Student housing is a Smoke Free Environment. All areas, including all suites, stairwells, hallways, and elevators and 15 feet from doorways are non-smoking. Residents and guest found smoking in student housing will be subject to fines and/or judicial action.

### Hookahs & Water Pipes

Hookahs and water pipes are not allowed in student housing. If they are found in your suite, they will be confiscated by Student Life Staff and not returned.

### Vaporizers And Electronic Cigarettes

The use of vaporizers and electronic cigarettes is prohibited from all College buildings include the residence halls. Use of these products is restricted in the same manner as tobacco products and must be used outside more than 15 feet from doorways.

### Wax

Students are not allowed to melt wax or work with melted wax in student housing.

### Incense

Due to the fire hazard incense presents, it is not permitted in student housing. If incense is found in your suite it will be confiscated by Student Life Staff and not returned.

## **Candles**

Due to the fire hazard candles present, candles are not permitted in the student housing. If candles are found in your suite they will be confiscated and disposed of by a member of the Student Life Staff in addition to having to meet with a judicial officer in regards to your offense.

## **Electronics**

Residents are advised to have surge protectors on all electrical equipment that could result in damages from a power surge. It is highly advised that surge protectors be used with stereo equipment, computers, televisions, DVD players, microwaves, etc.

## **Lamps**

Halogen lamps are not permitted in student housing. Residents are to supply their own lamps for their suite. If halogen lamps are found in suites, the lamp will be confiscated and not returned.

## **Lighting**

The placement of any material in or around facility lighting, inclusive of lights in resident rooms will be in violation of the Fire Safety Code.

## **Machinery**

Machinery that is required to run on gasoline (or any other flammable substance) is not permitted in the student housing.

## **Dangerous Items**

Items including, but not limited to fireworks, firearms, explosives, toxic substances, highly flammable substances, knives, and other weapons are prohibited from use or storage in the residence hall. Any item that may be considered a dangerous item, and is needed for academic reasons must be used solely for its intended academic purpose, and have the prior approval of the Residence Life Coordinator to be kept or used in the building.

## **Motorcycles**

Motorcycles, mopeds, or other gasoline-powered vehicles are not to be stored in student housing. These vehicles can be parked in the parking garage.

## **ACB-Specific Policies**

### *Cooking*

Students are to keep the cooking area in their suites clean, safe, and healthy.

### *Radiators*

When the weather gets cold you can regulate the heat in your suite by opening and closing your radiators. If your radiator does not have a knob to open and close the valve or if your radiator makes a hissing noise, notify the Housing Office or an RA.

Do not store items on top of or near radiators, especially flammable or pressure contained items. The completed renovations of the ACB will eliminate all radiators from the suites and will be replaced by modern HVAC units.

## **Taubman-Specific Policies**

### *Cooking*

Students are not allowed to use any open coiled kitchen appliances in their suites. This includes George Foreman style grills, toasters, toaster ovens, hot plates, pizza ovens or any other open coiled appliance. You may bring a microwave, mini refrigerator, coffee pot, rice cooker, and crock-pot. For further verification that a kitchen appliance is allowed, please contact the Residence Life Coordinator. Items that are not allowed and found in housing will be confiscated and not returned.

## **Reporting a Fire**

Report what you have found as soon as possible to the security officer at the front desk of your building. You can contact them at these numbers:

ACB- Guard at the front door of the lobby. 313.664.7402

TC- Guard near the front door in the TC lobby. 313.664.1442

If you feel the fire is large enough/out of control, call 911

## **Evacuation Procedures**

Evacuation upon the sounding of the fire alarm system is required. Failure to evacuate housing when an emergency alarm is sounding is a violation of the resident agreement and federal regulations. Residents are expected to become familiar with the evacuation procedures during their first few hours in residence. If the evacuation instruction information (found on the back of the room door) is illegible or missing, residents should contact the Residence Life Coordinator immediately for a replacement. Residents are expected to attend all housing meetings referencing safety training.

### When evacuating you should:

1. Yell for your suitemates to ensure that they hear the fire alarm.
2. Close your door behind you so that if the fire spreads to your floor the door will deter its speed.
3. Knock on the doors to the other suites on your floor. You should not wait for your suitemate or floor mates before you evacuate the building.
4. Do not use the elevator when evacuating. Please use either set of stairs located on each floor.
5. Once you have left the ACB, you should proceed to the cafeteria and wait for further instructions from either a Housing Staff member or Campus Safety. If you are evacuating from the Taubman Center, please go to the parking lot between Cass and 18 Woodward for further instructions. Housing Staff and/or Campus Safety personnel will determine when it is safe to re-enter the building.
6. Even if the alarm stops, continue to evacuate until the 'all clear' is given.

### Carelessness Related to Fire Alarms

Residents who are responsible for repeatedly showing carelessness and causing the fire alarm to sound will be charged a fine. A charge of \$50 may result the second time an alarm is set off due to carelessness and/or negligence, and the third time the resident may be asked to vacate student housing.

### Fire Drills for 2023

Art Centre Building Student Housing - 3

Taubman Center Student Housing - 3

### Student Housing Fire Statistics for 2023

Building	Date/Time	Cause	Injuries	Deaths	\$ Damage
Art Centre Building	2-20-2023/6:45 p.m.	Fire on top of stove	None	None	\$10
Taubman Center Housing	None Reported				

### Student Housing Fire Statistics for 2022

Building	Date/Time	Cause	Injuries	Deaths	\$ Damage
Art Centre Building	9-20-2022/8:30 p.m.	Items in stove	None	None	\$692
Taubman Center Housing	None Reported				

### Student Housing Fire Statistics for 2021

Building	Date/Time	Cause	Injuries	Deaths	\$ Damage
Art Centre Building	None Reported				
Taubman Center Housing	None Reported				
St. Regis Hotel	None Reported				