

Appendices

Appendix A: Academic Policies

Academic Progress and Probation Policy

Satisfactory Academic Progress

Cambridge College undergraduate students must maintain a cumulative grade point average of 2.0 to be considered as making satisfactory academic progress.

Cambridge College graduate students must maintain a cumulative grade point average of 3.0 to be considered as making satisfactory academic progress.

Academic Probation

Academic Probation is an official warning issued by the dean's office when a student falls below satisfactory academic progress (2.0 GPA at the undergraduate level, 3.0 at the graduate level). A student who has been placed on academic probation will be closely monitored over subsequent terms of enrollment. A student's continued lack of satisfactory academic progress may result in suspension or dismissal from their academic program.

Procedures: (specific procedures may be subject to periodic change)

If the Dean of the relevant school determines that a student will be placed on academic probation, a Notice of Academic Probation will be issued by the Dean's office. The student must adhere to the following protocol upon notification:

- The student must meet their academic advisor within two weeks of receiving the notice of academic probation to discuss the notice of academic probation and its implications, and to develop a plan for academic success.
- International students must also meet with the Office of International Student Services or designee immediately upon receiving the notification of academic probation to discuss potential visa ramifications.

A copy of the notification of academic probation is given to the Registrar's office for inclusion in the student's file. A student placed on probation for lack of satisfactory academic progress will remain on probation until their GPA reaches 2.0 (undergraduate) or 3.0 (graduate).

A student may appeal the probation or suspension decision, in writing, to the Provost or designee. The appeal should be made within five business days after receiving the probation/suspension notice and should include a clear explanation and documentation to support the appeal. The Provost or designee will make a decision within five business days of the receipt of the appeal. The decision by the Provost or designee is final.

Add Drop Policy

Cambridge College students may add or drop a class by the add/drop deadline listed in the Academic Calendar for the term. For courses that begin after the add/drop deadline, students may add or drop the courses before the first scheduled class/session. No verbal or telephone drops are permitted.

After the add/drop deadline, any requests for course additions or drops must be made using the ADD/DROP form, located at:

https://www.cambridgecollege.edu/sites/default/files/file_uploads/reg-adddrop.pdf

Students dropping courses after the add/drop period may be held financially responsible for the course tuition.

Attendance Policy

Class Attendance

Cambridge College expects students to attend all regularly scheduled class meetings. Students are responsible for adhering to course attendance/participation as outlined in the course syllabi. Attendance and active participation in class (including active participation in group projects and online courses) are essential components of the learning process, and are important factors in student success.

Instructors may adjust course grades due to unexcused absences or failure to participate, provided this is clearly stated in the course syllabus.

In all cases, including courses taught online, course requirements (exams, presentations, group projects, labs, reports, participation in discussion, and all other types of coursework assigned) are not waived due to class absence. Alternate or additional work may be assigned at the instructor's discretion.

Class Rosters Policy

Faculty members access a class roster via the MyCC portal. Faculty members must verify student attendance and refer students who are not on the roster to the Registrar by the Add/Drop deadline. Unregistered students cannot attend class or receive academic credit without the written permission of the Dean.

Course Waivers

Additional courses must be taken to make up the credits for courses accepted for waiver. See your academic advisor.

School of Undergraduate Studies

Some required courses may be waived if mastery of the learning outcomes is demonstrated by the successful completion of comparable coursework from a previous, regionally accredited college or university. Eligibility for waiving a required course or courses will be determined by the student's advisor in conjunction with the academic program chair and/or academic dean. Essential skills courses in writing and mathematics may only be waived if a student has successfully completed previous college-level work in those areas, and a standardized assessment administered by Cambridge College indicates appropriate competencies.

School of Education

Required licensure courses may be waived if mastery of the learning outcomes is demonstrated by successful completion of comparable coursework from a previous, regionally accredited college or university. Other required courses may be waived if students demonstrate comparable graduate learning. Eligibility for waiving a required course will be determined by the program chair with subsequent approval by the Dean.

School of Psychology and Counseling

Course waivers are typically requested along with evaluation of transfer credit. Other courses must be taken in place of any credits waived.

School of Management

Required courses may be waived if students demonstrate comparable graduate learning. Some essential skills courses may be waived if mastery of the learning outcomes is demonstrated through assessments administered by Cambridge College. Additional management courses must be taken in place of any credits waived. See the Dean of the School of Management.

Courses Taken at Other Institutions after Matriculation

Undergraduate

Only the following may be accepted into the School of Undergraduate Studies while a student is enrolled in the program.

Courses needed for graduation that are not offered within two terms of the anticipated graduation date

Electives not available at Cambridge College that are pre-approved by the undergraduate dean or program chair

Written approval from the academic advisor and undergraduate dean is required.

Graduate

Courses taken at other institutions while a student is enrolled in a Cambridge College master's degree program may not be transferred towards that degree. Special exceptions may be considered with the academic dean's approval.

Faculty-Related Complaints Procedure

Purpose

The purpose of this procedure is to provide a clear pathway for the review of certain student complaints against faculty members and other course instructors. This procedure will be used only for complaints against faculty/instructors that are not governed by any other applicable College policy. Examples might include complaints about general professional demeanor and classroom conduct. If a student has a question about the applicable procedure to follow for a particular complaint, s/he should consult with the Dean of Students.

Procedure

Informal Resolution: Students are encouraged to attempt first to resolve complaints under this policy informally with the faculty member/instructor. If the attempt for an informal resolution is unsuccessful, the student should attempt a mediation as described in the next step.

Mediation: Only after a student has either given reasonable time for the faculty member/instructor to respond to a request for an informal resolution (no less than five business days) or is not satisfied with the response to the request, may the student move to this step. At this step, if the student is enrolled in a program in Boston, the student must contact the assistant dean or the department chair for the school responsible for the course. If the student is enrolled in a program in one of the College's regional locations, the student must contact the program coordinator or the site director. The student must include a written description of the situation and attach pertinent documentation, if applicable. After review of the complaint, the assistant dean, department chair, program coordinator, or site director (as applicable) will discuss the option of mediation with the student and the involved faculty member/instructor. If there is no such assistant dean, department chair, program coordinator, or site director, the student may contact the Dean of the School to initiate this process. If all parties involved agree to mediation, the appropriate College employee will appoint a mediator to attempt to resolve the matter. Following any mediation, the mediator will send an email to formally notify the student of the resolution with a copy to the faculty member/instructor and the Dean of the School.

Formal Resolution: If the issue is not resolved through the previous steps, the student may elect to initiate the formal complaint process by completing the Complaint Form and delivering it to the Dean of the school responsible for the course. The Dean (or designee) has 15 business days from receipt of the Form to discuss the situation with the student and the faculty member/instructor, and, if necessary, assistant dean, department chair, program coordinator, site director, or other necessary witnesses, and submit a written decision. The Dean (or designee) may convene a faculty panel to advise the Dean on the proper course of action.

The Dean will inform the student in writing of the resolution or decision with a copy to the faculty member/instructor. The Dean's decision at this stage is final and binding on the student. If the instructor does not agree with the decision, he/she shall appeal directly within 5 calendar days of the written notification from the dean to the Provost who will examine the documentation, interview the instructor, render a decision and notify the instructor and student.

Grades and Grading Policy

Faculty has discretion over grades. Grades are based on performance in relation to learning outcomes listed on each course syllabus.

Grade Entry

No one other than instructors may enter final grades using the MyCC web portal. If an instructor is unable to enter grades through the portal, he or she is to forward a grade list to the Registrar for entry. In the event that an instructor fails to submit grades to Cambridge College, the Provost may assign the Dean of the school in which the instructor teaches to issue (or change) the missing grades.

General Definitions and Policies

Grade Point Value

Letter Grade	Grade Point Value	Numerical Range
A	4.0	93-100
A-	3.7	90-92
B+	3.3	87-89
B	3.0	83-86
B-	2.7	80-82
C+	2.3	77-79
C	2.0	73-76
C-	1.7	70-72
D+	1.3	67-69
D	1.0	60-66
F	0.0	0-59

Credit (CR) is a grade denoting content competence.

- Undergraduate programs — equivalent to D or better
- Graduate and post-graduate programs — equivalent to B or better

No Credit (NC) means that the student has not met expectations and that the academic work will not be counted toward degree requirements. Students who receive a grade of “No Credit” in a required course or seminar are required to repeat the course or seminar. In general, reasons for a grade of “No Credit” include:

- Lack of class attendance — absent for more than four hours of class time
- Required work not completed to the instructor’s standards
- Failing grades on required work

Students incur financial liability for courses attempted whether or not credit is awarded.

No Show (NS) indicates that a student did not attend a class and/or did not formally withdraw from the course. The student remains financially liable for the tuition.

Changes in Grade — Grades (including CR) are considered to be final unless a clerical or procedural error has been made. If there are discrepancies, please contact the instructor and/or the Registrar’s Office.

Undergraduate Grades

Grades of “Credit” or “No Credit” are awarded only for portfolios, challenge exams, standardized exams, seminars, and skill development courses.

Graduate and Post-graduate Grades

Graduate and post-graduate programs award passing grades of B or better. Coursework below B receives a grade of “No Credit”. Grades of “Credit” or “No Credit” may be an option for students in specific courses.

Incompletes (INC)

An incomplete grade (INC) may be granted by an instructor if the student has satisfactorily completed 67% or more of the required work for the course, and the instructor has agreed to consider pending work for submission before the end of the following term. Students have one term after receiving an INC to submit outstanding work. INCs that are not converted to a grade after one term will be converted to a grade of NCI (No Credit Incomplete) or a letter grade, assigned by the instructor, consistent with the work previously submitted for the course. NCI grades are factored into a student’s GPA as 0.0.

Note: Granting an incomplete is a privilege afforded to the student, not a right. If an instructor agrees to grant an incomplete, an “Incomplete Course Work Agreement” form, which clearly states the work needed and the timeframe in which it must be delivered must be signed by both the student and the instructor.

Academic Support for Students with Incomplete Grades

At the end of each term, students who have two or more Incomplete grades on their grade report will receive an “academic hold” on their account. Before they can register for the next term, these students must:

- Meet with their faculty advisor. International students must also meet with the international student advisor
- Meet with course instructors, complete their coursework satisfactorily, and clear the Incomplete grades

Incomplete Final Project

Graduate (Independent Learning Project/Independent Research Project/Advanced Research Project, Graduate Management Capstone): If students do not complete the final project by the deadline within the term in which they registered for it, a grade of Permanent Incomplete (PIN) is assigned and cannot be changed to a grade thereafter. Students must register for the project completion course for their program (e.g. 801 for ILP/IRP, and 699 for Graduate Management Capstone) in order to complete their project and degree.

Students have up to three years from the expected graduation date (based on entry date and length of program) to complete and have the final project (ILP/IRP/ARP/Graduate Management Capstone) approved. An extension may be granted by the student’s academic dean. If the original faculty advisor is not available, the academic dean will assign another faculty member to supervise the completion of the project.

Undergraduate: If the Capstone is incomplete, students have one term to finish the work and have the Incomplete grade changed to a letter grade. If the Capstone is still incomplete, the student must register in the next term for the Capstone completion course in order to receive a grade. For example, students who get an Incomplete grade in BHS490 and do not finish it in the following term must register for BHS491 in the next term.

Students should be aware that there are fees associated with incomplete final projects.

Satisfactory Academic Progress

Students must make satisfactory academic progress to continue at Cambridge College as well as receive financial aid. Student records are reviewed at the end of each term. (See Financial Aid Satisfactory Academic Progress.)

Grade Grievance Procedure

The purpose of this process is to resolve grade disputes between students and faculty in a timely manner that upholds academic integrity.

This process will be used for disputes regarding final grades (except for those involving academic dishonesty as defined in the Student Code of Conduct).

A student who perceives an individual grade received during a course to be unfair must attempt to resolve the matter directly with the course instructor. Only when an individual grade has impacted a student's final grade, or when a student perceives a final grade to be unfair, may the student invoke the formal grievance process described below.

If, at any time in the process, a grade grievance touches upon policies related to disabilities, discrimination, Title IX or any other policies established to follow federal regulations, the College, at its sole discretion, may decide that the process indicated in the existing policy or policies must be pursued rather than this one.

Informal Process

Step 1

The student is required to contact the course instructor within 15 calendar days after the official posting of the final course grade to try to resolve the grading concern. The student is expected to communicate via email with the faculty member. Any complaint received after the 15-day period will not be considered.

The faculty member will have a reasonable time to respond, not to exceed 10 business days, after receipt of the email. If the student does not receive a response within 10 business days or the grade dispute is not resolved after step 1, the student may move to step 2.

Step 2

A student may proceed to step 2 only after the procedures for step 1 have been followed. In step 2, the student will contact the appropriate department chair, program coordinator or site director with a written description of the situation and request they serve as a mediator for the dispute. The department chair, program coordinator or site director will reach out to the faculty to member for a response

and will try to mediate a resolution between both parties that is mutually agreeable.

If there is no department chair, program coordinator or site director, the student may contact the Dean of the school directly, who will assign an individual to facilitate step 2. The chair, coordinator or site director (or designee of the Dean of the school, if applicable) must send an email to formally notify the student of the resolution. The faculty member will be copied.

Formal Process

Step 3

If the issue is not resolved at Step 2, the student has five calendar days (after receiving the email from mediator) to initiate the Formal Grade Grievance Process. This entails the completion of a Grade Appeal Form. The student will deliver the completed form to the Academic Dean of the school responsible for the course. The Dean has 15 business days from receipt of the Grade Appeal Form to discuss the situation with the student and instructor, and, if necessary, the Step 2 facilitator before submitting a written decision. The Dean may convene a faculty panel for advisory purposes. The instructor of the course may suggest one member of the panel to the Dean. The Dean will consider the following factors in rendering a decision:

- Whether or to what extent the student and the instructor followed the guidelines and course requirements set forth in the course syllabus as submitted through the Concourse system.
- Whether or to what extent college and school policies and procedures that ultimately impacted the student's grade were followed.
- Whether or to what extent the student has shown that he or she was treated in an unfair manner.
- Whether the grade was miscalculated.
- Other factors relevant to the particular circumstances.

The Dean will inform the student in writing of the decision to deny the request for a change of grade. The Dean's decision at this stage is final and binding on the student. If the Dean finds in favor of the student, the Dean shall ask the instructor to submit a Change of Grade Form to the Registrar's Office within 5 business days of the written notification. If the instructor does not agree with the decision of the Dean, the instructor may appeal directly to the Provost within 5 business days of the written notification from the Dean. Pending any appeal to the Provost, the Registrar's Office will not make any grade changes.

If an appeal is submitted by the faculty member, the Provost will then review the documentation, interview the instructor and render a decision. Student and faculty member will be notified of the decision. The Provost's decision will be final and binding.

Graduation

Preparing to Graduate

Grades Required

- Undergraduate students must successfully complete all components of their academic program (see your program chart in the catalog) with grades of D or better or Credit. A cumulative grade point average of 2.0 (letter grade of C) is required for all undergraduate courses completed at Cambridge College.

- Graduate students must earn grades of B or better for successful completion of all graduate courses counted towards degree completion, with a cumulative grade point average of 3.0.

Intent to Graduate form

Students planning to graduate must complete and submit to the Office of the Registrar an Intent to Graduate form. It must be submitted during the term the student intends to graduate, by the deadline published in the academic calendar, in order for the student's academic record to be reviewed for graduation clearance. Students must meet with their academic advisor and review their academic plan to ensure that all program requirements will be completed by the end of the term.

Final Payment

All tuition and other charges must be paid in full by the published graduation clearance deadline in order to receive graduation clearance from the Bursar's Office.

Registrar Clearance for Graduation

The Registrar will review records of students who have submitted the Intent to Graduate form by the deadline.

Candidates who have completed all academic requirements are notified by the Registrar's Office via Cambridge College email. Their academic records are closed and the degree conferral date is placed on their final transcripts. Candidates who have not satisfied the academic requirements are informed via Cambridge College email of their status and next steps.

Degree Conferral

The College has three conferral dates for graduation, in January, June, and August. A student who completes all academic program requirements and successfully completes the graduation clearance process may request an official transcript from the Registrar's Office at any time after the degree conferral date (see Student Records.)

Diplomas

Diplomas are mailed to all students who have been financially and academically cleared within three months of the degree conferral date. Diplomas are mailed via U.S. mail to the address that is in the student database as of the commencement date. Diplomas that require tracking may be mailed by UPS by special arrangement, at the expense of the student.

If a hold is removed from the student's record after the original diploma mailing, the student must contact the Registrar's Office to arrange shipment of the diploma.

Student's Official Name — All name changes must be received, verified and processed by the Registrar's Office prior to the degree conferral date.

Replacement Diplomas — Students who need a replacement diploma must request it in writing, including their name, signature, student ID number, telephone number, and an up-to-date address. Replacement diplomas cost \$27. Students may include credit card information, or a check or money order made out to Cambridge College. The replacement diploma will be mailed via U.S. mail. Please note: all diplomas must show the student's name as of the degree

conferral date.

Commencement Ceremony

One Commencement Ceremony is held each year in Boston, in June. Graduates who earned a degree from all Cambridge College locations are invited to participate. Students who confer in August or January are invited to the Commencement Ceremony the following June. (Certificate students do not participate in Commencement.)

Diplomas are not presented at the Commencement Ceremony, but are mailed.

"March Only" Conditions

Students may be allowed to "march only" in the Commencement Ceremony with the status of "participants" only under the following conditions:

- All core requirements, including the final project (e.g. Capstone, Independent Learning/Research Project, Action Research Project) and required practicum and/or internship, must be completed and a passing grade documented in the student's academic record by the grade posting deadline.
- Six or fewer credits remain to complete the course of study; the credits are offered and completion is anticipated in the summer term.
- The student has registered for the summer term, for all remaining credits, and the registration has been processed.
- Exception by Provost, authorizing a student to march.
- A student must submit a Petition to March Only to the Registrar after registering and no later than April 11.
- No College written materials shall refer to the student as a Cambridge College graduate or otherwise imply that the student has satisfied Cambridge College graduation requirements.
- Students who have not completed graduation requirements cannot obtain a diploma and will not be given any written documentation that implies that they have graduated.

Leave of Absence and Withdrawal Policy

Any student of Cambridge College may request a personal leave of absence, a medical leave of absence, and/or a withdrawal from the College. This policy sets out the general guidelines and procedures for requesting a leave of absence or withdrawal. The College's specific schools and departments may require additional procedures for requesting leave and gaining readmission. Any student who wishes to request a leave of absence or withdrawal should discuss the request with the corresponding academic advisor or the Office of Student Affairs before making the request. The student must also meet with the Office of Student Financial Services prior to any leave request regardless the reason to review financial obligations and any impact on financial aid eligibility.

Requesting a Personal Leave of Absence

A student may request a personal (i.e., non-medical) leave of absence for no less than academic term and only up to 180 days in any 12 month period. Typically, the student must make the request at least one month prior to the start of the first semester for which the student

is requesting the leave of absence. Only in exceptional circumstances will the College grant a personal leave of absence that is requested after the one-month deadline or after the start of the semester. All requests for a personal leave of absence must be made in writing and submitted to the Student Leave Review Committee (composed of the Dean of Student Affairs, a representative from the academic school, a representative from the Registrar's Office and a representative from student financial services). The request must state the reason(s) for the leave of absence and must be signed and dated by the student. All requests must be reviewed and approved by the Student Leave Review Committee. If the committee determines that there is any financial impact, the request must be forwarded to the VPFA for final approval.

Requesting a Medical Leave of Absence

A student may request a medical leave of absence based on a medical issue pertaining to the student. All requests for a medical leave of absence must be made in writing and submitted to the Student Leave Review Committee (composed of the Dean of Student Affairs, a representative from the academic school, a representative from the Registrar's Office and a representative from student financial services). For foreseen situations a student must make the request at least one month prior to the start of the first semester for which the student is requesting the medical leave of absence but no request will be considered retroactively once the term of the leave request ends as per the academic calendar of that year. However, since medical situations often result from emergencies, those would be considered exceptional circumstances and the College may still grant a medical leave of absence that is requested after the one-month deadline or after the start of the semester. The request must state the reason(s) for the leave of absence and must be signed and dated by the student health care proxy or next of kin. The College may require that the student provide medical documentation from a licensed care provider to support the request for medical leave. All request must be approved by the Student Leave Review Committee. If the committee determines that there is any financial impact, the request must be forwarded to the VPFA for final approval.

Guidelines for Personal and Medical Leaves of Absence

Leaves of absence will be granted only to students who have a reasonable expectation of returning to the College. Students who are absent from the College for one or more semesters without officially taking leave of absence may jeopardize their ability to return to the program. Mere absences from class does not reduce financial obligations or guarantee that final grades will not be recorded.

If a student is granted a leave of absence after the start of the semester, the student's grades and financial obligations will be determined in accordance with the College's policies on withdrawals and financial obligations/refunds. An approval of a leave of absence does not guarantee that a student will remain able to complete degree or program requirements within the time frame set by the applicable school or department.

A student who is out on a leave of absence is not permitted to participate in other College programming or activities, unless such programs or activities are open generally to the public.

A leave of absence may, depending on the circumstances, impact a student's obligation to make repayments on federal financial aid. Any

failure to return to the College following a leave of absence may also affect the student's repayment obligations. Students must discuss any leave of absence with the corresponding academic advisor or the Office of Student Affairs before making the request. The student must also meet with the Office of Student Financial Services prior to any leave request regardless the reason to review financial obligations and any impact on financial aid eligibility.

Process for Readmission

Any student who wishes to return to the College after a leave of absence must complete the "Returning Student Reinstatement" form and ensure that all past due balances are paid to the college prior to being readmitted. The form must be signed, dated and submitted to the Registrar's Office no later than one month prior to the desired reinstatement date.

A student who seeks reinstatement following a medical leave of absence may be required to provide medical documentation demonstrating that the student's health permits his/her/their readmission. The College reserves the right to impose additional conditions on reinstatement from a medical leave, including but not limited to: the length of time on leave; the submission of appropriate medical and non-medical documentation; the student's consent that his/her/their medical provider discuss the student's condition with College; an independent evaluation of the student's condition by College employees or College-appointed clinicians; and/or the student's consent to use certain College or outside professional services. Students who fail to return to the College after a period of 5-years are required to reapply through Admissions

All requests for reinstatement must be approved by Registrar's Office. The College's decision to grant a leave of absence does not guarantee that the student will be reinstated to the College. In deciding whether to readmit a student, the College will consider all relevant factors, including the student's standing at the College, the student's academic record, the student's activities and conduct during the leave, the student's fitness for readmission, etc. The College shall also require the student to pay any outstanding balances owed to the College as a condition to readmission. The College retains full discretion as to whether, and under what conditions, a student will be granted readmission following a leave of absence.

Withdrawals from Cambridge College

A student may decide to leave the College without any intention to return to the College to complete his/her/their studies. In order to officially withdraw, the student must complete the "Withdrawal from the College Form".

Financial Impact of Leave of Absence or Withdrawal

The financial impact of a leave of absence or withdrawal depends on when the student takes the leave/withdraws. All financial calculations are determined by the date the leave of absence or withdrawal becomes effective. For purposes of this policy, the effective date of a leave of absence or withdrawal is the date on which the student files his/her/their written, signed request for the leave of absence or the appropriate withdrawal paperwork.

If a student takes a leave of absence or withdraws during the Fall or Spring semesters, financial calculations are determined by the following tables:

Date of Withdrawal from 8-20 Week Courses	Tuition Refund
Before add/drop deadline (within first two weeks of term)	100%
During third week of session/term	75%
During fourth week of session/term	25%
Thereafter	0%

Date of Withdrawal from 5 Week Courses	Tuition Refund
Prior and during first week of session/term	100%
During second week of session/term.	75%
Thereafter	0%

Date of Withdrawal from Intensive & Weekend Courses	Tuition Refund
Prior to first class	100%
During week one.	75%
Thereafter	0%

Refunds only apply to self-pay students. If a student receives Title IV funds, s/he is not eligible for refund.

Students who receive federal financial aid and take leave of absence/withdraw during a semester will have their financial aid adjusted in accordance with the Return of Title IV Funds regulations. Under the regulations, the amount of federal financial aid that a student “earns” in a semester is based on the number of calendar days on which the student attended class. Students who complete more than 60 percent of the semester are considered to have earned 100% of their financial aid for that term. If a student receiving federal financial aid completely withdraws from classes before completing 60% of the term, the College must determine how much of the financial aid was earned up to the time of withdrawal. The College makes this determination by dividing the number of calendar days the student attended classes by the total number of calendar days in the term, and then multiplying that quotient by the total federal funds that were disbursed to the student during the term (for example, if the student attended 50% of the term, the student would have earned 50% of the aid disbursed). The Return of Title IV Funds regulations do not apply to private loans, state grants, or outside scholarships.

Annual student fees are assessed to students upon their enrollment and are non-refundable, regardless of whether the student completes the full academic year or a given term at the College.

A student granted a leave of absence is not considered to have withdrawn, and no Return to Title IV funds is required. Upon the student’s return from the leave, if all requirements for eligibility were submitted before the leave of absence, he or she continues to earn the Title IV aid previously awarded for the period.

Repeat Courses

Undergraduate Students

The College has established the following policy for undergraduate students regarding the repeating of courses:

1. An undergraduate student will be allowed to repeat a course only if the student has failed the course (F, NCI or NC). A course successfully completed may not be repeated.
2. A failed course may be repeated two times. Exceptions to this limitation may be considered by the Dean after consulting

with the student's advisor and/or program coordinator and/or program chair and, if necessary, after a meeting with the student.

3. Courses taken at Cambridge College in which a student achieves a failing grade, a WD, NC or NCI will become a part of the permanent academic record. If the course is repeated with a passing grade, the previous grade will be noted on the transcript as repeated (R) and the failing grade, the WD, NC or the NIC will be removed.
4. A student's grade point average will not change if the student repeats a course after completing a degree or graduating.
5. Any course taken or repeated may only count toward one degree with the exception of advance standing programs, with the permission of the Dean.

Students on federal financial aid should know that there are regulations that limit financial aid support for repeated classes. A student may need to locate alternate financing for a repeated course.

Graduate Students

The College has established the following policy for graduate students regarding the repeating of courses:

1. A graduate student will be allowed to repeat a course if the student has failed the course (B- or less).
2. A course successfully completed may not be repeated unless the academic dean determines that changes in the field or licensure requirements justify a repeat course for the purpose of updating knowledge, skills and/or behaviors. The determination will be made by the academic dean on a case-by-case basis.
3. A failed course may be repeated two times. Exceptions to this limitation may be considered by the Dean after consulting with the student's advisor and/or program coordinator and/or program chair and, if necessary, after a meeting with the student.
4. Courses taken at Cambridge College in which a student achieves a failing grade, a WD, NC or NCI will become a part of the permanent academic record. If the course is repeated with a passing grade, the previous grade will be noted on the transcript as repeated (R) and the failing grade, the WD, NC or the NIC will be removed.
5. Any course taken or repeated may only count toward one degree with the exception of advance standing programs, with the permission of the Dean.

Students on federal financial aid should know that there are regulations that limit financial aid support for repeated classes. A student may need to locate alternate financing for a repeated course.

Returning Student Policy

1) Leave of Absence (LOA): Current students who do not wish to enroll in the next term must visit the registrar’s office to complete the Leave of Absence form.

2) Students who complete courses, withdraw or go on leave of absence, then wish to return.

If more than five years, the student needs to reapply with all materials through the admissions office.

If five years or less, students need to complete the Reinstatement form through the registrar's office, and obtain all of the required signatures to certify they are in good academic and financial standing.

3) Reinstatement: Students who withdraw anytime after their initial registration, even during add/drop, then wish to return.

If more than five years ago, students need to reapply through admissions office.

If five years or less, students need to complete the Reinstatement form through the registrar's office, and obtain all of the required signatures to certify they are in good academic and financial standing.

4) Reactivation: Students who complete the application process, do not register, then wish to enroll.

These students have up to three terms within a year, or a year (but no longer than a year) to request deferment to another semester. After a year, documents are disposed and they must reapply.

5) Reapplication: Students who have an incomplete application, and have not been admitted, then wish to enroll.

These students have up to three terms within a year, or a year (but no longer than a year) to request deferment to another semester. They must complete the application process before being admitted. After a year, documents are disposed of and they must reapply.

6) New Degree

Students who wish to complete a degree (certificate, bachelors, master's, CAGS or EdD) different from their current or past degree must reapply through the admissions office, indicating the new degree on their admissions application and submitting all application materials.

7) Change of program or major

Students who wish to change programs or majors, while still remaining in the same degree program, must complete the change of major form from the registrar's office and obtain all required signatures, including their advisor/program coordinators from their previous program and the new program. For example, students who wish to change from a master's in management to a master's in education need to complete the change of major form in order to change graduate programs. They do not need to reapply using the admissions application.

8) Completion of ILP, ARP: Students who return to complete their projects and graduate.

These students have to complete the Reinstatement form through the registrar's office, and obtain all of the required signatures to verify that the student is in good academic and financial standing.

Student Holds Policies and Procedures

A hold may be placed on a student's record for admissions, academics, graduation, business, financial-aid, disciplinary or immunization reasons. A hold may prevent a student from registering for courses. If a hold is placed on a student record, when the student enters her/his user ID and password into MyCC, the student will see a description of the hold and contact information, so that the student can remedy the situation. Registration will not be possible until all

holds are reconciled and removed.

To protect a student from losing financial aid funds or being unable to pay for additional courses, each term, after the close of the add/drop period, the college may place a hold on all student accounts. This hold may be lifted once the student has made satisfactory payment arrangements with the Financial Aid or Business office.

The immunization hold is placed on the accounts of full-time, Massachusetts-resident students who have not presented completed immunization forms to the College, in accordance with Massachusetts law. If a student to whom this is applicable should fail to submit complete immunization forms by the end of the Add/Drop Period of the current term, the student will be disenrolled.

Placement of Holds

In order to register each term, the student must receive a clearance from the Bursar's Office. If satisfactory arrangements for tuition payments are not made, a business hold (BR) will be applied to the student account. If a student has not completed the financial aid process, then a financial hold (FA) will be applied to the student record. Holds will be placed two weeks before registration opens. Students will be notified by e-mail through their MyCC e-mail accounts or by letter through U.S. mail.

Removal of Holds

An automated process will run on a nightly basis removing any financial hold when a student account balance is zero. Any other holds will be removed manually on an individual basis once the condition has been ameliorated. Only the Director of Financial Aid, the Bursar or the Registrar (or staff members of those offices with written authorization) may remove holds.

Non-Matriculated Students

Students not matriculated into a degree or certificate program at Cambridge College are allowed to take up to nine (9) credits for credit without applying for and enrolling in a degree or certificate program. Students should seek advisement from the academic dean of the school in which they are taking courses. Certain exceptions based on program, alumni status or location may apply.

Courses completed at Cambridge College by students not enrolled in an academic program may be evaluated for acceptance into Cambridge College programs by the dean or program chair of the receiving program. There is no guarantee that courses taken as a non-matriculated student will be accepted into an academic program at Cambridge College.

Transfer Credit Policy

Transfer credit requests, initiated by the student, are evaluated only on the basis of official transcripts. Students must submit a completed admissions application packet, including official transcripts and course descriptions/syllabi, if applicable.

Evaluation Process

- The Transfer Credit Office reviews official transcripts and identifies all courses that meet the general criteria and may be

eligible for transfer.

- Undergraduate academic advisors will create an academic plan which includes all eligible transfer credits that meet Cambridge College undergraduate degree/program distribution requirements. Based on the policy below, credits constituting an earned associate's degree will be accepted in total up to 69 credits. Credits outside of, or above and beyond an earned associate's degree, will be evaluated for transferability by the academic advisor.
- For licensure programs, specialized concentrations, CAGS and doctoral programs, the program chair reviews the content and approves courses that meet program-specific criteria.
- Final determination of the transferability and programmatic distribution of credit lies with the academic dean of the appropriate school.

Undergraduate Transfer Credit

Student must be accepted into a specific degree program for transfer credit to be evaluated. The following general criteria will guide the evaluation process.

Courses: General Criteria

- Course credits must be earned at a regionally or nationally accredited degree granting institution of higher learning.
- For courses not included as part of an earned associate's degree, only grades of C (2.0) or better are considered, and such courses must meet program distribution requirements;
- Professional development courses (PD) and continuing education units (CEU) are not eligible for transfer;
- Associate's degrees from regionally or nationally accredited institutions are accepted in their entirety at 60-69 semester hours, including only the courses actually required for the degree.
- A maximum of ninety (90) semester hours from a regionally or nationally degree granting accredited institution of higher learning may be accepted, provided the coursework meets Cambridge College degree/program distribution requirements.

Standardized Examinations

- Credits earned through standardized examinations (DANTES, DSST, CLEP, FLATS and AP) may be accepted and will be recorded as transfer credits.
- Credits earned through school-specific testing are not eligible for transfer;
- Credits earned through standardized exams may replace major requirements only at the discretion of the program chair or academic dean;
- Students already matriculated into a Cambridge College program are advised to consult their academic advisor for written approval prior to taking any standardized exams. Without prior approval; acceptance of credits is not guaranteed.

ACE Evaluated Transcripts

Credits recognized through the American Council on Education (ACE) evaluated transcripts will be accepted at their full credit value as

follows.

- Up to 60 lower level credits may be accepted, provided the coursework meets Cambridge College general education or elective distribution requirements.
- An additional 30 upper level credits may be accepted provided the coursework meets Cambridge College degree/program distribution requirements;
- No "V" or vocational credits will be accepted for college transfer credits.

Please note:

- Prior written approval by the undergraduate academic dean is required before taking courses at other institutions.
- As many as 18 transfer credits may be awarded for FLATs or other language equivalency exams.
- ACE evaluated and standardized exam credits may not duplicate a course taken at Cambridge College or at another institution.
- Electronic transcripts will be accepted from military branches that only provide electronic transcripts i.e. Army (AARTS) transcripts which will transition to Joint Services Transcripts on January 1, 2013.

Master's and CAGS and Doctoral Transfer Credit

The student must be accepted into a specific degree and concentration for transfer credit to be accepted. The following general criteria will guide the evaluation process.

All courses must meet the following criteria.

- Only graduate courses designed for graduate degree credit may be accepted.
- Courses completed at regionally accredited institutions authorized to grant graduate/post-graduate degrees may be accepted.
- Only grades of B (3.0) or better are considered; other grades must be confirmed as equivalent to B or better.
- Courses must be degree credit-bearing graduate courses that are not professional development or continuing education unit courses.
- Courses must meet current program requirements.

School of Education: CAGS and EdD

CAGS and EdD transfer courses must be advanced graduate level; courses open to undergraduate students are not accepted.

Courses NOT Acceptable

Courses **not** acceptable for master's, CAGS or doctoral transfer credit:

- Course work taken at other institutions after enrollment in a Cambridge College graduate degree program or during an absence from that program
- Field experiences, practica and internships

- Independent learning, research and applied action projects (final projects cannot be replaced by transfer credit)
- Professional development courses, including school collaborative courses and other courses taken for continuing education units
- Courses/credits included in another degree (anticipated or completed)

Licensure Course Transfer

To safeguard your licensure application, a course is accepted for transfer into a licensure program only if:

- The content matches a corresponding Cambridge College required course, meeting the high standards of our programs, and
- It is judged to match the requirements and expectations of the licensing authorities.

Counseling Licensure Courses - Final approval of other institutions' course work for your licensure application is solely within the discretion of the licensing authorities; please seek their advice.

Educator Licensure Programs - All transfer of credit into educator licensure programs is defined by the Mass. Department of Elementary and Secondary Education (ESE) as a "waiver." Records of all waivers are kept in student files, and are subject to audit at any time by the ESE. These records will be required when you apply for licensure.

Doctor of Education (EdD)

Nine credits may be accepted from an approved master of education program and 12 credits from an approved CAGS program; total: 21 credits.

Transfer Credit Limits

School/Degree Program	Credit Limit	Time Limit
School of Psychology and Counseling programs	9	5 years
School of Education programs	9	5 years
Instructional technology, law, and finance courses for licensure		3 years
Doctor of Education (EdD)	9	5 years
School of Management programs	9	7 years
Any one specific Cambridge College management certificate	12-16	5 years

Please note: Quarter-hours are converted into semester-hours at a 3/4 ratio and rounded to the nearest whole number.

Individual Responsible for Revision and Implementation: Provost and Vice President for Academic Affairs, Vice President for Enrollment Management, Director of Admissions, Transfer Credit Advisor

Appendix B: Financial Aid Policies

Federal Financial Aid Academic Award Year Policy

Purpose

The Department of Education requires Cambridge College to define its academic year for financial aid awarding purposes. The academic year is used to define the student's eligibility for all Federal Student Assistance programs.

Scope

This policy applies to all Cambridge College students.

Academic Award Year

For awarding purposes the Fall term is considered to be the beginning (header) of the academic award year for Cambridge College. The Summer term will be considered the end (trailer) for the academic award year. For determining eligibility and disbursing funds the Free Application for Federal Student Aid (FAFSA) year must match the academic award year. Example: Student applies to start for the Summer 2011 term. The academic award year is Fall 2010 to Summer 2011. Student must file the 2010-2011 FAFSA for financial aid eligibility. Student will be awarded for the Summer 2011 term only. For the next academic award year of 2011-2012 the student must file the 2011-2012 FAFSA. The student will be awarded starting with the Fall 2011 term and ending with the Summer 2012 term. Students may submit to the Director of Financial Aid an appeal if they wish to be awarded on a different schedule due to extenuating circumstances. All appeals must be in writing and contain appropriate supporting documentation. Each appeal will be reviewed on a case by case basis by the Director of Financial Aid.

Federal Financial Aid Verification Policy

Purpose

The purpose of this policy is to meet the Federal Department of Education requirement that Cambridge College have a policy for verifying the reported information on a financial aid application.

Summary

Students sometimes make errors on their financial aid application. The Federal Department of Education requires that 30% of Free Application for Student FAFSA filers be verified, as selected by the Central Processing System (CPS). However Cambridge College also has the authority, and may be required, to verify additional students.

Scope

This policy applies to all Cambridge College students and their parents (only dependent students).

Selecting Students

Cambridge College will request verification information from all students who are selected by the Central Processing System (CPS). Required verification items are:

1. Household size as defined by the Federal Department of Education.
2. Number in college
3. Adjusted gross income as supplied by the IRS
4. U.S. taxes paid
5. Certain types of untaxed income and benefits (examples not all inclusive)
 - Child Care
 - IRA/Keogh deductions
 - Interest on tax-free bonds
6. All other untaxed income included on the U.S. income tax return (excluding schedules).

Cambridge College is also required to verify any application information that appears to be incorrect or contains discrepancies. Students with these applications are considered to be selected for verification by the College even though the data being verified may not be same as the required items for CPS selected students.

Notifications

Students who are selected for verification will be notified in writing in a letter which lists all documents that have been requested. This information is also posted on the students Cambridge College MYCC account. Students whose award has changed due to verification will be notified through an updated award letter indicating the changes to each and any award.

Deadlines

Students are responsible for submitting all required verification items by the established deadline included in the letter sent to the student. Failure to submit required documents by the deadline may forfeit Federal Financial Aid eligibility. Deadlines are established each academic year and are located on the Cambridge College Financial Aid Application and on the Cambridge College web site.

Federal Title IV Financial Aid Eligibility

Summary

Cambridge College has developed a policy on federal financial aid eligibility to ensure that minimum eligibility requirements as set forth by the Federal Department of Education are published, and applied to all applicants of federal financial aid.

Eligibility for federal financial aid is determined by the following criteria:

- According to federal regulations, to be eligible for federal financial aid a student must be enrolled in an approved program leading to a degree or certificate at Cambridge College and the student may only receive federal financial aid for classes

that are required for degree completion at Cambridge College. Classes outside of a student's approved program cannot be used in cost of attendance calculations and determination of half time enrollment. Students enrolled in non-degree programs or certificate programs not Title IV approved are not eligible for federal financial aid.

- Students may not receive federal financial aid from two schools at the same time. Students can only receive federal aid from the school from which they are matriculated.
- The maximum time frame allowable to complete a program will be no more than 150% of the published length of the program (measured in total credits attempted, including transfer credits) for undergraduate students and no more than 200% of the published length for graduate students. If a student does not complete a program in less than 150% of the published length of the program they will no longer be eligible for federal aid. (See policy on Satisfactory Academic Progress.)
- Students must be enrolled at least half time to receive a federal direct loan. (undergraduate: at least 6 credits; graduate: at least 4 credits).
- Students must be enrolled full time to receive the maximum Pell Grant. If a student is enrolled less than full time the Pell grant will be prorated based on enrollment status.
- Federal financial aid will be adjusted if a student withdraws from all classes before 60% of the semester is completed. Students may have a balance owed to the College after these adjustments to financial aid are posted to the student's account. (See policy on Withdrawals and Leave of Absence.)
- Students must have financial need except for the unsubsidized loan program and some merit based aid or private grant aid. Need is defined as the cost of attendance minus the expected family contribution derived from filing the Free Application for Federal Student Aid (FAFSA).
- Students must have a high school diploma or equivalent (General Education Diploma(GED) certificate, a certificate from a state-authorized examination that the state recognizes as the equivalent of a high school diploma, a two year degree acceptable for full credit towards a bachelor degree), or have passed a Federal Department of Education approved ability –to –benefit test, or complete a high school education in a home setting that is treated as a home school or private school under applicable state law.
- Students must be a U.S. Citizen or eligible non-citizen.
- Students must have a valid Social Security Number.
- Students cannot be in default or owe money on a federal student loan.
- Students must register with the Selective Service.

Federal Financial Aid: Student Satisfactory Academic Progress (SAP)

Summary

Cambridge College has developed a Satisfactory Academic Progress (SAP) Policy to meet the Federal Department of Education's administrative capabilities requirements that all schools must establish, publish, and apply reasonable standards for measuring SAP.

Satisfactory Academic Progress

Satisfactory Academic Progress (SAP) is a measure of progress toward the completion of a student's course of study according to Cambridge College standards and required by federal regulations. Students must meet these standards to maintain eligibility for federal financial aid. These standards apply to all federal financial assistance programs and to all students: full-time and part-time, undergraduate, and graduate, degree and certificate candidates.

Term Review: The Financial Aid Office measures student academic progress by calculating completed credits as a percentage of attempted credits after each term. All attempted credit hours are counted, including transfer credits, whether or not federal financial aid was received or the course work was successfully completed.

SAP Standards

Undergraduate

- Credits earned: a minimum of 67% of the credits attempted must be completed satisfactorily each year.
- Maximum time frame: Students must complete their program within 150% of the published completion time. For example, if student begins a full-time, four-year bachelor's degree at Cambridge College, they must complete their degree in a maximum of six years. If a student's enrollment goes beyond six years, they will no longer be eligible for additional federal financial aid.
- Transfer credits must be counted towards earned and attempted credits. Transfer credits accepted into students program of study are included in the calculation of maximum time frame.

Graduate/Postgraduate

- Credits earned: a minimum of 50% of courses attempted must be completed satisfactorily each year.
- Maximum time frame: students must complete their program of study within 200% of the published completion time. They will not be eligible to receive federal financial aid once they have attempted more than 200% of the credits normally required for the degree or certificate. For example, if they begin a full-time one-year 36-credit M.Ed. program, they must complete their degree in a maximum of two years and may attempt up to 72 credits. If they take more time or attempt more credits, they will no longer be eligible for additional federal financial aid.
- Transfer credits accepted into students program of study are included in the calculation of maximum time frame.

Satisfactory grades:

Credits attempted and earned

- Undergraduate: grades A,B,C,D, and/or Credit.
- Graduate: grades of Credit and/or letter grades A, B (B-minus is not satisfactory).
- Credit [for Cr/NCr courses).
- Continuation courses: Incomplete.

Unsatisfactory grades:

Credits attempted but not earned

- Withdrawal
- No Show
- Incomplete
- No Credit/Incomplete
- No Credit
- Undergraduate: letter grade F
- Graduate: letter grades below B

Repeated Courses - Courses can only be taken twice to be eligible for federal financial aid.

Change of Program: Students can have their SAP reset by changing their program of study. Credits attempted and grades earned that do not count towards the new program of study will not be included in the SAP determination. Students may only change their program of study once for the purpose of resetting SAP.

Probation: Students Grade Point Average and Credits are reviewed once a year to determine compliance with SAP standards. If at the term review they do not meet the SAP standards, the Financial Aid Office will review their situation and notify them of the outcome. If eligible, they will be placed on financial aid probation for one academic term. Students placed on probation have one academic term to bring their status back to meeting SAP standards. During this probationary period students will not lose their federal financial aid eligibility.

Loss of Eligibility: If the SAP standards have not been met by the end of the probationary term, students will lose eligibility for further federal financial aid until they once again meet the SAP standards.

Appeals: Students have the right to appeal if after the probationary period they are still not making SAP standards and have lost their eligibility for federal financial aid. They may have their situation reviewed by the Director of Financial Aid. Approval will be based on serious extenuating circumstances outside the College that have an impact on ability to achieve the SAP standard; for example: a student becomes seriously ill, is severely injured, or a relative dies. Other circumstances may be considered. Each situation is reviewed on a case-by-case basis.

Students must submit a written statement to the Financial Aid Office describing the circumstances, time-frame and consequences along with supporting documentation to be kept in their financial aid file. A third party statement verifying the circumstances documented is also required. Eligibility for all federal financial aid will be lost in the next term if the student does not meet the requirements in the period stated. (Go to <http://www.cambridgecollege.edu/financialaid/forms>.)

cfm and scroll down to SAP Appeal form.)

Regaining Eligibility: Students may regain eligibility for federal financial aid during the academic year if they reach the minimum standards of satisfactory progress within the same period of enrollment. Students may continue to attend courses at Cambridge College without the assistance of federal, state or College funding. Students are determined to be eligible for funding based on the timing in which they reach the minimum standards. The Financial Aid Office will award appropriate federal financial aid as specified by the Federal Department of Education. (The Federal Department of Education's standards outline different eligibility criteria for students who meet satisfactory progress standards within the current period of enrollment versus those who regain eligibility in a later period.)

Federal Financial Aid Student Withdrawals and Leave of Absence

Summary

Cambridge College has developed a policy on withdrawals and leave of absences to comply with the Federal Department of Education's return of federal Title IV funds regulations. Cambridge College is required to determine the earned and unearned portions of Title IV aid as of the date a student ceases attendance based on the amount of time the student spent in attendance up through 60% point in each term.

Students who need to withdraw or take a leave of absence from Cambridge College may do so for academic, disciplinary, personal, or medical reasons. If the student is receiving federal financial aid and withdraws or takes a leave of absence from the College, they may be subject to the federal financial aid return policies. Students must notify the Financial Aid Office about any change in planned period of enrollment, whether due to withdrawal from a class, a leave of absence, a change in academic division, or withdrawal from the College.

Non-attendance does not constitute official withdrawal. If a student who began attendance and did not officially withdraw fails to earn a passing grade in at least one course over an entire term, the College must assume that the student has unofficially withdrawn. For this purpose, non-passing grades are defined as No Credit/Incomplete (NCI), No Credit (NC), Withdrawal (WD), Administrative Withdrawal (AW), No Show (NS). Unofficial withdrawals will be determined within 90 days of the end of the term. Federal financial aid recipients will have their awards reviewed and recalculated, resulting in a reduction in federal financial aid awarded.

Federal Return to Title IV Aid Overview

The Financial Aid Office is required by federal statute to recalculate federal financial aid eligibility for students who withdraw, drop out, are dismissed, or take a leave of absence prior to completing 60% of a term. The student's eligibility for the funds received from federal Title IV financial aid programs must be recalculated in these situations. Recalculation is based on the percentage of earned aid using the following Federal Return of Title IV funds formula.

- $\text{Percentage of earned aid} = \frac{\text{number of days of the term completed up to the withdrawal date}}{\text{total days in the term}}$ For unofficial withdrawals, the withdrawal date used

for aid recalculation is the midpoint of the term. Any break of five days or more is not counted as part of the days in the term.

Funds are returned to the appropriate federal program based on the percentage of unearned aid using the following formula:

- Aid to be returned = (100% of the aid that could be disbursed minus the percentage of earned aid) multiplied by the total amount of aid that could have been disbursed during the term.

If a student earned less aid than was disbursed, the College is required to return a portion of the funds that have been received by the student. Keep in mind that when federal Title IV funds are returned, the student may owe a balance to the College. If a student earned more aid than was disbursed, the College would owe the student a post-withdrawal disbursement which must be paid within 120 days of the student's withdrawal.

Financial Aid: Year Round Pell Grant

Summary

Cambridge College has developed a policy concerning year round Pell Grant to meet the Federal Department of Education's requirements that all colleges have a policy explaining how students may be eligible to receive up to two consecutive Pell Grant scheduled awards during a single academic year.

Year Round Pell Grant:

In order for a student to receive the Second Scheduled Pell Grant Award they must meet ALL of the following requirements:

- Student is otherwise Pell eligible.
- Enrolled at least half-time (6 credits) for the semester that will apply to the second award.
- Received 100% of the first scheduled award.
- Student must demonstrate academic year acceleration which is defined below.

Acceleration:

Acceleration is defined as at least one credit in the payment period that must be attributable to the student's next academic year. The calculation for total credits in one academic year is any credits already earned, not attempted, in the academic year plus the credits that the student is enrolled in for the semester in which the second Pell Grant will be awarded. If a student fails a class it will not count towards the total credits for that academic year.

Earned Credits from the first 2 semesters + Credits enrolled for the 3rd semester = total credits for the academic year

In terms of Cambridge College the academic year is defined by 36 credits, therefore, a student must have a total of 37 credits or greater in order to be eligible.

For example:

Student A earns 15 credits in the fall semester, 15 credits in the spring semester, and is taking 9 credits in the summer. Student A is eligible for the second scheduled Pell Grant award for the summer

semester since his credits total 39.

Student B earns 15 credits in the fall semester and 15 credits in the spring semester but in the summer he only takes 6 credits. Student B is NOT eligible for the additional award because the total credits are only 36.

Credits that are not applicable to acceleration and may not count towards the academic year total are:

- Advance placement
- International baccalaureate
- Testing out
- Life experience
- Portfolios
- Other similar competency measures Remedial credits DO count.

The Financial Aid Office can waive the completion requirement upon appeal if:

- It is determined that the student was unable to complete the hours of the first academic year due to "circumstances beyond the student's control".
- Circumstances may include but are not limited to
 - Student withdrawing from class due to illness or illness of a close family member.
 - Student being unable to register for classes necessary to complete his or her eligible program because those classes were not offered

Appeal forms will be submitted to the Director of Financial Aid. The Director will approve or deny the appeal based on the information provided. All decisions are final.

Transfer Students:

If a student received 100% of the first scheduled award at a prior institution(s), it can be assumed that the student completed the first academic year. If the student received less than 100% the College will use the same ratio to determine the % of the academic year completed at that the other college, always rounded down. The College may use actual credits earned at the prior college, even if the credits do not transfer to the College and/or they are not related to the academic program.

Cross-Over Payment Period:

The cross-over payment period is any payment period that includes both June 30th and July 1st. The College must award from the award year with the highest award amount for the payment period for the student. The Pell Grant can be awarded in a different award year than other Title IV aid.

If the following academic year's FAFSA is received after the Pell Grant award for the cross over payment period has been determined, it must be reviewed for possible recalculation due to changes in eligibility. The Federal Department of Education will set a cutoff date after which this will not have to be completed. This date has not been determined as of yet but most likely will be set for sometime in mid-September. After the cutoff date is determined a comparison will not have to be performed for any following academic year FAFSA's received after that date.

Scholarship Awarding and Administration Policy

Purpose

Cambridge College provides undergraduate and graduate scholarships to students who are enrolled in degree and certificate programs through funds provided by donors and College general funds. All scholarship funds must be awarded through the Office of Financial Aid.

This policy shall govern the compliant awarding of scholarships. Eligibility for scholarship aid will be based upon the following:

- Completion of the annual Free Application for Federal Student Aid (FAFSA) for all need based scholarships,
- Completion of the award year Cambridge College Scholarship Application,
- Continuing students must meet "Satisfactory Academic Progress" requirements,
- Students must be in compliance with the College's "Code of Student Conduct",
- Students must demonstrate financial need where necessary—based upon the Expected Family Contribution on the FAFSA,
- Students must meet any other requirements as set forth by the donor.

College scholarships are leveraged to ensure the maximum utilization of funds to meet enrollment goals, to attract students who will contribute to the diversity of the student population and to remove financial barriers to education, further promoting access for eligible students. Student recruitment and retention are also key components of the College's mission.

Scope

A Scholarship Committee shall be established with representation and responsibility as set forth from the following College Offices:

- Financial Aid: the College authority for determining student financial need based on the FAFSA
- Institutional Advancement: the College authority for communicating donor restrictions and for stewardship in reporting scholarship awards to donors
- Bursar: the College authority for student billing, payment application and refunds
- Grants Accounting: the College authority for scholarship fund accounting
- Academics: the College authority for executing the College's mission
- Registrar: the College authority for determining satisfactory academic progress
- Admissions: the College authority for enrollment management and recruitment

This Committee shall be charged with the responsibility for recommending the selection of scholarship recipients, based upon all of the eligibility requirements to the Director of Financial Aid. The Committee shall meet once per term or more frequently as necessary, as scholarships are awarded on a term by term basis based upon available funding.

A student who withdraws, cancels, becomes inactive, enrolls less than full-time (when full-time enrollment is required for scholarship retention), or is suspended or dismissed from the College, will lose his/her scholarship eligibility. A student who is classified under one of the above categories due to medical reason may appeal in writing to the Committee to have his/her scholarship reinstated. The appeal must be submitted in writing with supporting documentation.

The Committee will submit a report to Audit, Finance & Investment (AFI) Committee of the Board of Trustees on the awards disbursed each academic year after the awards for the summer term are disbursed. This report will be presented at the next regularly scheduled AFI Committee meeting.

Appendix C: Information Technology Policies

CCOL Information Access Policy

Introduction

Cambridge College's Online Library (CCOL) offers information and research support services to the academic community of Cambridge College. The development of its collections is based on the needs of the academic community it serves and taking into account that they are collections with balanced information that includes different points of view, avoiding prejudice and censorship. It defends free access to information respecting intellectual property laws and promoting its fair use among users.

Mission

Offer the academic community a virtual space where access to information resources and services and the guidance of information professionals enable interaction, exchange of ideas, development of skills, discovery of new sources and creation of new knowledge resulting in an empowering learning experience.

Definition: Access to information

According to the Universal Declaration of Human Rights of the United Nations Organization in its article 19:

"Every individual has the right to freedom of opinion and expression; This right includes the right not to be bothered because of their opinions, to investigate and receive information and opinions, and to disseminate them, without limitation of borders, by any means of expression"¹

Librarians, as custodians of a large number of information sources, have the responsibility to ensure compliance with this right without distinction of persons. Access to information must be facilitated in any format and through any available means.

Procurement and Budget

The budget is approved yearly by the College administration. New materials are acquired through staff and student recommendation and Librarian review. Further recommendations, oversight and management suggestions are offered by the Library Strategic Planning Committee made up of faculty and staff.

Personal

Access to information is the main function of the Library. All personnel from management, and the departments of technical services, information systems, information skills and public services require specialized skills so that this function can be performed efficiently. For this, it is important that the staff receive continuous training in the different organization, search and information access tools. This includes:

- Knowledge of laws governing copyright and fair use of copyright resources information.
- Management of the catalog of collections, academic databases

and the Internet. Continuous training is required to master different platforms, interfaces and to know the constant updates of the various electronic products.

- The technical services staff must know the resource cataloging standards adopted by library organizations at an international level to organize information and thus facilitate its access and exchange.
- The institution's virtual services and information systems personnel ensure that, as information technologies evolve, library services are updated with equipment and programmed to meet the needs and expectations of users.
- Information skills staff have as their primary goal that users are able to define their need for information, access sources, and evaluate information in order to use it effectively. Offers workshops on: use of library resources, catalog and database searches, information literacy, ethical use of information, and others, as needed.

Information access services

As our library belongs to the College, our main users are the academic community that includes students, professors and administrative staff. The services offered to these users include consultation, quick, investigative and virtual reference services, virtual loan of resources, face-to-face and remote access to database collections and information skills workshops.

Our collection is organized in an integrated way, which means that resources in different formats such as books, magazines and audiovisuals can be searched together in a single collection via our aggregated search engine: Ebsco's Discovery Service (EDS). This makes it easier for the user to search and access information. The library offers virtual reference services. It also has an online catalog, website and an Ask-A-Librarian application to facilitate communication with users. The academic databases are available 24 hours a day by remote access (only for the College community).

1 ALA is the leading professional organization for librarians in the United States and its territories. Bill of Rights. (Chicago, IL.: American Library Association, 2014) <http://www.ala.org/advocacy/intfreedom/librarybill>.

CCOL Interlibrary Services

As the College relies on an online platform across all campuses with no local physical collections offered, the College does not have any formal borrowing agreements with other institutions and does not offer ILL (interlibrary loan) services. Students are encouraged to acquire public library cards from their local public libraries, all of which offer Interlibrary-loan services.

Data Security Policy

Purpose

This policy defines the guidelines for the security and confidentiality of data maintained by Cambridge College, both in paper and electronic form. This policy also informs each person who is entrusted to access student, employee and/or institutional data of their responsibilities with regard to confidentiality and safeguarding Cambridge College data.

Statement of Policy

All custodians and guardians of administrative data are expected to manage, access, and utilize the data in a manner that maintains and protects the security and confidentiality of that information. All notice to Federal, State & local regulations must be considered and adhered to when using or sharing personal or confidential information. Any notice of a breach of confidential information whether in paper or electronic form MUST be reported to the appropriate Vice President for the area involved and the General Counsel immediately.

Under no circumstances shall credit card numbers be stored or sent from College servers or desktops.

DEFINITIONS

There are two primary categories of data-handling and access defined in this policy. They are Data Custodians and Data Guardians.

Data Custodians

Data custodians function as gatekeepers for the data that is collected and maintained by individuals in their departments. Custodians are responsible for establishing access procedures for the administrative data available in their area and for approving access requests for that data. The table below indicates the administrative areas that maintain the college's primary data stores and the respective data custodians.

Administrative Areas	Data Custodian
Alumni and Development Data	Vice President for Advancement
Financial Data	College Controller
Financial Aid Data	Director of Financial Aid
Human Resources Data	Director of Human Resources
Information Technology Data	Director of Information Technology
Student Services Data	Dean of Enrollment Management

Data Guardian

A data guardian is defined as anyone who, as a function of their position at Cambridge College, possesses or has access to Cambridge College administrative data, either electronic or otherwise. Guardianship and its associated responsibilities apply to individuals who dispense or receive data.

Department heads are responsible for signing off on data access requests for employees under their supervision.

Scope

College employees, or others who are associated with the college, who request, use, possess, or have access to college administrative data must agree to adhere to the protocols outlined above. In

addition, guardians, custodians and data users are prohibited from:

- Changing data about themselves or others except as required to fulfill one's assigned College duties or as authorized by a supervisor. (This does not apply to self-service applications that are designed to permit you to change one's own data).
- Using information to enable actions by which other individuals might profit.
- Disclosing information about individuals without prior authorization by a supervisor.
- Engaging in what might be termed "administrative voyeurism" (reviewing information not required by job duties) unless authorized to conduct such analyses.
- Examples include tracking the pattern of salary raises, viewing a colleague's personal information, looking up someone else's grades or viewing other colleague's work product when not authorized to do so.
- Circumventing the level of data access given to others by providing access that is broader than that available to them, unless authorized. For example, providing an extract file of employee salaries to someone who does not have security access to salary data is prohibited by this policy.
- Allowing unauthorized access to Cambridge College's administrative systems or data by sharing an individual's username and password.
- Engaging in any other action that violates the letter and spirit of this policy, either purposefully or accidentally.

Improper Guardianship

In assuming responsibility for the interpretation and use of College administrative data, guardians are expected to recognize the potential serious consequences of their improper guardianship. Improper maintenance, disposal, or release of college administrative data exposes the College to significant risk, including lawsuits, loss of employee and student trust, and loss of funding.

Guardians who are found in violation of this policy will be subject to Cambridge College disciplinary processes and procedures including, but not limited to, those outlined in the Student Handbook, in Cambridge College Policies and any applicable bargaining unit contracts. Illegal acts may also subject users to prosecution by local, state, and/or federal authorities.

POLICY APPLIES TO

College employees, or others who are associated with the College, who request, use, possess, or have access to College administrative data.

EXCEPTIONS

This policy does not prevent the release of institutional data to external organizations or governmental agencies as required by legislation, Regulation, or other legal requirements.

Digital Millennium Copyright Act Policy

Reason for this Policy

Cambridge College has policies and codes of conduct that define responsible use of computers and networks for all members of its community. There are also federal, state and local laws governing many interactions that occur on the Internet. This policy addresses the specific requirements of a 1998 Federal law known as the Digital Millennium Copyright Act, or DMCA. The DMCA addresses issues of copyright protection as it relates to electronic media.

Downloading or distributing whole copies of copyrighted material for personal use or entertainment without explicit permission from the copyright owner is against the law. As a provider of Internet access to its community, Cambridge College has specific obligations under DMCA. This policy describes the rules and processes proscribed by the DMCA, and how they are implemented at the College.

This policy is guided by the following objectives:

1. DMCA requires formal notification of the College community of its obligations regarding
2. electronic content that is protected by copyright
3. Heightened community awareness to the seriousness of illegal file sharing and the penalties attached to infringement
4. Broad awareness that any activity that is illegal is a violation of Cambridge College policy.
5. Compliance with DMCA and HEOA requirements

Statement of Policy

When attached to the Cambridge College network, downloading or distribution of whole copies of copyrighted material for personal use or entertainment without explicit permission from the copyright owner is against the law, and therefore against College policy.

Cambridge College faculty, staff or students who do this can find themselves being personally sued if a subpoena or early settlement offer is served by the copyright holder. Anyone who does this may be prosecuted, fined and in some cases, incarcerated. Cambridge College complies with all court orders requiring names and information in the case of subpoenas or settlement letters demanding the identity of a specific user of the college network.

If you are a staff or faculty member, and the College receives an infringement complaint, an investigation will be performed. If it is determined that the complaint was valid, applicable personnel policies will apply.

If you are a student, and Cambridge College receives an infringement complaint about content on a machine owned or registered by you, the following procedures will apply:

- You will be notified of the complaint by the Dean of Students, and be instructed on the requirements of the law. If the complaint is determined to be valid, you will be required to remove the content in question within 24 hours.
- The second time a take down notice is received for a machine owned by you, you will again be notified of the complaint by the Dean of Students, and educated on the requirements of the law. Further disciplinary action, referenced in the Student Code of Conduct, will be taken.

- The third time a take down notice is received for a machine owned by you, the College reserves the right to restrict your network access for a period of time determined by the College.

Doing Schoolwork with a Restricted Computer

Although your personal computer may be blocked from accessing the network because of copyright infringement, your Cambridge College computing accounts are not disabled. You are still able to access Cambridge College technology using other resources such as the computer labs on campus. While this may be an inconvenience, connecting your personal computer to the Cambridge College network is a privilege, not a right. Of course, any use you make of Cambridge College lab computers must also comply with the copyright law.

Your Responsibilities as a Computer User at Cambridge College

When you accept computing accounts at Cambridge College, you agree to use the College's computing resources responsibly. A major part of responsible use is maintaining the security and confidentiality of your computer accounts and the information you store on them. You need to protect your computer accounts, passwords, and other types of authorization that are assigned to you alone. You should never share them with others. If you allow a friend to use your computer or to access your accounts, you can be held responsible for his or her actions on the network. If your friend uses your computer and downloads copyrighted material illegally, you can be held responsible because your computer is identified in the notice that is sent to the College from the copyright holder.

Electronic Communication (Email) Policy

Purpose

Cambridge College has invested in its technology infrastructure to enhance teaching and learning and to enable efficient business practices. All Cambridge College students, faculty, and staff have access to email as a communication tool and the MyCC portal for current news, events, personalized messages and teaching and learning activities. Cambridge College is committed to the use of College wide electronic communication to enhance interpersonal communications, improve information exchange, and to reduce the use of paper and printed materials.

The purpose of this policy is to identify electronic communication as an official means of communication within Cambridge College and to define the responsibilities of Cambridge College students, faculty and staff related to electronic communication.

Statement of Policy

Cambridge College provides access to email and the MyCC portal for all students, faculty and staff. Email is an official method of communication at Cambridge College. Students, faculty and staff are held strictly responsible for the consequences of not reading College related communications sent to their official Cambridge College email address. Cambridge College students will also utilize the MyCC portal to post role specific messages and College related announcements.

Scope

Assignment of email addresses

Students and faculty are assigned a go-email username and password upon acceptance to a program or upon hire. Core faculty, Coordinators and staff are assigned a Microsoft Exchange username and password upon hire by Cambridge College, after being added to the Human Resource System. Core faculty will have both go-email and Exchange email accounts. Access to email is provided directly or indirectly through the MyCC portal, Outlook Web Access or Outlook on a Windows desktop (on campus). The official Cambridge College email address is:

Core Faculty/Staff - username@cambridgecollege.edu

Student/faculty - username@go.cambridgecollege.edu

Educational uses of electronic communications

Faculty members may require the use of email, MyCC course tools, or other forms of electronic communication for course content delivery, class discussion, or synchronous chat. It is recommended that faculty specify these requirements in their course syllabus. Faculty may expect or require that students access MyCC and read notices sent to their official Cambridge College email address.

Email forwarding

Students who forward their official Cambridge College email to another email address (e.g. username@gmail.com) do so at their own risk. Cambridge College cannot be held accountable or ensure the delivery of its official communications by external service providers. Forwarding email does not relieve the receiver from the responsibilities associated with electronic communications sent to their official Cambridge College email address. It cannot be stressed more strongly that students and faculty MUST use their College provided email address while they are associated with the College.

Responsible use of email

All use of email will be consistent with other Cambridge College policies and local, state and federal law, including the Cambridge College Policy on the Responsible Use of Information Technology.

Email is a tool provided by the College to complement traditional methods of communications and to improve education and administrative efficiency. All email users have a responsibility to use this resource in an efficient, effective, ethical and lawful manner. Use of the college's e-mail system is confirmation that the user agrees to be bound by this policy. Violations of the policy may result in restriction of access to the College's email system and/or other appropriate disciplinary action.

The following should be observed when using any College email system:

Conducting business for profit using College email and or other resources is prohibited. Incidental non-business personal use of e-mail is acceptable, but an expectation of privacy cannot be guaranteed due to the official nature of the email system; Using any email to send information that is classified as private or can be shown to contain personally identifiable information is prohibited. While the College will make every attempt to keep email messages secure, privacy is not guaranteed and users should have no general expectation of privacy in email messages sent through a College email system.

Under certain circumstances, it may be necessary for the Cambridge College IT staff or other appropriate College officials to access email files to investigate security or abuse incidents or violations of this or other college policies. Such access must be approved by a Vice President, the President or General Counsel and will be on an as needed basis and any e-mail accessed will only be disclosed to those individuals with a need to know or as required by law.

Individuals are responsible for saving email messages as they deem appropriate. Due to limited resources the IT department has the right to restrict the amount of user storage on the College email system. Go email storage quotas are likewise controlled by Google. Users are asked to manage the volume of email in their account and are required, from time-to-time, to purge deleted or trashed emails. The College reserves the right to purge deleted emails in a users' account if space needs become critical.

When using email as an official means of communication, students, faculty, and staff should apply the same professionalism, discretion, and standards that they would use in written business communication. Furthermore, students, faculty, and staff should not communicate anything via email that they would not be prepared to say publicly. Email may be accessed by the College for official purposes including but not limited to administrative need for official information, production in legal proceedings, information related to student records, information related to personnel records, etc.; however, such access must be approved by the account holder, a Vice President, the President or General Counsel.

Approval and transmission of email containing essential college announcements to students, faculty, and/or staff must be obtained from the appropriate authority. Only the Offices of Vice Presidents or President can authorize the sending of broadcast messages to a wide audience of students, faculty, and staff within the scope of their authority. IT will only send broadcast messages as they relate to maintenance issues or security concerns.

The following types of emails are explicitly prohibited:

- Emails that exchange proprietary information or other highly privileged, confidential or sensitive information.
- Emails that are considered advertisements, solicitations, chain letters, political communications and other unofficial, unsolicited email.
- Emails including sexual content, pornography, lewd or other highly inappropriate behavior when considering the official nature and purpose of the College email system.
- Emails that are in violation of any laws, including copyright laws, or Institutional policies.
- Emails that knowingly transmit a message containing a computer virus.
- Emails that intentionally misrepresent the identity of the sender of an e-mail. Emails that use or attempt to use the accounts of others without their permission.

POLICY APPLIES TO

This policy applies to all students, faculty, and staff of the College and to all other users of information technology resources at Cambridge College. These users are responsible for reading, understanding, and complying with this policy.

Responsible Use Policy

Purpose

Cambridge College is an educational institution which encourages continuous learning, experimentation, and the development of the adult learner. The College is committed to respecting individual privacy and freedom while expecting each individual to act in a responsible, legal, ethical and efficient manner when using the College's information technology systems and resources. These systems are designed to encourage high-quality educational, professional career development and self-discovery activities.

The purpose of this policy is to define responsible and ethical behavior that guides faculty, student, and staff use of information technology resources at Cambridge College.

Statement of Policy

Cambridge College provides access to information technology resources for faculty, staff, students, and certain other users to support the College's mission and to conduct the business of the College. Every authorized user of information technology resources at Cambridge College is responsible for utilizing these resources in an efficient, ethical, and legal manner and in ways consistent with overall College policy.

Definitions:

Information technology includes but is not limited to desktop computers, workstations, network servers, mainframes computers, software, digital information and voice, video and data networks, including official College web pages on its portal, public website and social networking sites.

Scope

The following principles serve to guide the responsible use of information technology for all Cambridge College users.

Respect the rights of others by complying with all College policies regarding sexual, racial and other forms of harassment, and by preserving the privacy of other individuals. For example, it is prohibited to send harassing messages via email or social networking or transmit or reveal personal or private information about individuals. Use computing facilities, accounts and data only when you have appropriate authorization and use them for approved purposes. For example, you should not use Cambridge College information Technology resources to run a business or to access another individual's computer account.

Respect all pertinent licenses, contractual agreements, and copyrights. Use only legal versions of copyrighted software in compliance with vendor license requirements. For example, you should not post another individual's copyrighted material on your web page or install software with a single user license on multiple computers.

Preserve the integrity of computing systems, electronic data, and communications networks. For example, you should not modify settings on a desktop computer to make it unusable to others or excessively utilize networked resources, like music videos, that may overload Cambridge College's network bandwidth.

Respect and adhere to all applicable local, state and federal laws.

For example, it is prohibited to use Cambridge College's information technology resources to attack computers on another network by launching viruses, worms, or other forms of attack.

Privacy

While the College values and respects the privacy of its staff, faculty, students, and other users, the intrinsic nature of electronic records places limits on the extent to which the College can guarantee a user's privacy. Despite security protocols, communications over the Internet—and across the College's local campus network—can be vulnerable to interception and alteration. Consequently, the College cannot assure that absolute privacy can be maintained for data that resides on the College network or on storage media.

Out of respect for personal privacy, the College does not routinely examine the contents of data or files in user accounts. However, on occasion, circumstances may require an examination of a user's files to maintain system security, to administer or maintain system integrity, to access necessary College information or in response to legal mandate. In such cases, authorized personnel may examine a user's data without notice. Authorized personnel are those specifically entrusted and approved by the College (needs VP level or General Counsel approval) to conduct such examinations.

Some data are subject to strict access restrictions, such as library patron records and data protected by the Family Educational Rights and Privacy Act (FERPA). The Library, the Office of the Registrar, and other departments that administer confidential data may enforce more stringent access policies.

Personal Use

Personal use is defined as the non-academic, non-administrative use of Cambridge College's IT systems. Such use is solely discretionary; it neither serves an essential employment function nor is it related to academic discourse. Data that result from personal use are "personal data."

Personal use of Cambridge College's IT resources is secondary to performing essential College functions using such resources. If personal use of College IT resources interferes with or causes disruptions to the essential functions of the College performed by IT, then authorized personnel may curtail such use.

Passwords and User IDs

System accounts, passwords, and user IDs plays an important role in protecting the files and privacy of all users. Because users are responsible for all uses made of their accounts, users must take exceptional care to prevent unauthorized use of their accounts. This includes changing passwords regularly and disabling "automatic" log-ins.

In most cases, it is inappropriate—and perhaps dangerous—to allow another person to use another user's network credentials or email account. In some cases, a user's data are vulnerable to alteration or deletion. In others, the validity of a user's credentials could be compromised. Alternatively, if criminal activity can be traced to a user's account, the person to whom the account is assigned may be held accountable. The College, therefore, reserves the right to restrict or prohibit password sharing.

In addition, the College reserves the right to implement and enforce

password maintenance procedures, including detecting and disabling “weak” passwords and implementing password “aging” mechanisms. Weak passwords are those that may be easily “cracked,” guessed, or discovered, such as a user’s birth date or name. Password aging refers to a process that requires users to change passwords at predetermined intervals.

Data Storage and Back-ups

The College maintains a centralized repository of data stored in user accounts on the College network. This includes all the data that a user creates and saves on the College’s network storage devices. It also includes saved email messages, attachments, files, and folders.

The College reserves the right to restrict the amount of network storage available for users. This includes the prerogative to impose quotas on the number and/or size of stored files. The Director of IT, after conferring with the College Leadership, can regulate the availability of central network storage to which each user is entitled.

Data files are routinely backed up on a daily, weekly, monthly, and/or yearly basis. These back-ups facilitate the restoration of College data that have been lost, altered, or damaged. The College will not routinely retrieve backed-up personal data. Users, therefore, are encouraged to maintain independent back-ups of their important personal data, including email messages. Cambridge College disclaims any responsibility for maintaining or providing access to backups of a user’s personal data.

For data backed up by the IT department, retrieval or restoration is at the discretion of the Director and/or the College Leadership.

Security

The College implements appropriate “industry-standard” practices concerning the security of the College’s IT resources. These methods are designed to protect against unauthorized access, intrusion, or damage to the availability, access, or integrity of the College’s IT systems. However, due primarily to the nature of security threats and the remote possibility of a breach of security, the College warrants neither a user’s privacy nor the integrity of data stored on the College network.

Copyright, Trademark, and Domain Names

Users must comply with all copyright, trademark, and other intellectual property laws. In general, permission is necessary for a user to reproduce materials, such as video, music, images, or text. To “reproduce” in this context includes downloading and saving a digital copy to a hard drive, floppy, or other storage media. Photocopying copyrighted materials without authorization is also prohibited. Certain exceptions apply, such as “Fair Use.”

In addition, users must generally obtain permission from the copyright owner to prepare derivative works, including modifying existing works. Copyright law also prohibits the distribution, display, or performance of works created by another without a proper release.

The College possesses trademark rights in certain symbols and phrases such as images of the College logo and the words “Cambridge College.” Unauthorized use of these trademarks is not permitted.

Additionally, the College owns certain Internet domain names. These

include cambridgecollege.edu, ccnite.org and other such domain names. Registration of domain names incorporating or referencing College trademarks is prohibited without the approval of the College Leadership.

Compliance and Enforcement

All users of the College’s IT resources must abide by these policies. Users not wishing to agree to and comply with this policy will be denied use of or access to Cambridge College IT resources.

College community users who intentionally violate these policies are subject to disciplinary action by the College consistent with established College due process. At the discretion of the Director of IT alleged violations of this policy may be referred to the Executive Leadership or College disciplinary body. In addition, the Director of Human Resources may conduct an investigation regarding the alleged infraction. Violators may also be liable for civil damages and/or criminal prosecution, if applicable.

Guest users of publicly available College IT resources are also subject to the terms of this policy. While explicit acceptance of this policy is not required for guests to access these limited IT resources, guests are accountable for their actions while using College IT resources. Guests who violate this policy will be asked to cease use and may be barred from further access. If a guest user violates federal, state, or local law while using College IT resources, the Director of IT may report this activity to the General Counsel.

Members of the Cambridge College community who believe they have witnessed or been a victim of a violation of this policy should notify or file a complaint with the appropriate College office as follows. Students should report suspected violations to the Dean of Students. Faculty members should report suspected violations to the Vice President/Provost of Academic Affairs. Staff members should report suspected violations to their department head who may report the problem to the Director of Human Resources. Reports of suspected unauthorized use or misuse of Cambridge College information technology resources will be investigated pursuant to standard College procedures.

Information technology users who are found in violation of this policy will be subject to Cambridge College disciplinary processes and procedures including, but not limited to, those outlined in the Student Handbook, the Cambridge College policies, and any applicable bargaining unit contracts. Privileges to use Cambridge College information technology resources may be revoked. Illegal acts may also subject users to prosecution by local, state, and/or federal authorities.

POLICY APPLIES TO:

This policy applies to all students, faculty, and staff of the College and to all other users of information technology resources at Cambridge College. These users are responsible for reading, understanding, and complying with this policy.

Social Security Use Policy

Reason for this Policy

Cambridge College is dedicated to ensuring the privacy and proper handling of Social Security Numbers (SSNs) of its students,

employees, and individuals associated with the College. The primary purpose of this Social Security Number policy is to ensure that the necessary procedures and awareness exist so that College employees and students comply with both the letter and the spirit of FERPA and The Massachusetts Data Privacy Act. Historically, SSNs have been used in College systems to uniquely identify students and employees. As our systems are updated we will only display the last four digits of social security numbers. This will be the default action. If your needs are such that you require access to the full SSN you will be required to submit a signed SSN Access form to IT. This form will need to be signed by your immediate Supervisor and the Dean for Enrollment Management.

This policy is guided by the following objectives:

1. Broad awareness of the confidential nature of the SSN
2. Reduced reliance upon the SSN for identification purposes
3. Increased emphasis on secure use, transmission, and storage of the SSN throughout the Cambridge College system
4. A consistent policy toward and treatment of SSNs throughout the College
5. Increased confidence by students and employees that SSNs are handled in a confidential manner.

Statement of Policy

It is the intent of Cambridge College to protect the SSN of its students, staff, and faculty to minimize the growing risks of identity theft.

Accordingly, the SSN may not be used as a common identifier or used as a database key in any electronic information system. The SSN may be collected and used when necessary for employment records, financial aid records, and a limited number of other business and governmental transactions, as permitted by law.

Cambridge College will assign a Cambridge College ID and other credentials, like a password or a digital

certificate, to an individual upon initial association with the College for identification and authentication, in order to eliminate the use of the SSN wherever possible.

Cambridge College is working toward a policy regulating the use of SSN and other personal information across all campuses within the College system.

The policy's major objectives are:

- The Jenzabar system, and all new systems purchased or developed by Cambridge College will only use the last four digits of student Social Security numbers where such use is specifically permitted or required under this policy. Such systems should not visually display the full SSN on any system output, including monitors and printed forms, unless required by law or required by Cambridge College as needed in execution of its duties.
- Staff and faculty whose job duties necessitate access to full SSN numbers will be given such access determined by the Dean for Enrollment Management.
- Each individual associated with Cambridge College will be assigned an ID that is not the same as, or based upon, the

individual's SSN or other unique demographic information.

- No new system or technology, where the SSN is a consideration, will be developed or purchased by Cambridge College unless it is compliant with this policy or approved by Dean for Enrollment Management as an exception.

Web Portal Accounts Policies and Procedures

MyCC Web Portal Accounts (<http://mycc.cambridgecollege.edu>)

The MyCC portal is where students and faculty can access Cambridge College information. The academic calendar, course search, degree and programs offered can be viewed through the portal.

Enrolled students can log into MyCC with their own user ID and password to register for courses each term, and view their personal information, such as their academic record, student account, course schedule and syllabi.

Faculty can log into MyCC with their own user ID and password to view courses being taught by term, and view all students enrolled in that course. Faculty will be able to enter grades on-line and e-mail students through the portal.

Staff who does not have full access to Jenzabar on their office computer would be able to log into MyCC with their own user ID and password to view student data that is appropriate for the responsibilities and duties of the employee.

Creation of MyCC Web Portal Accounts

Students—When a new applicant becomes accepted and rolled into the Registration module, a MyCC account will be created automatically, and the user ID and password (PIN) will be submitted to the student in a letter.

Faculty—When a new faculty member joins Cambridge College, a MyCC user ID and password will be created by the system, and an e-mail will be sent to the faculty member's Cambridge College e-mail account.

Cancellation of MyCC Web Portal Accounts

Faculty—The Office of Human Resources will notify the Office of Student Information Systems and User Services of all terminations, leaves of absences and resignations as far in advance as possible. The Office of Student Information Systems and User Services will need the existing faculty member's name and Jenzabar ID to disable the web portal account. Adjunct Faculty accounts would be disabled once they no longer teach at Cambridge College for two or more semesters.

Student—The Registrar's Office will notify the Office of Student Information Systems and User Services of any students who have had no activity on their accounts for two terms, excluding withdrawals and leaves of absence, then disable the students' Tel_Web_Group so that the students cannot register for courses.

Appendix D: Student Affairs Policies

Alcohol and Drug Policy

Purpose

In compliance with the Drug-Free Workplace Act of 1988 and the Drug Free Schools and Communities Amendments of 1989, this policy shall govern the use of drugs and alcohol at Cambridge College.

Cambridge College will enforce all applicable laws concerning illegal drugs and alcohol.

Scope

As a condition of employment and of continued employment, all employees of Cambridge College are required to adhere to this policy.

Policy

While on the premises of any Cambridge College location, and while conducting business-related activities off Cambridge College premises, including at all College-sponsored events, no employee may use, possess, distribute, dispense, sell, manufacture, transfer, purchase or be under the influence of alcohol, illegal drugs, intoxicants or controlled substances. Illegal drugs include all drugs of which the use, possession, transportation or sale is prohibited by any federal, state or local law. In addition, the possession of drug paraphernalia is prohibited.

The use of legal drugs, including prescribed drugs, is permitted on the job only if it does not impair an employee's ability to perform the essential functions of the job effectively and in a safe manner that does not endanger other individuals in the workplace. The misuse of prescription drugs, including drugs not prescribed to the employee is prohibited while working. These prohibitions cover arriving on College premises while impaired by the effects of such drugs, including those obtained by prescription under medical direction.

Employees who have been informed by a physician, pharmacist or other authorized medical personnel that the use of a legal drug may present a safety risk or inappropriate behavioral side effects, are required to submit a physician's statement to the Director of Human Resources that the prescription drug use will not affect job safety.

All Cambridge College faculty and staff are expected to abide by all federal, state and local laws, including those regulating the use, possession, sale distribution, manufacture and cultivation of illicit drugs and alcohol.

Cambridge College has a zero tolerance for the abuse of this policy. Members of the College community charged with violations of this policy are subject to disciplinary action through the established disciplinary procedures of the College and its collective bargaining agreements. Employees may face disciplinary action up to and including immediate termination of employment, in addition to criminal prosecution under applicable laws. The College may also require satisfactory completion of an appropriate substance abuse rehabilitation or treatment program, counseling or education program as a condition of reinstatement or continued employment.

Employees receiving federal grants or contracts are required to certify to the funding agency that they are drug-free before receiving any awards. This certification may also be required of other employees whose employment is partially or fully federally funded.

An employee who is convicted of a criminal drug statute violation occurring in the workplace must, within five (5) days after the conviction, notify the Human Resources Office of such conviction. Further action may be taken to the extent allowable by law, and in accordance with applicable federal funding contracts and collective bargaining agreements.

Persons who are not employees of Cambridge College, but who perform work for its benefit (such as independent contractor, temporary employees provided by agencies, visitors engaged in joint projects, etc.) are required to comply with this policy. Violation by such persons is likely to result in their being barred from the workplace, even for a first offense.

As a member of the Cambridge College community, it is your responsibility to know and abide by all campus rules and regulations, to understand the risks associated with the use and abuse of alcohol and illegal drugs and to assist in creating an environment that promotes health-enhancing attitudes and activities.

FERPA Student Records Access and Confidentiality

- A. In compliance with the Family Educational Rights and Privacy Act (FERPA) of 1974, as amended, the College does not permit the release of personally identifiable information in student records without the written consent of the student, except as specifically allowed by FERPA statute or regulation. The Registrar controls access to and disclosure of student education records and maintains safeguards against unlawful disclosure. Record of the access and disclosure of student records must be maintained by the office providing such records (usually the Registrar), and will be made available to the student upon request.
- B. Students have the right to inspect and review all College records, files and data directly related to themselves with certain exceptions such as financial records of the student's parents, confidential recommendations which were received before January, 1975, or records to which students have waived their right of access. Official records and data related to a student are incorporated into his/her file, kept in the Registrar's Office. Other student records may be maintained in the office which created the records such as Academic Deans, Faculty, Dean of Students, etc. The College reserves the right to charge for copies of student records and will prohibit release of official transcripts for students who have financial holds.
- C. The College allows, without prior written authorization from individual students, release of personally-identifiable directory information as permitted by FERPA. Non-directory information may

be accessed by school officials whom the College has determined to have legitimate education interests, authorized representatives of federal, state and local educational authorities, accrediting organizations, and officials of another institution of postsecondary education where a student seeks or intends to enroll. The College may also disclose non-directory information in connection with a health or safety emergency, in compliance with a judicial order or lawfully issued subpoena, or in connection with the award of financial aid. Directory information at Cambridge College includes name, class year, home address and telephone number, e-mail address, dates of attendance, program status/major, degrees awarded, high school and any college previously attended. The term "school official" includes a person employed by the College in an administrative, supervisory, academic, research or support staff position; a person serving on the Board of Trustees; and a contractor outside of the College who performs an institutional service or function for which the College would otherwise use its own employees and who is under the direct control of the College with respect to the use and maintenance of personally identifiable information from education records. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for the College.

- D. Students who wish to keep their entire directory information private (a "FERPA block") may contact the Registrar. Students will be annually notified of this FERPA policy by web notice, catalogue, email or other appropriate delivery method.
- E. FERPA does not apply to the records of applicants for admission who are denied acceptance, nor does it apply to applicants who are accepted but choose not to attend Cambridge College. Admitted students are covered by FERPA once they have enrolled. A student is considered enrolled on the first day of classes.
- F. FERPA defines "student" as any individual who is or has been in attendance at an educational agency or institution and regarding whom the agency or institution maintains education records. 34 CFR 99.3. In interpreting this definition with respect to application materials, Cambridge College has generally taken the position that records sent by the student to the college are not protected as education records unless/until the student matriculates.
- G. If students take exception to anything in their folders on the grounds that it is inaccurate, misleading or otherwise inappropriate, they have the right to challenge its inclusion and seek to have it corrected or deleted. A written request must be submitted to the Registrar for a joint meeting with the Provost and Vice President for Academic Affairs, the Registrar, and any other appropriate person to discuss the matter.
- H. If the College fails to comply with FERPA requirements, written complaints may be submitted to the Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Avenue, SW, Washington, D.C. 20202-5920.

Health Policies for Students

Health Insurance

Massachusetts state law requires ALL full or three-quarter time students at Cambridge College to participate in the school sponsored

Student Accident and Sickness Insurance Plan or have an alternate insurance plan with comparable coverage. (Please note: Student status as full or three quarter time for the term will be determined as of the last date of the add/drop period) To comply, students must either enroll in the Cambridge College-sponsored student health insurance plan, or provide proof of enrollment in an alternate qualifying insurance plan by logging into MyCC and selecting the Health Insurance link found under the Student Services tab. It is the student's responsibility to ensure that the alternate insurance is adequate.

Cambridge College students attending classes at regional centers outside Massachusetts are not required to participate in the student health program.

Students who do not return the Health Insurance form (available in the application booklet and on the website) with their insurance provider information will automatically be enrolled in and billed for the College health insurance plan.

National Institute for Teaching Excellence (NITE) Students enrolled in more than three weeks of classes will need to show proof of health insurance. Massachusetts law does not require students enrolled in short-term courses (defined as no more than 15 days of classes for each term and 30 days total for the entire school year) to participate in the student health program.

International Students must enroll in the Cambridge College-sponsored student health insurance plan.

Immunization Policy

Massachusetts state law requires that all full time undergraduate or graduate students show proof of at least one dose of mumps and rubella vaccine given at or after 12 months of age, two doses of live measles vaccine given at least one month apart beginning at or after 12 months of age, a booster dose of tetanus/diphtheria within the last ten years, and a tuberculosis test (PPD) within the last six months. Massachusetts state law also requires all new students to receive a meningitis inoculation.

Institutional Protocol for the Management of School Bullying

The Government of Puerto Rico, Law No. 85 of 2017, also known as the Alexander Santiago Martínez Law.

A. Objective

Cambridge College ("CC" or "the College") is committed to establishing and maintaining an educational environment that is free from harassment, intimidation, or bullying as defined below. This Protocol governs investigations and determinations of claims of harassment, intimidation or bullying that would, if proven, constitute a violation of The Government of Puerto Rico, Law No. 85 of 2017, also known as the Alexander Santiago Martínez Law.

B. justification

The justification for this Protocol is to establish a secure and safe environment free of harassment, intimidation, bullying, and cyberbullying for students so they can learn in an academic environment free from acts of violence, harassment, intimidation and

bullying or cyberbullying: behaviors that interfere with the ability to learn in the state's public and private education system.

C. Definitions

As specified by the Alexander Santiago Martínez Law, the following types of harassment and intimidation will violate this Protocol:

(a) Harassment and intimidation and/or "Bullying": any pattern of actions carried out intentionally, whether through psychological, physical, cybernetic or social abuse, that has the effect of frightening a student or a group of students and interfering with them, their school opportunities and their performance, both in the classroom, school campus, and in their immediate social environment. Harassment and intimidation and/or bullying must be a pattern of harassment, consisting of more than one act, continuous or not, and usually extending over weeks, months and even years.

(b) Harassment and intimidation by any electronic means and/or through the use of the Internet and/or "Cyberbullying": is the use of any oral, written, visual or textual electronic communication, made with the purpose of harassing, annoying, and intimidating a student or a group of students; and that typically results in harm to the affected student's physical, mental, or emotional integrity and/or property, and unwelcome interference with the affected student's opportunities, performance, and benefit. Although the actions may not originate in the school or in the immediate school environment, cyberbullying has serious repercussions and adverse consequences in the educational environment.

D. Expectations and Institutional Policy

The College is dedicated to its mission of offering high-quality educational programs to all students. We firmly believe that our students deserve a secure, friendly and respectful environment. The College promotes a positive culture of zero tolerance to violence, harassment, intimidation, bullying or cyberbullying. Accordingly, the entire community has the right to be respected, learn or teach, and feel secure in the College environment.

Violence, intimidation, harassment, bullying or cyberbullying is a violation of a person's rights, dignity, and integrity, and is contrary to the mission and values of the College. Acts of violence, intimidation, harassment, bullying or cyberbullying are strictly prohibited and will not be tolerated. The College takes all complaints seriously and is committed to providing information, education, resources, support, interim supportive measures, and direction to the CC community to prevent and address acts of violence, intimidation, harassment, bullying or cyberbullying committed against any member of the CC community.

The College requires all students to act as responsible citizens and members of a higher education academic community. Each student is responsible to know, observe, abide by, and adhere to all College policies, rules, and regulations, including the College's Student Code of Conduct.

In response to complaints as described in this Protocol and other policies, the College will take all appropriate steps to eliminate the harassment, prevent its recurrence, and address its effects.

This Protocol does not govern instances of sexual misconduct/harassment committed by a student, or the College's process for reviewing and investigating such allegations. Those standards

and processes are set forth in the College's Title IX/Sexual Misconduct Policies. Also, this Protocol does not govern instances of discrimination or harassment as set forth in the College's Non-Discrimination and Harassment Policy.

The College reserves the right to amend, supplement, or modify this Protocol at any time consistent with The Government of Puerto Rico, Law No. 85 of 2017 and its implementing regulations as they may be amended from time to time.

E. Responsibilities of the members of the educational community

The College is responsible for implementing prompt actions to stop bullying and cyberbullying, taking steps to ensure that any bullying or cyberbullying behavior does not reoccur, locating resources to assist involved students, faculty and staff, and protecting the confidentiality of all parties subject to applicable law.

The College shall take steps to ensure that the members of the Puerto Rico Regional Center community receive annual training regarding the Protocol established for compliance with The Government of Puerto Rico, Law No. 85 of 2017. The College shall collect evidence annually, in a systematic manner, of all orientation, training and prevention activities. In addition, it shall monitor compliance with this Protocol, produce a written report of the College's training efforts and maintain records of any reported cases, investigations, and disposition in a manner consistent with the College's record retention practices and applicable law.

The Puerto Rico Regional Center Director is responsible for:

- Providing a written version of this Protocol to students and other members of the College community annually
- Providing annual bullying and cyberbullying training to faculty and staff
- Reviewing and ensuring that this Protocol is published and circulated annually through the College web site, College Catalog, and Student Handbook
- Maintaining and reporting the statistics of harassment and intimidation cases by July 1st of each year to the Council of Education of Puerto Rico (CEPR)

The Student Services Coordinator is responsible for:

- Delivering an orientation to students concerning this Protocol
- The training materials shall include:
 - The definitions of violence, intimidation, harassment, bullying, and cyberbullying
 - The immediate consequences for anyone who is claimed to have engaged in such behaviors, including the suspension of access to the physical and digital facilities of the College until the College has investigated the claim
 - Assurances that incidents of violence, intimidation, bullying, or cyberbullying shall be reported and managed in accordance with the terms of the Protocol

Faculty and staff are responsible for:

- Reporting any bullying or cyberbullying situation immediately to the Regional Center Director and the Professional Counselor
- Attending annual trainings concerning this Protocol

The Professional Counselor is responsible for:

- Serving as the point person for the reporting of any claim of violence, intimidation, harassment, bullying, or cyberbullying and maintaining written documentation of the claimed harassment behavior
- Notifying the parties involved that an investigation will be performed
- Sending the results to the Regional Center Director
- Notifying both parties involved about the outcomes of the investigation and the case resolution
- Developing an action plan for the complainant
- Reporting to the Associate Provost suspected violations of this Protocol for further investigation and disciplinary action

Students are responsible for:

- Complying with all policies applicable to conduct in the classroom as well as College-sponsored activities
- Understanding that upon enrolling in the College, the guidelines, rules, and regulations established by the College apply to their conduct at the College
- Familiarizing themselves with all policies and procedures affecting them

F. PREVENTION STRATEGIES

- Provide annual training to faculty and staff, as described
- Provide training to students, as described
- Student training shall include
 - IT policies about the responsible use of technology at the College
 - Coverage of this Protocol and the Student Code of Conduct
 - How to report incidences of violence, harassment, bullying, or cyberbullying

G. PROCEDURE FOR DISCLOSURE OF THE PROTOCOL

This Protocol will be published annually through the Puerto Rico Regional Center webpage, College Catalog, and Student Handbook.

H. PROCEDURE TO DOCUMENT THE CASES, FILE CONFIDENTIALITY AND MAINTENANCE

Case documentation

- A student harassment claim must be made in writing to the Professional Counselor. The complainant shall offer details about the harassment. In cases of cyberbullying, the complainant should provide copies of any email, text messages, photos, or other media documenting the cyberbullying.

File Confidentiality and Maintenance

- Student documentation will be held in a protected digital system and physically preserved in the Regional Center Director's office for an indefinite period of time. Only the Regional Center Director, Professional Counselor, and Associate Provost (or designee) will have access to these files and to the information contained in them.
- The mechanisms to protect and keep confidentiality of the information and the file will be carried out as established in this Protocol and other applicable College policies concerning confidentiality of student information. The bullying or cyberbullying claim files will be available for the Law and Order authorities and the Council of Education of Puerto Rico, upon written request and subject to applicable law.

I. CASE COMPLAINT PROCEDURE

- The student must notify the Professional Counselor in writing, through email or letter, that they have been a victim of violence, harassment, intimidation, bullying or cyberbullying.
- The Professional Counselor shall notify the Regional Center Director and the Associate Provost that a complaint has been made.
- The Professional Counselor (or designee) handles alleged violations of this Protocol.
- When a student has been charged with a violation of the Protocol, the student will be notified of the charges in writing.
- Following notification, the Professional Counselor (or designee) will meet with the student charged. If there is more than one accused student in the case, the Professional Counselor (or designee) will decide whether to conduct the meeting(s) separately or jointly.
- The Professional Counselor (or designee) may also conduct meetings and interviews with the complaining student(s) and any witnesses, and may collect and review any documentary materials that he/she believes to be relevant to the alleged violation.
- The complaining student shall be made aware that they have the right to also file their complaint with the Puerto Rico Authorities. Grievances may be filed with the Puerto Rico Council on Higher Education, PO Box 19900, San Juan, Puerto Rico 00910-1900 • 787-641-7100 • Fax: 787-641-2573 • www.ce.pr.gov
- The Professional Counselor (or designee) will make written findings and recommendations to the Associate Provost (or designee).
- The Associate Provost (or designee) will review the findings and recommendations made by the Professional Counselor (or designee), and will make a determination on responsibility and sanctions, if appropriate.
- The student charged may appeal the determination and/or sanction to the Provost within ten (10) days of the decision of the Associate Provost (or designee). The decision of the Provost will be final.

Authorities in charge of assisting the complainant:

- Student Services Coordinator
- Professional Counselor
- Regional Center Director

J. COMPLAINT INVESTIGATION STRATEGIES

The College will manage complaints regarding violations of the Protocol in accordance with the following strategies:

1. The Professional Counselor (or designee) will conduct interviews of the accused student, the accusing student and all witnesses in a professional and confidential manner.
2. The accused student may be accompanied by an advisor in interviews with the Professional Counselor (or designee). This advisor may provide support to the student, but may not engage in the questioning or behave in a disruptive manner. The advisor may not be a licensed attorney.
3. The Professional Counselor (or designee) will conduct and complete the investigation within fourteen (14) business days of receipt of the complaint, in the absence of extenuating circumstances such as the temporary unavailability of a party or witness.
4. The Professional Counselor (or designee) may consult with the College's Information Technology (IT) staff and may collect and evaluate evidence from College staff relating to the incidents in question.
5. If the accused student files a claim with any state authority concerning the same incidents, or the accused student comes under investigation by any state authority concerning the same incidents, the College will acknowledge and respect those procedures. However, any interim measures taken by the College (such as suspension from the use of the College's servers) will remain in place pending those procedures.

K. INTERVENTION STRATEGIES AND SANCTIONS

Intervention Strategies

The College will employ prompt intervention strategies to manage the incident(s), including but not limited to the following:

1. Immediate physical separation of the accuser and the accused
2. Immediate denial of any rights of the accused to access the College's server and other electronic resources
3. Referral to professional counseling services for both parties and/or other students

Interim Sanctions

In certain circumstances, the Associate Provost (or designee) may impose an interim suspension and/or removal of privileges prior to the completion of the investigation. Interim suspension and/or removal of privileges may be imposed to ensure the safety and well-being of members of the College community, including the student accuser. During any interim suspension and/or removal of privileges,

the accused student may be denied access to the Regional Center campus (including classes) and/or to the College's server and other electronic resources. Interim suspension and/or removal of privileges does not replace the investigation process, which shall proceed on the normal schedule.

Possible Sanctions

1. Verbal warning
2. Written warning
3. Probation – a period of observation and review of conduct to ensure compliance with this Protocol and other College policies.
4. Permanent or temporary removal from a program
5. Suspension – temporary removal from the College
6. Expulsion – permanent removal from the College and forfeiture of all rights and degrees not awarded.
7. Revocation of a Degree
8. Other Sanctions - Other sanctions may be imposed instead of, or in addition to, specific sanctions listed in this section. These may include, but are not limited to: (a) recommendations for counseling, (b) establishment of mandatory behavior conditions/contract-signing stating agreed-upon behavior expectations for continued enrollment or reenrollment, (c) permanent loss of access to College computers and/or network, or (d) a specific project designed to assist the student in better understanding the overall impact of the behavioral infraction.

L. FOLLOW UP STRATEGIES FOR PROFESSIONAL ASSISTANCE

After the conclusion of the process, the Professional Counselor will determine the need for professional assistance for either or both parties consistent with the results of the investigation. If the intervention of a mental health professional is necessary, the Professional Counselor will refer the student/s to the corresponding resources. The Professional Counselor will also review the events and the process followed to determine if any improvements are necessary.

M. GUIDELINES FOR REFERRALS TO HEALTH PROFESSIONAL

Students may be referred to the following health care providers:

- Procuraduría de la Mujer - (787) 722-2977.
- Administración de Servicios de Salud Mental y Contra la Adicción (AMSCA) (787) 763-7575.
- Asociación de Servicios Psicológicos (787) 764-7594.
- Private professionals/hospitals.

Non-Academic and Service Offices: Concerns and Complaints Student Complaints Process

A student complaint is any unresolved issue that a student feels should be addressed. This process resolves differences within the College; it is not a legal forum.

Here are the steps for handling concerns and complaints:

STEP 1 — Promptly discuss issue with the office involved and act upon their suggestions towards resolution. Connect with the director of that office or your Cambridge College regional site director if necessary. Resolution of complaints or grievances usually begins with this informal discussion with the person or office immediately concerned.

Please make every effort to resolve an issue at step 1. Do not proceed to step 2 unless no adequate resolution has been achieved.

STEP 2 — Students who want assistance with problem solving are invited to contact the student navigators.

Send an email including all details to studentnavigation@cambridgecollege.edu. Cambridge College will make its best effort to resolve issues in a way that is positive for both students and the institution.

Grievances may be taken to the appropriate state education commission. Please note that state authorities typically expect a student to make every attempt to resolve a problem within their college first. Each state has its own procedure for handling complaints, often including a student complaint form and other documentation. They typically do not accept anonymous complaints.

Office of Student Affairs (OSA) Policies for Student Community

Student COMMUNITY-Opportunities for personal and academic growth are accessible through the co-curricular life where students are encouraged to participate in skill building workshops, networking events, College Student Clubs, and College Student Advisory Board.

The following policies are to direct the Cambridge College Community in creating and managing these opportunities of growth for Student Organizations/Clubs and Student Advisory Boards. If you should have any questions or concerns feel free to get in contact with the Dean of Student Affairs.

Policies for Student Organizations/Clubs

Starting a Student Organization/Club

1. Student Organizations and Clubs are open to all currently registered Cambridge College students.
2. Students interested in forming a new Student Organization or Club are required to fill out the Petition for Recognition for a New Student Organization/Club. (Petitions are available in the Office of Student Affairs.)
3. All organizations and clubs must maintain an active status with the OSA.
 - a. Active: Group has an up to date Constitution and is following the responsibilities listed in the Operation of Student Organizations/Clubs.
 - b. Inactive: Group has an out of date constitution and repeatedly fails to follow the responsibilities listed in the Operation of Student

Organizations/Clubs.

4. Student Organizations and Clubs are considered as independent organizations that are registered with the college. Student Organizations and Clubs are required to follow the Student Code of Conduct and the policies and procedures pertaining to student community and established by Cambridge College.

Operation of Student Organizations/Clubs

1. A Student Organization/Club is considered active when it is in good standing with Student Affairs, which means the group has completed the Petition for Recognition for a New Student Organization/Club and followed the responsibilities listed in the Operation of Student Organizations/Clubs.
2. Student Organization and Club activities and events are open to all currently registered Cambridge College students.
3. To host an event a Student Organization/Club must submit a student activity form to be approved by the Office of Student Affairs. (Forms are available through the Office of Student Affairs.)
4. Student Organizations and Clubs must meet a minimum of twice an academic year. The meeting times and dates are to be posted on campus bulletin boards and registered with the Office of Student Affairs.
5. Minutes are to be taken at each meeting detailing topics of discussion and any matter requiring a vote of the membership. Minutes are to be submitted to the Office of Student Affairs.
6. When amending the constitution, as with the by-laws, previous notice of any proposed changes are required to be given to the membership and should not be changed in the same meeting in which proposed.
7. Student Organizations/Clubs must have a representative sitting on the Student Advisory Board (SAB).
8. All student leaders must maintain Satisfactory Academic Progress by completing 67% of your registered courses. If a student is below the 67% completion rate, he/she will be considered an inactive member and removed from his/her position within the organization.

Policies for Student Advisory Board (SAB)

1. The SAB will serve as the student governing body for the undergraduate college.
2. The advisor to the SAB will be appointed by the Dean of Student Affairs
3. For membership into the SAB an Undergraduate Cambridge College student must submit the following documents to the OSA
 - a. Letter of recommendation from past SAB, faculty, or staff member
 - b. Statement of purpose. (Why are you looking to join SAB/what skills will you bring to the board?) (1-2 paragraphs)
4. The SAB will follow the agreed upon and established constitution of the board.
5. The SAB will have a seat on the College Senate; serving as active members of the senate.

SARA Online Students Complaint System

Thank you for enrolling at Cambridge College. Cambridge College is a private nonprofit institution, approved to operate in Massachusetts by

the Department of Higher Education.

You are encouraged to review the academic catalog, the student handbook, and the College's complaint processes.

For Massachusetts Residents and Online Students in Non-SARA Member States and Territories

After you have exhausted Cambridge College complaint procedures, if your complaint has not been resolved, you may file a consumer complaint with the Massachusetts Department of Higher Education by using the consumer complaint form. The DHE consumer complaint form should be used by students who are located in:

- Massachusetts
- Non-SARA Member States or Territories (e.g., California, Guam, etc. — check to see if you reside in a SARA member state)

For Online Students Located in SARA Member States and Territories

After you have exhausted Cambridge College complaint procedures, if your complaint has not been resolved, you may file a complaint with the DHE by using the SARA complaint form. The DHE SARA complaint form should be used by students who are located in SARA member states and territories. This includes all students who are located in SARA member states and territories for the purposes of completing out-of-state learning placements, such as internships, practica, clinical experiences, etc. in SARA member states and territories outside Massachusetts.

Additional information from the DHE's SARA complaint website is below:

The SARA complaint process is as follows:

- Students must first attempt to resolve their complaint using internal administrative procedures offered by the SARA institution.
- After all administrative remedies have been exhausted with the MA-SARA institution, the student may submit a SARA Complaint via the URL below.
- The Department shall send a copy of the complaint to the institution that is the subject of the complaint.
- Within 30 days of the date that the Department sends a copy of the complaint to the institution, the institution must provide a written response to the student and the Department.

Sexual Misconduct Policy **(for claims not covered by the Cambridge College Title IX Sexual Harassment Policy)**

I. Cambridge College Values, Purpose of Policy, & Statement on Nondiscrimination

A. Statement of Institutional Values

Cambridge College ("CC" or "the College") is committed to establishing and maintaining an educational and employment environment that is free from sexual misconduct. Sexual misconduct, as defined below, is a violation of a person's rights, dignity, and integrity, and is contrary to the mission and values of the College. Acts of sexual misconduct are strictly prohibited and will not be

tolerated.

The College has three policies that address sexual misconduct: the Cambridge College Title IX Sexual Harassment Policy, the Cambridge College Sexual Misconduct Policy (i.e., this policy), and the Non-Discrimination and Harassment Policy for Employees. The Cambridge College Title IX Sexual Harassment Policy is a limited policy that only applies to reports and formal complaints of sexual harassment, as defined by Title IX, asserted against a CC student or employee when the other jurisdictional requirements of Title IX are satisfied and the Title IX Coordinator determines that the alleged conduct requires a formal Title IX investigation. The Cambridge College Sexual Misconduct Policy is a broader policy that applies to all reports and complaints of sexual misconduct asserted against a CC student or employee that fall outside the jurisdiction of the Cambridge College Title IX Sexual Harassment Policy. The Non-Discrimination and Harassment Policy for Employees governs the grievance process for all reports and complaints of sexual misconduct asserted against a CC employee that do not involve sexual harassment, as defined by Title IX, and which the Title IX Coordinator determines do not require a formal Title IX investigation.

The College takes all allegations of sexual misconduct seriously and is committed to providing information, education, resources, support, interim measures, and direction to the College community to prevent and address sexual misconduct. In response to any report that a member of the CC community has engaged in sexual misconduct, the College will take all appropriate steps to eliminate the misconduct, prevent its recurrence, and address its effects. To achieve equitable results, the College will carefully review and/or investigate all reports and complaints of sexual misconduct with an earnest intent to understand the perspective and experiences of each individual involved, and to provide for fair and impartial evaluation and resolution.

B. Purpose & Scope of Policy

The purpose of this policy is to provide the CC community with a clear set of behavioral standards, definitions, and descriptions of sexual misconduct. The policy is intended to protect and guide CC community members who have been affected by sexual misconduct, whether as a Complainant, a Respondent, or a third party.

When used in this policy, "Complainant" refers to those persons who have reported to the College that they have been the subject of prohibited conduct. "Respondent" refers to those persons who have been accused of engaging in prohibited conduct. "Third party" refers to any other person with information concerning a report of prohibited conduct, including any witness to the incident or any individual who makes a report to the College concerning someone else. "Employee" refers generally to all staff and faculty members, unless otherwise specified. A "report" refers to any incident or concern regarding prohibited conduct that is reported to the College. A "complaint" is an allegation of sexual misconduct filed against a member of the CC community that initiates the disciplinary process outlined in this policy.

In addition to defining prohibited conduct relating to sex or gender that violates the standards of our community, this policy will also:

- Identify resources for all CC community members who are impacted by prohibited conduct;
- Identify Laretta Siggers, Vice President of Human Resources and Talent Development (the "VP of Human Resources"), as the CC

official responsible for addressing complaints and reports of sexual misconduct allegedly committed by a CC employee and Tracy McLaughlin, Associate Provost for Student Learning Outcomes Assessment (the "Associate Provost"), as the CC official responsible for addressing complaints and reports of sexual misconduct allegedly committed by a CC student;

- Provide information about where a CC community member can obtain confidential support and access resources without triggering a report to the College's Title IX Coordinator;
- Provide information about how a CC community member can report an incident of sexual misconduct to the College, to outside law enforcement, or to neither; and,
- Provide information about how a report of prohibited conduct concerning a CC community member will be investigated, evaluated, and resolved by the College.

This policy applies to all CC community members, including students, faculty, and staff. Vendors, visitors, and others who conduct business with the College or on College property are also expected to comply with this policy. All CC community members are responsible for their actions and behavior, both on campus and off campus. Members of the CC community have a responsibility to adhere to both College policies and all laws (local, state, and federal) of wherever they reside or travel. Therefore, this policy applies both to on-campus and off-campus conduct, including, but not limited to, off-campus conduct that has an actual or potential adverse impact on any member of the CC community or the College.

Any individual may make a report alleging a violation of this policy, whether or not he/she/they is affiliated with the College. The College will provide resource options and respond promptly and equitably to all reports of prohibited conduct involving a College community member. The College will engage in a review of the alleged prohibited conduct during which it is committed to maintaining fairness for all parties and balancing the needs and interests of individuals with the safety of the community.

Violations of this policy may result in disciplinary action. Depending on the nature of the violation, disciplinary consequences for violations of this policy may include denial of privileges, written warnings, disciplinary probation, suspension, and expulsion for students, and may include warnings (verbal or written), demotions, suspensions, and termination for employees. In addition, the College community should be aware that the conduct described in this policy may also violate federal or state laws and regulations.

The College reserves the right to amend or modify this policy at any time.

C. Coordination with CC's Title IX Sexual Harassment Policy

The College's Title IX Sexual Harassment Policy is a limited policy that only applies to reports and formal complaints of sexual harassment, as defined by Title IX, asserted against a CC student or employee when the other jurisdictional requirements of Title IX are satisfied and the Title IX Coordinator determines that the alleged conduct requires a formal Title IX investigation. This Policy is a broader policy and applies to all reports or complaints of sexual misconduct asserted against a CC student or employee that the Title IX Coordinator determines to fall outside the scope of the Title IX Sexual Harassment Policy.

D. Coordination with CC's Nondiscrimination Policies

The College recognizes that discrimination or harassment related to an individual's sex, gender identity or gender expression (collectively, "gender related status"), which is prohibited by this policy, can occur in conjunction with discrimination or harassment related to an individual's race, color, ethnicity, national origin, religion, age, disability, sexual orientation, or any other legally protected characteristics ("protected characteristics"). Targeting individuals on the basis of any protected characteristics also violates CC's community standards. When misconduct relates solely to a person's gender related status, the College will address such conduct pursuant to this policy. When the College receives a report that a community member has engaged in misconduct related to both a person's gender related status and other protected characteristics, the College has discretion to decide under which policy or policies to address the report and will coordinate the investigation and resolution efforts to address any and all harassment and discrimination.

II. Notice of Nondiscrimination

The College is committed to establishing and maintaining an environment free of all forms of harassment and discrimination for all CC community members. The College does not discriminate on the basis of race, color, ethnicity, national origin, sex, sexual orientation, gender identity or expression, disability, age, or any other status protected by state or federal law in its programs or activities.

The College does not discriminate on the basis of sex in its educational, extracurricular or other programs, or in the context of employment. Sexual misconduct, including sexual harassment as defined in this policy, is a form of sex discrimination that unjustly deprives a person of equal treatment. It is prohibited by Title IX of the Educational Amendments of 1971, a federal law that provides that:

No person in the United States shall, on the basis of sex, be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.

Discrimination, including sexual harassment, is also prohibited under Title VII of the Civil Rights Act of 1964, Massachusetts General Laws Chapter 6, sec 168E and Chapter 151B, and other applicable statutes.

This policy prohibits sexual misconduct committed by any CC community member, regardless of gender related status. This policy also prohibits gender-based harassment and violence that may not involve conduct of a sexual nature, including, but not limited to, certain reports of domestic violence, dating violence, or stalking.

For assistance related to civil rights, students may visit the Department of Education, Office for Civil Rights website at <http://wdcrobcop01.ed.gov/CFAPPS/OCR/contactus.cfm>, which provides information regarding the address and phone number of the OCR office that serves their area, or they may call 1-800-421-3481.

III. Statement on Privacy, Confidential Resources, & Other Resources

A. Privacy & Confidentiality

The College is committed to respecting the privacy of all individuals involved in a report or complaint of prohibited conduct. In any review of a report or complaint of prohibited conduct, every effort will be

made to protect the privacy and interests of the individuals involved in a manner that is consistent with the need for a thorough review of the allegation(s). Such a review is essential to protecting the safety of the Complainant, the Respondent, and the broader campus community, and to maintaining an environment free from sex or gender-related discrimination.

At all times, the College will respect and safeguard the privacy of those involved in a report or complaint of misconduct, and information relating to such a report or complaint will be shared only with individuals who “need to know” in order to assist in the College’s investigation and/or resolution of the report or complaint. In some cases, the Complainant may wish to keep his/her/their identity or other aspects of an incident confidential or may request that the College not pursue an investigation. In such cases, the College must balance these requests against the College’s responsibility to provide a safe and non-discriminatory environment for all CC community members. This responsibility may require that the College disclose certain aspects of the report or complaint to the alleged perpetrator, law enforcement officials, or others with a need to know such information. The College will seek to respect the request of the Complainant and, where it cannot do so, it will consult with the Complainant and keep her/him/them informed about the chosen course of action.

When considering a request for confidentiality, the College will determine the degree of confidentiality that can be afforded, taking into account a range of factors, including, but not limited to, the following:

- Whether the Respondent is alleged to have committed sexual misconduct in the past;
- The risk that the Respondent will commit additional acts of sexual misconduct;
- Whether the misconduct was perpetrated with a weapon;
- Whether the Complainant is a minor;
- Whether the College possesses other means of obtaining relevant evidence; and,
- Whether the report suggests a pattern of sexual misconduct at a particular location or within a particular group.

If the College concludes that a report of sexual misconduct represents an immediate threat to the CC campus community, the College may issue a timely notice of the conduct to the CC community to protect the health or safety of the broader campus community. This notice will not contain any biographical or other identifying information of the Complainant.

All investigative and sanction proceedings, and all related notices or statements issued by the College, will comply with the requirements of the Family Educational Rights and Privacy Act (FERPA), the Clery Act, Title IX, Massachusetts law, other applicable law, and College policy. No information shall be released from such proceedings by the College, except as required or permitted by law or College policy.

B. Confidential Resources

The College encourages victims of sexual misconduct to talk with a trained counselor about the incident. If a member of the

CC community wishes to obtain confidential assistance through on-campus or off-campus resources without making report to the College, he/she/they may use the following Confidential Resources:

On-Campus Resources

Employee Assistance Program (EAP)
1-800-386-7055
www.ibhworklife.com

Off-Campus Resources

Boston Area Rape Crisis Center
99 Bishop Allen Drive
(BARCC):
Cambridge, MA 02139
(800) 841-8371 (24 hour hotline)
www.barcc.org

BARCC provides counseling, legal advice, and advocacy to help victims consider their options; medical advocates to accompany them to the hospital; and legal advocacy. All services are free and available to victims of sexual misconduct and their friends/family.

The Network/La Red:
PO Box 6011
Boston, MA 02114
(617) 742-4911
<http://tnlr.org/en/>

Provides free advocacy, support, and safety planning for LGBTQ victims of domestic and dating violence.

REACH Beyond Domestic Violence:
PO Box 540024
Waltham, MA 02454
(800) 899-4000 (free hotline)
(781) 891-0724 (office)
www.reachma.org

Provides free safety planning, advocacy, 24-hour hotline staffed by domestic violence crisis counselors, and shelter and support services to victims of domestic and dating violence.

Fenway Health Center:
1340 Boylston Street
Boston, MA 02215
(617) 267-9001 (help line)
(617) 267-0900
www.fenwayhealth.org

Provides comprehensive health services for the LGBTQ community and beyond. Also provides support via the above help line.

Victims Right Law Center:
115 Broad Street
Boston, MA 02110
(617) 399-6720
www.victimrights.org

Provides free lawyers to represent victims on court-ordered no contact orders, school-based complaints, immigration, and other legal matters related to sexual assault and violence. Assistance is available in both English and Spanish.

The organizations identified above are available to offer support services and are able, if requested, to maintain the confidentiality of the victim's identity. If confidentiality is a concern, the victim should clarify the extent to which information should be kept confidential before disclosing information about the incident.

All College employees are expected to notify the VP of Human Resources if they receive information that any employee member of the CC community or visitor to CC has engaged in conduct prohibited by this policy. All College employees are expected to notify the Associate Provost if they receive information that any student member of the CC community has engaged in conduct prohibited by this policy. In both instances, employees must otherwise keep such information as private as possible.

C. Other Campus Resources

In addition to the Confidential Resources listed above, all CC community members have access to a variety of resources provided by the College that can provide crisis intervention services, counseling, and academic support. All of the staff listed below are trained to support individuals affected by sexual misconduct and to coordinate with the Title IX Coordinator consistent with the College's commitment to a safe and healthy educational environment. While not bound by confidentiality, these resources will nevertheless maintain the privacy of an individual's information within the limited circle of those involved in the investigation and resolution process.

Campus Safety:

John Spinard
500 Rutherford Avenue
Boston, MA 02129
617-873-0169
John.spinard@cambridgecollege.edu

Associate Provost for Student Learning Outcomes Assessment:

Tracy McLaughlin
500 Rutherford Avenue
Boston, MA 02129
617-873-0150
Tracy.McLaughlin@cambridgecollege.edu

Vice President of Human Resources and Talent Development:

Lauretta Siggers
500 Rutherford Avenue
Boston, MA 02129
617-873-0170
Lauretta.siggers@cambridgecollege.edu

Section 504 Coordinator:

Vera Dimoplou
500 Rutherford Avenue
Boston, MA 02129
617-873-0614
Vera.Dimoplou@cambridgecollege.edu

Confidential Resource Provider
Vera Dimoplou
500 Rutherford Avenue
Boston, MA 02129
617-873-0614
Vera.Dimoplou@cambridgecollege.edu

D. Administrative Resources

Various administrative agencies can provide resources and legal assistance for victims of sexual misconduct. Some agencies in the local Boston-area community include:

Massachusetts Commission Against Discrimination (MCAD)
John McCormack Building
One Ashburton Place
Sixth floor, Room 601
Boston, MA 02108
(617) 994-6000

The MCAD prohibits sexual discrimination, including sexual harassment and gender related status harassment, in the workplace. The statute of limitations for filing a complaint is 300 days from the last date of discrimination.

Equal Employment Opportunity Commission (EEOC)
JFK Federal Building
475 Government Center
Boston, MA 02203
(800) 669-4000

The EEOC prohibits discrimination, including sexual harassment, in the workplace. The statute of limitations for filing a complaint is 300 days from the last date of discrimination.

U.S. Department of Education, Office for Civil Rights (OCR)
5 Post Office Square, 8th floor
Boston, MA 02109
(617) 289-0111

While OCR complaints should generally be filed within 180 days of the last date of the alleged discrimination, OCR may extend this filing deadline in a variety of circumstances.

IV. Prohibited Conduct & Definitions

Cambridge College prohibits all forms of sexual misconduct and gender-based harassment. Sexual misconduct is a broad term that includes, but is not limited to, sexual assault, sexual harassment, sexual violence, sexual exploitation, stalking, cyber-stalking, relationship violence, bullying or cyber-bullying relating to one's sex or gender identity, and aiding or facilitating the commission of any such prohibited conduct. Gender-based harassment is also a broad term, and includes acts of verbal, nonverbal, or physical aggression, intimidation, or hostility based on sex, gender identity, gender expression or sex-stereotyping, even if those acts do not involve conduct of a sexual nature, and regardless of whether the gender-based harassment rises to the level of violating the law.

CC policy also prohibits retaliation relating to the reporting of any sexual misconduct or gender-based harassment.

The College has three policies that address sexual misconduct: the Cambridge College Title IX Sexual Harassment Policy, the Cambridge College Sexual Misconduct Policy (i.e., this policy), and the Non-Discrimination and Harassment Policy for Employees. The Cambridge College Title IX Sexual Harassment Policy is a limited policy that only applies to reports and formal complaints of sexual harassment, as defined by Title IX, asserted against a CC student or employee when the other jurisdictional requirements of Title IX are satisfied and the Title IX Coordinator determines that the alleged conduct requires a formal Title IX investigation. The Cambridge College Sexual Misconduct Policy is a broader policy that applies to all reports and complaints of sexual misconduct asserted against a CC student or employee that fall outside the jurisdiction of the Cambridge College Title IX Sexual Harassment Policy. The Non-Discrimination and Harassment Policy for Employees governs the grievance process for all reports and complaints of sexual misconduct asserted against a CC employee that do not involve sexual harassment, as defined by Title IX, and which the Title IX Coordinator determines do not require a formal Title IX investigation.

A. Definition of Sexual Harassment

Sexual harassment is a form of unlawful sex discrimination and consists of three basic types:

Unwelcome Advances: Any unwelcome and objectively inappropriate requests or advances upon another person to engage in sexual actions.

Intimidating, Hostile, or Demeaning Environment: Any unwelcome action or verbal expression, or a series of actions or expressions, that have either the intent, or are reasonably perceived as having the effect, of creating an intimidating, hostile, or demeaning educational or employment environment for a CC student or employee, either by being sexual in nature or by focusing on a person's gender, sexual orientation, gender identity, or gender expression. An intimidating, hostile, or demeaning environment is defined as one that is so severe, pervasive, and objectively offensive that it interferes with a person's ability to learn, work (if employed by CC), or have access and opportunity to participate in any and all aspects of campus life.

A single or isolated incident of sexual harassment may create a hostile environment if the incident is sufficiently severe. The more severe the conduct, the less need there is to show a repetitive series of incidents to provide a hostile environment, particularly if the harassment is physical.

Quid Pro Quo Harassment: Any action in which submission to conduct of a sexual nature is made either explicitly or implicitly a term or condition of an individual's education, grades, recommendations, or extra-curricular or employment opportunities.

In any type of sexual harassment noted above, the effect will be evaluated based on the standard of a reasonable person in the position of the Complainant.

B. Forms of Prohibited Sexual Harassment

In some cases, sexual harassment is obvious and may involve an overt action, a threat, or a reprisal. In other instances, sexual harassment is subtle and indirect, with a coercive aspect that is unstated.

Sexual harassment can take many forms:

- It can occur between persons of equal power status (e.g., student to student, staff to staff, faculty member to faculty member, visitor/contracted employee to staff) or between persons of unequal power status (e.g., supervisor to subordinate, faculty member to student, student leader to first-year student). Although sexual harassment often occurs in the context of an exploitation of power by the individual with the greater power, a person who appears to have less power in a relationship can also commit sexual harassment (e.g., student harassing faculty member).

- It can be committed by an individual or may be a result of the collective actions of an organization or group.

- It can be committed against an individual, an organization, or a group.

- It can be committed by an acquaintance, a stranger, or someone with whom the Complainant has a personal, intimate, or sexual relationship.

- It can occur by or against an individual of any sex, gender identity, gender expression, or sexual orientation.

- It does NOT have to include intent to harm, be directed at a specific target, or involve repeated incidents.

Examples of behavior that might be considered sexual harassment include, but are not limited to:

- Unwanted sexual innuendo, propositions, sexual attention or suggestive comments and gestures; unwanted indecent exposure towards another person; humor and jokes about sex or gender-specific traits; sexual slurs or derogatory language directed at another person's sexuality, gender, gender identity, sexual orientation or gender expression; insults and threats based on sex, gender, gender identity, sexual orientation or gender expression; and other oral, written or electronic communications of a sexual nature that an individual communicates is unwanted and unwelcome;

- Unwelcome leering or whistling at another in a sexually suggestive manner;

- The creation, display, or distribution of sexually explicit drawings, pictures, or written materials; sexually charged name-calling; sexual rumors or ratings of sexual activity/performance; or the circulation, display, or creation of e-mails or websites of a sexual nature;

- Non-academic display or circulation of written materials or pictures degrading to an individual or gender group;

- Unwelcome and objectively inappropriate physical contact or suggestive body language, such as touching, patting, pinching, hugging, or kissing, or brushing against an individual's body;

- Undue and unwanted sexual attention, such as repeated flirting, objectively inappropriate or repetitive compliments about clothing or physical attributes, sexual activities, or sexual prowess; objectively inappropriate inquiries into one's sexual activities; or making sexually oriented gestures;

- Physical coercion or pressure of an individual to engage in sexual activity or punishment for a refusal to respond or comply with sexual advances;

- Change of academic or employment responsibilities (increase in difficulty or decrease of responsibility) based on sex, gender identity, sexual orientation, or gender expression;
- Use of a position of power or authority to: (1) threaten or punish, either directly or by implication, for refusing to tolerate harassment, for refusing to submit to sexual activity, or for reporting harassment; or (2) promise rewards in return for sexual favors;
- Sexual assault;
- Abusive, disruptive, or harassing behavior, whether verbal or physical, which endangers another's mental or physical health, including but not limited to threats, acts of violence, or assault based on gender related status and/or in the context of intimate partner violence;
- Demeaning verbal or other expressive behavior of a sexual or gendered nature in instructional settings; and
- Acts of verbal, nonverbal, or physical aggression, intimidation, or hostility based on sex or sex-stereotyping; harassment for exhibiting what is perceived as a stereotypical characteristic for one's sex, or for failing to conform to stereotypical notions of masculinity and femininity, regardless of actual or perceived gender related status of the harasser or her/his/their target.

C. Additional Forms of Prohibited Sexual Misconduct

Sexual misconduct may vary in its severity and includes a range of behaviors. The following descriptions represent forms of sexual misconduct that violate CC's community standards and another person's rights, dignity, and integrity.

Sexual Violence: Engaging in physical sexual acts with someone who has not given her/his/their consent or who is incapable of giving consent. This includes rape, sexual assault, battery, and sexual coercion. Sexual violence may involve individuals who are known to one another or have an intimate and/or sexual relationship (relationship violence) or may involve individuals not known to one another. Examples include, but are not limited to:

- Having or attempting to have sexual intercourse with another individual without consent. Sexual intercourse includes vaginal or anal penetration, however slight, with a body part or object, or oral copulation by mouth-to-genital contact;
- Having or attempting to have sexual contact of any kind with another individual without consent. Sexual contact includes kissing, touching the intimate parts of another, causing the other to touch one's intimate parts, or disrobing of another without permission. Intimate parts may include the breasts, genitals, buttocks, mouth or any other part of the body that is touched in a sexual manner; and,
- Knowingly exposing another individual to a sexually transmitted disease or virus without his or her knowledge;

Sexual Exploitation: An act or acts committed through non-consensual abuse or exploitation of another person's sexuality for the purpose of sexual gratification, financial gain, personal benefit, or any other non-legitimate purpose. The act(s) of sexual exploitation are prohibited even if the behavior does not constitute another sexual misconduct offense. Sexual exploitation may involve individuals who are known to one another, have an intimate or sexual relationship, or

may involve individuals not known to one another. Examples include, but are not limited to:

- Observing another individual's nudity or sexual activity or allowing another to observe consensual sexual activity without the knowledge and consent of all parties involved;
- Non-consensual streaming of images, photography, video, or audio recording of sexual activity or nudity, or distribution of such without the knowledge and consent of all parties involved;
- Photographing or taping someone (via audio, video, or otherwise) involved in sexual activity, sexual intercourse/penetration, or in a state of undress, without their knowledge or consent. Even if a person consented to the sexual activity or intercourse/penetration, photographing or taping someone without their knowledge goes beyond the boundaries of that consent. The dissemination of photographs or video/audio of someone involved in sexual activity, intercourse/penetration, or in a state of undress, without their knowledge or consent constitutes a separate and additional act of sexual exploitation;
- Voyeurism, which is the act of observing someone involved in sexual contact/activity or in a state of undress, without their knowledge or consent;
- Prostituting another individual; and
- Inducing incapacitation for the purpose of making another person vulnerable to non-consensual activity.

Stalking & Intimidation: A course of conduct involving more than one instance of unwanted attention, harassment, physical or verbal contact, or any other course of conduct directed at an individual that could be reasonably regarded as likely to alarm that individual or place him/her in fear of harm or injury, including physical, emotional, or psychological harm. This includes cyber-stalking, a particular form of stalking in which electronic media such as the internet, social networks, blogs, cell phones, texts, or other similar devices or forms of contact are used to pursue, harass, or make unwelcome contact with another person. Stalking and cyber-stalking may involve individuals who are known to one another or have an intimate or sexual relationship or may involve individuals not known to one another. Prohibited sexual intimidation involves threats to commit unwanted physical contact against someone based on his/her/their sex or gender related status.

Examples of stalking and intimidation include, but are not limited to:

- Unwelcome following or surveillance of another person;
- Unwelcome appearances at a person's home, work, or place of study;
- Making/sending frequent and unwelcome phone calls, emails, or text messages to another person;
- Leaving unwelcome written messages or objects for a person;
- Making verbal or written threats to harm another based on their sex or gender-related status; and
- Vandalizing a person's property.

Relationship Violence: Relationship violence is any intentionally violent or controlling behavior by a person who is currently or was previously in a relationship with the victim. Relationship violence can also involve domestic violence committed by a person with whom the Complainant shares a child and/or residence. Relationship violence includes actual or threatened physical injury, sexual assault, psychological abuse, economic control, and/or progressive social isolation. Relationship violence can occur in all types of relationships. Relationship violence can include, but is not limited to:

- physical abuse or violence;
- psychological/emotional abuse, such as demeaning or humiliating language and conduct;
- controlling/possessive behavior, including social and economic control (such as limiting access to funds or interfering with employment);
- making him/her/them feel like: he/she/they is walking on eggshells; he/she/they must call his/her/their friends in secret; he/she/they must dress in a certain way; and
- any sexual exploitation, as defined above, that arises in the context of a relationship.

Aiding or Facilitating Sexual Misconduct: Aiding or facilitating sexual misconduct means promoting or encouraging the commission of any behavior prohibited under this policy. Members of the CC community are prohibited both from personally engaging in sexual misconduct, as well as from engaging in conduct that assists or encourages another person to engage in such misconduct.

Retaliation: Retaliating or attempting to retaliate or seek retribution against a Complainant, Respondent, or any other individual or group of individuals involved in the investigation and/or resolution of an allegation of sexual misconduct. Retaliation can be committed by any individual or group of individuals, not just a Respondent or Complainant. Retaliation may include abuse or violence, other forms of harassment, and/or making defamatory statements about another person.

D. Consent, Coercion, & Incapacitation

Consent to sexual activity must be clear, knowing, and voluntary. Consent must exist from the beginning to the end of each instance of sexual activity and for each form of sexual contact. Consent to one form of sexual contact does not constitute consent to any other forms of sexual contact. Further, consent to engage in a particular sexual act at any given time is not indefinite or ongoing consent to engage in that same act, or any other sexual act, on other occasions. Mutually understandable consent must be obtained by the initiator, or the person who wants to engage in the specific sexual activity, at every stage of sexual interaction.

Consent requires an affirmative, outward demonstration indicating that an individual has freely chosen to engage in sexual activity. Consent is demonstrated through mutually understandable words and/or actions that clearly indicate a willingness to engage freely in sexual activity. Consent is mutually understandable when a reasonable person would consider the words and/or actions of the parties to have expressed a mutually understandable agreement between them to do the same thing, in the same way, at the same time, with one another. Relying on non-verbal communication can

lead to misunderstandings. When in doubt, ask before acting.

A lack of consent may be indicated in a variety of ways. First, a verbal "no," even if it sounds indecisive or insincere, must be accepted as a lack of consent. If consent is requested verbally, the absence of any explicit affirmative verbal response constitutes lack of consent. In addition, if at any time a person's words, actions, or demeanor suggest hesitancy, confusion, or uncertainty about engaging in sexual activity, the parties should stop and obtain mutual verbal consent before continuing sexual activity.

Consent may NOT be inferred from silence, passivity, lack of resistance, or lack of an active response alone. A person who does not physically resist or verbally refuse sexual activity is not necessarily giving consent. In the absence of an outward demonstration, consent does not exist. If at any time it is reasonably apparent that either party is hesitant, confused, or uncertain, both parties should stop and obtain mutual verbal consent before continuing sexual activity. In the absence of mutually understandable words or actions, it is the responsibility of the initiator to make sure that he/she/they have consent from his/her/their partner(s).

A current or previous dating or sexual relationship, by itself, is not sufficient to constitute consent. Even in the context of a relationship, there must be mutually understandable communication that clearly indicates willingness to engage in sexual activity each time such activity occurs.

Consent may be withdrawn by either party at any time. Withdrawal of consent must also be outwardly demonstrated by words or actions that clearly indicate a desire to end sexual activity. Once withdrawal of consent has been expressed, sexual activity must cease.

In Massachusetts, consent can never be given by a minor under the age of 16. In California, consent cannot be given by a minor under the age of 18 unless the minor is married to the alleged perpetrator. In Puerto Rico, consent can never be given by a minor under the age of 16.

Consent cannot be obtained from the use or threat of physical force, intimidation, or coercion, or any other factor that would eliminate an individual's ability to exercise his or her own free will to choose whether or not to have sexual contact. Coercion includes the use of pressure and/or oppressive behavior, including express or implied threats of harm, and severe and/or pervasive emotional intimidation that places an individual in fear of immediate or future harm or physical injury or causes a person to engage in unwelcome sexual activity. A person's words or conduct amount to coercion if they wrongfully impair the other's freedom of will and ability to choose whether or not to engage in sexual activity. If sexual acts were preceded by threats or coercion, there is no consent.

Individuals of any age are considered incapacitated and unable to consent to sexual activity if they are not able to make rational, reasonable judgments. Incapacitation is the inability, temporarily or permanently, to give consent because the individual is mentally and/or physically helpless. Individuals may be incapacitated and unable to consent to sexual activity due to drug or alcohol consumption, either voluntarily or involuntarily, or if the individual is unconscious, asleep, or otherwise unaware that the sexual activity is occurring.

Individuals are incapacitated if they are unaware of where they are, how they got there, or why or how they became engaged in a sexual

interaction. Where alcohol is involved, incapacitation is a state beyond drunkenness or intoxication.

Some indicators of incapacitation may include, but are not limited to:

- lack of control over physical movements or equilibrium;
- lack of awareness of circumstances or surroundings;
- an inability to communicate coherently or other signs of confusion or disorientation; and
- vomiting and/or lack of consciousness.

An individual may experience a blackout state in which he/she/they appear to be giving consent, but do not actually have conscious awareness or the ability to consent. It is especially important, therefore, that anyone engaging in sexual activity be aware of the other person's level of intoxication. The relevant standard that will be applied is whether the Respondent knew, or a sober reasonable person in the same position should have known, that the other party was incapacitated and therefore could not consent to the sexual activity.

Alcohol or drugs impair a person's decision-making capacity, awareness of the consequences, and ability to make informed judgments. However, being intoxicated or impaired by drugs or alcohol is never an excuse to engage in sexual misconduct and does not excuse one from the responsibility to obtain consent. As stated above, even if Respondents are intoxicated they will be found responsible for sexual misconduct if they engage in sexual activity with another person who did not consent to the sexual activity.

V. Reporting

All Cambridge College employees, including full-time and part-time faculty, staff, administrators, and student employees, are required to share with the VP of Human Resources or the Associate Provost any report of sexual misconduct they receive or of which they become aware.

When the College receives a report or complaint of sexual misconduct, it is obligated to take immediate steps to investigate the incident and, where possible, to prevent and remediate any violations of this policy. The College will promptly and thoroughly investigate and respond to all reports and complaints of sexual misconduct. The College will respond to all reports and complaints in an integrated, consistent manner that treats each individual with dignity and respect. The College will approach each report and complaint with an earnest intent to understand the perspective and experiences of each individual involved in order to ensure fair and impartial evaluation and resolution.

The College recognizes that the decision whether or not to report sexual misconduct is personal, and that there are many barriers to reporting, both individual and societal. Not every individual will be prepared to make a report or complaint to the College or to law enforcement, and individuals are not expected or required to pursue a specific course of action. The College recognizes that choosing to make a report and deciding how to proceed after making the report, can be a process that unfolds over time. Therefore, an individual does not have to decide whether or not to request disciplinary action at the time the report or complaint is made.

The College will respect an individual's autonomy in making these important decisions and will provide support that will assist each individual in making these determinations. The College will also honor a victim's decision as to whether or not to report the incident to law enforcement. A criminal complaint will not terminate the College's internal investigation or its response to sexual misconduct in its programs or activities.

A. Emergency/Immediate Reporting Options

In the event that an individual is the victim of sexual assault or sexual violence, the physical safety and emotional well-being of the person is of primary importance. A victim may have been physically injured in a number of ways, may have been exposed to a sexually transmitted disease, and/or may be at risk of impregnation. The College strongly encourages any person who has been the victim of sexual assault/violence to seek immediate medical attention from the nearest hospital emergency room.

Additionally, if an assault has occurred very recently, there may be physical evidence present that can be collected. Although the collection of physical evidence does not require a victim to pursue criminal or civil charges, preserving evidence allows a victim to make the decision to do so in the future. If a victim is assaulted, he/she/they should not shower, change clothing, or brush his/her/their teeth. The decision to seek medical attention and gather any evidence will remain confidential. Local medical resources include the following:

Beth Israel Deaconess Medical Center:
Rape Crisis Intervention Program
330 Brookline Avenue
Boston, MA 02215
(617) 667-4645 (Request a Sexual Assault Nurse Examiner (S.A.N.E.))

Brigham and Women's Hospital:
75 Francis Street
Boston, MA 02115
(617) 732-5636 (Request a Sexual Assault Nurse Examiner (S.A.N.E.))

Individuals are strongly encouraged to call 911 if they are feeling unsafe and wish to reach local law enforcement or emergency medical care (including an ambulance) anywhere within the United States. Local law enforcement can also be reached at:

Boston Police Department
20 Vine Street, Boston, MA 02129
Phone: (617) 343-4888

Springfield Police Department
130 Pearl St, Springfield, MA 01105
Phone: (413) 787-6310

Lawrence Police Department
90 Lowell St, Lawrence, MA 01840
Phone: (978) 794-5900

Cuartel General de la Policia de Puerto Rico
601 Ave Franklin Delano Roosevelt,
San Juan, 00936, Puerto Rico

Phone: +1 787-793-1234

Rancho Cucamonga Police Department
10510 Civic Center Dr, Rancho Cucamonga, CA 91730
Phone: (909) 477-2800

In addition, Campus Security can be reached at (617) 873-0115 (Boston location).

B. Campus Reporting Options

To enable the College to respond to all reports in a prompt and equitable manner, the College encourages all individuals to directly report any incident of sexual misconduct to the VP of Human Resources or the Associate Provost. Individuals may also choose to use the College's anonymous reporting mechanism by calling (617) 873-0633 (external) or extension 1633 (internal).

The College recognizes that a student or employee may choose to report sexual misconduct to any trusted employee of the College. For example, a student may choose to confide in a faculty member or an admissions counselor, each of which must report the incident to the College. Likewise, an employee may choose to confide in a supervisor. Under this policy, any full-time or part-time faculty member, staff member, or other employee who receives a report of sexual misconduct allegedly committed by a CC employee or visitor to CC must share the report with the VP of Human Resources. The VP of Human Resources is specifically charged with overseeing the investigation and response to allegations of sexual misconduct allegedly committed by a CC employee or visitor. Under this policy, any full-time or part-time faculty member, staff member, or other employee who receives a report of sexual misconduct allegedly committed by a CC student must share the report with the Associate Provost. The Associate Provost is specifically charged with overseeing the investigation and response to allegations of sexual misconduct allegedly committed by a CC student.

C. Timeframe for Reporting

Individuals are encouraged to report sexual misconduct as soon as possible to maximize the College's and/or law enforcement's ability to respond promptly and equitably. The College does not limit the timeframe for reporting an incident, and upon receipt of any report or complaint, regardless of when the incident occurred, the College will conduct an assessment to determine if an investigation and/or any safety measures are necessary to maintain the safety of the community. However, CC will not be able to impose disciplinary sanctions against an individual who is no longer affiliated with the College.

D. Coordination with Law Enforcement

The College encourages Complainants to pursue criminal action for incidents of sexual misconduct when the incident constitutes a crime under the law of the jurisdiction where the incident occurred. If an individual chooses to report an incident of sexual misconduct to Campus Security, then the College will notify the law enforcement agency with jurisdiction over the alleged crime. To the extent permitted by law, the College will also assist a Complainant in making a criminal report and will cooperate with law enforcement agencies if a Complainant decides to pursue the criminal process.

The College's definitions of sexual misconduct and its process and standard of proof for finding a Respondent responsible for sexual misconduct differ from those used in criminal prosecutions. Thus, a Complainant may reasonably seek resolution through the College's complaint process, may pursue criminal action, may choose one

but not the other, or may choose to report an incident to both or neither. Law enforcement's determination regarding whether or not to prosecute a Respondent is not determinative of whether the College will conduct an investigation or conclude that a member of the community has committed sexual misconduct in violation of this policy. However, any criminal disposition related to a complaint of sexual misconduct will be taken into consideration in the College's investigation of the complaint of sexual misconduct. Proceedings under this policy may be carried out prior to, simultaneously with, or following civil or criminal proceedings off-campus. However, the College will, to the extent possible and consistent with its obligations to address promptly reports and complaints of sexual misconduct, cooperate and coordinate with local law enforcement officers and the prosecutor's office. For example, the College will comply with law enforcement agency requests for cooperation and such cooperation may require the College to temporarily suspend the fact-finding portion of its investigation while the law enforcement agency gathers evidence. In such cases, the College will promptly resume its investigation as soon as notified by the law enforcement agency that it has completed its evidence gathering process.

E. Amnesty

The College encourages reporting and seeks to remove any barriers to reporting by making the procedures for reporting transparent and straightforward. The College recognizes that an individual who has been drinking or using drugs at the time of the incident may be reluctant to make a report for fear of being subject to discipline under the College's Drug and Alcohol Policy. An individual who reports sexual misconduct will not be subject to disciplinary action by the College for his/her/their own violation of these policies.

F. Bystander Intervention

Cambridge College strongly encourages all community members to take reasonable and prudent actions to prevent or stop sexual misconduct, including relationship violence, stalking and sexual assault. Taking action may include directly or indirectly confronting the situation (if it is safe to do so), taking steps to interrupt the situation, or seeking assistance from a person in authority. CC community members who choose to exercise this positive moral obligation in good faith will be supported by the College and protected from retaliation.

G. Statement Against Retaliation

It is a violation of this policy to retaliate in any way against an individual or a group because the individual or group made a report concerning sexual misconduct, was the subject of such a report, or otherwise participated in the College's investigation of such a report.

The College recognizes that retaliation can take many forms, may be committed by an individual or a group against an individual or a group, and that a Respondent can also be the subject of retaliation by the Complainant or a third party. The College will take immediate and responsive action to any report of retaliation and may pursue disciplinary action as appropriate. The VP of Human Resources will review all reports of retaliation allegedly committed by CC employees and visitors and will determine whether to impose immediate corrective action. The Associate Provost will review all reports of retaliation allegedly committed by CC students and determine whether to impose immediate corrective action or whether to refer the report for investigation pursuant to the processes identified in this policy. In making this determination, the VP of Human Resources and/or the Associate Provost may consult with others. An individual who in good faith reports sexual misconduct, is the subject of such a report, or otherwise participates in the College's investigation of such a report

may not be subject to retaliation even if the report is later not proven.

VI. Interim Measures

Upon receipt of a report of sexual misconduct, the College will provide interim support and reasonable protective measures to prevent further acts of misconduct, and to provide a safe educational and work environment. The College will determine the necessity and scope of any interim measures. Even when a Complainant or Respondent does not specifically request that protective action be taken, the College may choose to impose interim measures at its discretion to ensure the safety of any individual, the broader CC community, or the integrity of the review process.

Students seeking such assistance should speak with the Associate Provost, who will coordinate such requests on behalf of the student. Employees seeking such assistance should speak with the VP of Human Resources, who will coordinate such requests on behalf of the employee. The College will maintain contact with the parties to ensure that all concerns are being addressed.

All individuals are encouraged to report concerns about the failure of another individual to abide by any restrictions imposed by an interim measure. The College will take immediate and responsive action to enforce measures previously ordered or implemented by the College.

The College may impose any remedy that can be tailored to the involved parties to achieve the goals of this policy, even if not specifically listed here. The range of interim measures may include:

No Contact Order: A Complainant or Respondent may request, or the College may impose, communication and contact restrictions to prevent further, potentially harmful interaction. These communication and contact restrictions generally preclude in-person, telephonic, electronic, or third-party communications. In some cases, an individual may also wish to consider an Abuse Prevention Order or a Harassment Prevention Order from the local courts. This is a civil proceeding independent of the College. If a court order is issued, the College will, to the extent possible, assist the protected person in benefiting from the restrictions imposed by the court and will also facilitate on-campus compliance with the order. The College may also limit an individual or organization's access to certain College facilities or activities as part of the no contact order.

Academic or Employment Modifications: Any party involved in an investigation pursuant to this policy may request an academic or employment accommodation after a report or complaint of sexual misconduct. An individual who requests assistance in changing his/her/their academic or employment situation after an incident of sexual misconduct will receive appropriate and reasonably available accommodations. These may include:

- Academic accommodations, including a change in class schedule, taking an incomplete, dropping a course without penalty, attending a class via alternative means, providing an academic tutor, or extending deadlines for assignments;
- Change in work assignment or schedule; and/or
- Providing an escort to ensure safe movement between classes and activities.

Emotional Support: The College will assist in providing a referral to off-campus agencies as detailed in this policy. Counseling and emotional

support is available to any member of the campus community.

Interim Separation: Where the report of sexual misconduct poses an ongoing risk of harm to the safety or well-being of an individual or members of the campus community, the College may place an individual on interim suspension or impose leave for an employee. Pending resolution of the complaint, the individual may be denied access to campus. When interim suspension or leave is imposed, the College will make reasonable efforts to complete the investigation and resolution within an expedited timeframe.

VII. Sexual Misconduct Complaint Process

A. The VP of Human Resources and the Associate Provost

The College has appointed the VP of Human Resources to oversee the College's centralized review, investigation, and resolution process for reports and complaints of sexual misconduct allegedly committed by a CC employee or visitor. The College has appointed the Associate Provost to oversee the College's centralized review, investigation, and resolution process for reports and complaints of sexual misconduct allegedly committed by a CC student. Both are knowledgeable and trained in state and federal laws that apply to matters of sexual misconduct, as well as College policy and procedure.

The duties and responsibilities of the VP of Human Resources and the Associate Provost include training, education, and climate checks, as well as the oversight of procedures that promptly and equitably eliminate sexual misconduct, prevent its recurrence and address its effects on individuals and the College community.

The VP of Human Resources and the Associate Provost will:

- Oversee the investigation and resolution of all reports of sexual misconduct;
- Meet with any individual, whether a Complainant, a Respondent, or a third party, to discuss interim measures, resources, and procedural options on and off campus;
- Ensure prompt and equitable resolutions that comply with all requirements and timeframes specified in the complaint procedures;
- Participate in assessment of periodic climate checks, tracking, and monitoring of sexual misconduct allegations on campus; and,
- Participate in campus training, education, and prevention efforts.

The VP of Human Resources and the Associate Provost are tasked with ensuring consistent application of this policy to all individuals and enabling the College to respond promptly and equitably to eliminate sexual misconduct, prevent its recurrence, and address its effects. The VP of Human Resources and the Associate Provost have the discretion to determine the appropriate response to reports or complaints of sexual misconduct, subject to applicable law. Other matters that do not involve complaints of sexual misconduct against a student may be referred to other departments within the College for further investigation and resolution.

B. Timeframe for Resolution

The investigation and resolution of all reports of sexual misconduct will generally be completed within 60 to 90 days. Extenuating circumstances, including, but not limited to, the complexity and

severity of a report may require the process to extend beyond 60 to 90 days. In general, a Complainant and Respondent can expect to receive periodic updates from the VP of Human Resources or the Associate Provost as to the status of the investigation and resolution.

In the event that the investigation and resolution exceed this timeframe, the College will notify all parties of the need for additional time and reasonable efforts will be made to complete the process in a timely manner.

C. Grievance Procedures

The following are the College's procedures for responding to and resolving reports of sexual misconduct asserted against a CC student. The College will resolve reports of sexual misconduct asserted against a CC employee in accordance with the process described in the Non-Discrimination and Harassment Policy for Employees.

1. Complaint

Any individual may initiate an investigation by the College against a student member of the CC community for violation of this policy by making a complaint of sexual misconduct to the Associate Provost. The complaint should include the following information:

- The name of the accused student (i.e., the Respondent), or if her/his/their name is unknown, information sufficient to allow the College to identify the Respondent, such as her/his/their photograph;
- A statement explaining the nature and circumstances of the report including a list of possible witnesses; and,
- The names, addresses, and telephone numbers of those making the report.

The report or complaint must be signed by the individual making it.

Timeframe for Submitting a Report or Complaint: The College does not limit the timeframe for submitting a complaint. However, individuals are encouraged to submit the complaint as soon as possible in order to maximize the College's ability to investigate and come to an appropriate resolution. The College will not be able to pursue disciplinary action against a Respondent who is no longer affiliated with the College.

Withdrawal of Report: If a Complainant withdraws her/his/their complaint, the Associate Provosts will assess whether sufficient evidence of sexual misconduct exists to support completing an investigation. Among the factors that the Associate Provost will consider in making this determination is whether prior reports by the Complainant or others have been made against the Respondent. The College's decision to proceed in investigating a student member of the community when the Complainant has withdrawn the complaint shall be made by the Associate Provost in his/her/their sole discretion, but the Complainant's wishes will be taken into consideration. If the Associate Provost determines that no action will be taken against the Respondent because the Complainant has withdrawn her/his/their report, a file concerning the withdrawn report will be maintained by the Associate Provost, so that the matter can be re-opened if, among other things, the Complainant later decides to reinitiate the report, or if independent evidence of sexual misconduct by the Respondent comes to the College's attention, which the Associate Provost determines warrants re-opening the investigation.

2. Incomplete and Unofficial Reports

Any individual may also report that a student member of the CC

community engaged in behavior prohibited by this policy by bringing the report to the attention of the Associate Provost or any College employee.

When the Associate Provost receives a report that a CC student has engaged in prohibited conduct but the report does not meet the requirements of a complaint, the Associate Provost will determine what steps should be taken to gather additional information. Thereafter, the Associate Provost will direct the gathering of the additional information.

Once all available additional information has been obtained, it will be evaluated by the Associate Provost, who will decide whether an investigation, in accordance with this policy, is warranted. In making this decision, the Associate Provost will consider the wishes of the person(s) reported to have been harmed by the Respondent (the "reported survivor"), as well as the risk that declining to investigate might jeopardize the safety of the reported survivor or any member(s) of the CC community. If the Associate Provost decides that an investigation is warranted as a result of an incomplete or informal report, the Respondent will be notified that the College has elected to proceed with the investigation of the report on its own initiative and the investigation will proceed without a Complainant. If the College initiates an investigation against a Respondent as a result of an incomplete or informal report, the reported survivor(s) may choose whether to participate in the investigation, for example by serving as a witness.

3. Advisors

The Complainant and Respondent may each choose and be accompanied to any meeting or interview related to these procedures by a non-lawyer advisor. Each party's advisor may provide support related to any meeting or interview but may not participate actively in such meetings or interviews. During meetings and interviews, an advisor may quietly confer or pass notes with the party in a non-disruptive manner. The advisor may not intervene in a meeting or interview or address the Investigator. The parties must each bear the expense of his/her/their advisor, if any. Consistent with the College's obligation to promptly resolve sexual misconduct complaints, the College reserves the right to proceed with any meeting or interview, regardless of the availability of the party's selected advisor.

4. Declining to Participate

A Complainant and/or Respondent may decline to participate in the investigative or complaint resolution process. The College may continue the process without the Complainant's and/or Respondent's participation. In most cases, a refusal to participate in the investigative process will preclude a Complainant or Respondent from appealing any determination. This determination will be made in the discretion of the College.

5. Investigation and Findings Process

After receiving a report or complaint of sexual misconduct, the Associate Provost will conduct a preliminary assessment to determine whether there is sufficient evidence to support the initiation of a formal investigation. The Associate Provost will also consider whether the matter could be resolved under the informal resolution process set forth in section VIII of this policy. If the Associate Provost concludes that a report or complaint of sexual misconduct warrants an investigation, the following steps will generally be taken:

1. The Associate Provost will determine whether to serve as the

investigator or to appoint another individual (a College employee or an external investigator) to serve as the investigator (the "Investigator"). The Investigator is tasked with investigating the report and making (i) findings of fact and (ii) recommended findings as to whether the Respondent violated any provision of this policy. In making these findings, the Investigator shall employ the "preponderance of the evidence" standard of proof.

2. Prior to any investigative meetings, the Associate Provost will meet with the Complainant and Respondent individually and:

- a. Provide each with written notification of the allegations of sexual misconduct under investigation, which shall include, to the extent then known, a reference to any specific provisions of this policy allegedly violated;
- b. Inform each that an Investigator has been appointed who will be investigating the allegations, or that he/she/they will be serving as the Investigator;
- c. Advise each that any behavior that can be construed as retaliation against the Complainant, Respondent, and/or witnesses will be subject to immediate disciplinary action, up to, and including, suspension or dismissal from the College;
- d. Provide each with a copy of this policy and advise each to read it carefully;
- e. Advise each that they may have a non-lawyer advisor present whenever they meet with the Investigator;
- f. Advise each that they will be permitted to submit a list of witnesses to the Investigator;
- g. Advise each that they will be permitted to submit relevant documentary evidence to the Investigator (e.g., texts, e-mails, photographs);
- h. Advise each of Confidential Resources, including advocates, health care providers, and counseling services in the local community;
- i. Advise each of the importance of preserving evidence (e.g., texts, e-mails, notes, photographs, etc.);
- j. Advise each of their option to request that the College take steps to prevent unnecessary or unwelcome contact or communication with another member of the CC community;
- k. Advise the Complainant of her/his/their option to pursue a criminal report or complaint action against the Respondent working with local police in addition to pursuing remedies and/or sanctions through CC processes, or to seek a court order of protection/restraining order; and,
- l. Advise the Complainant that CC Campus Security is available to assist him/her/them in contacting and communicating with local police or in seeking court orders of protection/restraining orders.

3. Thereafter, the Investigator shall interview the Complainant (if possible). The Investigator shall ask the Complainant for, among other information, names, addresses, and other contact information (e.g., phone numbers and/or e-mail addresses) of witnesses. As a part of this process, the Investigator shall also assess whether interim measures not already implemented are appropriate and, if so, work with the Associate Provost to ensure that they are in place.

4. The Investigator shall then interview the Respondent (if possible). The Investigator shall ask the Respondent for, among other information, names, addresses, and other contact information (e.g., phone numbers and/or e-mail addresses) of witnesses. As a part of this process, the Investigator shall also assess whether interim

measures not already implemented are appropriate and, if so, work with the Associate Provost to ensure that they are in place.

If at any point the Respondent admits to violating this policy, the Investigator will inform the Associate Provost, who will terminate the resolution process. Where appropriate, the Associate Provost will send the matter through the Sanctions Process detailed below. If the Complainant and Respondent each accept the issued sanction(s), the matter will be closed. If either party is unsatisfied with the sanction(s), he/she/they may request to proceed through the formal resolution process in full by submitting a written request to the Associate Provost within five (5) business days of the receipt of the sanctions decision. The College maintains the ultimate discretion as to whether or not such a request should be granted.

5. The Investigator shall review CC records to assess whether any prior allegations have been made against the Respondent that relate to the subject of the complaint. The Respondent will be provided with a copy of any of his/her/their own records that relate to the subject of the complaint.

6. The Investigator shall make reasonable attempts to interview any relevant witnesses identified by the Complainant or Respondent or identified by witnesses or any other source.

7. The Investigator shall review any documentary evidence submitted by the Complainant, Respondent, or other witnesses.

8. The Investigator shall gather and assess any other relevant evidence available to the College (e.g., additional witnesses not identified by the parties, security camera footage, etc.).

9. After reviewing any witness statements, documentary evidence, and other relevant evidence as noted above, the Investigator may, in his/her/their discretion, conduct follow-up interviews with the Complainant and the Respondent.

10. Following the foregoing investigation, the Investigator shall create a written report that summarizes his/her/their investigation, sets out the documentary evidence submitted by the parties/witnesses, and describes his/her/their determination(s) concerning the relevance of the documentary evidence. Relevant information reviewed by the Investigator shall be described in the written report and appended (and redacted, if necessary), as appropriate.

11. If the Investigator is not the Associate Provost, the Investigator shall submit his/her/their draft written report (with a summary of evidence and attachments) to the Associate Provost for review at the conclusion of the investigation, but before any findings are reached by the Investigator. The Associate Provost may suggest additional clarification or the gathering of additional evidence, as appropriate.

12. The Investigator shall permit both the Complainant and Respondent and their respective advisors, if applicable, the opportunity to review a copy of the draft written report (still without findings, but as revised consistent with any suggestions from the Associate Provost) under the supervision of a College employee in the Human Resources Office office or in the Investigator's office. Upon reviewing the draft report, the Complainant and the Respondent may provide any clarifications or comments they may wish to offer.

13. Neither the Complainant nor the Respondent will be permitted to copy or remove the draft written report from the Human Resources

Office or the Investigator's office. Relevant and clarifying comments provided by either party will be incorporated into the draft report by the Investigator in his/her/their discretion in consultation with the Associate Provost, and the Investigator will note any significant deviations from previous statements. If the Complainant and/or Respondent identify additional relevant evidence, that evidence shall be gathered by the Investigator and included in the written report. Depending on the nature of the new evidence, it may be shared with the Complainant or the Respondent for comment.

14. The Investigator shall revise the draft report to summarize all relevant evidence obtained during the investigation, and shall draft written recommendations, using a preponderance of the evidence standard, as to whether the Respondent should be found to have violated any provision(s) of this policy.

15. In reaching his/her/their recommended conclusions, the Investigator may not consider any statements or other evidence about the Complainant's prior sexual conduct with anyone other than the Respondent. Further, the Investigator may not presume that a prior consensual dating or sexual relationship between the parties necessarily constitutes consent or precludes a finding of sexual misconduct.

16. The Investigator's recommended conclusion(s) should be explained clearly and address each element necessary to establish whether the Respondent violated this policy so that the reader may understand how the Investigator reached his/her/their recommended conclusion in light of the available evidence and the standard of proof.

17. If the Investigator is not the Associate Provost, he/she/they shall submit the revised draft investigation report, including recommended conclusions, to the Associate Provost. The Associate Provost may offer feedback, which should be incorporated into the final draft, if applicable. The Investigator shall revise the draft report to reflect the Associate Provost's feedback, and the Investigator shall resubmit his/her/their revised final draft to the Associate Provost.

18. The revised final draft shall include, along with the information contained in the draft reports:

- a. A summary of the allegations;
- b. A determination of whether the allegations were substantiated, with an identification of all supporting evidence and credibility determinations;
- c. A determination of whether this policy was violated, along with all supporting evidence, conclusions, and references to pertinent policy provisions.

19. The Associate Provost shall determine whether or not the Respondent violated this policy, based on the preponderance of the evidence standard, and shall update and finalize the report to reflect this decision.

20. The Associate Provost shall send a letter to the Complainant and the Respondent informing them of the investigation findings concerning whether the Respondent violated any provision of this policy (the "Determination Letter"). Generally, the Determination Letter will be issued within three (3) business days of finalizing the Investigator's report. The Associate Provost shall send this communication to the Complainant and the Respondent via certified mail, return receipt requested, and also by electronic mail (read receipt requested).

- a. If the Respondent is found not to have violated any provision of this policy, the Determination Letter to both parties will inform them of the Complainant's right to appeal that decision, in accordance with the Appeals Process below.
- b. If the Respondent is found to have violated any provision of this policy, the Determination Letter will notify both parties of those findings and provide them with information relating to the action(s) to be taken by the College described below.
- c. Regardless of the findings, the Associate Provost shall present both parties with an opportunity to review the final investigative report, with their advisor present, in the presence of the Associate Provost.

VIII. Informal Resolution Process

A. The informal resolution process is a voluntary, remedies-based process designed to provide members of the CC community with an option to resolve certain disputes with other members of the community in a forum that is separate and distinct from the College's formal grievance processes under the Title IX Sexual Harassment Policy or the Sexual Misconduct Policy.

The purpose of the informal resolution process is to eliminate the conduct which has been reported by the Complainant (and prevent its recurrence), and place both individuals in a position to pursue their academic, working, and non-academic interests in a safe, respectful, and productive educational and working environment. Under this process, there will be no disciplinary action taken against a Respondent, and the resolution will not appear on the Respondent's disciplinary record.

B. The following are features of the informal resolution process:

Participation in the informal resolution process is completely voluntary. All parties must consent in writing to participation in the informal resolution process.

No party will be required to participate in the informal resolution process and the College will not require, encourage, or discourage the parties from participating in the informal resolution process.

C. The College may offer the informal resolution process only under the following circumstances:

1. A complaint has been filed by the Complainant;
2. The Associate Provost has determined, through an initial assessment, that the alleged conduct, if substantiated, would constitute sexual misconduct under this policy, and he/she/they has determined that the informal resolution process is appropriate for this matter.
3. All parties will be provided with a written notice disclosing the allegations, the requirements of the informal resolution process, and any outcomes resulting from participating in the informal resolution process.
4. At any time prior to signing an informal resolution agreement, any party has the right to withdraw from the informal resolution process and resume the formal grievance process outlined above in this policy.
5. Under the informal resolution process, there will be no disciplinary action taken against a Respondent, and the resolution will not appear on the Respondent's disciplinary record. If a complaint is filed against the Respondent in a subsequent matter under the Title IX Sexual Harassment policy or the Sexual Misconduct policy, the

Respondent's participation in a prior informal resolution process will not be considered relevant and will not be taken into account in the resolution of the subsequent complaint.

6. Parties may be accompanied by a non-lawyer member of the College community who will serve as a support person to any meeting related to the informal resolution process. However, the College support person may not actively participate in meetings and may not serve as a proxy or representative for the party.

7. Any individual who serves as a College support person is expected to be available for meetings as scheduled by the College. The College (including any official acting on behalf of the College) has the right at all times to determine what constitutes appropriate behavior on the part of a College support person and to take appropriate steps to ensure compliance with this policy.

8. Any agreements reached as part of the informal resolution process must be approved by the Associate Provost in order to ensure consistency with the College's obligations under federal and state law. If the Associate Provost determines at any time prior to the signing of the informal resolution agreement that the informal resolution process is no longer appropriate, the Associate Provost may terminate the process.

9. Upon signing the informal resolution agreement, the parties are bound by its terms and cannot opt for a formal grievance process based on the conduct alleged in the formal complaint.

10. Failure to comply with the signed agreement may result in disciplinary action for either party.

11. If the parties' circumstances change significantly, they may request a supplemental agreement. The Associate Provost will determine whether it is appropriate to proceed.

D. Initiation of the Informal Resolution Process

1. If the Complainant files a complaint and requests to engage in the informal resolution process, the Associate Provost will consider whether the informal resolution process is appropriate in the particular matter. In making this determination, the Associate Provost will consider the following factors:

2. The disciplinary record (or past conduct) of the Respondent relating to sexual misconduct, physical violence, failure to comply with a No Contact Order, and/or other relevant conduct;

3. The nature of the alleged conduct, whether allegations involve multiple victims and/or a pattern of conduct, or other evidence-informed factors indicative of increased risk to campus safety;

4. Whether the circumstances warrant the Associate Provost filing a complaint (e.g., if there is sufficient evidence to proceed with an investigation/adjudication even without participation by the Complainant); and/or

5. Whether proceeding with the informal resolution process is in accordance with the principles and objectives of the College's Title IX Sexual Harassment Policy and this Policy, as determined by the Associate Provost.

6. If the Associate Provost determines that a case is not appropriate for the informal resolution process, he/she/they will inform the

Complainant that the informal resolution process is unavailable.

7. If the formal grievance process has already begun, either party may seek to initiate the informal resolution process up until the Investigator's report has been finalized. If both parties agree to participate in the informal resolution process and the Associate Provost approves of the informal resolution process, the formal grievance process will be adjourned while the informal resolution process is pending. If an agreement is not reached, the formal grievance process will be resumed.

8. Upon initiation of the informal resolution process, the Associate Provost will refer the matter to a trained informal resolution facilitator ("Facilitator"). The Facilitator will consult (separately) with each party in an effort to reach a resolution that best meets the interests and needs of the parties. Unless they mutually choose to do so as part of an agreement, the parties will not meet together in person as part of the process.

E. Potential Outcomes of the Informal Resolution Process

1. Depending on the nature and circumstances of the particular situation, parties may agree to outcomes such as:

- a. Long-term extension of a mutual No Contact Order or No Communication Order;
- b. Imposition of a No Contact Order that places the burden on the Respondent to limit the Respondent's physical and/or electronic proximity to the Complainant;
- c. Restrictions on the Respondent from participation in particular organizations or events;
- d. Provision to the Respondent of an "impact statement" written by the Complainant (describing the impact(s) that the Respondent's conduct had on the Complainant);
- e. Conversation between the parties facilitated by a trained individual appointed by the Associate Provost; and/or
- f. Other measures deemed appropriate by the Associate Provost.

F. Failure to Comply with the Informal Resolution Agreement

Failure to comply with the signed agreement may result in disciplinary action for either party, consistent with the applicable disciplinary procedures.

G. Records Relating to the Informal Resolution Process

1. The records relating to the informal resolution process will be maintained in accordance with section XII.B. below.

2. Prior to participating in the informal resolution process, the parties will be notified in writing that any information gathered in the informal resolution process may be used in the Title IX Sexual Harassment or Sexual Misconduct formal grievance processes if the informal resolution process ends prior to a written agreement being signed by the parties. However, the College will not draw any adverse inference based on a Respondent's participation in the informal resolution process, nor will such participation be considered an admission by the Respondent.

3. Even if the parties enter into a written informal resolution agreement, if information related to the violation of other College policies (i.e., policies other than the Title IX Sexual Harassment Policy or the Sexual Misconduct Policy) comes to light through the informal

resolution process, such information may be used in other College disciplinary processes.

H. Retaliation

The protections against Retaliation apply to individuals participating in the informal resolution process. Disciplinary consequences may result for those found responsible for Retaliation.

I. Time Frame for the Informal Resolution Process

The time frame for completion of the informal resolution process may vary, but the College will seek to complete the informal resolution process within thirty (30) business days of completion of the initial assessment. Should the time period extend beyond this time frame, the parties will be notified.

IX. Sanctions Process

If an investigation concludes that there has been a violation of this policy, or if the Respondent admits to violating this policy, the College will appoint a Sanctions Administrator to determine appropriate sanctions.

The name of the Sanctions Administrator, and his/her/their contact information, shall be communicated to the parties in the Determination Letter. The Sanctions Administrator may not be the Associate Provost or the Investigator.

Upon review of the final report and findings, the Sanctions Administrator may impose any sanction designed to eliminate the misconduct, prevent its recurrence, and remedy its effects, while supporting CC's educational mission and obligations under local, state, and federal law. Sanctions may also serve to promote safety or deter students from similar future behavior. Any sanctions must be issued, and communicated to the parties, within five (5) business days of the issuance of the Determination Letter (the "Sanctions Letter").

The following, individually or in combination, are potential sanctions for violations of this policy. Where appropriate, the statement of the sanction includes the duration, any conditions to be observed during that period, and the conditions for termination of the sanction:

Major Sanctions:

- Expulsion from the College or a program of the College.
- Suspension from the College or a program of the College for a specific period of time.
- Deferred suspension from the College or a program of the College.
- Denial of graduation, diploma, or degree.
- Deferral of graduation, diploma, or degree for a specific period of time.
- Revocation or withdrawal of diploma or degree previously credited, awarded, or conferred.

Other Available Sanctions:

- Disciplinary probation. Disciplinary probation may involve counseling with faculty or administrative staff; restriction of student privileges; or prohibitions against participation in CC activities or events.

- Disciplinary reprimand or warning.

X. Appeals Process

The Complainant may request an appeal within ten (10) business days of the Determination Letter. The Respondent may request an appeal within ten (10) business days of the Sanctions Letter. Appeals must be in writing (the "Notice of Appeal") and submitted to the Associate Provost. The Notice of Appeal shall consist of a written statement explaining the grounds for the appeal, and the bases therefore. The appeal may be based only on one or more of the following grounds: material procedural error; new material evidence or information; and/or a sanction that is disproportionate to the offense, or otherwise unjust or unfair.

The Associate Provost shall notify the non-appealing party of the appeal and shall provide him/her/them with a copy of the Notice of Appeal. The non-appealing party may submit a written response to the Associate Provost within ten (10) business days of receiving the Notice of Appeal.

The College shall appoint an Appeals Officer to decide the appeal. The identity of the Appeals Officer shall be communicated to the parties as soon as practicable after his/her/their appointment. The Appeals Officer shall review the final investigative report, the Notice of Appeal, and the response of the non-appealing party. Within fourteen (14) business days after the deadline for the non-appealing party's response, the Appeals Officer shall provide his/her/their conclusions to the parties. These conclusions may include, but are not limited to:

- Reopening of the investigation;
- Affirming the original findings and sanctions;
- Reversing of the original findings and sanctions;
- Modifying the original findings;
- Modifying the imposed sanctions and remedies.

The appeal is based on the record and is limited to the enumerated bases for appeal. The appeal is not a de novo review. Appeal decisions are final.

XI. Conflicts of Interest

In the event that the Complainant or Respondent believes that the Investigator, Sanctions Administrator, and/or Appeals Officer has a conflict of interest in performing the functions required of him/her/them under this policy, the Complaint or Respondent may seek to disqualify that person from the resolution process. The Complainant or Respondent may seek to disqualify the Investigator, Sanctions Administrator, and/or Appeals Officer by submitting a written objection to the Associate Provost within two (2) business days of receiving notice of the subject individual's appointment to his/her/their position. The written objection shall state the party's reasons for believing that the subject individual is incapable of fairly judging the matter.

The Associate Provost will decide whether an objection is justified, and that decision is final. When necessary, the Associate Provost will select a replacement for any removed individual. The parties will have an opportunity to object to any individual selected as a replacement.

XII. Confidentiality, Recordkeeping, and Education & Training

A. Confidentiality & FERPA

All documents created in connection with the above resolution process, including but not limited to any written complaint, the investigative draft reports, the final report, the Determination Letter, the Sanctions Letter, the Notice of Appeal, any response thereto, and/or the appeals decision will be kept confidential by the College. They will be shared only with individuals with a “need-to-know” such information. To the extent any of these documents constitute “education records” under FERPA, they will be treated accordingly. All parties to the College’s complaint resolution process are expected to maintain the confidentiality of any documents they receive in connection with the process. A party who improperly disseminates any such documents, or otherwise discloses the contents of those documents to third-parties, will be subject to disciplinary action.

B. Recordkeeping

The College will maintain all documents related to each report or complaint of sexual misconduct, including all documents related to all formal and informal resolution processes conducted pursuant to this Policy, for seven (7) years.

C. Education & Prevention

The College embraces an interdepartmental, multimodal, and situational approach to educate the CC community about this policy and to prevent sexual misconduct. To that end, the Office of Student Affairs works collaboratively to provide the community with educational opportunities as follows:

Orientation/Welcome Week: Students received a student handbook and new student orientation which includes the policies of the College. The Office of Student Affairs outlines the importance of bystander awareness, student faculty, and reporting procedures.

D. Training

The College trains faculty, staff and Campus Safety, on the following topics:

- Responding to reports and complaints;
- Bystander intervention;
- Record-keeping and documentation;
- Assessing and reporting complaints of sexual misconduct;
- The availability of Confidential Resources;
- The availability of other campus resources for support, advocacy, and medical assistance

CAMBRIDGE COLLEGE RESERVES THE RIGHT TO AMEND OR MODIFY THIS POLICY AT ANY TIME.

Student Code of Conduct

Introduction

Cambridge College (the “College”) requires all students to act as responsible citizens and members of a higher education academic community. Each student is responsible to know, observe, abide

by, and adhere to the College’s Student Code of Conduct, policies, rules, and regulations. Students must comply with all policies applicable to conduct in the classroom as well as College-sponsored activities. The College has made this Code of Conduct, as well as its other policies and procedures, available to its students. Upon enrolling in the College, students are automatically placed under the guidelines, rules and regulations established by the College. Students are responsible for familiarizing themselves with all policies and procedures affecting them.

Consistent with the College’s mission and culture of respect, the purposes of the Code are to:

- Establish standards of personal conduct for all students;
- Provide for the advancement of knowledge and the development of ethically sensitive and responsible persons; and
- Recognize that students are adults and, as such, their relationships with the College community should reflect adult behavior.

The types of prohibited conduct set forth in this Code are not intended to be all-inclusive or to limit the types of inappropriate conduct that may subject a student to sanctions or disciplinary action. Other rules and regulations of the College and the College’s schools and departments may also apply. In addition, certain school-, department-, or degree-specific rules, policies, or regulations (including any such rules and policies relating to licensing) may supplement or supersede this Code. These additional rules and policies may be communicated to students in publications and posted notices including, but not limited to, the Student Handbook, Academic Catalog, enrollment contracts, MyCC web portal, and school-specific publications.

This Code does not govern instances of sexual misconduct/harassment committed by a student, or the College’s process for reviewing and investigating such allegations. Those standards and processes are set forth in the Title IX/Sexual Misconduct Policy. Also, this Code does not govern instances of discrimination or harassment as set forth in the College’s Non-Discrimination and Harassment Policy.

The College reserves the right to amend, supplement, or modify this Code at any time.

Classroom/Field Experience Conduct

Students have the right to learn without interference from others. Faculty members have the authority to protect this right by creating and maintaining an environment that is conducive to learning. The college is an institution of learning and teaching and strives to maintain a climate of respect, sensitivity, and courtesy.

Classroom/field experience misconduct is any behavior which disrupts or interferes with the learning experience or violates the expectations of any instructor or field experience supervisor. Students are required and expected to conduct themselves in a mature and considerate manner. Interruptions and disruptions of the classroom atmosphere inhibit and prevent learning and teaching. Students are expected to conduct and express themselves in a way that is respectful to all individuals. This includes respecting the rights of others to comment and participate fully in class as well as following specific guidelines provided by the College, instructors, or field placement supervisors.

Examples of Classroom/Field Experience

Misconduct

Classroom/field experience misconduct includes, but is not limited to, the following:

1. Engaging in behavior that disrupts or interferes with the learning experience, including talking in class while the faculty member or other students are speaking, using offensive language or personal attack, creating distractions or disturbances, sleeping, and reading unrelated materials.
2. Using cell phones or other electronic devices that disrupt the learning process. The use of personal laptop computers, phones, etc. may be acceptable in some classes; however, they must be used only for note-taking or activities in direct support of the course objectives. Faculty members have the right to ask students to shut down any electronic devices.
3. Entering the classroom late or leaving the classroom prior to the end of class, unless exceptional circumstances arise.

Consequences of Classroom/Field Experience Misconduct

Any student who commits an act of classroom/field experience misconduct will be subject to classroom and College sanctions as determined by this Code and/or any policies established by the College's individual schools or departments. Unlike other violations of this Code, an instance of classroom/field experience misconduct can be resolved directly by the applicable professor or instructor. If a professor or instructor determines that a student has engaged in classroom/field misconduct, he/she may impose sanctions, including, but not limited to, the following:

- Giving a warning — an oral explanation of the violation and the possible consequences if misconduct continues;
- Dismissal from the remaining class/field experience time during which the infraction occurs;
- Dismissal from the remaining class/field experience time during which the infraction occurs, with required meeting with a designated College employee (e.g., faculty member, department chair, Dean of Student Affairs, etc.) prior to returning to class;
- Assignment of a reduced or failing grade on an assignment, paper, project or exam;
- Reduction in the final grade for the course;
- Assignment of a failing grade for the course;
- Required meeting with the faculty member and/or a College official if necessary; and
- Referral to the Office of Student Affairs.

If a student is removed from class for a second offense, or if the first offense is egregious and/or involves threatening or violent behavior, the student could be placed on temporary suspension from that class pending investigation by the Dean of Student Affairs.

Any student who receives a sanction for classroom/field experience misconduct may pursue the student appeal process set forth in Student Conduct Process and Procedures. Withdrawal from a course does not exempt a student from any pending allegations of classroom misconduct.

Academic Honesty

The College believes that each student can learn, notwithstanding his or her age, life history, current circumstances, or past academic experience. The College is a learning community in which adult

students experience educational practices that honor and empower them. The College works with students to design the education and training needed for their academic and career success through programs which develop and enhance skills, competencies, attitudes, and values. The College's students are expected to meet high academic standards.

In order for students to take advantage of the educational opportunities at the College, they must engage with and generate their own original papers, exams and other assignments. Students may not reproduce the work of others and characterize it as their own. Not only is such a practice dishonest, but it does not lead to the development of new skills and habits of mind.

Academic dishonesty is any form of academic conduct that is deceptive, dishonest, or fraudulent. Academic dishonesty includes, but is not limited to, cheating, plagiarism, and fabrications.

Cheating

Cheating includes, but is not limited to, the following:

- Using resources not authorized by the faculty member (textbooks, notes, websites, the work of other students) to complete examinations or other assignments;
- Giving or receiving content information relating to assignments/quizzes/tests/examinations to/from others unless authorized by the instructor;
- Using unauthorized electronic equipment;
- Submitting academic work previously submitted in another course without authorization; and
- Altering or otherwise tampering with grades.

Plagiarism

Plagiarism is intentional or unintentional use of the intellectual creations of another source, person or organization without proper attribution. Credit must be given for every direct quotation, for paraphrasing or summarizing a work (in whole, or in part) in one's own words, and for information that is not common knowledge. Plagiarism usually takes two main forms:

- Stealing or passing off as one's own the ideas or words, images, or other creative works of another; and
- Using or relying upon another's work without crediting the source, even if only minimal information is available to identify it for citation.

Fabrication

Fabrication is defined as intentionally falsifying or inventing any information or citation on any academic exercise, without authorization. Therefore:

- "Invented" information may not be used in any laboratory experiment or academic exercise.
- One should acknowledge the actual source from which cited information is obtained.
- Students must not change or resubmit previous academic work without prior permission of the instructor.

Other Examples of Academic Dishonesty

Other examples of academic dishonesty include, but are not limited to:

- Copying during a test or allowing another student to copy during a

test;

- Giving homework, term papers, or other academic work to another student to plagiarize;
- Submitting any work that is not one's own;
- Falsifying information to a faculty member or College official;
- Altering a graded work after it has been returned, then submitting the work for re-grading without the instructor's knowledge/ approval;
- Stealing or improperly obtaining tests or other assessment items;
- Forging signatures on College documents;
- Giving false or misleading information to a faculty member in an effort to receive a postponement or an extension on a test or other assignment;
- Accessing computerized College records or systems without authorization;
- Unauthorized recording, reproduction, retransmission, or redistribution of course materials (e.g., lectures, handouts, podcasts, exams, student projects, group work, online material, etc.); and
- Providing material or information to another person with knowledge that such aid could be used in any of the violations stated above.

Process for Instances of Academic Dishonesty and Potential Consequences

The College's process for resolving instances of academic dishonestly are set forth below.

1. If a student's work in a course is deemed by the professor to constitute academic dishonesty (e.g., the work includes plagiarized material), the following steps will be taken:
 - a. The professor will approach the student in a private setting and discuss the matter with the student directly.
 - b. The seriousness of the incident will be discussed with the student, and the potential consequences will be reviewed.
 - c. If applicable, the student may be given a copy of an overview of plagiarism such as the one developed by the School of Undergraduate Studies.
 - d. The subject work will be returned to the student without a grade. A copy will be kept by the professor.
2. If it is clear to the professor that the student was simply unaware of what constitutes academic dishonesty, or that the academic dishonesty was otherwise unintentional, then the opportunity to re-write or re-do the assignment will be offered. The professor will then assign a grade to the new assignment. If the academic dishonesty resulted from plagiarism, then the opportunity to re-write or re-do the assignment will be subject to the following additional conditions:
 - a. The student must take a plagiarism tutorial. One example of such a tutorial is at: <https://www.indiana.edu/~istd/test.html>.
 - b. The student must provide a printout of the tutorial results as a condition for resubmitting the assignment. Note that a certificate will only be available to the student if he or she completes the entire assignment correctly.
3. If it is determined by the professor that the student's intent was to knowingly commit academic dishonesty, then the student will be informed that he or she will be receiving a grade of "F" or "NC" for the assignment/course (at the discretion of the

professor) or will be recommended to the Dean of the College for dismissal from the College or program. If the matter is referred to the Dean, the Dean shall make a determination on the recommendation and, if applicable, may impose a sanction, including those sanctions listed on page X of this Code. If the student disagrees with the decision of the professor or the Dean,, he/she should follow the Student Academic Grievance Procedure starting with Formal Process.

General Conduct

All students are expected to respect and value the rights of others and conduct themselves as responsible citizens. Choosing to join the College community obligates each student to abide by a code of respectful behavior. The following personal actions, whether on- or off-campus, are prohibited. The following list contains specific conduct that is prohibited by the College under this Code. The list is not intended to be exhaustive, and the College reserves the right to impose sanctions on students for personal actions which may not be expressly identified. The College's other rules and policies set forth additional prohibited conduct.

1. Attempts to Defraud
Includes any activity intended to misrepresent any official document or identification used by or issued by the College.
2. Bullying
Bullying is systematic intentional behavior that threatens, intimidates, or is intended to threaten or intimidate others. Bullying may take many forms, including but not limited to, repeated unwanted physical, verbal, or written acts, which are hostile or offensive; that target at an individual or group and create an intimidating and/or threatening environment or a risk of psychological and/or physical harm. Bullying may manifest as cyber stalking or cyber bullying as well as behaviors such as ignoring or dismissing individuals or groups.
 - a. Hostile behaviors include, but are not limited to, inappropriate behaviors that are harmful or damaging to an individual and/ or property. Behaviors that are intimidating, threatening, disruptive, humiliating, sarcastic or vicious may also constitute hostile behavior. Offensive behaviors may include, but are not limited to, inappropriate behaviors such as abusive language, derogatory remarks, or insults.
 - b. Other offensive behaviors may include the use of condescending, humiliating, or vulgar language, swearing, shouting or use of unsuitable language, use of obscene gestures or mocking.
3. Copyright Infringement
Students must respect copyright laws that protect publishers, software owners, artists, and writers. The use of College resources to infringe upon copyright laws (print, digital, and Internet) is prohibited. This applies to all forms of electronic media including, but not limited to, software, electronic encyclopedias, image files, video files and sound files.
4. Demonstrations
The College encourages civilized discourse. However, the College will not tolerate any mass assemblies or demonstrations that disrupt the classroom experience, work environment, or movement of others. The College also forbids all acts of violence, threatening conduct, and physical interference with the facilities or functions

of the College campus. If protestors (or anti-protestors) resort to the use of violence or physical interference, College officials may, without delay, invoke the use of legitimate authority to remove all violators.

5. Disruptive Behavior

Includes the disruption of College activities and College business in classes, programs, meetings, and other student activities. Disruption may include: disorderly conduct, lewd or indecent behavior, breach of peace, or aiding, abetting or procuring another person to breach the peace on College premises or at functions sponsored by or participated in by the College.

6. Ethical and Acceptable Use of Technology

The use of technology resources is subject to all federal, state and local laws, and to the College's applicable policies and guidelines.

7. Gangs

Involvement in gang-related activities includes, but is not limited to, the display of gang symbols, gang paraphernalia, colors, signs, or graffiti. A gang is defined as a group of individuals with identifiable leadership that conspires and acts in concert, mainly for criminal purposes. Behavior on or about College premises or at College-sponsored events that creates conflict or an atmosphere of intimidation, or creates a clear and present danger to life or property, or disrupts orderly operation, is prohibited.

8. Hazing

Hazing means any act that endangers the mental or physical health or safety of an individual (including, without limitation, an act intended to cause degradation, cruelty, or humiliation), or that destroys or removes public or private property, for the purpose of initiation in, admission to, affiliation with, or as a condition for continued membership in, a group or organization. Hazing is prohibited by the College.

In response to allegations of hazing, it is not a defense that:

- The victim gave consent to the conduct;
- The conduct was not part of an official organizational event or sanctioned or approved by the organization; or
- The conduct was not required as a condition of membership in the organization.

9. Illegal or Unauthorized Possession/Use of Alcohol and Drugs

This includes the unauthorized use, possession, manufacturing or distribution of illegal drugs (under federal or state law), controlled substances, narcotics, or alcoholic beverages or being under the unauthorized influence of the same on campus. Prohibited conduct includes the use of a prescription drug if the prescription was not issued to the student, and sniffing toxic vapors.

10. Illegal or Unauthorized Possession/Use of Weapons

The College prohibits the possession, use, control or distribution of any weapons, including but not limited to, firearms, pellet guns, air pistols/rifles, explosives, dangerous chemicals, knives, stilettos, dirks, brass knuckles, licensed weapons, or other objects or instruments possessed for use as a weapon.

11. Indecent or Obscene Behavior

Such behavior includes, but is not limited to, indecent exposure, urinating or defecating in public, voyeurism, etc.

12. Misrepresentation

Includes representing or acting on behalf of the College or another individual when not authorized to do so.

13. Misuse or Unauthorized Possession or Use of Public or Private Property

Includes, but is not limited to:

- Theft or the taking or unauthorized use or possession of public or private property or unauthorized use or acquisition of services;
- Destroying, damaging or littering of any property;
- Conduct that defaces, destroys, damages, or litters any property of the College or any property of an individual or group.

14. Obstruction/Abuse of Student Conduct Process

Includes, but is not limited to:

- Failure to comply with any aspect of any student disciplinary process;
- Falsification, distortion, or misrepresentation of information in connection with any student disciplinary process;
- Disruption or interference with the orderly process of a discipline hearing;
- Attempting to discourage an individual's proper participation in or use of any student grievance or appeals process;
- Attempting to influence the impartiality of any student disciplinary process or grievance process, or any College individual involved in the process;
- Verbal or physical harassment and/or intimidation of any individual who participates in any student disciplinary process or grievance process.
- Influencing or attempting to influence another person to commit an abuse of any student disciplinary process or grievance process.
- Retaliating against any other College community member because of their participation in any student disciplinary process or grievance process.

15. Refusal to Identify and/or Comply

Students must comply with all lawful directives of College officials and agents, including security personnel. Conduct that violates this Code includes, but is not limited to: failing to follow such lawful directives of a College official; violating the terms of a disciplinary sanction imposed by this policy; and disobedience or insubordination toward College officials or designees acting in the performance of their duties. Students are required to produce identification for a College official when asked, specifically their student ID card.

16. Rioting

Rioting is defined as engaging in, or inciting others to engage in, harmful or destructive behavior in the context of an assembly of persons disturbing the peace. Rioting includes, but is not limited to, such conduct as using or threatening violence to others, damaging or destroying property, impeding or impairing fire or other emergency services, or refusing the direction of authorized personnel.

17. Safety Violations

Conduct which endangers the health or safety of any person(s), including, but not limited to:

- a. Intentionally or recklessly starting a fire or causing an explosion;
- b. Misusing fire safety equipment, fire escapes or elevators;
- c. Intentionally or recklessly endangering the welfare of any individual;
- d. Intentionally or recklessly obstructing fire, police, or emergency services;
- e. Using, possessing, or storing dangerous chemicals, fireworks, or explosives;
- f. Using or storing a weapon on college property;
- g. Utilizing any instrument in a manner that endangers or tends to endanger any person;
- h. Obstructing the free flow of pedestrian or vehicular traffic;
- i. Failing to comply with the reasonable and lawful directions of CC officials; and
- j. Falsely alerting others about an emergency.

18. Stalking

A course of conduct involving more than one instance of unwanted attention, physical or verbal contact, or any other course of conduct directed at an individual that could be reasonably regarded as likely to alarm that individual or place him/her in fear of harm or injury, including physical, emotional, or psychological harm.

19. Threatening Behavior Includes, but is not limited to:

- a. Any written or oral communication, conduct or gesture that causes a reasonable apprehension of physical harm to a person or property.
- b. Interference by force, threat, harassment or duress with personal safety, academic efforts, employment and/or participation in College-sponsored activities.

Note: A student can be responsible for threatening behavior even if the person who is the object of the threat does not observe or receive it, so long as a reasonable person would interpret the maker's statement, communication, conduct or gesture as a serious expression of intent to physically harm.

20. Threatening or Causing Physical or Other Harm to any Person

Includes any conduct that threatens or causes physical injury or endangers another person's or one's own health or safety including, but not limited to: physical violence, assault, or the threat to use physical violence; use or possession of fireworks, gunpowder, dangerous chemicals, or explosive materials; and blocking or preventing the use of or access to fire exit doors and building hallways, etc.

21. Unauthorized Access and Use of Facilities and Services

Includes, but is not limited to:

- a. Unauthorized access or entry (as determined by a College official) to College buildings, structures or facilities, information systems, or obtaining or providing to another person the means of such unauthorized access.
- b. Unauthorized possession, duplication or use of keys or access cards for any College property.
- c. Continued occupation of any College facility after being requested to leave by a College employee, official or designee acting in the performance of their duties.

22. Violations of College Rules, Procedures, and Policies

Students are responsible for making themselves aware of and complying with College policies and guidelines, which can be found on MyCC.

23. Violation of Local, State or Federal Laws

Includes engaging in conduct that violates any municipal or county ordinance, federal or state law, including, but not limited to, laws governing alcoholic beverages, drugs, gambling, sex offenses, indecent conduct, arson, copyright, etc. The conduct process may be instituted without regard to the pendency of civil or criminal litigation in court or criminal arrest and prosecution.

24. Complicity in Violating the Student Code of Conduct

The College does not condone any complicit behavior that assists or results in a violation of this Code. Such behavior includes attempting, aiding, abetting, conspiring to commit, hiring someone to commit, or being an accessory to any act prohibited by this Code. If a student has knowledge of another student, individual, or group committing or attempting to commit a violation of this Code, he or she is required to remove him or herself from the situation and report it to the College.

Student Conduct Process and Procedures

Any member of the Cambridge College community (e.g., students, faculty or staff) may file a report against a student for violations of the Student Code of Conduct. A report may be filed with the Office of the Dean of Student Affairs. As noted above, however, this Student Conduct Process and Procedure may not govern all reports of student misconduct (e.g., violations of the College's Title IX/Sexual Misconduct Policy). In addition, certain school-, department-, or degree-specific rules, policies, or regulations (including any such rules and policies relating to licensing) may supplement or supersede this Student Conduct Process.

The Dean of Student Affairs (or designee) handles alleged violations of the Student Code of Conduct. When a student has been charged with a violation of the Code, the student will be notified of the charges in writing. Following notification, the Dean of Student Affairs (or designee) will meet with the student charged. The student may have an advisor present during the meeting. If there is more than one accused student in the case, it is within the discretion of the Dean of Student Affairs (or designee) to conduct the meeting(s) either separately or jointly. The Dean of Student Affairs (or designee) may also conduct meetings and interviews with the complaining student(s) and any witnesses, and may collect and review any documentary materials that he/she believes to be relevant to the alleged violation.

A student charged with a violation of the Student Code of Conduct may obtain an advisor to assist the student during the Student Conduct Process. The student advisor may be an individual of the student's choice but must be a member of the Cambridge College faculty, staff, or student body. The student must provide at least 24 hours prior notice of his/her/their advisor before any meeting or conference during which the student wishes the advisor to attend. If the Dean of Student Affairs or designee does not give prior approval of the advisor, the advisor may be dismissed at the time of the hearing. If a student and/or group or organization is found responsible for a violation of the Student Code of Conduct, the Dean of Student Affairs (or designee) shall determine the sanction(s) to be imposed. The student and/or group or organization (and a complainant who believes s/he was the victim of another student's conduct) will receive the determination and sanction(s) imposed, if any, in writing.

Sanctions

The following sanctions/consequences may be imposed by the College for a violation of the Student Code of Conduct (unless stated otherwise in the Code).

- a. Verbal warning
- b. Written warning
- c. Probation - A period of observation and review of conduct during which the student or organization must demonstrate compliance with College standards. Terms of this probationary period will be determined at the time probation is imposed.
- d. Permanent or temporary removal from a course.
- e. Permanent or temporary removal from a program.
- f. Restitution - Restitution is monetary compensation required of students who have taken, misused, damaged, or destroyed College property or the property of another. Amounts charged to students may include cost to repair, replace, recover, clean, or otherwise account for the property affected.
- g. Suspension - the student or organization has temporary loss of student status for a specified length of time.
- h. Expulsion from the College
 - a. Expulsion is the most serious disciplinary action and means the permanent removal of the student from the College. Expulsion includes forfeiture of all rights and degrees not actually awarded at the time of the expulsion, notification of expulsion to the student and/or permanent notation of the action on the student's record. A "W" grade will be recorded on the permanent record for each course on the student's schedule at the time of expulsion. The student may no longer participate for any purpose in any College activity or be on College property owned, operated, leased, or maintained for any purpose except when engaged in official business approved in writing by the Dean of Student Affairs (or designee). The College takes this sanction very seriously. If the Dean of Student Affairs (or designee) believes that expulsion is warranted, s/he will make a recommendation to the Provost who will constitute a committee to evaluate the recommendation. The committee may also consult with the College President on an "as needed" basis. The committee will make the decision as to expulsion.
 - i. Other Sanction-Other sanctions may be imposed instead of, or in addition to, specific sanctions listed in this section. These may include, but are not limited to: recommendations for counseling, establishment of mandatory behavior conditions/contract-signing stating agreed-upon behavior expectations for continued enrollment or reenrollment; loss of access to College computers and/or network; a specific project designed to assist the student in better understanding the overall impact of his or her behavioral infraction; a contract of terms for restitution of damages/stolen property before enrollment is continued and/or records are released; suspension without pay from an on-campus job; and suspension from participation in extracurricular activities, interscholastic or leadership positions, or community service.
 - j. Revocation of Admission and/or Degree — Admission to or a degree awarded from the College may be revoked for fraud, misrepresentation, or other violation of College standards in obtaining the degree, or for other serious violations committed by a student prior to graduation.
 - k. Withholding Degree — The College may withhold awarding a degree otherwise earned until the completion of the process set forth in this Student Code of Conduct, including the completion

of all sanctions imposed, if any.

More than one of the sanctions listed above may be imposed for any single violation. Sanctions of suspension, expulsion or revocation or withholding of a degree will become a permanent part of a student's record. The following sanctions may be imposed upon groups or organizations:

- a. Those sanctions listed above.
- b. Loss of selected rights and privileges for a specified period of time.
- c. Loss of Recognition — College student organizations may lose recognition and will be deprived of the use of College resources, the use of the College's name, and the right to participate in College or campus-sponsored activities. This loss of recognition may be for a specific period of time or for an indefinite period of time until all stated conditions are met.

Interim Suspension

In certain circumstances, the Dean of Student Affairs (or designee) may impose an interim suspension prior to the completion of the conduct process. An Interim suspension may be imposed to ensure the safety and well-being of members of the College community or the preservation of College property or if the student poses an ongoing threat of disruption of, or interference with, the normal operations of the college. During the interim suspension, the student may be denied access to the College campus (including classes) or to a particular building or part of the College property. S/he may also be permitted to access certain College property only at select times and on select days. The terms of any suspension shall be determined by the Dean of Student Affairs (or designee), in consultation with the Provost. Interim suspension does not replace the regular process, which shall proceed on the normal schedule.

Requesting a hearing

If a student disagrees with the decision reached by the Dean of Student Affairs (or designee) or with any or all of the sanctions imposed, s/he may request a hearing before a hearing committee. If appealing a decision that resulted in a warning only, the case is only eligible for a review of written documentation by the Provost (or designee). The hearing committee process will not apply.

Process for Requesting a Hearing: The request for the hearing must be made in writing within five (5) business days following the Dean of Student Affairs' (or designee's) written notification of the conduct decision to the student.

Hearing Committee Make-up

The hearing committee will consist of three (3) people selected from a pool of hearing members appointed by the Dean of Student Affairs (or designee). The appealing student, and any other student-party to the underlying student conduct process, shall be given written notice of the time, date and place of the hearing, the reason for the assigned decision and sanction, a list of potential witnesses (unless by doing so would compromise their safety), and the list of hearing committee members. If any student who participates in the hearing committee process believes that one or more members of the hearing committee has a conflict of interest, that student shall notify the Dean of Student Affairs (or designee) immediately and, in any event, at least forty-eight (48) hours prior to the hearing.

Timing

The hearing must begin within twenty (20) business days of receipt of the student's request and proceed as promptly as possible. (Upon mutual agreement between the student and the College, the timeline may extend past the twenty business days.) The appealing student, and any other student-party to the underlying student conduct process, may attend the hearing, present evidence and witnesses, and hear witnesses. Questions to witnesses may be directed through the hearing committee chair.

Rules and Regulations

1. For the hearing, students are entitled to be accompanied by one advisor.
2. The student's advisor shall have no role at the Hearing other than to advise the student. The advisor shall not be permitted to ask or answer questions or to make oral arguments or otherwise disrupt or delay the hearing.
3. Pre-Hearing Conference: The College will convene a pre-hearing conference for the appealing student, and for any other student-party to the underlying student conduct process. Each student will receive notification of this meeting by a letter explaining the nature of the appeal. The purpose of this meeting is for the Dean of Student Affairs or designee to familiarize the students with the hearing process and to allow the students to prepare for the hearing.
4. The chair of the hearing committee will establish what will govern the hearing by following the guidelines below:
 - a. Witness lists and all documents to be presented in the hearing will be exchanged between the Dean of Student Affairs (or designee) and the appealing student prior to the hearing. This process will be coordinated by the Dean of Student Affairs (or designee) and copies of the information will be provided to the hearing committee at the beginning of the hearing.
 - b. All individuals present will be introduced.
 - c. The Dean of Student Affairs (or designee) will elect a representative to present the complaint and decision of the Dean of Student Affairs, citing, where applicable, the specific policy(ies), rule(s), or regulation(s) at issue.
 - d. The appealing student will be given an opportunity to respond briefly.
 - e. The Dean of Student Affairs (or designee) will elect a representative to briefly present relevant information. Witnesses and documents may be presented. The appealing student may request that the hearing committee ask certain questions of the witness(es).
 - f. The appealing student will be given an opportunity to respond briefly. Witnesses and documents may be presented. The hearing committee may pose questions to the witness(es). The hearing committee retains the discretion to determine which materials to consider, which witnesses contain relevant information, and which questions are appropriate to ask the witnesses.
 - g. In its discretion, the hearing committee may elect to allow any other student-party to the underlying student conduct process (i.e. the non-appealing student(s)) the opportunity to present relevant information and/or to pose relevant questions, through the Committee to the witness(es).
 - h. The appealing student will be given an opportunity to ask questions.

- i. The Dean of Student Affairs and appealing student will be allowed to present summation statements.
 - j. All participants are expected to act in a courteous fashion and to respect the protocols established by the chair of the hearing committee. Interruptions, name-calling, threats, or other rude or inappropriate behavior will result in sanctions or disciplinary actions being imposed on the offending party.
 - k. The hearing committee may proceed with its hearing and make its determinations and recommendations without the presence of the student if the committee determines that the student was properly notified of the hearing and fails to attend without good cause.
5. Questions from the student(s) to witnesses or to other students will be directed through the Hearing Committee Chairperson.
 6. Unless the law requires, the hearings are not open to the public.

Hearing Decision

Following the hearing, the hearing committee will deliberate and determine whether to affirm, modify, or reject the decision(s) of the Dean of Students (or designee). The decision of the hearing committee will be based solely upon matters introduced into evidence during the hearing. In the case of an appeal concerning a sanction, the hearing committee may maintain or lessen the sanction's impact, but cannot assign a more significant sanction. A vote of two committee members will be considered a majority decision and will be presented in writing, no later than twenty (20) business days after the conclusion of the hearing, to all the student-parties to the hearing committee process.

Final Appeal

Any student-party to the hearing committee process may appeal the hearing committee's decision in writing to the Provost within five (5) business days of the committee's decision. This final level of appeal is a review of written documentation only. If it is not filed within this time, the student will waive his or her final appeal opportunity.

1. Appeal Procedures: All appeals must be submitted in writing directly to the Provost. All appeals must include the name, address, and telephone number of the appealing student; and must clearly explain, in detail, the basis for the appeal. The basis for the appeal must address one or more of the followings in detail:
 - a. Whether appropriate procedures were followed;
 - b. Whether the sanctions imposed are appropriate, reasonable or just;
 - c. Whether the decision was supported or unsupported by evidence; and/or
 - d. Whether all relevant information was available at the time of the hearing.
2. If the appealing student fails to follow through with the above-outlined process, the appeal opportunity will be forfeited.
3. Provost Decision: After reviewing the hearing committee's written decision, along with the written appeal from the student, the Provost shall have ten (10) business days to render a written decision. The decision shall be final, binding, and mailed, by first-class mail, to all the student-parties to the hearing committee process.

Record Keeping

All sanctions or disciplinary actions are recorded and maintained by the Dean of Students.

External Resources

State Education Commissions

Grievances may be taken to the appropriate state education commission. Please note that state authorities typically expect a student to make every attempt to resolve a problem within their college first. Each state has its own procedure for handling complaints, often including a student complaint form and other documentation. They typically do not accept anonymous complaints.

Complaints are handled by the state education commissions listed below for the main campus and regional locations. Students who reside in other states see also Complaint Process for All States, below.

California — A student or any member of the public may file a complaint/grievance with the Bureau for Private Postsecondary Education at any time by calling 1-888-370-7589 or by completing a complaint form, which can be obtained on the bureau's Internet web site, <http://www.bppe.ca.gov/enforcement/complaint.shtml>

Massachusetts — Massachusetts Board of Higher Education, One Ashburton Place, Room 1401, Boston, MA 02108 • 617-994-6950
• <https://www.mass.edu/forstufam/complaints/complaints.asp>

Puerto Rico — Puerto Rico Department of State - Office of Registration and Licensing of Educational Institutions, PO Box 9023271, San Juan, Puerto Rico 00902-3271 • 787-722-2121 • www.estado.pr.gov

Other External Resources

Standards for Accreditation — The NECHE (formerly known as NEASC) complaint procedures are solely for the purpose of addressing significant non-compliance with the Standards for Accreditation, not for individual dispute resolution.

Contact: New England Commission of Higher Education, 3 Burlington Woods Drive, Suite 100, Burlington, MA 01803-4514 • 781.425.7785 • email: info@neche.org

Equal Opportunity, Harrassment, Sexual Harrassment — Please contact:

The United States Equal Employment Opportunity Commission (EEOC)

John F. Kennedy Federal Building, 475 Government Center
Boston, MA 02203 • 617-565-3200
EEOC offices nationwide are listed online at www.eeoc.gov

Massachusetts Commission Against Discrimination (MCAD) • www.mass.gov/mcad

One Ashburton Place, Sixth Floor, Room 601, Boston, MA 02108 • 617-994-6000
436 Dwight Street, Second Floor, Room 220, Springfield, MA 01103 • 413-739-2145

FERPA — If the College fails to comply with FERPA requirements, written complaints may be submitted to:

Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Avenue, SW, Washington, DC 20202-8520

Suicide Prevention Policy and Intervention Protocol

I. Rationale

Suicide is one of the most alarming and complex problems faced by our society. It is often preventable, especially in situations where appropriate training allows individuals to intervene with a person at risk. Cambridge College recognizes the need to ensure that members of its community are aware of the resources available to appropriately respond when concerned about the suicide risk of a student exhibiting suicidal behaviors or thoughts, understand that seeking help is encouraged and that help is available. The policy and protocol that follows is intended to establish a culture of seeking and obtaining help for suicidal students among members of the College community.

II. Policy

A. DEFINITIONS

Suicide: Death from a self-inflicted injury by which the student intended to kill themselves.

Suicidal Behavior: Any potentially injurious behavior which is self-inflicted and by which a student intends, or gives the appearance of intending, to kill themselves.

Suicidal Ideation: Any self-reported thoughts or feelings about engaging in suicidal behavior.

Suicide Plan: A proposed method of self-inflicted injury through which the potential and intentional outcome is death.

Active Suicidal Ideation with Specific Plan and Intent to Act:

Thoughts of killing oneself with details of plan fully or partially worked out and student has some intent to carry it out.

Active Suicidal Ideation with Some Intent to Act, without Specific Plan:

Active suicidal thoughts of killing oneself and student reports having some intent to act on such thoughts, as opposed to "I have the thoughts, but I definitely will not do anything about them."

Actual Knowledge: The direct and clear awareness of a fact or circumstance, as opposed to inferred or implied knowledge. What a person "must have known" as opposed to "should have known."

B. Cambridge College is committed to promoting the health and safety of its community. The purpose of this policy is to protect the health and well-being of all students by raising awareness of, having procedures in place to prevent, assess the risk of, intervene in, and respond to suicide in our student population. The College recognizes:

- (1) that suicide is a problem in the locations we serve, and it is our obligation to confront it.
- (2) the effect of the social stigma associated with mental health conditions, which all too often prevents a person from seeking help when they are at risk of suicide.

- (3) that the social stigma also affects families and makes it difficult for them to return to a normal and productive life.
- (4) that suicide imposes emotional loss and economic burdens on the states and locations in which we deliver academic programs and serve.
- (5) that suicide is a complex multi-factorial (biological, psychological and social) problem.
- (6) that suicide is preventable and that we must develop more effective prevention programs.
- (7) that prevention efforts must be constantly examined and refreshed in light of new facts and deeper understanding.
- (8) the importance of developing a suicide prevention plan that is culturally responsive to the College's environment

III. Suicide Prevention Guidelines

The purpose for Suicide Prevention Guidelines is to ensure that members of the CC community are provided with educational opportunities that raise awareness for suicide prevention and to provide guidance to faculty, staff, students, and other members of the College community to help prevent suicide.

A. CRISIS INTERVENTION INFORMATION

The College will make suicide prevention information and mental health program resources, including but not limited to: guidelines for referral, assistance and immediate assistance; 24-hour assistance resources; and campus, local and national resources, available each semester. This information will be distributed through various means, which may include web pages, campus news sources, and literature distribution.

All incoming students will be provided with information on mental health services and support networks that address mental health topics, including depression, anxiety, stress and suicide prevention during orientation.

B. EDUCATION

Students and employees will receive educational material and training opportunities that focus on identifying suicide warning signs, protocols for helping someone in a mental health crisis, campus support networks, and local support resources. The College will:

- develop an educational campaign focused on suicide prevention
- provide student and employee training that will help participants identify someone in crisis, engage with them appropriately, and find assistance
- develop professional development programs on how to promote relationships and feelings of connectedness
- create programs that further a sense of connection on campus
- offer workshops that focus on coping skills.

C. OUTREACH

The College will maintain suicide prevention education outreach and engagement efforts, through the following outreach initiative:

- distribute appropriate information supported and/or developed by credible sources, such as the Jed Foundation and the Suicide

Prevention Resource Center, that are comprehensive and focus on educational components, helping components, national hotlines, local hotlines, suicide warning signs, and local resource information

- create a dedicated web page for Suicide Prevention efforts on campus
- utilize national and local initiatives to support on campus efforts
- establish and maintain partnerships with local community resources
- distribute printed material, such as brochures

IV. SUICIDE PREVENTION AND CRISIS RESPONSE PROTOCOL

A. PURPOSE

Cambridge College is committed to the safety and health of all members of the College community. The purpose of the Suicide Prevention Protocol is to provide members of the College community tools to respond to students who may be considering suicide.

ALL SUICIDAL BEHAVIOR OR THREATS SHOULD BE TAKEN SERIOUSLY. IN CASE OF AN EMERGENCY, PLEASE DIAL 911 IMMEDIATELY. IN CASE OF AN ON-CAMPUS EMERGENCY, ALSO NOTIFY CAMPUS SECURITY AS FOLLOWS:

- Boston Campus 617-873-0111 (Ext. 1111 within Cambridge College)
- Lawrence Campus617-873-0474
- Springfield Campus413-733-6061
- Southern California Campus 909-652-6911 (Chaffey College Police Dept.)
- Puerto Rico Campus787-641-0099 (Front Desk Security)

B. SUICIDE WARNING SIGNS

According to the American Foundation for Suicide Prevention*, while there is no single cause for suicide, people at risk tend to exhibit one or more warning signs. Suicide most often occurs when stressors and health issues converge to create an experience of hopelessness and despair.

Risk factors

Risk factors are characteristics or conditions that increase the chance that a person may try to take their life.

- Mental health conditions
 - Depression
 - Substance use problems
 - Bipolar disorder
 - Schizophrenia
 - Personality traits of aggression, mood changes and poor relationships
 - Conduct disorder
 - Anxiety disorders
- Serious physical health conditions including pain
- Traumatic brain injury
- Access to lethal means including firearms and drugs
- Prolonged stress, such as harassment, bullying, relationship problems or unemployment

- Stressful life events, like rejection, divorce, financial crisis, other life transitions or loss
- Exposure to another person's suicide, or to graphic or sensationalized accounts of suicide
- Previous suicide attempts
- Family history of suicide
- Childhood abuse, neglect or trauma

Protective Factors

- Access to mental health care, and being proactive about mental health
- Feeling connected to family and community support
- Problem-solving and coping skills
- Limited access to lethal means
- Cultural and religious beliefs that encourage connecting and help-seeking, discourage suicidal behavior, or create a strong sense of purpose or self-esteem

Warning signs

Something to look out for when concerned that a person may be suicidal is a change in behavior or the presence of entirely new behaviors. This is of greatest concern if the new or changed behavior is related to a painful event, loss, or change. Most people who take their lives exhibit one or more warning signs, either through what they say or what they do.

Talk

If a person talks about:

- Killing or hurting themselves
- Feeling hopeless
- Having no reason to live
- Being a burden to others
- Feeling trapped
- Unbearable pain

Behavior

Behaviors that may signal risk, especially if related to a painful event, loss or change:

- Increased use of alcohol or drugs
- Looking for a way to end their lives, such as searching online for methods
- Prior suicide attempt
- Withdrawing from activities
- Isolating from family and friends
- Sleeping too much or too little
- Visiting or calling people to say goodbye
- Giving away prized possessions
- Aggression
- Fatigue

Mood

People who are considering suicide often display one or more of the following moods:

- Depression
- Anxiety

- Loss of interest
- Irritability
- Humiliation/Shame
- Agitation/Anger
- Relief/Sudden Improvement

*<https://afsp.org/risk-factors-protective-factors-and-warning-signs#risk-factors>

C. Suicide Prevention Procedures for Puerto Rico Campus A student should be immediately referred for assistance according to the procedures outlined below.

Student Active Suicidal Behavior

1. Any member of the College community who has actual knowledge that a student has just engaged in, is in the process of engaging in, or is about to engage in suicidal behavior on campus, shall immediately contact emergency personnel by calling 911.
2. Take the student seriously and, if possible, stay with them. Keep talking to them and call the emergency ASSMCA hotline at 1-800-981-0023 with them while you wait for emergency personnel to arrive. Keep yourself and others safe if the person is demonstrating signs of intense aggression or threatening behavior.
3. Notify Campus Security for the Puerto Rico Campus at 787-641-0099 (Front Desk Security).
4. Contact the Professional Counselor or designee at 787-296-1101 extension 5 as soon as practical to report the incident.
5. For off-campus emergencies, call 911 immediately, then the emergency ASSMCA hotline at 1-800-981-0023 or an emergency mental health center.
6. The Professional Counselor or designee shall immediately notify the student's emergency contact of record. (Contact information for emergency contacts can be found in Jenzabar under 'Work with Students' □ 'Emergency Contacts'.)
7. The Professional Counselor or designee will follow up to provide resources, such as academic accommodations, phone numbers for crisis hotlines and emergency services providers, and additional resources.
8. Once the student is under the care of emergency personnel, College staff will not interfere with the professional judgment of emergency personnel, even if the student is uncooperative or refuses medical assistance.
9. A student who has engaged in active suicidal behavior shall be required to be assessed by a licensed mental health professional to determine the level of continued suicide risk posed and whether they are capable of continuing their education per the College's Readiness to Return Policy. Any documentation will be reviewed by the Professional Counselor or designee.

Stated Plans or Intentions to Attempt Suicide (Threats of Suicide)

1. Any member of the College community who has actual knowledge that a student has stated plans or intentions to attempt suicide shall take the threat very seriously and contact the Professional Counselor or designee immediately at 787-296-1101 extension 5.

2. Talk to the student, if possible, and encourage them to call the emergency ASSMCA hotline at 1-800-981-0023.
3. The Professional Counselor or designee will meet with the student to assess the situation and assist them with obtaining appropriate care and support as necessary.
4. Based on the information received, the Professional Counselor or designee shall determine whether the protocol should be activated.
5. If the protocol is activated, the Professional Counselor or designee shall attempt to contact the student's emergency contact of record.
6. The Professional Counselor or designee may help identify support resources and strategies and/or develop a follow-up action plan for the student.
7. The Professional Counselor or designee may require that a student who has stated plans or intentions to attempt suicide be assessed by a licensed mental health professional to determine the level of suicide risk posed and whether they are capable of continuing their education per the College's Readiness to Return Policy. Any documentation will be reviewed by the Professional Counselor or designee.

Suicide Prevention Crisis Hotlines

If you or someone you know is thinking about suicide, please call one of the 24-hour crisis hotline numbers below right away:

- Emergencias: 911
- Línea PAS de ASSMCA: 1-800-981-0023 <https://lineapas.assmca.pr.gov/>
- La Línea PAS está disponible las 24 horas del día, los 365 días del año. La Línea PAS te ofrece: sesión de desahogo, consejería en crisis y apoyo emocional, cernimiento preliminar a nivel psicosocial, coordinación de evaluación psiquiátrica y psicológica, tele-enlaces y referidos.
- Suicide Prevention Lifeline – Red Nacional (TALK): 1-800-273-8255
- Centro de Control de Envenenamiento (Poison Help): 1-800-222-1222

National resources

- IMAlive Suicide Prevention Hotline 800-784-2433
- National Suicide Prevention Lifeline at 1-800-273-TALK (8255)
- Press # 1 if you are a Veteran
- American Foundation for Suicide Prevention (AFSP) www.afsp.org
- Jed Foundation www.jedfoundation.org
- Samaritans Statewide Hotline. Call or Text: 1-877-870-HOPE (4673)
- The Trevor Helpline. 866-4-U-TREVOR (488-7386)
- Specifically for Lesbian, Gay, Bisexual and Transgender youth and young adults
- [National Organization for People of Color Against Suicide \(NOPCAS\)](http://www.nopcas.org)
- [Suicide Prevention Resource Center](http://www.sprc.org)
- [American Association of Suicidology](http://www.suicidology.org)

- [National Action Alliance for Suicide Prevention](http://www.nationalallianceformentalhealth.org)
- [Partnership for Workplace Mental Health](http://www.workplacementalhealth.com)
- [Stop A Suicide](http://www.stopasuicide.com)

Links of interests:

1. Organización Mundial de la Salud. Sección de Prevención del suicidio: http://www.who.int/mental_health/prevention/suicide/suicideprevent/es/
2. Project ATTEMPTERS. Devoted to Those Who Attempted Suicide: <http://projectattempters.com/>
3. Programa ConVida: <http://convidauprrp.wordpress.com/>
4. Asociación Internacional para la Prevención del Suicidio: <http://iasp.info/es/index.php>
5. American Association of Suicidology: <http://www.suicidology.org/home>
6. Instituto Hispanoamericano de Suicidología: <http://www.suicidologia.com.mx/radio.html>
7. Asociación Mexicana de Suicidología: <http://www.suicidologia.org.mx/>
8. National Suicide Prevention Lifeline: <http://www.suicidepreventionlifeline.org/>
9. SAMHSA: Suicide prevention: <http://www.samhsa.gov/prevention/suicide.aspx>
10. Suicide Prevention Resource Center: http://www.sprc.org/about_sprc
11. Centers for Disease Control and Prevention: <http://www.cdc.gov/ViolencePrevention/suicide/index.html>

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3809451/>

<https://www.sprc.org/resources-programs/risk-protective-factors-racial-ethnic-populations-us>

Title IX Sexual Harassment Policy

I. Cambridge College Values and Purpose of Policy

A. Statement of Institutional Values

Cambridge College ("CC" or "the College") is committed to establishing and maintaining an educational and employment environment that is free from sexual harassment, as defined below. This policy governs investigations and determinations of claims of sexual harassment that would, if proven, constitute a violation of Title IX and the Massachusetts Act Relative to Sexual Violence on Campus. Claims of sexual misconduct other than Title IX sexual harassment will be considered under the Cambridge College Sexual Misconduct Policy. Claims of sex discrimination that would not violate Title IX, if proven, will be considered under the College's Non-Discrimination Policy.

Sexual harassment is a violation of a person's rights, dignity, and integrity, and is contrary to the mission and values of the College. Acts of sexual harassment are strictly prohibited and will not be tolerated.

The College takes all sexual harassment seriously and is committed to providing information, education, resources, support, interim supportive measures, and direction to the CC community to prevent and address sexual harassment. In response to a Formal Complaint, as defined below, that a member of the CC community has engaged in sexual harassment, the College will take all appropriate steps to eliminate the harassment, prevent its recurrence, and address its effects. To achieve equitable results, the College will carefully review and/or investigate all Formal Complaints of sexual harassment with an earnest intent to understand the perspective and experiences of each individual involved, and to provide for fair and impartial evaluation and resolution.

The College is committed to establishing and maintaining an environment free of all forms of sexual harassment. Sexual harassment, as defined in this policy, is a form of sex discrimination that unjustly deprives a person of equal treatment. It is prohibited by Title IX of the Educational Amendments of 1971, a federal law that provides that:

No person in the United States shall, on the basis of sex, be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.

Sexual harassment is also prohibited under Title VII of the Civil Rights Act of 1964, Massachusetts General Laws Chapter 6, section 168E and 151B, and other applicable statutes. This policy prohibits sexual harassment committed by any CC community member, regardless of gender related status.

The College is committed to ensuring that any response to a Formal Complaint of sexual harassment will treat the Complainant(s) and the Respondent(s) equitably by providing remedies to the Complainant(s) and by following a grievance process compliant with the applicable federal regulations set forth in 34 C.F.R. §106.45 and Massachusetts regulations promulgated under MGLc 6, sec 168E, as applicable. As such, the College is committed to the following principles in its investigations of Formal Complaints:

- A Respondent is presumed to be not responsible until/unless a determination has been made;
- The burden of proof and burden of gathering evidence sufficient to reach a determination rest on the College, not the Complainant and/or the Respondent;
- All relevant evidence will be evaluated objectively;
- Credibility determinations will not be based on a person's status as a Complainant, Respondent, or witness;
- The Complainant and the Respondent will have equal opportunities to present witnesses (fact and expert) and to present other inculpatory and exculpatory evidence;
- The Complainant and the Respondent are not restricted from discussing the allegations under investigation; and

- The Complainant and the Respondent will have equal opportunities to inspect and review any evidence.

B. Purpose & Scope of Policy

The purpose of this policy is to provide the CC community with a clear set of behavioral standards, definitions, and descriptions of sexual harassment. The policy is intended to protect and guide CC community members who have been affected by sexual harassment, whether as a Complainant, a Respondent, or a third party.

When used in this policy, "Complainant" refers to those persons who have made a Formal Report to the College that they are alleged to have been the victim of conduct that could constitute sexual harassment. "Respondent" refers to those persons who have been identified in a Formal Report to be the perpetrator of conduct that could constitute sexual harassment. "Third party" refers to any other person with information concerning a Formal Complaint of prohibited conduct, including any witness to the incident or any individual who makes a report to the College concerning someone else. "Employee" refers generally to all staff and faculty members, unless otherwise specified. A "Formal Complaint" is a document filed and signed by a Complainant or by the Title IX Coordinator alleging sexual harassment against a Respondent and requesting that the College investigate the allegation. At the time of the Formal Complaint, the Complainant must be participating in or attempting to participate in the education program or activity of the College. "Actual knowledge" means notice of sexual harassment or allegations of sexual harassment to the Title IX Coordinator or Deputy Title IX Coordinator for Students or to any official who has authority to institute corrective measures on behalf of the College.

In addition to defining prohibited conduct relating to sexual harassment that violates the standards of our community, this policy will also:

- Identify resources for all CC community members who are impacted by conduct prohibited by this policy;
- Identify the College's Title IX Coordinator and Deputy Title IX Coordinator for Students, and their roles;
- Identify the roles of the Title IX Investigator(s) and Title IX Decision-maker(s).
- Provide information about where a CC community member can obtain confidential support and access resources without making a Formal Report to the College's Title IX Coordinator or the Deputy Title IX Coordinator for Students;
- Provide information about how a Complainant can report an incident of sexual harassment to the College, to outside law enforcement, or to neither; and,
- Provide information about how a Formal Complaint of sexual harassment concerning a CC community member will be investigated, evaluated, and resolved by the College.

This policy applies to the behavior of all CC community members, including students, faculty, and staff, that occurs within the educational programs and activities sponsored by the College. All CC community members are responsible for their actions and behavior.

Any individual affiliated with the College may make a report of

sexual harassment to the Title IX Coordinator or the Deputy Title IX Coordinator for Students. Only a Complainant who is affiliated with the College may make a Formal Complaint alleging a violation of this policy. The College will provide resource options and respond promptly and equitably to all Formal Complaints of sexual harassment involving a CC community member. The College will engage in a Title IX investigation during which it is committed to maintaining fairness for all parties and balancing the needs and interests of individuals with the safety of the community.

Violations of this policy may result in disciplinary action. Depending on the nature of the violation, disciplinary consequences for violations of this policy may include denial of privileges, written warnings, disciplinary probation, suspension, and expulsion for students, and may include warnings (verbal or written), demotions, suspensions, and termination for employees. In addition, the College community should be aware that the conduct described in this policy may also violate federal or state laws and regulations.

Cambridge College reserves the right to amend or modify this policy at any time.

II. Statement on Privacy, Confidential Resources, & Other Resources

A. Privacy & Confidentiality

The College is committed to respecting the privacy of all individuals involved in a Formal Complaint of sexual harassment. In any Title IX review of a Formal Complaint, every effort will be made to protect the privacy and interests of the individuals involved in a manner that is consistent with the need for a thorough review of the allegations of the Formal Complaint. Such a review is essential to protecting the safety of the Complainant, the Respondent, and the broader campus community, and to maintaining an environment free from sexual harassment.

At all times, the College will respect and safeguard the privacy of those involved in a Formal Complaint of sexual harassment, and information relating to such a Formal Complaint will be shared only with individuals who “need to know” in order to assist in the College’s Title IX investigation and/or resolution of the Formal Complaint. In some cases, the Complainant may wish to keep his/her/their identity or other aspects of an incident confidential or may request that the College not pursue a Title IX investigation. In such cases, the College must balance these requests against the College’s responsibility to provide a safe environment free from sexual harassment for all CC community members. This responsibility may require that the College disclose certain aspects of the Formal Complaint to the alleged perpetrator, law enforcement officials, or others with a need to know such information. The College will seek to respect the request of the Complainant and, where it cannot do so, it will consult with the Complainant and keep her/him/them informed about the chosen course of action.

When considering a request for confidentiality, the College’s Title IX Coordinator will determine the degree of confidentiality that can be afforded, taking into account a range of factors, including, but not limited to, the following:

- Whether the Respondent is alleged to have committed sexual harassment in the past;
- The risk that the Respondent will commit additional acts of sexual

harassment;

- Whether the sexual harassment was perpetrated with a weapon;
- Whether the Complainant is a minor;
- Whether the College possesses other means of obtaining relevant evidence; and,
- Whether the Formal Complaint suggests a pattern of sexual harassment at a particular location or within a particular group.

If the College, having conducted a safety and risk analysis, concludes that a Formal Complaint of sexual harassment represents an immediate threat to the CC campus community, the College may issue a timely notice of the conduct to the CC community to protect the health or safety of the broader campus community. This notice will not contain any biographical or other identifying information of the Complainant.

All Title IX investigative and sanction proceedings, and all related notices or statements issued by the College, will comply with the requirements of the Family Educational Rights and Privacy Act (FERPA), the Clery Act, Title IX, MGLc 6, sec 168E, other applicable law, and College policy. No information shall be released from such proceedings by the College, except as required or permitted by law or College policy.

B. Confidential Resources

Cambridge College encourages victims of sexual misconduct to talk with a trained counselor about the incident. If a member of the College community wishes to obtain confidential assistance through on-campus or off-campus resources without making a Formal Complaint with the College, he/she/they may use the following Confidential Resources:

On-Campus Resources

Employee Assistance Program (EAP)
1-800-386-7055
www.ibhworklife.com

Off-Campus Resources

Boston Area Rape Crisis Center
99 Bishop Allen Drive
(BARCC):
Cambridge, MA 02139
(800) 841-8371 (24 hour hotline)
www.barcc.org

BARCC provides counseling, legal advice, and advocacy to help victims consider their options; medical advocates to accompany them to the hospital; and legal advocacy. All services are free and available to victims of sexual misconduct and their friends/family.

The Network/La Red:
PO Box 6011
Boston, MA 02114
(617) 742-4911
<http://tnlr.org/en/>

Provides free advocacy, support, and safety planning for LGBTQ

victims of domestic and dating violence.

REACH Beyond Domestic Violence:
PO Box 540024
Waltham, MA 02454
(800) 899-4000 (free hotline)
(781) 891-0724 (office)
www.reachma.org

Provides free safety planning, advocacy, 24-hour hotline staffed by domestic violence crisis counselors, and shelter and support services to victims of domestic and dating violence.

Fenway Health Center:
1340 Boylston Street
Boston, MA 02215
(617) 267-9001 (help line)
(617) 267-0900
www.fenwayhealth.org

Provides comprehensive health services for the LGBTQ community and beyond. Also provides support via the above help line.

Victims Right Law Center:
115 Broad Street
Boston, MA 02110
(617) 399-6720
www.victimrights.org

Provides free lawyers to represent victims on court-ordered no contact orders, school-based complaints, immigration, and other legal matters related to sexual assault and violence. Assistance is available in both English and Spanish.

The organizations identified above are available to offer support services and are able, if requested, to maintain the confidentiality of the victim's identity. If confidentiality is a concern, the victim should clarify the extent to which information should be kept confidential before disclosing information about the incident.

C. Other Campus Resources

In addition to the Confidential Resources listed above, all CC community members have access to a variety of resources provided by the College that can provide crisis intervention services, counseling, and academic support. All of the staff listed below are trained to support individuals affected by sexual harassment and to coordinate with the Title IX Coordinator or the Deputy Title IX Coordinator for Students consistent with the College's commitment to a safe and healthy educational environment. While not bound by confidentiality, these resources will nevertheless maintain the privacy of an individual's information within the limited circle of those involved in the Title IX resolution process.

Campus Safety:
John Spinard
500 Rutherford Avenue
Boston, MA 02129
617-873-0169

John.spinard@cambridgecollege.edu

Associate Provost for Student Learning Outcomes Assessment:
Tracy McLaughlin
500 Rutherford Avenue
Boston, MA 02129
617-873-0150
Tracy.McLaughlin@cambridgecollege.edu

Vice President of Human Resources and Talent Development:
Lauretta Siggers
500 Rutherford Avenue
Boston, MA 02129
617-873-0170
Lauretta.siggers@cambridgecollege.edu

Section 504 Coordinator:
Vera Dimoplou
500 Rutherford Avenue
Boston, MA 02129
617-873-0614
Vera.Dimoplou@cambridgecollege.edu

Confidential Resource Provider
Vera Dimoplou
500 Rutherford Avenue
Boston, MA 02129
617-873-0614
Vera.Dimoplou@cambridgecollege.edu

D. Administrative Resources

Various administrative agencies can provide resources and legal assistance for victims of sexual harassment. Some agencies in the local Boston-area community include:

Massachusetts Commission Against Discrimination (MCAD)
John McCormack Building
One Ashburton Place
Sixth floor, Room 601
Boston, MA 02108
(617) 994-6000

The MCAD prohibits sexual discrimination, including sexual harassment and gender related status harassment, in the workplace. The statute of limitations for filing a complaint is 300 days from the last date of discrimination.

Equal Employment Opportunity Commission (EEOC)
JFK Federal Building
475 Government Center
Boston, MA 02203
(800) 669-4000

The EEOC prohibits discrimination, including sexual harassment, in the workplace. The statute of limitations for filing a complaint is 300 days from the last date of discrimination.

U.S. Department of Education, Office for Civil Rights (OCR)
5 Post Office Square, 8th floor
Boston, MA 02109
(617) 289-0111

For assistance related to civil rights, students may visit the Department of Education, Office for Civil Rights website at <http://wdcrocolp01.ed.gov/CFAPPS/OCR/contactus.cfm>, which provides information regarding the address and phone number of the OCR office that serves their area, or they may call 1-800-421-3481. While OCR complaints should generally be filed within 180 days of the last date of the alleged discrimination, OCR may extend this filing deadline in a variety of circumstances.

III. Prohibited Conduct & Definitions

The College prohibits all forms of sexual harassment, as defined below. The College also prohibits retaliation relating to any Formal Complaint of sexual harassment.

A. Definition of Sexual Harassment

Under Title IX, sexual harassment is a form of unlawful sex discrimination and consists of three basic types:

1. **Quid Pro Quo Harassment:** Any action by a College employee in which submission to conduct of a sexual nature is made either explicitly or implicitly a term or condition of an individual's education, grades, recommendations, or extra-curricular or employment opportunities.
2. **Unwelcome Conduct:** Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the College's education program or activity.
3. **Sexual Assault, Dating Violence, or Stalking:** "Sexual assault" as defined in 20 U.S.C. §1092(f)(6)(A)(v), namely, "an offense classified as a forcible or non-forcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation. "Dating violence" as defined in 34 U.S.C. § 12291(a)(1), namely, "violence committed by a person – (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) the length of the relationship; (ii) the type of relationship; and (iii) the frequency of interaction between the persons involved in the relationship." "Stalking" as defined in 34 U.S.C. § 12291(a)(30), namely, "engaging in a course of conduct directed at a specific person that would cause a reasonable person to- (A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress."

In any type of sexual harassment noted above, the effect will be evaluated based on the standard of a reasonable person in the position of the Complainant.

B. Forms of Prohibited Sexual Harassment

In some cases, sexual harassment is obvious and may involve an overt action, a threat, or a reprisal. In other instances, sexual harassment is subtle and indirect, with a coercive aspect that is unstated.

Sexual harassment can take many forms, including but not limited to:

- It can occur between persons of equal power status (e.g., student to student, staff to staff, faculty member to faculty member, visitor/contracted employee to staff) or between persons of unequal power status (e.g., supervisor to subordinate, faculty member to student, student leader to first-year student). Although sexual harassment often occurs in the context of an exploitation of power by the individual with the greater power, a person who appears to have less power in a relationship can also commit sexual harassment (e.g., student harassing faculty member).
- It can be committed by an individual or may be a result of the collective actions of an organization or group.
- It can be committed against an individual, an organization, or a group.
- It can be committed by an acquaintance, a stranger, or someone with whom the Complainant has a personal, intimate, or sexual relationship.
- It can occur by or against an individual of any sex, gender identity, gender expression, or sexual orientation.
- It does NOT have to include intent to harm, be directed at a specific target, or involve repeated incidents.

Examples of behavior that might be considered sexual harassment include, but are not limited to:

- Unwanted sexual innuendo, propositions, sexual attention or suggestive comments and gestures; unwanted indecent exposure towards another person; humor and jokes about sex or gender-specific traits; sexual slurs or derogatory language directed at another person's sexuality, gender, gender identity, sexual orientation or gender expression; insults and threats based on sex, gender, gender identity, sexual orientation or gender expression; and other oral, written or electronic communications of a sexual nature that an individual communicates is unwanted and unwelcome;
- Unwelcome leering or whistling at another in a sexually suggestive manner;
- The creation, display, or distribution of sexually explicit drawings, pictures, or written materials; sexually charged name-calling; sexual rumors or ratings of sexual activity/performance; or the circulation, display, or creation of e-mails or websites of a sexual nature;
- Non-academic display or circulation of written materials or pictures degrading to an individual or gender group;
- Unwelcome and objectively inappropriate physical contact or suggestive body language, such as touching, patting, pinching, hugging, or kissing, or brushing against an individual's body;
- Undue and unwanted sexual attention, such as repeated flirting, objectively inappropriate or repetitive compliments about clothing or physical attributes, sexual activities, or sexual prowess; objectively inappropriate inquiries into one's sexual activities; or making sexually oriented gestures;
- Physical coercion or pressure of an individual to engage in sexual activity or punishment for a refusal to respond or comply with sexual advances;

- Change of academic or employment responsibilities (increase in difficulty or decrease of responsibility) based on sex, gender identity, sexual orientation, or gender expression;
- Use of a position of power or authority to: (1) threaten or punish, either directly or by implication, for refusing to tolerate harassment, for refusing to submit to sexual activity, or for reporting harassment; or (2) promise rewards in return for sexual favors;
- Sexual assault;
- Sexual Violence: Engaging in physical sexual acts with someone who has not given her/his/their consent or who is incapable of giving consent. This includes rape, sexual assault, battery, and sexual coercion. Sexual violence may involve individuals who are known to one another or have an intimate and/or sexual relationship (relationship violence), or may involve individuals not known to one another. Examples include, but are not limited to:
 - o Having or attempting to have sexual intercourse with another individual without consent. Sexual intercourse includes vaginal or anal penetration, however slight, with a body part or object, or oral copulation by mouth-to-genital contact;
 - o Having or attempting to have sexual contact of any kind with another individual without consent. Sexual contact includes kissing, touching the intimate parts of another, causing the other to touch one's intimate parts, or disrobing of another without permission. Intimate parts may include the breasts, genitals, buttocks, mouth or any other part of the body that is touched in a sexual manner; or,
 - o Knowingly exposing another individual to a sexually transmitted disease or virus without his or her knowledge.
- Sexual exploitation: An act or acts committed through non-consensual abuse or exploitation of another person's sexuality for the purpose of sexual gratification, financial gain, personal benefit, or any other non-legitimate purpose. The act(s) of sexual exploitation are prohibited even if the behavior does not constitute another sexual misconduct offense. Sexual exploitation may involve individuals who are known to one another, have an intimate or sexual relationship, or may involve individuals not known to one another. Examples include, but are not limited to:
 - o Observing another individual's nudity or sexual activity or allowing another to observe consensual sexual activity without the knowledge and consent of all parties involved;
 - o Non-consensual streaming of images, photography, video, or audio recording of sexual activity or nudity, or distribution of such without the knowledge and consent of all parties involved;
 - o Photographing or taping someone (via audio, video, or otherwise) involved in sexual activity, sexual intercourse/penetration, or in a state of undress, without their knowledge or consent. Even if a person consented to the sexual activity or intercourse/penetration, photographing or taping someone without their knowledge goes beyond the boundaries of that consent. The dissemination of photographs or video/audio of someone involved in sexual activity, intercourse/penetration, or in a state of undress, without their knowledge or consent constitutes a separate and additional act of sexual exploitation;
 - o Voyeurism, which is the act of observing someone involved in sexual contact/activity or in a state of undress, without their knowledge or consent;
 - o Prostituting another individual; or
 - o Inducing incapacitation for the purpose of making another person vulnerable to non-consensual activity.
- Stalking and intimidation: A course of conduct involving more than one instance of unwanted attention, harassment, physical or verbal contact, or any other course of conduct directed at an individual that could be reasonably regarded as likely to alarm that individual or place him/her/them in fear of harm or injury, including physical, emotional, or psychological harm. This includes cyber-stalking, a particular form of stalking in which electronic media such as the internet, social networks, blogs, cell phones, texts, or other similar devices or forms of contact are used to pursue, harass, or make unwelcome contact with another person. Stalking and cyber-stalking may involve individuals who are known to one another or have an intimate or sexual relationship, or may involve individuals not known to one another. Prohibited sexual intimidation involves threats to commit unwanted physical contact against someone based on his/her/their sex or gender related status. Examples of stalking and intimidation include, but are not limited to:
 - o Unwelcome following or surveillance of another person;
 - o Unwelcome appearances at a person's home, work, or place of study;
 - o Making/sending frequent and unwelcome phone calls, emails, or text messages to another person;
 - o Leaving unwelcome written messages or objects for a person;
 - o Making verbal or written threats to harm another based on their sex or gender-related status; or
 - o Vandalizing a person's property.
- Relationship violence: Relationship violence is any intentionally violent or controlling behavior by a person who is currently or was previously in a relationship with the victim. Relationship violence can also involve domestic violence committed by a person with whom the Complainant shares a child and/or residence. Relationship violence includes actual or threatened physical injury, sexual assault, psychological abuse, economic control, and/or progressive social isolation. Relationship violence can occur in all types of relationships. Relationship violence can include, but is not limited to:
 - o physical abuse or violence;
 - o psychological/emotional abuse, such as demeaning or humiliating language and conduct;
 - o controlling/possessive behavior, including social and economic control (such as limiting access to funds or interfering with employment);
 - o making him/her/they feel like: he/she/they is walking on eggshells; he/she/they must call his/her/their friends in secret; he/she/they must dress in a certain way; or

o any sexual exploitation, as defined above, that arises in the context of a relationship.

- Abusive, disruptive, or harassing behavior, whether verbal or physical, which endangers another's mental or physical health, including but not limited to threats, acts of violence, or assault based on gender related status and/or in the context of intimate partner violence;
- Demeaning verbal or other expressive behavior of a sexual or gendered nature in instructional settings; and
- Acts of verbal, nonverbal, or physical aggression, intimidation, or hostility based on sex or sex-stereotyping; harassment for exhibiting what is perceived as a stereotypical characteristic for one's sex, or for failing to conform to stereotypical notions of masculinity and femininity, regardless of actual or perceived gender related status of the harasser or her/his/their target.

C. Additional Conduct Related to Sexual Harassment Prohibited by this Policy

Aiding or Facilitating Sexual Harassment: Aiding or facilitating sexual harassment means promoting or encouraging the commission of any behavior prohibited under this policy. Members of the CC community are prohibited both from personally engaging in sexual harassment, as well as from engaging in conduct that assists or encourages another person to engage in sexual harassment.

Retaliation: Retaliating or attempting to retaliate or seek retribution against a Complainant, Respondent, or any other individual or group of individuals involved in the investigation and/or resolution of a Formal Complaint of sexual harassment is prohibited. Retaliation can be committed by any individual or group of individuals, not just a Respondent or Complainant. Retaliation may include abuse or violence, other forms of harassment, and/or making defamatory statements about another person.

D. Consent, Coercion, & Incapacitation

Consent to sexual activity must be clear, knowing, and voluntary. Consent must exist from the beginning to the end of each instance of sexual activity and for each form of sexual contact. Consent to one form of sexual contact does not constitute consent to any other forms of sexual contact. Further, consent to engage in a particular sexual act at any given time is not indefinite or ongoing consent to engage in that same act, or any other sexual act, on other occasions. Mutually understandable consent must be obtained by the initiator, or the person who wants to engage in the specific sexual activity, at every stage of sexual interaction.

Consent requires an affirmative, outward demonstration indicating that an individual has freely chosen to engage in sexual activity. Consent is demonstrated through mutually understandable words and/or actions that clearly indicate a willingness to engage freely in sexual activity. Consent is mutually understandable when a reasonable person would consider the words and/or actions of the parties to have expressed a mutually understandable agreement between them to do the same thing, in the same way, at the same time, with one another. Relying on non-verbal communication can lead to misunderstandings. When in doubt, ask before acting.

A lack of consent may be indicated in a variety of ways. First,

a verbal "no," even if it sounds indecisive or insincere, must be accepted as a lack of consent. If consent is requested verbally, the absence of any explicit affirmative verbal response constitutes lack of consent. In addition, if at any time a person's words, actions, or demeanor suggest hesitancy, confusion, or uncertainty about engaging in sexual activity, the parties should stop and obtain mutual verbal consent before continuing sexual activity.

Consent may NOT be inferred from silence, passivity, lack of resistance, or lack of an active response alone. A person who does not physically resist or verbally refuse sexual activity is not necessarily giving consent. In the absence of an outward demonstration, consent does not exist. If at any time it is reasonably apparent that either party is hesitant, confused, or uncertain, both parties should stop and obtain mutual verbal consent before continuing sexual activity. In the absence of mutually understandable words or actions, it is the responsibility of the initiator to make sure that he/she/they have consent from his/her/their partner(s).

A current or previous dating or sexual relationship, by itself, is not sufficient to constitute consent. Even in the context of a relationship, there must be mutually understandable communication that clearly indicates willingness to engage in sexual activity each time such activity occurs.

Consent may be withdrawn by either party at any time. Withdrawal of consent must also be outwardly demonstrated by words or actions that clearly indicate a desire to end sexual activity. Once withdrawal of consent has been expressed, sexual activity must cease.

In Massachusetts, consent can never be given by a minor under the age of 16. In California, consent cannot be given by a minor under the age of 18 unless the minor is married to the alleged perpetrator. In Puerto Rico, consent can never be given by a minor under the age of 16.

Consent cannot be obtained from the use or threat of physical force, intimidation, or coercion, or any other factor that would eliminate an individual's ability to exercise his or her own free will to choose whether or not to have sexual contact. Coercion includes the use of pressure and/or oppressive behavior, including express or implied threats of harm, and severe and/or pervasive emotional intimidation that places an individual in fear of immediate or future harm or physical injury or causes a person to engage in unwelcome sexual activity. A person's words or conduct amount to coercion if they wrongfully impair the other's freedom of will and ability to choose whether or not to engage in sexual activity. If sexual acts were preceded by threats or coercion, there is no consent.

Individuals of any age are considered incapacitated and unable to consent to sexual activity if they are not able to make rational, reasonable judgments. Incapacitation is the inability, temporarily or permanently, to give consent because the individual is mentally and/or physically helpless. Individuals may be incapacitated and unable to consent to sexual activity due to drug or alcohol consumption, either voluntarily or involuntarily, or if the individual is unconscious, asleep, or otherwise unaware that the sexual activity is occurring. Individuals are incapacitated if they are unaware of where they are, how they got there, or why or how they became engaged in a sexual interaction. Where alcohol is involved, incapacitation is a state beyond drunkenness or intoxication.

Some indicators of incapacitation may include, but are not limited to:

- lack of control over physical movements or equilibrium;
- lack of awareness of circumstances or surroundings;
- an inability to communicate coherently or other signs of confusion or disorientation; and
- vomiting and/or lack of consciousness.

An individual may experience a blackout state in which he/she/they appear to be giving consent, but do not actually have conscious awareness or the ability to consent. It is especially important, therefore, that anyone engaging in sexual activity be aware of the other person's level of intoxication. The relevant standard that will be applied is whether the Respondent knew, or a sober reasonable person in the same position should have known, that the other party was incapacitated and therefore could not consent to the sexual activity.

Alcohol or drugs impair a person's decision-making capacity, awareness of the consequences, and ability to make informed judgments. However, being intoxicated or impaired by drugs or alcohol is never an excuse to engage in sexual misconduct and does not excuse one from the responsibility to obtain consent. As stated above, even if Respondents are intoxicated they will be found responsible for sexual misconduct if they engage in sexual activity with another person who did not consent to the sexual activity.

IV. Reporting

When the College receives a Formal Complaint of sexual harassment, it is obligated to take immediate steps to investigate the incident and, where possible, to prevent and remediate any violations of this policy. When the College receives a report of sexual harassment, the Title IX Coordinator will determine whether to instigate a formal Title IX investigation. The College will promptly and thoroughly investigate and respond to all Formal Complaints of sexual harassment. The College will respond to all Formal Complaints in an integrated, consistent manner that treats each individual with dignity and respect. The College will approach each formal Complaint with an earnest intent to understand the perspective and experiences of each individual involved in order to ensure fair and impartial evaluation and resolution.

The College recognizes that the decision whether or not to make a Formal Complaint of sexual harassment is personal, and that there are many barriers to doing so, both individual and societal. Not every individual will be prepared to make a Formal Complaint to the College or to law enforcement, and individuals are not expected or required to pursue a specific course of action. The College recognizes that choosing to make a Formal Report, and deciding how to proceed after making the Formal Complaint, can be a process that unfolds over time. Therefore, an individual does not have to decide whether or not to request disciplinary action at the time the Formal Complaint is made.

The College will respect an individual's autonomy in making these important decisions and will provide support that will assist each individual in making these determinations. The College will also honor a victim's decision as to whether or not to report the incident to law enforcement. A criminal complaint will not terminate the College's

internal investigation or its response to a Formal Complaint of sexual harassment in its programs or activities.

A. Emergency/Immediate Reporting Options

In the event that an individual is the victim of sexual assault or sexual violence, the physical safety and emotional well-being of the person is of primary importance. A victim may have been physically injured in a number of ways, may have been exposed to a sexually transmitted disease, and/or may be at risk of impregnation. The College strongly encourages any person who has been the victim of sexual assault/violence to seek immediate medical attention from the nearest hospital emergency room.

Additionally, if an assault has occurred very recently, there may be physical evidence present that can be collected. Although the collection of physical evidence does not require a victim to pursue criminal or civil charges, preserving evidence allows a victim to make the decision to do so in the future. If a victim is assaulted, he/she/they should not shower, change clothing, or brush his/her/their teeth. The decision to seek medical attention and gather any evidence will remain confidential. Local medical resources include the following:

Beth Israel Deaconess Medical Center:
Rape Crisis Intervention Program
330 Brookline Avenue
Boston, MA 02215
(617) 667-4645 (Request a Sexual Assault Nurse Examiner (S.A.N.E.))

Brigham and Women's Hospital:
75 Francis Street
Boston, MA 02115
(617) 732-5636 (Request a Sexual Assault Nurse Examiner (S.A.N.E.))

Individuals are strongly encouraged to call 911 if they are feeling unsafe and wish to reach local law enforcement or emergency medical care (including an ambulance) anywhere within the United States. Local law enforcement can also be reached at:

Boston Police Department
20 Vine Street, Boston, MA 02129
Phone: (617) 343-4888

Springfield Police Department
130 Pearl St, Springfield, MA 01105
Phone: (413) 787-6310

Lawrence Police Department
90 Lowell St, Lawrence, MA 01840
Phone: (978) 794-5900

Cuartel General de la Policía de Puerto Rico
601 Ave Franklin Delano Roosevelt,
San Juan, 00936, Puerto Rico
Phone: +1 787-793-1234

Rancho Cucamonga Police Department
10510 Civic Center Dr, Rancho Cucamonga, CA 91730

Phone: (909) 477-2800

In addition, Campus Security can be reached at (617) 873-0115 (Boston location)

B. Campus Reporting Options

To enable the College to respond to all Formal Complaints in a prompt and equitable manner, all individuals should make any Formal Complaint of sexual harassment directly to the Title IX Coordinator or to the Deputy Title IX Coordinator for Students. Only the Title IX Coordinator, the Deputy Title IX Coordinator for Students, and College officials who have the authority to institute corrective measures on the College's behalf are responsible for responding to Formal Complaints and reports of sexual harassment.

The College recognizes that a student or employee may choose to report sexual harassment to any trusted employee of the College. For example, a student may choose to confide in a faculty member or an admissions counselor. Likewise, an employee may choose to confide in a supervisor. However, any faculty member, staff member, or other employee who receives a report of sexual harassment is not responsible for responding; he/she/they must immediately share the report with the Title IX Coordinator or the Deputy Title IX Coordinator for Students. The Title IX Coordinator and the Deputy Title IX Coordinator for Students are specifically charged with overseeing the investigation of and response to allegations of sexual harassment.

Individuals may also choose to use the College's anonymous reporting mechanism by calling the Confidential Reporting Line at (617) 873-0633 (external), extension 1633 (internal).

C. Timeframe for Reporting

Individuals are encouraged to make a Formal Complaint of sexual harassment as soon as possible to maximize the College's and/or law enforcement's ability to respond promptly and equitably. The College does not limit the timeframe for making a Formal Complaint, and upon receipt of any Formal Complaint, regardless of when the incident occurred, the College will conduct a Title IX assessment to determine if an investigation and/or any safety measures are necessary to maintain the safety of the community.

D. Coordination with Law Enforcement

The College encourages Complainants to pursue criminal action for incidents of sexual harassment when the incident constitutes a crime under the law of the jurisdiction where the incident occurred. If an individual chooses to report an incident of sexual harassment to Campus Security, then the College will notify the law enforcement agency with jurisdiction over the alleged crime. To the extent permitted by law, the College will also assist a Complainant in making a criminal report and will cooperate with law enforcement agencies if a Complainant decides to pursue the criminal process.

The College's definitions of sexual harassment and its process and standard of proof for finding a Respondent responsible for sexual harassment differ from those used in criminal prosecutions. Thus, a Complainant may reasonably seek resolution through the College's Title IX Formal Complaint process, may pursue criminal action, may choose one but not the other, or may choose to make a Formal Complaint to both or neither. Law enforcement's determination regarding whether or not to prosecute a Respondent is not determinative of whether the College will conduct a Title IX investigation or conclude that a member of the CC community has

committed sexual harassment in violation of this policy. However, any criminal disposition related to the Title IX complaint will be taken into consideration in a Title IX investigation. Proceedings under this policy may be carried out prior to, simultaneously with, or following civil or criminal proceedings off-campus. However, the College will, to the extent possible and consistent with its obligations to address promptly Formal Complaints under Title IX, cooperate and coordinate with local law enforcement officers and the prosecutor's office. For example, the College will comply with law enforcement agency requests for cooperation and such cooperation may require the College to temporarily suspend the fact-finding portion of a Title IX investigation while the law enforcement agency gathers evidence. In such cases, the College will promptly resume its Title IX investigation as soon as notified by the law enforcement agency that it has completed its evidence gathering process.

E. Amnesty

The College encourages reporting and seeks to remove any barriers to reporting by making the procedures for reporting transparent and straightforward. The College recognizes that an individual who has been drinking or using drugs at the time of the incident may be reluctant to make a report for fear of being subject to discipline under the College's Drug and Alcohol Policy. A Complainant who makes a Formal Complaint of sexual harassment will not be subject to disciplinary action by the College for his/her/their own violation of these policies.

F. Bystander Intervention

The College strongly encourages all community members to take reasonable and prudent actions to prevent or stop sexual harassment, including relationship violence, stalking and sexual assault. Taking action may include directly or indirectly confronting the situation (if it is safe to do so), taking steps to interrupt the situation, or seeking assistance from a person in authority. CC community members who choose to exercise this positive moral obligation in good faith will be supported by the College and protected from retaliation.

G. Statement Against Retaliation

It is a violation of this policy to retaliate in any way against an individual or a group because the individual or group made a Formal Complaint of sexual harassment, was the subject of such a Formal Complaint, or otherwise participated in the College's investigation of such a Formal Complaint.

The College recognizes that retaliation can take many forms, may be committed by an individual or a group against an individual or a group, and that a Respondent can also be the subject of retaliation by the Complainant or a third party. The College will take immediate and responsive action to any report of retaliation and may pursue disciplinary action as appropriate. The Title IX Coordinator will review all reports of retaliation and determine whether to impose immediate corrective action or whether to refer the report for investigation pursuant to the processes identified in this policy. In making this determination, the Title IX Coordinator may consult with others, including the Deputy Title IX Coordinator for Students. An individual who in good faith makes a Formal Complaint of sexual harassment, is the subject of such a Formal Complaint, or otherwise participates in the College's investigation of such a Formal Complaint may not be subject to retaliation even if the Formal Complaint is later not proven.

V. Interim Supportive Measures

Upon receipt of a Formal Complaint of sexual harassment, the College will provide interim supportive measures and reasonable protective measures to a Complainant and a Respondent to prevent further acts of harassment, and to provide a safe educational and work environment. The College will determine the necessity and scope of any interim supportive measures. Interim supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, to the Complainant or the Respondent before or after the filing of a formal complaint. Such measures are designed to restore or preserve equal access to the College's education programs or activities without unreasonably burdening the other party. Even when a Complainant or Respondent does not specifically request that interim protective action be taken, the College, after conducting an individualized safety and risk analysis and determining an immediate threat to physical health or safety, may choose to impose interim supportive measures at its discretion to ensure the safety of any individual, the broader College community, or the integrity of the review process.

Students seeking such assistance should speak with the Title IX Coordinator or the Deputy Title IX Coordinator for Students, who will coordinate such requests on behalf of the student. The College will maintain contact with the parties to ensure that all concerns are being addressed.

All individuals are encouraged to report concerns about the failure of another individual to abide by any restrictions imposed by an interim supportive measure. The College will take immediate and responsive action to enforce measures previously ordered or implemented by the College.

The College may impose any remedy that can be tailored to the involved parties to achieve the goals of this policy, even if not specifically listed here. The range of interim supportive measures may include, but are not limited to:

No Contact Order: A Complainant or Respondent may request, or the College may impose, communication and contact restrictions to prevent further, potentially harmful interaction. These communication and contact restrictions generally preclude in-person, telephonic, electronic, mail, or third-party communications. In some cases, an individual may also wish to consider an Abuse Prevention Order or a Harassment Prevention Order from the local courts. This is a civil proceeding independent of the College. If a court order is issued, the College will, to the extent possible, assist the protected person in benefiting from the restrictions imposed by the court and will also facilitate on-campus compliance with the order. The College may also limit an individual or organization's access to certain College facilities or activities as part of the no contact order.

Academic or Employment Modifications: Any party involved in a Title IX investigation may request an academic or employment accommodation after a Formal Complaint of sexual harassment. An individual who requests assistance in changing his or her academic or employment situation after a Formal Report of sexual harassment will receive appropriate and reasonably available accommodations. These may include, but are not limited to:

- Academic accommodations, including a change in class schedule, taking an incomplete, dropping a course without penalty, attending a class via Zoom or other alternative means, providing an academic tutor, or extending deadlines for assignments;

- Change in work assignment or schedule; and/or
- Providing an escort to ensure safe movement between classes and activities.

Emotional Support: The College will assist in providing a referral to off-campus agencies as detailed in this policy. Counseling and emotional support is available to any member of the campus community.

Interim Separation: Where the Formal Complaint of sexual harassment poses an ongoing risk of harm to the safety or well-being of an individual or members of the CC community, the College, having conducted an individualized safety and risk analysis and determined an immediate threat to physical health or safety, may place an individual on interim suspension or impose leave for an employee. In this case, the College will provide such a removed Respondent with notice and an opportunity to challenge the decision immediately following the removal. If the interim removal remains in place, pending resolution of the Formal Complaint, the individual may be denied access to campus. When interim suspension or leave is imposed, the College will make reasonable efforts to complete the Title IX investigation and resolution within an expedited timeframe.

VI. Title IX Complaint Process

A. Title IX Coordinator and Deputy Title IX Coordinator for Students

The College has appointed Laretta Siggers, Vice President of Human Resources and Talent Development, as the Title IX Coordinator, and Tracy McLaughlin, Associate Provost for Student Learning Outcomes Assessment, as the Deputy Title IX Coordinator for Students. In their roles as Title IX Coordinators, Ms. Siggers and Ms. McLaughlin oversee the College's centralized review, investigation, and resolution process for Formal Complaints of sexual harassment. They also coordinate the College's compliance with Title IX. Both are knowledgeable and trained in state and federal laws that apply to matters of sexual harassment, as well as College policy and procedure.

The duties and responsibilities of the Title IX Coordinator and the Deputy Title IX Coordinator for Students include training, education, and climate checks, as well as the oversight of procedures that promptly and equitably eliminate sexual harassment, prevent its recurrence, and address its effects on individuals and the CC community. The Title IX Coordinator and the Deputy Title IX Coordinator for Students will:

- Oversee the investigation and resolution of all Formal Complaints of sexual harassment and all reports of sexual harassment;
- Meet with any individual, whether a Complainant, a Respondent, or a third party, to discuss interim supportive measures, resources, and procedural options on and off campus;
- Ensure prompt and equitable resolutions that comply with all requirements and timeframes specified in the complaint procedures;
- Participate in assessment of periodic climate checks, tracking, and monitoring of sexual harassment allegations on campus; and,
- Participate in campus training, education, and prevention efforts.

The Title IX Coordinator and the Deputy Title IX Coordinator for

Students are tasked with ensuring consistent application of this policy to all individuals and enabling the College to respond promptly and equitably to eliminate sexual harassment, prevent its recurrence, and address its effects. The Title IX Coordinator has the discretion to determine the appropriate procedural response to Formal Complaints of sexual harassment but not to determine the issue of responsibility.

Other matters that do not involve Formal Complaints of sexual harassment against a student may be referred to other departments within the College and/or handled under other policies, such as the Cambridge College Sexual Misconduct Policy, the Cambridge College Non-Discrimination Policy, or the Student Code of Conduct, for further investigation and resolution.

The Title IX Coordinator's and the Deputy Title IX Coordinator for Students' contact information is:

Title IX Coordinator:
Lauretta Siggers
500 Rutherford Avenue
Boston, MA 02129
617-873-0170
Lauretta.siggers@cambridgecollege.edu

Deputy Title IX Coordinator for Students:
Tracy McLaughlin
500 Rutherford Avenue
Boston, MA 02129
617-873-0150
Tracy.McLaughlin@cambridgecollege.edu

The above contact information is distributed to all students, employees, applicants for admission or employment, and parents/guardians through the College's website. The above contact information is also included in all of the College's handbooks and catalogs.

B. Timeframe for Resolution

The investigation and resolution of all Formal Complaints of sexual harassment will be reasonably prompt, with a goal of completion within 60 to 90 days. Extenuating circumstances, including, but not limited to, the complexity and severity of a Formal Complaint may require the process to be delayed or extended beyond 60 to 90 days; in such a situation, the College will provide the Complainant and the Respondent written notice of the delay or extension and the reasons for the delay or extension. If there is a cause for a delay or extension, the College will use best efforts to complete the process in as timely a manner as possible. In general, a Complainant and Respondent can expect to receive periodic updates from the Title IX Coordinator and/or the Deputy Title IX Coordinator for Students as to the status of the investigation and resolution.

C. Title IX Grievance Procedures and Title IX Review

The following are the College's procedures for responding to and resolving Formal Complaints of sexual harassment asserted against a student or a College employee. The College will apply the same standard of evidence – i.e., preponderance of the evidence – in Formal Complaints of sexual harassment against a student Respondent and in Formal Complaints of sexual harassment against a College employee Respondent.

1. Formal Complaint

A Complainant may make an oral or written report of a violation of this policy (i.e., sexual harassment) by a member of the CC community in person, by telephone, or by email using the contact information of the Title IX Coordinator. Such a report should include as much information as possible including:

- The name of the accused individual (i.e., the Respondent), or if her/his/their name is unknown, information sufficient to allow the College to identify the Respondent, such as her/his/their photograph;
- A statement explaining the nature and circumstances of the Formal Complaint including a list of possible witnesses; and,
- The names, addresses, and telephone numbers of those making the Formal Complaint.

The Formal Complaint must be signed by the individual initiating the report (i.e., the Complainant). The Title IX Coordinator may sign a Formal Complaint; doing so does not make the Title IX Coordinator the Complainant for the purposes of the investigation. A Formal Complaint will result in a Title IX investigation to determine whether the Respondent violated any provisions of this policy.

Timeframe for Submitting a Formal Complaint: The College does not limit the timeframe for submitting a Formal Complaint but, at the time of the Formal Complaint, the Complainant must be participating in or attempting to participate in the education programs or activities of the College within the United States. Moreover, Complainants are encouraged to submit the Formal Complaint as soon as possible in order to maximize the College's ability to investigate and come to an appropriate resolution.

Withdrawal of Formal Complaint: If a Complainant notifies the Title IX Coordinator and/or the Deputy Title IX Coordinator for Students in writing that the Complainant would like to withdraw the Formal Complaint, the Title IX Coordinator will assess whether sufficient evidence of sexual harassment exists to support completing an investigation. Among the factors that the Title IX Coordinator will consider in making this determination is whether prior Formal Complaints by the Complainant or others have been made against the Respondent. The College's decision to proceed in investigating a member of the CC community when the Complainant has withdrawn the Formal Complaint shall be made by the Title IX Coordinator in his/her/their sole discretion, but will take the Complainant's wishes into consideration. If the Title IX Coordinator determines that dismissal is appropriate, the College will promptly send written notice of the dismissal of the Formal Complaint and the reason(s) therefore simultaneously to the Complainant and the Respondent. A file concerning the withdrawn Formal Complaint will be maintained by the Title IX Coordinator, so that the matter can be re-opened if, among other things, the Complainant later decides to reinstate the Formal Complaint, or if independent evidence of sexual harassment by the Respondent comes to the College's attention, which the Title IX Coordinator determines warrants re-opening the investigation. If the investigation is re-opened, either because the Complainant decides to reinstate the Formal Complaint or the College determines that there are grounds to do so, the College will promptly send written notice of the re-opening of the investigation and the grounds therefore simultaneously to the Complainant and the Respondent.

Dismissal of Formal Complaint: The College will investigate the

allegations in a Formal Complaint but, if the conduct would not constitute sexual harassment as defined above even if proved, or if the conduct did not occur in the College's education programs or activities, or did not occur against a person in the United States, the College must dismiss the Formal Complaint with regard to Title IX. The College will promptly send written notice of the dismissal of the Formal Complaint and the reasons therefore simultaneously to the Complainant and the Respondent. Dismissal in the Title IX context does not preclude the College from taking action under another policy (e.g., the Cambridge College Sexual Misconduct Policy) in response to the allegations in the Formal Complaint.

The College may dismiss a Formal Complaint if the Respondent is no longer enrolled or employed by the College. The College also may dismiss a Formal Complaint if specific circumstances prevent the College from gathering evidence sufficient to reach a determination. In either case, the College will promptly send written notice of the dismissal of the Formal Complaint and the reasons therefore simultaneously to the Complainant and the Respondent.

2. Incomplete and Unofficial Reports

When the Title IX Coordinator or the Deputy Title IX Coordinator for Students receives a report that a member of the CC community has engaged in prohibited conduct, but the report does not meet the requirements of a Formal Complaint, the Title IX Coordinator will determine what steps should be taken to gather additional information. Thereafter, the Title IX Coordinator will direct the gathering of the additional information.

Once all available additional information has been obtained, the Title IX Coordinator will decide whether a Title IX investigation, in accordance with this policy, is warranted.

3. Advisors

The Complainant and Respondent may each choose and be accompanied to any meeting or interview related to these procedures by an advisor of his/her/their own choice, who may be, but is not required to be, an attorney. Each party's advisor may provide support related to any meeting or interview but may not participate actively in such meetings or interviews. During meetings and interviews, an advisor may quietly confer or pass notes with the party in a non-disruptive manner. The advisor may not intervene in a meeting or interview or address the Title IX Investigator. The parties must each bear the expense of his/her/their advisor, if any, with the exception that if there is a hearing and a party does not have an advisor, the College will select an advisor of its choice (at the College's expense) to conduct any examination of a party or witness. Consistent with the College's obligation to resolve Formal Complaints of sexual harassment promptly, the College will take reasonable steps to accommodate the schedules of the parties' selected advisors but requests that the parties' selected advisors to be as flexible as possible with regard to scheduling.

4. Declining to Participate

A Complainant and/or Respondent may decline to participate in the investigative or Formal Complaint resolution process. The College may continue the process without the Complainant's and/or Respondent's participation.

5. Investigation and Findings Process

After receiving a Formal Complaint of sexual harassment, the Title IX Coordinator will conduct a preliminary assessment to determine whether there is sufficient evidence to support the initiation of a formal investigation. If the Title IX Coordinator concludes that a Formal Complaint of sexual harassment warrants a Title IX Investigation, the following steps will generally be taken:

- a. The Title IX Coordinator will appoint a Title IX Investigator. The Title IX Investigator is tasked with investigating the Formal Complaint and creating an investigative report that fairly summarizes the relevant evidence.
- b. The College will appoint a Title IX Decision-maker, who cannot be the Title IX Coordinator, the Deputy Title IX Coordinator for Students, or the Title IX Investigator. The Title IX Decision-maker is tasked with reviewing the final investigative report of the Title IX Investigator, conducting any hearing, if necessary, and issuing a written determination regarding the responsibility of the Respondent.
- c. Prior to any meetings between any party and the Title IX Investigator, the Title IX Coordinator or the Deputy Title IX Coordinator for Students will promptly provide written notice to the parties (the "Initial Notice"), allowing sufficient time to prepare responses before any initial interview, that:
 - i. Provides a copy of this policy, which sets forth the grievance process, with advice that each read it carefully;
 - ii. Provides notice of the allegations potentially constituting sexual harassment as defined in this policy;
 - iii. Provides sufficient details known at the time (i.e., the identities of the parties involved, the conduct allegedly constituting sexual harassment, and the date and location of the alleged incident, if known);
 - iv. Includes a statement that the Respondent is presumed not responsible for the alleged conduct and a determination regarding responsibility is made at the conclusion of the grievance process;
 - v. Informs the Complainant and the Respondent that a Title IX Investigator has been appointed who will be investigating the allegations;
 - vi. Identifies the Title IX Investigator by name to each;
 - vii. Informs the Complainant and the Respondent that a Title IX Decision-maker has been appointed who will conduct any hearing, if necessary, and will issue a written determination regarding the Respondent's responsibility;
 - viii. Identifies the Title IX Decision-maker by name to each;
 - ix. Advises each of Confidential Resources, including advocates, health care providers, and counseling services in the local community;
 - x. Advises each of the option to request that the College take steps to prevent unnecessary or unwelcome contact or communication with another member of the CC community;
 - xi. Informs the Complainant and the Respondent that the burden of proof and burden of gathering evidence sufficient to reach a determination rest on the College, not the Complainant or the Respondent;
 - xii. Advises the Complainant and the Respondent that each may have an advisor of his/her/their own choice, who may be, but is not required to be, an attorney and that the advisor may be

- present at all meetings, interviews, and hearings;
- xiii. Advises the Complainant and the Respondent that each may inspect and review the evidence and that both will have an equal opportunity to do so;
- xiv. Advises the Complainant and the Respondent of the importance of preserving evidence (e.g., text, e-mails, notes, photographs, etc.);
- xv. Advises the Complainant and the Respondent that each may present witnesses, both fact and expert, and each may present other inculpatory and exculpatory documentary evidence (e.g., texts, e-mails, notes, photographs, etc.) and that both will have an equal opportunity to do so;
- xvi. Provides notice of any provision of the College's code of conduct or other policy that prohibits knowingly making false statements or knowingly submitting false information during the grievance process;
- xvii. Advises the Complainant and the Respondent that any behavior that can be construed as retaliation against the Complainant, Respondent, and/or witnesses will be subject to immediate disciplinary action, up to, and including, suspension or dismissal from the College;
- xviii. Advises the Complainant of his/her/their option to pursue a criminal report or complaint action against the Respondent working with local police in addition to pursuing remedies and/or sanctions through the College's processes, or to seek a court order of protection/restraining order; and
- xix. Advises the Complainant that CC Campus Security is available to assist him/her/them in contacting and communicating with local police or in seeking court orders of protection/restraining orders.

If, in the course of the investigation, the College decides to investigate additional allegations about the Complainant and/or the Respondent, the Title IX Coordinator or the Deputy Title IX Coordinator for Students must promptly update the Initial Notice to the Complainant and the Respondent.

- d. The Title IX Investigator will provide written notice to the Complainant and to the Respondent of the date, time, location, participants, and purpose of all investigative interviews, hearings, or other meetings, with sufficient time for the party to prepare to participate.
- e. The Title IX Investigator shall interview the Complainant (if possible). The Title IX investigator shall ask the Complainant for, among other information, names, addresses, and other contact information (e.g., phone numbers and/or e-mail addresses) of witnesses. As a part of this process, the Title IX Investigator shall also assess whether interim supportive measures not already implemented for the Complainant are appropriate and, if so, work with the Title IX Coordinator or the Deputy Title IX Coordinator for Students to ensure that they are in place.
- f. The Title IX Investigator shall then interview the Respondent (if possible). The Title IX Investigator shall ask the Respondent for, among other information, names, addresses, and other contact information (e.g., phone numbers and/or e-mail addresses) of witnesses. As a part of this process, the Title IX Investigator shall also assess whether interim supportive measures not already implemented for the Respondent are appropriate and, if so, work with the Title IX Coordinator or the Deputy Title IX Coordinator for Students to ensure

that they are in place.

If at any point the Respondent admits to violating this policy, the Title IX Investigator will inform the Title IX Coordinator or the Deputy Title IX Coordinator for Students, who will terminate the resolution process. Where appropriate, the Title IX Coordinator will send the matter through the Sanctions Process detailed below. If the Complainant and Respondent each accept the issued sanction(s), the matter will be closed. If either party is unsatisfied with the sanction(s), he/she/they may request to proceed through the formal resolution process in full by submitting a written request to the Title IX Coordinator or the Deputy Title IX Coordinator for Students within five (5) business days of the receipt of the sanctions decision. The Title IX Coordinator maintains the ultimate discretion whether or not such a request should be granted.

g. The Title IX Investigator shall review CC records to assess whether any prior Formal Complaints have been made against the Respondent that relate to the subject of the Formal Complaint. The Respondent will be provided with a copy of any of his/her/their own records that relate to the subject of the Formal Complaint.

h. The Title IX Investigator shall make reasonable attempts to interview any relevant witnesses identified by the Complainant or Respondent, or identified by witnesses or any other source.

i. The Title IX Investigator shall review any documentary evidence submitted by the Complainant, Respondent, or other witnesses.

j. The Title IX Investigator shall gather and assess any other relevant evidence available to the College (e.g., additional witnesses not identified by the parties, security camera footage, etc.).

k. After reviewing any witness statements, documentary evidence, and other relevant evidence as noted above, the Title IX Investigator may, in his/her/their discretion, conduct follow-up interviews with the Complainant and the Respondent. The Title IX Investigator will provide the Complainant and the Respondent equal opportunities to present witnesses (fact and expert) and other inculpatory and exculpatory documentary evidence.

l. Following the foregoing investigation, the Title IX Investigator shall create a draft written report that summarizes his/her/their investigation, sets out the documentary evidence submitted by the parties/witnesses, and describes his/her/their determination(s) concerning the relevance of the documentary evidence (the "Title IX Investigator's Draft Report"). Relevant evidence reviewed by the Title IX Investigator shall be described in the Title IX Investigator's Draft Report and appended (and redacted, if necessary) in electronic or hard copy. The College will provide the parties and their advisors, if any, a copy of the Title IX Investigator's Draft Report, including the relevant evidence in electronic or hard copy. The parties will have at least ten (10) days to submit a written response, which the Title IX Investigator will consider prior to completion of the investigative report.

m. At the conclusion of the investigation, but prior to the finalization of the investigative report, the Title IX Investigator shall submit the Title IX Investigator's Draft Report (with a summary of evidence and the evidence attached in electronic or hard copy) to the Title IX Coordinator or the Deputy Title IX Coordinator for Students for review. The Title IX Coordinator or the Deputy Title IX Coordinator for Students may suggest additional clarification or the gathering

of additional evidence, as appropriate. Relevant and clarifying comments provided by either party will be incorporated into the draft report by the Title IX Investigator in his/her/their discretion in consultation with the Title IX Coordinator, and the Title IX Investigator will note any significant deviations from previous statements. If the Complainant and/or Respondent identify additional relevant evidence, that evidence shall be gathered by the Title IX Investigator and included in the written report. Depending on the nature of the new evidence, it may be shared with the Complainant or the Respondent for comment. The Title IX Investigator shall revise the Title IX Investigator's Draft Report to summarize all relevant evidence obtained during the investigation.

n. The Title IX Coordinator or the Deputy Title IX Coordinator for Students may offer feedback, which should be incorporated into the final draft, if applicable. The Title IX Investigator shall revise the Title IX Investigator's Draft Report to reflect the Title IX Coordinator's or the Deputy Title IX Coordinator for Students' feedback, and the Title IX Investigator shall resubmit his/her/their revised final investigative report (the "Title IX Investigator's Report") to the Title IX Coordinator or the Deputy Title IX Coordinator for Students. The Title IX Investigator's Report shall include, along with the information contained in the draft reports:

1. A summary of the allegations in the Formal Complaint;
2. A summary of the documentary evidence submitted by the parties/witnesses;
3. A description of his/her/their determination(s) concerning the relevance of the documentary evidence, attaching all relevant evidence in electronic or hard copy.

o. At least ten (10) days prior to any hearing, the College will send to each party, and each party's advisor, if any, the Title IX Investigator's Report in electronic or hard copy for their review and written response.

p. When the Title IX Investigator's Report is transmitted to the parties and their advisors, if any, the College shall simultaneously inform the Complainant and the Respondent and their advisors, if any, that the Title IX Decision-maker will be conducting a live hearing in the matter at which:

1. The Title IX Decision-maker must permit each party's advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those that challenge credibility;
2. Cross-examination must be conducted directly, orally, and in real time by the party's advisor of choice and never by a party personally;
3. If a party does not have an advisor, the College must select one and provide him/her/them to conduct cross-examination;
4. If requested by either party, the College must provide for the live hearing to occur with the parties in separate rooms with technology enabling the Title IX Decision-maker and the parties, simultaneously, to see and hear the party or the witness answering questions;
5. Only relevant questions may be asked of a party or other witness. The Title IX Decision-maker must determine whether

cross-examination questions are relevant and must explain his/her/their decision to exclude a question as not relevant; and

6. Questions and evidence regarding the Complainant's sexual predisposition or prior sexual behavior are not relevant unless (i) offered to prove that someone other than the Respondent committed the alleged conduct or (ii) if they concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.

q. The College will create an audiovisual recording and/or a transcript of any live hearing and make it available to the parties for inspection and review.

r. Following the conclusion of any live hearing, the Title IX Decision-maker, applying the preponderance of the evidence standard, will issue a written determination regarding the Respondent's responsibility (the "Title IX Decision-maker's Determination"). The Title IX Decision-maker's Determination must include:

1. An identification of the allegations in the Formal Complaint;
2. A description of all procedural steps taken;
3. Findings of fact supporting the determination regarding the Respondent's responsibility;
4. Conclusions regarding the application of this Policy to the facts;
5. A statement of, and rationale for, the result as to each allegation, any disciplinary sanctions the College will impose on the Respondent, and whether any remedies to restore the Complainant will be provided by the College; and
6. The College's procedures and permissible bases for the Complainant or the Respondent to appeal the Title IX Decision-maker's Determination.

s. The Title IX Coordinator or the Deputy Title IX Coordinator for Students will issue a letter to the Complainant and the Respondent transmitting the Title IX Decision-maker's Determination (the "Determination Letter"). Generally, the Determination Letter will be issued within three (3) business days of finalizing the Title IX Decision-maker's Determination. The Title IX Coordinator or the Deputy Title IX Coordinator for Students will send the Determination Letter, attaching a copy of the Title IX Decision-maker's Determination, to the Complainant and the Respondent simultaneously via certified mail, return receipt requested, and also by electronic mail (read receipt requested).

1. If the Respondent is found not to have violated any provision of this policy, the Determination Letter will inform the Complainant and the Respondent of the Complainant's right to appeal that decision, in accordance with the Appeals Process below.
2. If the Respondent is found to have violated any provision of this policy, the Determination Letter will inform the Complainant and the Respondent of the Respondent's right to appeal that decision, in accordance with the Appeals Process below.

VII. Informal Resolution Process

A. The informal resolution process is a voluntary, remedies-based process designed to provide members of the CC community with

an option to resolve certain disputes with other members of the community in a forum that is separate and distinct from the College's formal grievance processes under the Title IX Sexual Harassment Policy or the Sexual Misconduct Policy.

Subject to approval by the Title IX Coordinator, the informal resolution process is available in matters involving a student Complainant and a student Respondent or an employee Complainant and an employee Respondent, but is not available in matters involving a student and an employee.

The purpose of the informal resolution process is to eliminate the conduct which has been reported by the Complainant (and prevent its recurrence), and place both individuals in a position to pursue their academic, working, and non-academic interests in a safe, respectful, and productive educational and working environment. Under this process, there will be no disciplinary action taken against a Respondent, and the resolution will not appear on the Respondent's disciplinary record.

B. The following are features of the informal resolution process:

Participation in the informal resolution process is completely voluntary. All parties must consent in writing to participation in the informal resolution process.

No party will be required to participate in the informal resolution process and the College will not require, encourage, or discourage the parties from participating in the informal resolution process.

C. The College may offer the informal resolution process only under the following circumstances:

1. A Formal Complaint has been filed by the Complainant;
2. The Title IX Coordinator has determined, through an initial assessment, that the alleged conduct, if substantiated, would constitute Title IX Sexual Harassment or sexual misconduct under the Sexual Misconduct Policy, and the Title IX Coordinator has determined that the informal resolution process is appropriate for this matter.
3. All parties will be provided with a written notice disclosing the allegations, the requirements of the informal resolution process, and any outcomes resulting from participating in the informal resolution process.
4. At any time prior to signing an informal resolution agreement, any party has the right to withdraw from the informal resolution process and resume the formal grievance process.
5. Under the informal resolution process, there will be no disciplinary action taken against a Respondent, and the resolution will not appear on the Respondent's disciplinary record. If a formal complaint is filed against the Respondent in a subsequent matter under the Title IX Sexual Harassment policy or the Sexual Misconduct Policy, the Respondent's participation in a prior informal resolution process will not be considered relevant and will not be taken into account in the resolution of the subsequent complaint.
6. Parties may be accompanied by a member of the College community who will serve as a support person to any meeting related to the informal resolution process. However, the College support person may not actively participate in meetings and may not serve as a proxy for the party.

7. Any individual who serves as a College support person is expected to be available for meetings as scheduled by the College. The College (including any official acting on behalf of the College) has the right at all times to determine what constitutes appropriate behavior on the part of a College support person and to take appropriate steps to ensure compliance with this policy.

8. Any agreements reached as part of the informal resolution process must be approved by the Title IX Coordinator in order to ensure consistency with the College's obligations under federal law. If the Title IX Coordinator determines at any time prior to the signing of the informal resolution agreement that the informal resolution process is no longer appropriate, the Title IX Coordinator may terminate the process.

9. Upon signing the informal resolution agreement, the parties are bound by its terms and cannot opt for a formal grievance process based on the conduct alleged in the formal complaint.

10. Failure to comply with the signed agreement may result in disciplinary action for either party.

11. If the parties' circumstances change significantly, they may request a supplemental agreement. The Title IX Coordinator will determine whether it is appropriate to proceed.

D. Initiation of the Informal Resolution Process

1. If the Complainant files a Formal Complaint and requests to engage in the informal resolution process, the Title IX Coordinator will consider whether the informal resolution process is appropriate in the particular matter. In making this determination, the Title IX Coordinator will consider the following factors:
 2. The disciplinary record (or past conduct) of the Respondent relating to sexual misconduct, physical violence, failure to comply with a No Contact Order, and/or other relevant conduct;
 3. The nature of the alleged conduct, whether allegations involve multiple victims and/or a pattern of conduct, or other evidence-informed factors indicative of increased risk to campus safety;
 4. Whether the circumstances warrant the Title IX Coordinator filing a formal complaint (e.g., if there is sufficient evidence to proceed with an investigation/adjudication even absent participation by the Complainant); and/or
 5. Whether proceeding with the informal resolution process is in accordance with the principles and objectives of the College's Title IX Sexual Harassment Policy/Sexual Misconduct Policy, as determined by the Title IX Coordinator.
6. If the Title IX Coordinator determines that a case is not appropriate for the informal resolution process, the Title IX Coordinator will inform the Complainant that the informal resolution process is unavailable.
7. If the formal grievance process has already begun, either party may seek to initiate the informal resolution process up until five (5) business days prior to the hearing. If both parties agree to participate in the informal resolution process and the Title IX Coordinator approves of the informal resolution process, the formal grievance process will be adjourned while the informal resolution process is pending. If an agreement is not reached, the formal grievance process will be resumed.

8. Upon initiation of the informal resolution process, the Title IX Coordinator will refer the matter to a trained informal resolution facilitator (“Facilitator”). The Facilitator will consult (separately) with each party in an effort to reach a resolution that best meets the interests and needs of the parties. Unless they mutually choose to do so as part of an agreement, the parties will not meet together in person as part of the process.

E. Potential Outcomes of the Informal Resolution Process

1. Depending on the nature and circumstances of the particular situation, parties may agree to outcomes such as:

- a. Long-term extension of a mutual No Contact Order or No Communication Order;
- b. Imposition of a No Contact Order that places the burden on the Respondent to limit the Respondent's physical and/or electronic proximity to the Complainant;
- c. Restrictions on the Respondent from participation in particular organizations or events;
- d. Provision to the Respondent of an “impact statement” written by the Complainant (describing the impact(s) that the Respondent's conduct had on the Complainant);
- e. Conversation between the parties facilitated by a trained individual appointed by the Title IX Coordinator;
- f. Other measures deemed appropriate by the Title IX Coordinator.

F. Failure to Comply with the Informal Resolution Agreement

Failure to comply with the signed agreement may result in disciplinary action for either party, consistent with the applicable disciplinary procedures.

G. Records Relating to the Informal Resolution Process

1. The records relating to the informal resolution process will be maintained in accordance with section X.B. below.

2. Prior to participating in the informal resolution process, the parties will be notified in writing that any information gathered in the informal resolution process may be used in the Title IX Sexual Harassment or Sexual Misconduct formal grievance processes if the informal resolution process ends prior to a written agreement being signed by the parties. However, the College will not draw any adverse inference based on a Respondent's participation in the informal resolution process, nor will such participation be considered an admission by the Respondent.

3. Even if the parties enter into a written informal resolution agreement, if information related to the violation of other College policies (i.e., policies other than the Title IX Sexual Harassment Policy or the Sexual Misconduct Policy) comes to light through the informal resolution process, such information may be used in other College disciplinary processes.

H. Retaliation

The protections against Retaliation apply to individuals participating in the informal resolution process. Disciplinary consequences may result for those found responsible for Retaliation.

I. Time Frame for the Informal Resolution Process

The time frame for completion of the informal resolution process may vary, but the College will seek to complete the informal resolution process within thirty (30) business days of completion of the initial assessment. Should the time period extend beyond this time frame, the parties will be notified.

VIII. Sanctions Process

If the Title IX Decision-maker concludes that there has been a violation of this policy, or if the Respondent admits to violating this policy, the College will appoint a Sanctions Administrator to determine appropriate sanctions. The name of the Sanctions Administrator, and his/her/their contact information, shall be communicated to the parties in the Determination Letter. The Sanctions Administrator may not be the Title IX Coordinator, the Deputy Title IX Coordinator for Students, the Title IX Investigator, or the Title IX Decision-maker.

Upon review of the Title IX Decision-maker's Determination, the Sanctions Administrator may impose any sanction designed to eliminate the sexual harassment, prevent its recurrence, and remedy its effects, while supporting the College's educational mission and Title IX obligations. Sanctions may also serve to promote safety or deter students from similar future behavior. Any sanctions must be issued, and communicated to the parties, within five (5) business days of the issuance of the Determination Letter (the “Sanctions Letter”).

The following, individually or in combination, are potential sanctions for violations of this policy. Where appropriate, the statement of the sanction includes the duration, any conditions to be observed during that period, and the conditions for termination of the sanction:

Major Sanctions:

- Expulsion from the College or a program of the College.
- Suspension from the College or a program of the College for a specific period of time.
- Deferred suspension from the College or a program of the College.
- Denial of graduation, diploma, or degree.
- Deferral of graduation, diploma, or degree for a specific period of time.
- Revocation or withdrawal of diploma or degree previously credited, awarded, or conferred.

Other Available Sanctions:

- Disciplinary probation. Disciplinary probation may involve counseling with faculty or administrative staff; restriction of student privileges; and/or prohibitions against participation in CC activities or events.
- Disciplinary reprimand or warning.

VIII. Appeals Process

The Complainant may request an appeal within ten (10) business days of a dismissal of a Formal Complaint or of the Determination Letter. The Respondent may request an appeal within ten (10) business days of the Sanctions Letter. Appeals must be in writing and submitted to the Title IX Coordinator or the Deputy Title IX Coordinator for

Students (the “Notice of Appeal”). The Notice of Appeal shall consist of a written statement explaining the grounds for the appeal, and the bases therefore. The appeal may be based only on one or more of the following grounds: (1) a procedural irregularity that affected the outcome of the matter; (2) new evidence that was not reasonably available at the time the dismissal or determination was made that could affect the outcome of the matter; and (3) a conflict of interest or a bias on the part of the Title IX Coordinator, the Deputy Title IX Coordinator for Students, the Title IX Investigator, the Title IX Decision-maker, or the Sanctions Administrator.

The Title IX Coordinator or the Deputy Title IX Coordinator for Students shall notify the non-appealing party of the appeal and shall provide him/her/them with a copy of the Notice of Appeal. The non-appealing party may submit a written response to the Title IX Coordinator or the Deputy Title IX Coordinator for Students within ten (10) business days of receiving the Notice of Appeal.

The College shall appoint an Appeals Officer to decide the appeal. The identity of the Appeals Officer shall be communicated to the parties as soon as practicable after his/her/their appointment. The Appeals Officer shall review the Title IX Decision-maker’s Determination, the Notice of Appeal, and the response of the non-appealing party, if any. Within fourteen (14) business days after the deadline for the non-appealing party’s response, the Appeals Officer will provide his/her/their written decision describing the result of the appeal and the rationale for the result simultaneously to the parties (the “Appeals Officer’s Decision”). These conclusions may include, but are not limited to:

- Reopening of the investigation;
- Affirming the original findings and sanctions;
- Reversing of the original findings and sanctions;
- Modifying the original findings;
- Modifying the imposed sanctions and remedies.

The appeal is based on the record and is limited to the enumerated bases for appeal. The appeal is not a de novo review. Appeal decisions are final.

IX. Conflicts of Interest

In the event that the Complainant or Respondent believes that the Title IX Investigator, the Title IX Decision-maker, the Sanctions Administrator, and/or the Appeals Officer has a conflict of interest or bias in performing the functions required of him/her/them under this policy, the Complainant or Respondent may seek to disqualify that person from the resolution process. The Complainant or Respondent may seek to disqualify the Title IX Investigator, the Title IX Decision-maker, the Sanctions Administrator, and/or the Appeals Officer by submitting a written objection to the Title IX Coordinator or the Deputy Title IX Coordinator for Students within two (2) business days of receiving notice of the subject individual’s appointment to his/her/their position. The written objection shall state the party’s reasons for believing that the subject individual is incapable of fairly judging the matter.

The Title IX Coordinator will decide whether an objection is justified, and that decision is final. When necessary, the College will select a replacement for any removed individual. The parties will have an

opportunity to object to any individual selected as a replacement.

X. Confidentiality, Record-Keeping, Education & Training

A. Confidentiality & FERPA

All documents created in connection with the above resolution process, including but not limited to any written complaint, the investigative draft reports, the Title IX Investigator’s Report, the Title IX Decision-maker’s Determination, the Determination Letter, the Sanctions Letter, the Notice of Appeal, any response thereto, and/or the appeals decision will be kept confidential by the College. They will be shared only with individuals with a “need-to-know” such information. To the extent any of these documents constitute “education records” under FERPA, they will be treated accordingly. All parties to CC’s Title IX grievance process are expected to maintain the confidentiality of any documents they receive in connection with the process; this shall in no way limit the parties from discussing the allegations under investigation. A party who improperly disseminates any such documents, or otherwise discloses the contents of those documents to third parties, will be subject to disciplinary action.

B. Recordkeeping

The College will maintain the following for a period of seven (7) years:

Each sexual harassment investigation, including:

1. The Formal Complaint, including any withdrawals of a Formal Complaint;
2. Any notices of dismissal issued by the College;
3. Any notices to a Respondent that the College is proceeding without a Complainant;
4. The Initial Notice to the parties;
5. All written communications with the parties regarding interviews, hearings, and all other meetings;
6. The Title IX Investigator’s Draft Report, including any responses thereto from the parties;
7. The Title IX Investigator’s Report, including any responses thereto from the parties;
8. Any communications from the Title IX Decision-maker to the parties scheduling the live hearing;
9. All audio-visual or other recordings of the live hearing;
10. The Title IX Decision-maker’s Determination;
11. The Determination Letter;
12. The Sanctions Letter;
13. Any Notice of Appeal, including any responses thereto;
14. The Appeals Officer’s Decision; and
15. All materials used to train the Title IX Coordinator, the Deputy Title IX Coordinator for Students, the Title IX Investigator, the Title IX Decision-maker, the Sanctions Administrator, and the Appeals Officer.

C. Education & Prevention

The College embraces an interdepartmental, multimodal, and situational approach to educate the CC community about this policy and to prevent sexual harassment. To that end, the Office of Student Affairs works collaboratively to provide the community with educational opportunities as follows:

Orientation/Welcome Week: Students receive the Student Handbook and the Student Code of Conduct, which include the policies of the College.

Publication of this Policy: The College will publish this policy on its website, in all handbooks, and in all catalogs.

D. Training

The Title IX Coordinator, the Deputy Title IX Coordinator for Students, the Title IX Investigator(s), the Title IX Decision-maker(s), the Sanctions Administrator(s), and the Appeals Officer(s) will receive training that includes but is not limited to the following:

1. The definition of sexual harassment;
2. The scope of the College's education programs and activities;
3. How to conduct an investigation and grievance process (including hearings, appeals, and informal resolution processes), and
4. How to serve impartially.

The Title IX Investigator(s) will receive additional training on issues of relevance so that he/she/they can create an investigative report that fairly summarizes the relevant evidence.

The Title IX Decision-maker(s) will receive additional training on relevance of questions and evidence and how to use any technology to be used at a live hearing.

All training materials referenced above will be made publicly available on the College's website.

The College trains faculty, staff, and Campus Safety on the following topics:

- Responding to reports and complaints;
- Bystander intervention;
- Record-keeping and documentation;
- Assessing and reporting complaints of sexual harassment and sexual misconduct;
- The availability of Confidential Resources;
- The availability of other campus resources for support, advocacy, and medical assistance

CAMBRIDGE COLLEGE RESERVES THE RIGHT TO AMEND OR MODIFY THIS POLICY AT ANY TIME

Role of Admissions Counselors and Recruitment Policy

Cambridge College is accredited by the New England Commission of Higher Education. The College and all its degree programs are authorized by the Massachusetts Board of Higher Education. The College is authorized to operate and offer selected degree programs in their states by the California Bureau for Private Post-Secondary and Vocational Education, the Council on Higher Education of Puerto Rico, and is also recognized by the Puerto Rico Department of Education.

Cambridge College is committed to an educational and work environment in which all individuals are treated with respect and dignity. Each individual has the right to study and work in a professional atmosphere that promotes equal opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, CC expects that all relationships among persons in the educational setting and the workplace will be business-like and free of bias, prejudice and harassment.

It is the policy of CC to ensure equal opportunity without discrimination or harassment on the basis of race, color, religion or religious creed, sex (including pregnancy), sexual orientation, gender identity/expression, ancestry, age, disability or handicap, marital status, military or veteran status, citizenship, national or ethnic origin, genetics, or any other characteristic protected by applicable federal, state or local law. CC prohibits any such discrimination or harassment.

Cambridge College strives to make its programs accessible to all individuals, in compliance with Section 504 of the Rehabilitation Act of 1973 and Title III of the Americans with Disabilities Act of 1990 (amended in 2008). Its purpose is to create and maintain an environment that provides reasonable accommodations and supports to students with disabilities so they may participate in and benefit from as fully as possible the programs and services offered at Cambridge College. Such disabilities include physical or mental impairment that substantially limit major life functions. All faculty, staff, and students of Cambridge College are expected to adhere to this philosophy of equal access to educational opportunity and to assume broad responsibility for its implementation. Disclosure of a disability is not required, but if disclosed, it is the responsibility of the individual to seek available assistance through the Office of Disability Services.

Cambridge College admissions counselors serve as the first point of contact for prospective students and applicants to the college. They counsel students about Cambridge College and how to complete the application process. Admissions counselors are not academic advisors nor do they participate in any functions related to student registration or assessment, i.e. writing, placement, etc. Admissions counselors will refer applicants/students to appropriate parties for advising, registration, etc. As the College meets its enrollment goals, the College will keep the educational interests of all prospective students and the College at the forefront of admissions and recruitment practices. As such, the College will provide accurate information to assist all prospective students in making informed application and enrollment decisions. This includes information about College admissions, costs and other information that will allow students to determine whether a campus is a "good fit" for them. All admission counselors, will abide by local, state and federal laws (e.g., confidentiality and incentive compensation) applicable to the outreach,

recruitment and admission process College practices related to undergraduate outreach, recruitment and admissions will adhere to the guidelines explained in detail below. (1) Ban inducements, including any gratuity, favor, discount, entertainment, hospitality, loan, transportation, lodging, meals, or other item having a monetary value of more than a de minimis [defined as "an insignificant amount"] to any individual or entity, or its agents including third party lead generators or marketing firms other than salaries paid to employees or fees paid to contractors in conformity with all applicable laws for the purpose of securing enrollments of potential students including service members or obtaining access to all federal funds. (2) Refrain from providing any commission, bonus, or other incentive payment based directly or indirectly on securing enrollments or federal financial aid (including Department of Defense Tuition Assistance funds) to any persons or entities engaged in any student recruiting, admission activities, or making decisions regarding the award of student financial assistance; (3) Refrain from high-pressure recruitment tactics such as making multiple unsolicited contacts including contacts by phone, email, or in-person, and engaging in same-day recruitment and registration for the purpose of securing enrollments.

Non-Discrimination and Harassment Policy for Students

I. Statement of Equal Opportunity

It is the policy of Cambridge College ("CC" or "the College") to ensure equal opportunity without discrimination or harassment on the basis of race, color, religion or religious creed, sex (including pregnancy and pregnancy-related conditions), sexual orientation, gender identity/expression, ancestry, age, physical or mental disability or handicap, marital status, military or veteran status, citizenship, national or ethnic origin, genetics, or any other characteristic protected by applicable federal, state, or local law. The College prohibits any such discrimination or harassment.

The College is committed to establishing and maintaining an academic and employment environment that is free from discrimination and harassment and in which all individuals are treated with respect and dignity. Each individual has the right to attend classes, study, and work in a professional atmosphere that promotes equal opportunities and prohibits discriminatory practices, including harassment. Discrimination, as defined below, is a violation of a person's rights, dignity, and integrity, and is contrary to the mission and values of the College. Discrimination is strictly prohibited and will not be tolerated.

II. Purpose & Scope of Policy

A. Purpose and Definitions

The purpose of this policy is to provide CC students with a clear set of behavioral standards, definitions, and descriptions of discrimination and harassment. The policy is intended to protect and guide CC community members who have been affected by discrimination and harassment, whether as a Complainant or a Respondent (as defined below), or as a third party.

The College takes all allegations of discrimination and harassment seriously and is committed to providing information, education, resources, support, interim measures, and direction to the College community to prevent and address discrimination and harassment. In response to any report that a CC student has discriminated against or harassed a member of the CC community, the College will take all

appropriate steps to eliminate the misconduct, prevent its recurrence, and address its effects. To achieve equitable results, the College will carefully review and/or investigate all reports and complaints of discrimination with a view to understanding the perspective and experiences of each individual involved and providing for fair and impartial evaluation and resolution.

When used in this policy, "Complainant" refers to those persons who have reported to the College that they have been the subject of prohibited conduct. "Respondent" refers to the student or students who have been accused of engaging in prohibited conduct. "Third party" refers to any other person with information concerning a report of prohibited conduct, including any witness to the incident or any individual who makes a report to the College concerning someone else. A "report" refers to any incident or concern regarding prohibited conduct that is reported to the College. A "complaint" is an allegation of discrimination filed against a CC student that initiates the investigation and disciplinary process outlined in this policy.

B. Scope

This policy applies to all CC students. All CC students are responsible for their actions and behavior, both on campus and off campus. CC students have a responsibility to adhere to both College policies and all laws (local, state, and federal) of wherever they reside or travel. Therefore, this policy applies both to on-campus and off-campus conduct, including, but not limited to, clinical internships, field trips, or other off-campus College-related functions.

All College community members are expected to notify the Associate Provost if they receive information that any CC student has engaged in conduct prohibited by this policy. In addition, any individual may make a report alleging a violation of this policy, whether or not he/she/they is affiliated with the College. The College will provide resource options and respond promptly and equitably to all reports of prohibited conduct asserted against a CC student. The College will engage in a review of the alleged prohibited conduct during which it is committed to maintaining fairness for all parties and balancing the needs and interests of individuals with the safety of the community.

Associate Provost:

Tracy McLaughlin
500 Rutherford Avenue
Boston, MA 02129
617-873-0150

Tracy.McLaughlin@cambridgecollege.edu

Violations of this policy may result in disciplinary action. Depending on the nature of the violation, disciplinary consequences for violations of this policy may include warnings (verbal or written), removal from a course, changes to enrollment status, suspension or dismissal. In addition, CC students should be aware that the conduct described in this policy may also violate federal or state laws and regulations.

C. Coordination with the College's Title IX Sexual Harassment Policy, the College's Sexual Misconduct Policy, and the College's Non-Discrimination and Harassment Policy for Employees

1. Sexual Harassment and Sexual Misconduct. Sexual harassment is a form of discrimination on the basis of sex. Reports or complaints of sexual harassment allegedly committed by a CC student will not be addressed under this Policy; such reports or complaints, if the jurisdictional requirements of Title IX are satisfied and the Title IX Coordinator determines that the alleged conduct requires a formal Title IX investigation, will be addressed under the College's Title IX

Sexual Harassment Policy. Such reports or complaints that do not meet the jurisdictional requirements of Title IX or which the Title IX Coordinator determines do not require a formal Title IX investigation will be addressed under the College's Sexual Misconduct Policy and this policy.

2. Other Protected Characteristics. The College recognizes that discrimination or harassment related to an individual's sex, gender identity or gender expression (collectively, "gender related status"), which is prohibited by this policy, can occur in conjunction with discrimination or harassment related to an individual's race, color, ethnicity, national origin, religion, age, disability, sexual orientation, or any other legally protected characteristics ("protected characteristics"). When misconduct relates solely to a person's gender related status, the College will address such conduct pursuant to the College's Title IX Sexual Harassment Policy or the College's Sexual Misconduct Policy. When the College receives a report that a community member has engaged in misconduct related to both a person's gender related status and other protected characteristics, the College has discretion to decide under which policy or policies to address the report and will coordinate the investigation and resolution efforts to address any and all harassment and discrimination.
3. Claims Against CC Employees. Allegations of discrimination, harassment or retaliation allegedly committed by a CC employee will be handled under the Non-Discrimination and Harassment Policy for Employees. The term "employee" refers generally to all faculty members (full-time and part-time) and staff, including administrators and workers who are represented by unions.

III. Prohibited Conduct

A. Definitions

Discrimination: Discrimination is defined as conduct directed at a specific individual or group of identifiable individuals that subjects the individual or group to treatment that adversely affects their academic and/or student experience because of their race, color, religion or religious creed, sex (including pregnancy and pregnancy-related conditions), sexual orientation, gender identity/expression, ancestry, age, physical or mental disability or handicap, marital status, military or veteran status, citizenship, national or ethnic origin, genetics, or any other characteristic protected by law. Aiding or facilitating discrimination means promoting or encouraging the commission of any behavior prohibited under this policy.

Harassment: Harassment as a form of discrimination is defined as verbal or physical conduct that is directed at an individual or group because of race, color, religion or religious creed, sex (including pregnancy and pregnancy-related conditions), sexual orientation, gender identity/expression, ancestry, age, physical or mental disability or handicap, marital status, military or veteran status, citizenship, national or ethnic origin, genetics, or any other characteristic protected by law when such conduct is sufficiently severe, pervasive, or persistent so as to have the purpose or effect of interfering with an individual's or group's academic and/or student experience or of creating a hostile educational environment. This conduct can include technology-based communications such as texting or social media sites. Aiding or facilitating harassment means promoting or encouraging the commission of any behavior prohibited under this policy.

Retaliation: Retaliation is defined as seeking retribution or attempting to seek retribution against a Complainant, Respondent, or any other individual or group of individuals involved in an investigation

and/or resolution of an allegation of discrimination. Retaliation can be committed by any individual or group of individuals, not just a Respondent or Complainant. Retaliation may include abuse or violence, other forms of harassment, and/or making defamatory statements about another person. An individual who in good faith reports discrimination or harassment, is the subject of such a report, or otherwise participates in the College's investigation of such a report may not be subject to retaliation even if the report is later not proven.

B. Prohibition Against Discrimination, Harassment, and Retaliation

The College prohibits all forms of discrimination, harassment, and retaliation. CC students are prohibited both from personally engaging in discrimination, as well as from engaging in conduct that assists or encourages another person to engage in such misconduct. A CC student who discriminates against or harasses a member of the CC community or assists or encourages another person to engage in such misconduct will be subject to appropriate disciplinary action. The College also prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such a report.

IV. Reporting

All Cambridge College students are expected to share with the Associate Provost any report of discrimination they receive or of which they become aware that involves a CC student. Reports of discrimination involving a CC faculty or staff member should be directed to the Vice President of Human Resources and Talent Management, in accordance with the Non-Discrimination and Harassment Policy for Employees.

Any individual may report any incident of discrimination, harassment, or retaliation allegedly committed by a CC student directly to the Associate Provost. Individuals are encouraged to report discrimination as soon as possible to maximize the College's ability to respond promptly and equitably.

The College does not limit the timeframe for reporting an incident. Upon receipt of any report or complaint, regardless of when the incident occurred, the College will conduct an assessment to determine if an investigation and/or any safety measures are necessary to maintain the safety of the community. However, CC will not be able to impose disciplinary sanctions against a CC student who is no longer affiliated with the College.

All reports of discrimination, harassment, and/or retaliation asserted against a CC student must be made in good faith. False and/or malicious complaints of discrimination, harassment, and/or retaliation (as opposed to complaints which, even if erroneous, are made in good faith) may also be the subject of appropriate disciplinary action.

A person who wishes to make an anonymous report of discrimination, harassment, or retaliation may do so by calling 617-873-0633. Please note that anonymous reporting may limit the ability for the College to investigate fully and follow-through.

The College recognizes that a student may choose to report discrimination or harassment to a trusted employee of the College. For example, a student may choose to share concerns with a faculty member. Students should be aware that under College policy, a faculty member, staff member, or other employee who receives a report of discrimination or harassment allegedly committed by a CC student must share the report with the Associate Provost and cannot promise confidentiality to the reporting student.

V. Interim Measures

Upon receipt of a report of discrimination, harassment, or retaliation allegedly committed by a CC student, the College will provide interim support and reasonable protective measures to prevent acts of misconduct and to provide an academic environment free from discrimination, harassment, and retaliation.

The College will determine the necessity and scope of any interim measures. The College may impose any remedy that can be tailored to the involved parties to achieve the goals of this policy. Even when the reporting student or employee does not specifically request that protective action be taken, the College may choose to impose interim measures at its discretion. Students or employees seeking such assistance should speak with the Associate Provost, who will coordinate such requests on behalf of the student or employee. The College will maintain contact with the parties to ensure that all concerns are being addressed.

All individuals are encouraged to report concerns about the failure of a CC student to abide by any restrictions imposed by an interim measure. The College will take immediate and responsive action to enforce measures previously ordered or implemented by the College.

VI. Discrimination or Harassment – Formal Complaint Process

A. The Associate Provost

The College has appointed the Associate Provost to oversee the College's centralized review, investigation, and resolution process for reports and complaints of discrimination or harassment allegedly committed by a CC student. The Associate Provost is tasked with ensuring consistent application of this policy to all individuals and enabling the College to respond promptly and equitably to eliminate discrimination, harassment, and retaliation, prevent their recurrence, and address their effects.

B. Grievance Procedures

The following are the College's procedures for responding to and resolving reports or complaints of discrimination or harassment asserted against a CC student.

1. Complaint

Any individual may initiate the investigation process by the College against a CC student for violation of this policy by making a complaint of discrimination or harassment to the Associate Provost. The complaint should include the name of the accused (the Respondent), a statement explaining the nature and circumstances of the report, a list of possible witnesses, and contact information for the person making the report. The complaint must be signed or otherwise authenticated by the individual making it (the Complainant).

If the Associate Provost receives a report that a CC student has engaged in prohibited conduct but the report does not meet the requirements of a complaint as described above, the Associate Provost will determine what steps should be taken to gather additional information and direct the gathering of the additional information. Once all available additional information has been obtained, it will be evaluated by the Associate Provost, who will decide whether an investigation, in accordance with this policy, is warranted.

If the Associate Provost decides that an investigation is not warranted, he or she will memorialize in a written memorandum

the report of discrimination and his or her evaluation and reasoning concerning the decision not to initiate an investigation. This memorandum will be maintained in a confidential Student Affairs file.

2. Investigation and Findings Process

After receiving a report or complaint of discrimination, harassment or retaliation, the Associate Provost will conduct a preliminary assessment to determine whether there is sufficient evidence to support the initiation of a formal investigation. The Associate Provost will also consider whether the matter could be resolved under the informal resolution process set forth in section VII of this policy. If the Associate Provost concludes that a report or complaint of discrimination or harassment warrants an investigation, the following steps will generally be taken:

- a. Investigator(s). As part of the investigation process, the College will appoint an appropriate internal or external investigator (or, in some matters, two investigators), and will notify the Complainant and the Respondent of this appointment.
- b. Interviews and documents. At the discretion of the investigator(s), the investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. In the discretion of the Associate Provost, the Complainant and the Respondent will each be entitled to bring a non-lawyer advisor to meetings. The advisor may provide support related to any meeting or interview but may not participate actively in such meetings or interviews. During such meetings or interviews, an advisor may quietly confer or pass notes with the party in a non-disruptive manner. The advisor may not answer questions or otherwise act as an advocate, representative, or proxy. The investigator(s) may also review College files, documents, communications, and other information provided by the parties and/or witnesses. The investigator(s) will retain sole discretion as to which information and documents are relevant to the investigation.
- c. Confidentiality. Out of respect for all involved, the fact and progress of the investigation will be kept confidential. Only the Complainant, the Respondent, appropriate supervisor(s), the Associate Provost, the Vice President of Human Resources and Talent Development, the College's legal counsel, and other leadership officials with an appropriate need to know will be informed. Witnesses who participate in the investigative process will be advised to maintain the confidentiality of their participation, related information, and the investigation.

All investigative and sanction proceedings, and all related notices or statements issued by the College, will comply with the requirements of the Family Educational Rights and Privacy Act (FERPA), the Clery Act, Title IX, other applicable law, and College policy. No information shall be released from such proceedings by the College except as required or permitted by law or College policy.

- d. Report. At the conclusion of the investigative process, the investigator(s) will prepare a final report with factual findings and recommendations for discipline, if appropriate, and issue it to the Associate Provost and the Dean of the School in which the Respondent is enrolled (the "School Dean"). This report will be marked "CONFIDENTIAL." The Associate Provost will provide a copy of the report to the Respondent and will direct the Respondent to maintain its confidentiality. The factual findings, but not the recommendations for discipline, will be shared with the Complainant and the Associate Provost will direct the Complainant to maintain the confidentiality of such factual findings.

- e. Forms of discipline. Misconduct constituting discrimination, harassment, or retaliation will be subject to discipline. Recommendations may include, but not be limited to, training, referral to counseling, warning (verbal or written), removal from a course, change in enrollment status, suspension, or expulsion.
- f. School Dean's determination. Recommendations from the investigative report will be considered by the School Dean in consultation with the Associate Provost and followed through within their discretion. After considering the investigative report, the School Dean will decide whether to accept the recommendations contained in the report, to reject the recommendations, or to take an alternative approach.
- g. Appeal process. If a Complainant does not agree with any of the factual findings made by the investigator(s), the Complainant may appeal to the Provost and Vice President for Academic Affairs (the "Provost"). The Complainant must make his/her/their appeal in writing, setting out the specific reasons for the appeal, within ten (10) business days of receiving the factual findings made by the investigator(s). The Provost will review the investigative report and the factual findings of the investigator(s) and will respond in writing within ten (10) business days of receiving the appeal. The Provost may accept the factual findings of the investigator(s), reject them, or take an alternative approach.

If a Respondent does not agree with any of the factual findings made by the investigator(s) or the decision of the School Dean, the Respondent may appeal to the Provost. The Respondent must make his/her/their appeal in writing, setting out the specific reasons for the appeal, within ten (10) business days of receiving the decision of the School Dean. The Provost will review the investigative report and the School Dean's decision and will respond in writing within ten (10) business days of receiving the appeal. The Provost may accept the decision of the School Dean, reject it, or take an alternative approach.

If there are no appeals, the factual findings made by the investigator(s) and the decision of the School Dean will be final. If any appeal is taken, the decision(s) of the Provost will be final.

VII. Discrimination or Harassment - Informal Resolution Process

The informal resolution process is a completely voluntary, remedies-based process designed to provide members of the CC community with an option to resolve certain disputes with other members of the community in a forum that is separate and distinct from the College's formal grievance processes under this policy. No party will be required to participate in the informal resolution process and the College will not require, encourage, or discourage the parties from participating in the informal resolution process.

The purpose of the informal resolution process is to eliminate the conduct which has been reported by the Complainant and place both individuals in a position to pursue their study or work in a safe, respectful, and productive environment. Under this process, there will be no disciplinary action taken against a Respondent and the resolution will not appear in the Respondent's student records.

An individual who asserts a claim of discrimination or harassment may elect to pursue this informal resolution procedure. The informal resolution procedure is only available if the Associate Provost has determined, through an initial assessment, that the alleged conduct, if substantiated, would constitute misconduct under this policy, and he/she/they has determined that the informal resolution process is appropriate for this matter.

The Associate Provost or his/her/their designee will oversee and conduct the informal resolution process. The Associate Provost or designee will meet with the Complainant and the Respondent, individually, to understand the issues. The presence of advisors is not permitted in the informal resolution process. The Associate Provost or designee will determine whether a joint meeting with the Complainant and the Respondent is appropriate and/or would be helpful. If the parties are able to resolve their dispute, they and the Associate Provost or designee will sign an informal resolution agreement. At any time prior to signing an informal resolution agreement, any party has the right to withdraw from the informal resolution process and resume the formal grievance process outlined above in this policy. If the Associate Provost determines at any time prior to the signing of the informal resolution agreement that the informal resolution process is no longer appropriate, the Associate Provost may terminate the process.

Any agreements reached as part of the informal resolution process must be approved by the Associate Provost in order to ensure consistency with the College's legal obligations. Upon signing the informal resolution agreement, the parties are bound by its terms and cannot opt for a formal grievance process based on the conduct alleged in the formal complaint. Failure to comply with the signed agreement may result in disciplinary action for either party.

The protections against retaliation apply to individuals participating in the informal resolution process. Disciplinary consequences may result for those found responsible for retaliation.

VIII. Administrative Resources

Various administrative agencies can provide resources and legal assistance for victims of discrimination. Agencies in the local Boston-area community include:

Massachusetts Commission Against Discrimination (MCAD)
 John McCormack Building
 One Ashburton Place
 Sixth floor, Room 601
 Boston, MA 02108
 (617) 994-6000

The MCAD prohibits discrimination, including sexual harassment and gender related status harassment, in the workplace. The statute of limitations for filing a complaint is 300 days from the last date of discrimination.

Equal Employment Opportunity Commission (EEOC)
 JFK Federal Building
 475 Government Center
 Boston, MA 02203
 (800) 669-4000

The EEOC prohibits discrimination, including sexual harassment, in the workplace. The statute of limitations for filing a complaint is 300 days from the last date of discrimination.

U.S. Department of Education, Office for Civil Rights (OCR)
 5 Post Office Square, 8th floor
 Boston, MA 02109
 (617) 289-0111

While OCR complaints should generally be filed within 180 days of the last date of the alleged discrimination, OCR may extend this filing deadline in a variety of circumstances.

Policies for Students with Disabilities

Confidentiality of Disability Documentation and Status Policy

The Office of Disability Support Services (ODS) is committed to ensuring that all information and communication pertaining to a student's disability is maintained as confidential as required or permitted by law. The following guidelines about the treatment of such information have been adopted by ODS. These guidelines incorporate relevant state and federal regulations.

1. This information is protected by the Family Educational Rights and Privacy Act (FERPA). All records received and kept by the ODS are considered educational records. All documentation is kept in secure files, with access limited to the Coordinator of Academic and Disability Support.
2. No one will have immediate access to student Disability Support Services files except authorized staff. Any information regarding a disability is considered confidential and will be shared only with others within Cambridge College who have a legitimate educational interest.
3. Sensitive information in student disability files will not be released except in accordance with federal and state laws.
4. A student's file may be released pursuant to a court order or subpoena.
5. The student's disability file is separate from the student's educational record. If a student wishes to have information about his/her disability shared with others outside the institution, the student must provide written authorization to ODS to release the information.
6. The student should understand that there may be occasions when ODS will share information regarding a student's disability if circumstances necessitate the sharing of information and ODS has determined that there is an appropriate, legitimate, educational need to know.
7. A student has the right to review his/her own ODS file with reasonable notification.

Upon agreement of disabilities with ODS, students who take classes at a Cambridge College regional center will be asked if they would like their accommodations disclosed to regional center directors or to student service coordinators. Based on the student's response, staff at regional centers will be notified appropriately.

Disability Declaration and Documentation

Students with disabilities at Cambridge College are encouraged to contact the Office of Disability Support (ODS) to request appropriate services but are not required to disclose any disability. All students seeking accommodations under the Americans with Disabilities Act must self-identify with ODS and provide appropriate information. Students must disclose disability directly to ODS in order to receive status as a student with a disability. Disclosure to faculty, admissions counselors, or other staff members is not considered official disclosure.

Initial self-disclosure may be initiated through phone, email, or in-person, but receipt of accommodations will require an in-person meeting unless the student takes classes at one of the College's regional centers or unless an in-person meeting is impossible for another legitimate reason. In cases where an in-person meeting is not possible, only phone conversations will be acceptable.

Appropriate Documentation

ODS asks students who request disability accommodations to describe their disability, their past use of accommodations, and the disability's likely impact on their educational experiences. Documentation provides a valuable tool for helping Cambridge College understand how courses, systems, and facilities may present barriers, and for planning strategies, including reasonable accommodations, that provide access. ODS uses external documentation to augment conversations with students and to support requests for accommodations.

Types of documentation supportive of requests include medical records, psycho-educational testing, school records, and letters or affidavits from mental health professionals. If students do not have copies of this type of information, they are welcome to meet with ODS to discuss other ways to demonstrate a connection between the condition and academic barriers anticipated or currently being faced.

Any expenses incurred in the obtaining of professional verification are the individual's responsibility. The following documentation criteria will be used:

1. The documentation must state the diagnosis
2. The documentation must state the functional limitations of the diagnosis as they pertain to academics
3. The documentation must state recommendations for academic accommodations

All documentation must:

- Be signed by the treating clinician and be written on official letterhead
- Be recent except in cases of neuropsychological testing done as an adult
- Be complete (all pages included) except in cases of neuropsychological testing where students might prefer to omit personal background or history

Treating Clinician: Treating clinician is defined as a qualified, licensed health care professional, currently or recently associated with a student. Family members who are health care providers or work colleagues associated with students may not act as treating clinicians for the purposes of providing disability documentation.

Disability Grievance Policy and Procedure

Cambridge College is committed to providing a learning and working environment that is free from discrimination. Cambridge College does not discriminate on the basis of disability. As such, the College has adopted an internal grievance procedure providing for prompt and equitable resolution of complaints alleging any action prohibited by

Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990. These laws prohibit discrimination on the basis of disability in the programs, activities, and employment opportunities available at the College. These laws also prohibit retaliation against an individual who alleges discrimination.

Students, faculty, staff, applicants, guests, contractors, and other third parties of the college who are qualified individuals with disabilities as defined by law may request reasonable accommodations which afford them equal opportunity to access, use, and participate in the programs, activities, facilities, and employment available at Cambridge College. Accommodations are provided unless they would present an undue burden, make a fundamental alteration to the nature of the academic program or activity at issue, or an exception is otherwise permitted under law. In some cases, the College may provide an equally effective alternative to the requested accommodation.

If a requested accommodation is not provided, the College will attempt to propose alternatives if appropriate. The College will work with the person requesting the accommodation to determine if there are acceptable alternatives. If a dispute concerning an accommodation is not resolved by the College's interactive process, the individual may file a complaint using the process outlined below.

Individuals who wish to request an accommodation or who have questions about the process should contact:

Vera Dimoplou
Assistant Dean of Student Affairs,
Section 504 Disability Coordinator
Cambridge College
500 Rutherford Avenue
Boston, MA 02129
(617) 873-0614 (Phone)
vera.dimoplou@cambridgecollege.edu

The College's Equal Access to Education Policy and Disability Declaration and Documentation Policy give more information for students and applicants and the ADA and Reasonable Accommodations Policy gives more information for employees.

Any person who believes he/she has been discriminated against or has been the victim of retaliation on the basis of disability by any party at Cambridge College may file a grievance. Discrimination or retaliation complaints grieved under this policy may be directed against fellow students, employees, contractors or other third parties. The College will investigate the grievance and if there is a finding that

discrimination occurred, the College will take steps to prevent recurrence of discrimination and address any resulting discriminatory effects on the complaining party if appropriate.

Filing a Grievance

Grievances must be addressed in writing directly to the Section 504 Disability Coordinator. The written grievance should contain as much information as possible but at a minimum should contain:

- The name and contact information for the person filing the grievance
- A description of the problem or action alleged to be discriminatory or retaliatory
- Where applicable, the names and titles of any persons who were involved in the act of discrimination or who witnessed the

discrimination

- The proposed remedy sought if appropriate

Any employee or student who is aware of someone wishing to pursue a grievance under this policy, should direct the individual to the Section 504 Disability Coordinator.

If the complainant has an issue directly with the Section 504 Disability Coordinator, he/she may file a grievance with a Regional Center Director, the Director of Human Resources, the Associate Provost, or the Academic Dean for his/her program. Contact information for all parties can be found in the College catalog as well as the College's public web site. In all cases, the Section 504 Disability Coordinator will be made aware that a grievance has been filed so that she/he can direct the process to the appropriate designee, monitor the progress of the grievance procedure, and assure compliance with all applicable laws.

The Designee for Investigating the Grievance

The Section 504 Disability Coordinator will identify the appropriate person ("the designee") to investigate the grievance. When grievances are filed regarding academic matters such as academic adjustments, the designee will be the academic dean for the program involved because he/she has the most relevant knowledge of the academic requirements and applicable technical standards for the program of study. When grievances are filed regarding nonacademic matters such as facilities, operations, events, outside contractors, or parking, the designee will be the Associate Provost. When grievances relate to employment, the designee shall be the Director of Human Resources.

Procedure

The designee will determine if the investigation of the grievance will follow an informal process or a formal process.

For informal processes, the designee will speak directly with the complainant to gather all relevant information and will also seek information from any other parties mentioned in the written grievance. The complainant must agree to proceed with the informal process.

For formal processes, the designee will meet with all involved parties. This includes but is not limited to administrators, advisors, faculty members, witnesses, health care providers, the complainant, and legal advisors. In circumstances where legal advisors are present for the complainant, the legal advisor may consult with the complainant but may not lead or participate in the meeting.

During the meeting, the designee will hear all relevant information from involved parties. The complainant will have the opportunity to voice his/her grievance and to present any evidence or witnesses to support his/her case. The designee will be committed to impartial investigation of grievances and will include the opportunity for all parties to present witnesses and evidence.

Timing

Academic grievances related to the implementation or denials of accommodations are to be filed as soon as possible but no later than the end of the subsequent term in which the alleged discrimination occurred. Non-academic grievances and employment grievances should be filed as soon as possible but no later than 180 days after the alleged discrimination occurred.

When proceeding formally, the meeting will be scheduled within ten

working days of the filed grievance and no later than 30 calendar days from the filing unless extenuating circumstances arise. For both formal and informal procedures, the designee will provide his/her response to the complainant within ten working days, unless extenuating circumstances arise.

Resolution

During deliberation, the designee is encouraged to communicate with the College's General Counsel for guidance regarding the legal standards and basis of the decision under the circumstance of the complaint.

Once the designee has made a determination, he/she will respond to the grievance in writing, giving reasoning for his/her determination and outlining any additional actions that will need to take place. If the designee determines that disability discrimination occurred, the College will take steps to correct any discriminatory effects on the complainant and others, if appropriate. The Section 504 Disability Coordinator will be made aware of the response for tracking purposes and to answer any questions or concerns that the complainant has. Other appropriate parties involved in the grievance who have an administrative need to know (e.g. faculty member involved, program chair, facilities director, supervisor, regional center director, Human Resources, etc.) will also be informed of the determination as appropriate.

Previously determined accommodations that are being grieved will remain in place until a determination has been made. The designee may decide to approve an alternative temporary accommodation while the grievance procedure is followed but will be clear with the complainant that the alternative accommodation is temporary in nature.

Outside Agency

Use of this grievance procedure is not a prerequisite to the pursuit of other remedies, such as the filing of a 504/ADA complaint with the responsible federal department or agency, although it is strongly suggested that this grievance procedure be used first.

If a student or employee is dissatisfied with the grievance process at any time, he/she may use the following groups for assistance:

Massachusetts
Massachusetts Office on Disability
One Ashburton Place, Room 1305, Boston, MA 02108
Voice/TTY 617-727-7440 or 800-322-2020 Fax 617-727-0965

Office for Civil Rights
U.S. Department of Education
5 Post Office Square, 8th Floor Boston, MA 02190
Voice phone (617) 280-0111 FAX (617) 617-289-0150

Other States

Please ask your Cambridge College regional center director to put you in touch with state advocacy agencies.

Equal Access to Education Policy

Cambridge College strives to make its programs accessible to all individuals, in compliance with Section 504 of the Rehabilitation Act of 1973 and Title III of the Americans with Disabilities Act of 1990 (amended in 2008). Its purpose is to create and maintain

an environment that provides reasonable accommodations and supports to students with disabilities so they may participate in and benefit from as fully as possible the programs and services offered at Cambridge College. Such disabilities include physical or mental impairment that substantially limit major life functions. All faculty, staff, and students of Cambridge College are expected to adhere to this philosophy of equal access to educational opportunity and to assume broad responsibility for its implementation. Disclosure of a disability is not required, but if disclosed, it is the responsibility of the individual to seek available assistance through the Office of Disability Services.

The Office of Disability Services is the designated office at Cambridge College that maintains disability-related documents, certifies eligibility for services, and determines and communicates reasonable accommodations for students with disabilities. As an institution, implementation of accommodations is a shared responsibility and faculty, students, and the Office of Disability Services are all held responsible.

Students Requesting Disability Accommodations

Cambridge College is committed to providing equal access to all educational opportunities to students with physical, psychological or learning disabilities.

Students who think they may qualify for special accommodations must obtain documentation from a qualified physician or clinician that presents a specific diagnosis of your disability, explains its limiting effects, and makes recommendations for accommodation. Eligibility for accommodations and the accommodations themselves are determined on an individual basis by the Office of Academic and Disability Support Services in order to ensure compliance with the Americans with Disabilities Act. This Office also ensures that all students are aware of their rights, are knowledgeable of the available services and that faculty are aware of their responsibilities should they have a student with a disability in their classroom.

It is important to provide documentation of your disability as soon as possible as many of the services provided are outside of the College and must be arranged far in advance. Please contact the Office of Academic and Disability Support Services to arrange for an intake meeting and to discuss your needs. The Office can be contacted at disabilitysupport@cambridgecollege.edu or by phone at 617-873-0614.

Accommodations

Students with appropriately documented disabilities may be eligible for accommodations in accordance with the Americans with Disabilities Act. Under this law, students are eligible for accommodations which are deemed reasonable by the College.

Accommodations may consist of the following (this list is not exclusive): sign language interpreters, note takers, assistive technology, tutorial services, priority registration, course modification, parking accommodations and classroom modifications. At your initial intake meeting, we will discuss what accommodations are right for you for the courses you are taking. Students should meet with or contact the Director of Academic and Disability Support Services every term to help set up letters sent to faculty. Accommodations do not automatically transfer from term to term and may be course-specific. It is the responsibility of the student to initiate the accommodation process from term to term.

Policies for International Students

Conditional Acceptance of F1 International Students

Conditional acceptance to a Cambridge College degree program is offered to students who have not demonstrated the minimum level of English language proficiency required for full acceptance.

Eligibility for Conditional Acceptance

Students are eligible for Conditional Acceptance only if:

1. They have met ALL other admissions requirements;
2. They have been accepted to one of Cambridge College's accredited partner English language schools and have submitted to Cambridge College an official acceptance letter from the partner English language school;
3. They have paid a conditional acceptance fee, which is non-refundable but is credited towards their tuition once they fully matriculate.

Eligibility for Full Acceptance

Students are eligible to be fully accepted once they have provided to Cambridge College ONE of the following:

1. Formal documentation of successful completion of a pre-determined level at one of Cambridge College's accredited partner English language schools;
OR
2. An official TOEFL, IELTS, STEP Eiken, or Michigan Test score equal to or exceeding the minimum required score for the program to which the student has been accepted.

A student who has submitted the required documentation for full acceptance is eligible to matriculate in the next available term of study.

Restrictions

Ability to enroll in Cambridge College courses

Students who are conditionally accepted are prohibited from enrolling in any Cambridge College courses. Only once the student has been fully accepted is s/he eligible to register for, enroll in, and attend Cambridge College courses.

Duration of validity

The conditional acceptance is valid for up to three academic terms from initial issue. If a student requires additional time to meet the English language proficiency requirements set by the program to which s/he is conditionally accepted, s/he must request, in writing, an extension, and pay a second conditional acceptance fee, which will be credited towards tuition.

Change in program requirements

Conditionally accepted students must meet admissions and program requirements in effect at the time of matriculation. Students will be notified by the College if program changes occur after they have been conditionally accepted but prior to their matriculation.

International Student Policies for F1 Non-immigrant Students

Policies for Employees selected to serve as Primary Designated School Official (PDSO) or Designated School Official (DSO) at Cambridge College:

Prior to addition to Form I-17, employee must:

1. Complete, with a senior P/DSO present, the SEVP training for Designated School Officials.
2. Submit the following documents:
 - a. Proof of U.S. Citizenship: one of the following
 - i. Birth certificate
 - ii. Passport
 - iii. Permanent Resident Card
 - b. Marriage license if name on Proof of U.S. Citizenship differs from the employee's legal name
 - c. Form I-9, demonstrating employment at Cambridge College

After addition to Form I-17, Cambridge College recommends that the employee:

1. Participate in/demonstrate previous participation in and completion of one of the following within the first year as DSO:
 - a. NAFSA F1 for Beginners (hosted at the NAFSA Regional Conference)
 - b. IETS F1 Essentials Levels 1 and 2 (hosted by International Education Training Services)

Only individuals specified on Cambridge College's Form I-17A as PDSO or DSO may sign Form I-20 on page 1 (School Certification) or page 3 (travel authorization). No employee of Cambridge College who has not been designated PDSO or DSO may sign the I-20 for any reason.

Policies for students seeking admission to Cambridge College as F1 non-immigrant students:

Required Documentation

In order to receive Form I-20 for maintenance of F1 non-immigrant student status at Cambridge College, applicants must be fully admitted into a full-time degree program at Cambridge College. Documents required for admission to Cambridge College include but are not limited to:

1. Submission of a passport or other government-issued form of identification which shows:
 - a. Spelling of the student's name
 - b. Date of birth
 - c. Country of birth
 - d. Country of citizenship
2. Demonstration of adequate ability to fund their studies for at least the first year of study. Documents may be submitted as originals, photocopies, electronic scans, or facsimile. All documents submitted as proof of financial capability must be:

- a. In English or accompanied by a notarized translation
- b. Equal to or greater than the minimum amount calculated by the International Student Office and published by Admissions
- c. No older than 6 months from the date of acceptance, no older than 3 months preferred
- d. Accompanied by a completed Declaration of Funds, signed by the student or sponsor and signed by the bank from which funds are demonstrated

3. Proof of English language proficiency, as defined by the requirements set forth by Admissions

Transfer Students

Students who are transferring to Cambridge College in F1 status from another institution in the United States where they have previously maintained their F1 status must also request transfer of their SEVIS record from the previous institution to Cambridge College before Form I-20 can be issued from Cambridge College.

Obtaining/Regaining F1 Status

Students who are in the United States in another status and wish to obtain F1 status or who have lost F1 status and wish to regain it must provide the above-described documentation before they will be assisted with the Change of Status request process. Cambridge College cannot guarantee the success of any Change of Status or Reinstatement application submitted by the student to the Federal Government.

Policies for students maintaining F1 status through full-time enrollment in a degree program at Cambridge College:

Full Time Registration Requirement

In order to maintain F1 status at Cambridge College after admission to a full-time program and issuance of Form I-20, international students must:

1. Attend International Student Orientation or attend a make-up International Student Orientation session before the end of their first term of study with Cambridge College.
2. Register for a full course of study in all required terms, save for the final term of study, unless otherwise authorized by a P/DSO to drop below full course of study.
 - a. "Full course of study" for undergraduate study is defined in 8 C.F.R. § Sec. 214.2(f)(6)(i)(B) as "at least twelve semester or quarter hours of instruction per academic term."
 - b. "Full course of study" for post-graduate study is defined in 8 C.F.R. § Sec. 214.2(f)(6)(i)(A) as "certified by a DSO as a full course of study." The International Student Office at Cambridge College has certified 8 semester hours of instruction per academic term as full-time for graduate students.
3. Attend all courses which contribute to full-time registration. Failing a class for failing to meet specific class requirements for attendance is considered an unauthorized drop below full course of study.
4. Register for no more than 3 credits' online courses, except where the online course registration exceeds the required minimum full-time registration.
5. Register for and attend courses taught only on the campus where the student has been authorized to attend.

Authorization to Drop below Full-Time Registration

In order to obtain authorization to drop below the full-time registration requirement in a required term of study, students must first:

1. Request authorization for a drop below full course of study within the term in which s/he will drop below full course of study, as outlined in 8 C.F.R. § Sec. 214.2(f)(6)(iii). Acceptable reasons for drop below full course of study at any time during the student's studies are:
 - a. Improper course level placement.
 - b. Illness or medical condition
 - c. Student in final term of study.

Acceptable reasons for drop below full course of study during the student's first term of study only are:

- a. Unfamiliarity with US teaching methods.
- b. Initial difficulties with the English language.
- c. Initial difficulties with reading requirements.

Updated Record-keeping Requirement

While maintaining F1 student status at Cambridge College, F1 students must:

1. Submit a signed Certificate of Understanding: F1 Student Rights and Responsibilities and a complete International Student Information Sheet before the end of their first term of study with Cambridge College.
2. Maintain current, updated records with the International Student Office at all times. This includes:
 - a. Current major field of study
 - b. Current address
 - c. Student's name
 - d. Sources of funding
 - e. Photocopy of most updated passport
 - f. Photocopy of most updated visa
3. Notify a P/DSO in a timely manner prior to the end-date listed on the student's Form I-20 in Section 5 if an extension of program is needed.
4. Notify a P/DSO if s/he wishes to withdraw from classes prior to completing his/her program of study. This will result in termination of student's F1 status for "Authorized Early Withdrawal."
5. Depart the United States within 15 days of termination of F1 status.
6. Notify the P/DSO if s/he changes status.

Restriction of Work Eligibility

Pursuant to 8 C.F.R. § Sec. 214.2(f)(9), students maintaining F1 status may only engage in on-campus employment or authorized off-campus employment. For authorization of off-campus employment, students must:

1. Request authorization for off-campus employment prior to engaging in off-campus employment of any kind. Authorized employment includes:
 - a. Curricular Practical Training
 - b. Optional Practical Training
 - c. Hardship Employment
2. Not engage in unauthorized employment in the United States, as this is grounds for termination of the student's F1 status.

Policies for students maintaining F1 non-immigrant student status at Cambridge College through Optional Practical Training:

Authorization of Off-Campus Employment through Optional Practical training (OPT)

In order to maintain F1 status at Cambridge College while engaged in approved Optional Practical Training (OPT) after completion of a degree at Cambridge College, international students must:

1. Apply for OPT no more than 90 days prior to or 60 days after the student's final date of registration, having met the 1-year academic enrollment requirement, pursuant to 8 C.F.R. § 214.2(f)(10).
2. Pursuant to 8 C.F.R. § 214.2(f)(10)(ii)(A), engage in employment which is:
 - a. Directly related to the student's most current major field of study
 - b. No less than 20 hours per week for students engaged in full-time OPT
 - c. No more than 20 hours per week for students engaged in part-time OPT
3. Report to the ISO and document any gaps in employment after the start-date of OPT.
 - a. Students are permitted 90 days total unemployment within the specific period of OPT granted. Exceeding 90 days of unemployment puts the student out of status.
 - b. The ISO holds no responsibility for terminating student status when a student exceeds his/her 90 days of unemployment while on OPT
4. Depart the United States, change to another status, or begin a new F1 program of study within the 60 days following the end-date of OPT in order to avoid becoming an illegal overstay.

Updated Record-keeping Requirement

Once authorized for Optional Practical Training, students must:

1. Provide a photocopy of the Employment Authorization Document (EAD) in a timely manner after receipt
2. Keep all personal information updated with the ISO. This includes, but is not limited to:
 - a. Current residential address
 - b. Current telephone number
 - c. Current email address
3. Keep all employment information updated with the ISO.
 - a. Employment information should be provided in the form of an employment letter. This letter should contain the following information:
 - i. Company name
 - ii. Company address
 - iii. Student's name
 - iv. Employment start-date
 - v. Employment end-date (if specified in the student's contract)
 - vi. Position title
 - vii. Number of hours per week associated with the position
 - viii. Brief description of job duties
 - ix. Signature of supervisor, company owner, etc.

Policies for record-keeping within the institution:

Upon approval of the certificate to host F1 non-immigrant students, Cambridge College agrees:

1. Upon acceptance of any non-immigrant alien student, to furnish that student a Certificate of Eligibility (Form I-20 A/B)
2. To keep records containing the following specific information and documents relating to each non-immigrant F1 student to whom the school issues a Form I-20, while the student is attending the school and until the school notifies the Service, in accordance with

regulations at 8 C.F.R. 214.3, that the student is no longer pursuing full course of study.

3. The school must keep a record of having complied with the reporting requirements for at least one year.
4. If a student who is out of status is restored to status, the school the student is attending is responsible for maintaining these records following receipt of notification from the Service that the student has been restored to status.
5. The school must keep and make available to the Service upon request the following information and documents for each non-immigrant F1 student:
 - a. The admission number from the student's Form I-20 copy
 - b. Country of citizenship
 - c. Address and telephone number in the United States
 - d. Status, i.e. full-time or part-time
 - e. Course load
 - f. Date of commencement of studies
 - g. Degree program and field of study
 - h. Expected date of completion
 - i. Non-immigrant classification
 - j. Termination date and reason, if known
 - k. The documents which show the scholastic ability and financial status on which the student's admission to the school was based
 - l. Information specified by the Service as necessary to identify the student and to determine the student's immigration status.

Policies for advertisement, catalog, brochures, literature, or other material produced by/for Cambridge College:

1. Any statement which may appear concerning approval for admittance by non-immigrant students must be limited to the following: "This school is authorized under Federal law to enroll non-immigrant students."

International Students and Immunizations

To comply with state law, all new students at Cambridge College locations in Massachusetts are required to be immunized according to the Massachusetts College Immunization Law. Full-time students, full-time international students and part-time students in health sciences programs are required to submit proof of immunization.

International students at Cambridge College are required to be full-time students in fall and spring terms. They must be in compliance with all Cambridge College immunization requirements when they arrive on campus. International students who fail to present the required information by the end of the first term, in which they are enrolled at Cambridge College, are out of compliance.

If international students remain out of compliance, they will not receive official transcripts from the Registrar's Office and will be blocked from registering for the next term. U.S. federal regulations require international students maintain a full-time course of study each academic term. If international students are not registered for the next term, they are in violation of their F-visa status that may result in the termination of their I-20 "Certificate of Eligibility."

Policies for Military Students

Academic Progress

See *Military Servicemembers & Veterans: Academic Progress* on page 56.

Approved Courses and Transfer Credits for Military Students

Cambridge College participates in the Department of Defense Voluntary Education Partnership program so that eligible active duty service members are able to obtain Tuition Assistance from their military branch as administered by the Department of Defense. The Registrar, Regional Center Directors and the Student Financial Services Office serve as the first point of contact for veterans' educational benefits assistance and DoD tuition assistance.

Cambridge College certifies enrollment for veterans' educational benefits for students in degree seeking programs. All students eligible to receive veterans' benefits or DoD tuition assistance while attending the College are urged to complete arrangements with the appropriate agency in advance of enrollment.

Cambridge College is required to certify only those courses that meet minimum graduation requirements. Courses not directly related to a student's degree program or courses beyond those required for a specific degree program are not certified. Undergraduates should meet with an advisor to develop a course enrollment plan. Graduate students should have their program chair approve their study list as meeting graduation requirements on a semester basis.

To comply with federal regulations concerning credit for previous training (38 CFR 21.4253), Cambridge College is required to evaluate all previous education and training completed elsewhere to determine what credit, if any, should be granted to students eligible to receive Veterans Affairs educational benefits or DoD tuition assistance. Cambridge College is required to complete an evaluation; credit is granted when appropriate. Credit is evaluated toward the degree program registered with Veterans Affairs or DoD as determined by the Office of the University Registrar in conjunction with the relevant academic department(s) or program(s). All relevant policies regarding transfer credit apply. In addition, this evaluation occurs each time a student's degree program is changed. Subject to current federal and College guidelines, students eligible for receipt of VA educational benefits or DoD tuition assistance have their prior education and training evaluated up to the credit limits outlined in the College's Transfer Policy.

Delayed Disbursement of VA Funding

See *Delayed Disbursement of VA Funding* on page 55

Military Tuition Assistance (TA) Refund Policy

See *Military Tuition Assistance (TA) Refund Policy* on page 25

Transfer Credit Evaluation

Transfer credit—All students receiving Veterans' benefits will have all prior education and training evaluated upon enrollment. Credit will be awarded where applicable with the program being shortened accordingly. The student and the Department of Veteran Affairs will be notified. For transfer credit information please contact your Veterans certifying representative.

Prior learning assessment to earn college credit and shorten your program—Veterans enrolled in undergraduate programs are especially encouraged to consider documenting their learning derived from experience in the form of standardized college-level exams and portfolios that demonstrate learning equivalent to specific college courses. For more information, ask to speak with a faculty advisor or the academic coordinator of the Cambridge College center you plan to attend, or view our Transfer Credit Policy.

Please review our policy on Approved Courses and Transfer Credit for Military Students to ensure enrollment certification. Service members are advised to speak with a counselor within their Military Service prior to enrollment.

Readmission of Military Servicemembers

See *Readmission after Interruption Due to Military Service* on page 56