

COLLEGE *for* Creative STUDIES

2025 CCS Annual Campus Security and Fire Safety Report



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About the Report

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

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

Regular training is provided in the following topics:

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

Amanda Gillette

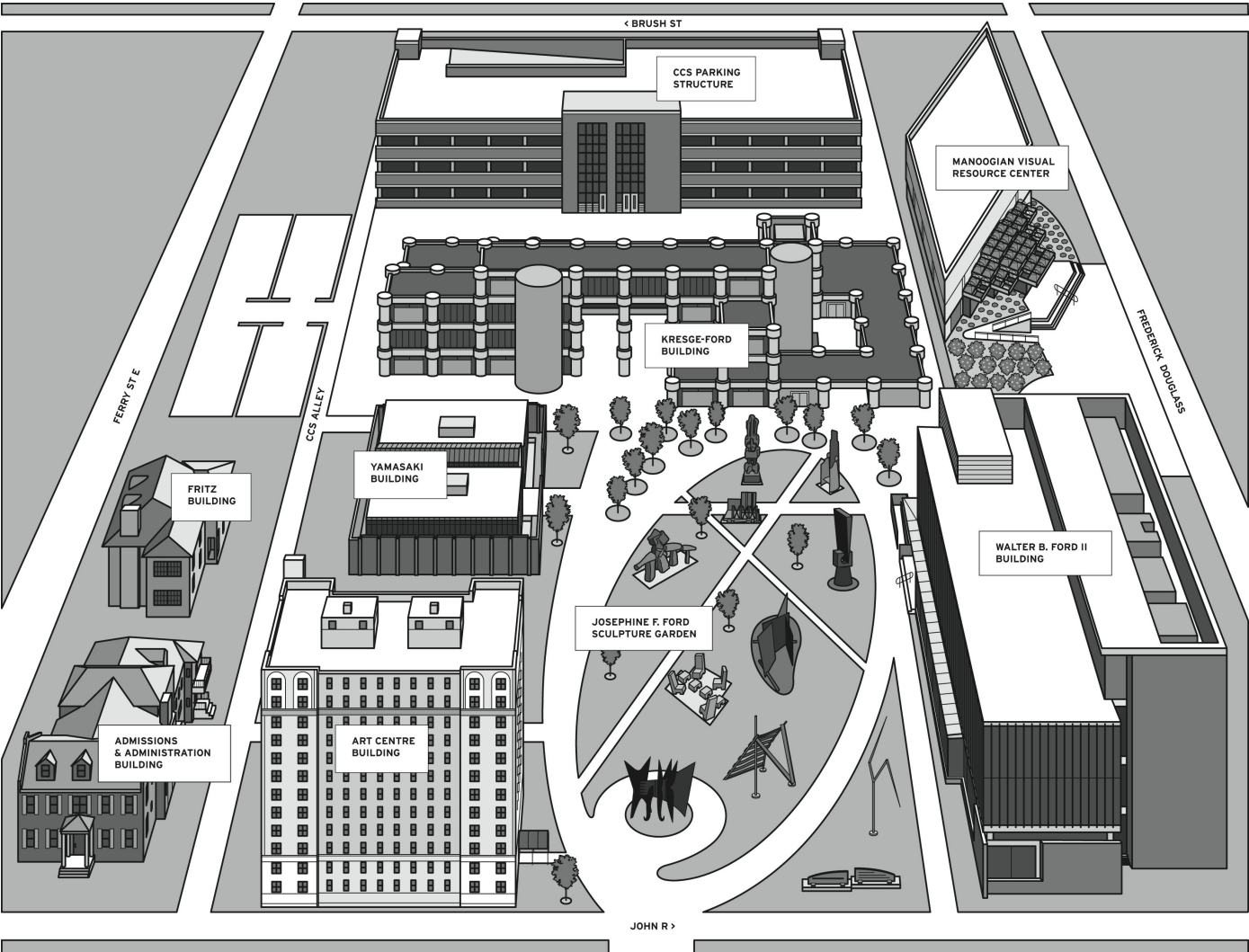
Director of Campus Safety & Security – Ford Campus

Dena Ryniak

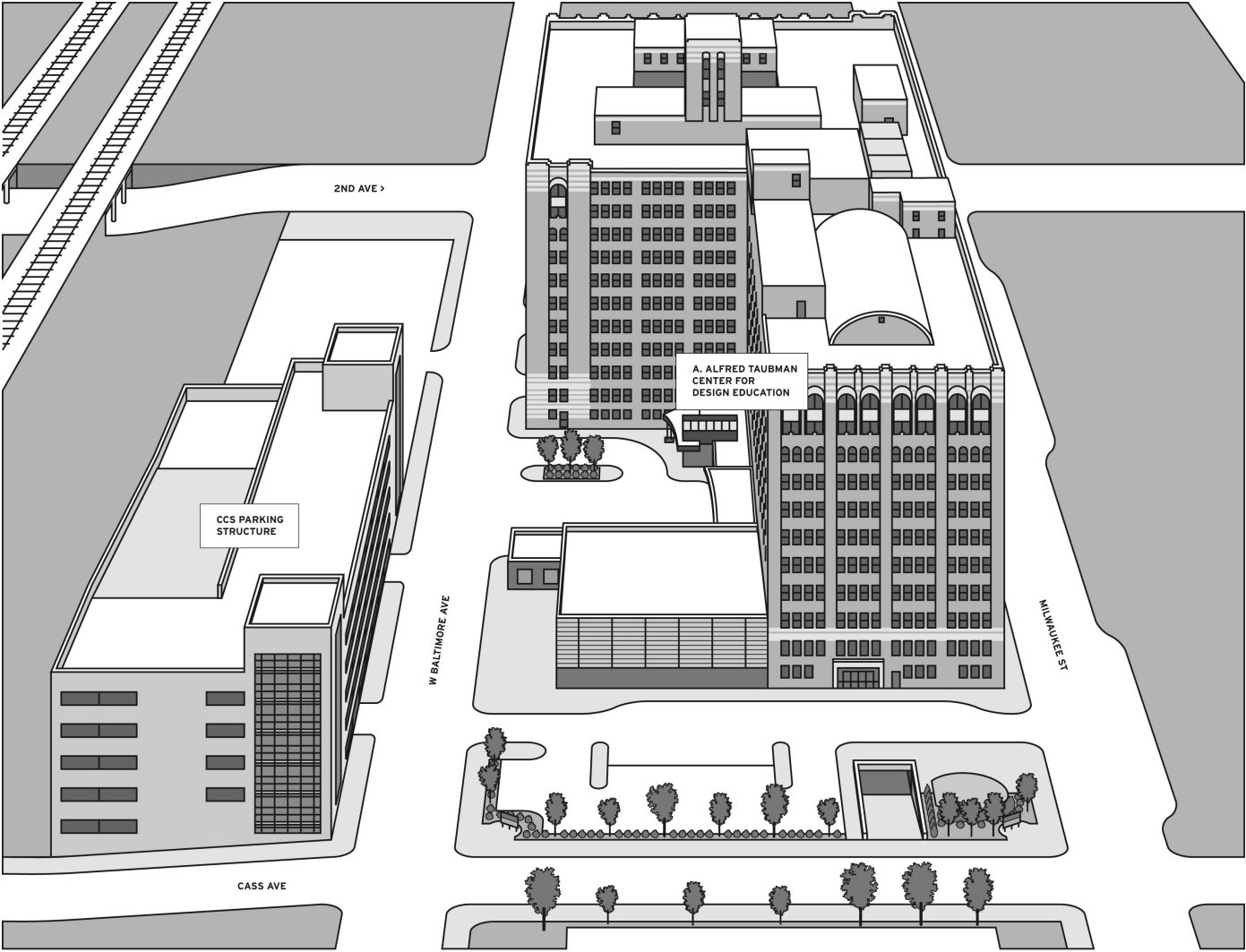
Director of Campus Safety & Security – Taubman Center

Campus Safety Patrol Areas

Ford Campus



Taubman Center



Procedure for Gathering Crime Statistics

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

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

Clery Geographic Definitions

Clery Geography

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

On-Campus

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

Non-Campus Building or Property

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

Public Property

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

Residence Hall

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

Definitions of Reportable Crimes

Criminal Offenses

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

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

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

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

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

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

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

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

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

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

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

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

Hate Crimes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Violence Against Women Act (VAWA) Offenses

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

Dating Violence – violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. For purposes of this definition, dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence.

Stalking – a course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or the safety of others or to suffer substantial emotional distress. A "course of conduct" means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property. A "reasonable person" means a reasonable person under similar circumstances and with similar identities to the victim. "Substantial emotional distress" means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

Arrests and Referrals for Disciplinary Action

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

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

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

Campus Safety Daily Crime and Fire Log

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

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

Crime Statistics

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

Ford Campus and Taubman Center combined

Criminal Offenses	On-Campus			On-Campus Residence*			Non-Campus			Public **			Unfounded Cases***		
	2024	2023	2022	2024	2023	2022	2024	2023	2022	2024	2023	2022	2024	2023	2022
Murder/Non-negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fondling	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Violence Against Women															
Domestic violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Dating violence	1	1	0	1	1	0	0	0	0	0	0	0	0	0	0
Stalking	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0
Arrests															
Weapons: carrying, possessing, etc.	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Actions															
Weapons: carrying, possessing, etc.	0	0	1	0	0	1	0	0	0	0	0	0	0	0	0
Drug abuse violations	1	0	1	1	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	4	1	1	4	1	1	0	0	0	0	0	0	0	0	0

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

** Public - For 2024, Detroit Police Department did not respond to request for crime statistics for our Clery geography

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

Ford Campus

Criminal Offenses	On-Campus			On-Campus Residence*			Non-Campus			Public **			Unfounded Cases***		
	2024	2023	2022	2024	2023	2022	2024	2023	2022	2024	2023	2022	2024	2023	2022
Murder/Non-negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Violence Against Women															
Domestic violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Dating violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Stalking	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
Arrests															
Weapons: carrying, possessing, etc.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Actions															
Weapons: carrying, possessing, etc.	0	0	1	0	0	1	0	0	0	0	0	0	0	0	0
Drug abuse violations	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	3	1	0	3	1	0	0	0	0	0	0	0	0	0	0

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

** Public - For 2024, Detroit Police Department did not respond to request for crime statistics for our Clery geography

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

Taubman Center

Criminal Offenses	On-Campus			On-Campus Residence*			Non-Campus			Public **			Unfounded Cases***		
	2024	2023	2022	2024	2023	2022	2024	2023	2022	2024	2023	2022	2024	2023	2022
Murder/Non-negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fondling	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Violence Against Women															
Domestic violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Dating violence	1	1	0	1	1	0	0	0	0	0	0	0	0	0	0
Stalking	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
Arrests															
Weapons: carrying, possessing, etc.	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Actions															
Weapons: carrying, possessing, etc.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Drug abuse violations	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	1	0	1	1	0	1	0	0	0	0	0	0	0	0	0

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

** Public - For 2024, Detroit Police Department did not respond to request for crime statistics for our Clery geography

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

Hate Crimes

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

2024: No crimes determined to be hate crimes

2023: No crimes determined to be hate crimes

2022: No crimes determined to be hate crimes

Office of Campus Safety & Security

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

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

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

Campus Safety personnel are stationed at the following campus locations:

Ford Campus – 313-664-7444

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

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

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

Taubman Center – 313-664-1444

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

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

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

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

Emergency Blue Light Phones

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

Location of Emergency Intercoms

Ford Campus

Art Center Building Elevators North 1 & 2

Art Center Building Elevators South 1 & 2

Administration Building east entry door

Art Centre Building Fitness Center 1st Floor

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

Taubman Center

A Elevator Cabs 1,2 & 3
B Elevator Cabs 1,2 & 3
C Elevator Cabs 1,2 & 3
Fitness Center 8th Floor East Side Kitchen Elevator
Freight Elevator
Underground parking, Rollup Door
Underground Parking, near G stairwell
Underground Parking, Northwest Wall
Underground Parking, near E stairwell
Parking Deck 1st level Elevator Lobby
Parking Deck 2nd level Elevator Lobby
Parking Deck 2nd level west stairwell
Parking Deck 3rd level Elevator Lobby
Parking Deck 3rd level west stairwell
Parking Deck 4th level Elevator Lobby
Parking Deck 4th level west stairwell
Parking Deck 5th level Elevator Lobby
Parking Deck 5th level west stairwell
Parking Deck 6th level Elevator Lobby
Parking Deck 6th level west stairwell
Parking Deck Elevator Cab 1 & 2
Woodward Lot, Northwest Corner
South Entrance Intercom
West Entrance Intercom
Northwest Entrance Intercom
East Entrance Intercom
Loading Dock Intercom
D Stairwell 6th Floor Intercom
D Stairwell 7th Floor Intercom
D Stairwell 9th Floor Intercom
Woodward Lot, Entrance Intercom
Woodward Lot, Exit Intercom

Underground Parking Entrance Intercom
Underground Parking, Exit Intercom

Operation of Emergency Intercoms

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

Automated External Defibrillators (AED) & Control the Bleed Kits

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

Ford Campus

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

Taubman Center

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

Off-Campus Assistance

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

Reporting Criminal and Other Serious Incidents

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

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

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

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

Campus Security Authorities

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

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

- Office of Campus Safety & Security personnel.
- Other Individuals with responsibility for campus security but are not Office of Campus Safety & Security personnel, i.e., those responsible for monitoring entrance into institutional property, such as parking enforcement staff, event security staff and patrol staff.
- Officials who have significant responsibility for student and campus activities, included but not limited to those involved in student housing, student discipline and campus judicial proceedings, students who serve as judicial affairs officials, officials who oversee student extracurricular activities, faculty advisors and those who oversee student programs.
- Individuals Designated by CCS—Any individual or organization specified in an institution's statement of campus security policy as one to which students and employees should report criminal offenses. CCS-designated Campus Security Authorities include:
 - Campus Safety Directors, and Officers
 - Asst. Vice President of Campus Life
 - Residence Life Staff
 - Resident Assistants (RA)
 - Student Engagement Staff
 - Civil Rights and Title IX Staff
 - Academic Advisors
 - Human Resource Staff
 - Faculty and Staff who act as advisors to student organizations
- Campus Security Authorities are required to complete an online training module each year prior to the start of the academic year.
- CCS Personal Counseling staff maintain a high level of confidentiality in all areas of their work with students. If a student provides a member of the Counseling staff with information regarding being a victim of a crime, confidentiality will be maintained with the exception of limited situations as outlined below:
 - The crime includes information that would be indicative of the student's plan to harm either themselves or another person
 - First-hand information regarding the abuse of a child or incapacitated person
 - Under Michigan Mental Health Law, counselors are obligated to directly report this information to the appropriate authority.

- Campus Security Authorities will document all reports of a student being a victim of a crime by completing the [Incident Reporting Form](#) and this form will be routed to the appropriate campus administrator. Depending on the nature of the crime, the Campus Security Authority may also contact 911 or Wayne State Police.

Maintenance and Security of Campus Grounds and Facilities

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

Card Access to Campus Facilities

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

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

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

Emergency Notification

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

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

be used for emergency notification purposes. While your profile is automatically created, it is important that you update your [profile](#) information to keep the most current forms of contact for the alert system.

- CCS's website—when it is deemed necessary, the College will also utilize the website's home page to inform and update community members about an emergency occurring on campus. The web alert will contain information about the nature of the emergency and the steps being taken to address the situation.

Timely Warnings Reports (Safety Alerts)

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

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

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

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

Information included in a timely warning may include:

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

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

Wayne State University Police and Emergency Notifications/Timely Warnings

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

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

Behavioral Intervention Team (BIT)

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

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

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

Emergency Response and Crisis Management Plan

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

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

Operational Emergencies

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

An emergency is defined as any incident that:

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

Operational Emergency Classifications/Levels

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

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

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

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

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

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

Emergency Numbers

Immediate help - Dial 911

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

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

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

Crisis Management Team

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

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

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

Scope of Crisis Management Team

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

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

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

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

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

Crisis Management Team Members

The Crisis Management Team (CMT) is activated and directed by the President of the College, Donald L. Tuski, PhD along with the following list of administrators. If President Tuski is unavailable, the Provost or Asst. Vice President of Campus Life will activate and direct the team.

- Don Tuski, President
- Amanda Gillette, Director Campus Safety & Security – Ford Campus
- Dena Ryniak, Director Campus Safety & Security – Taubman Center
- Olga Stella, Vice President of Strategy and Communications
- Dan Long, Asst. Vice President of Campus Life
- Raquel Diroff, Chief Human Resources Officer
- Greg Fraser, Chief Information Technology Officer
- Carla Gonzalez, Dean of Enrollment
- Provost/Vice President of Academic Affairs/Chief Academic Officer
- Denise Thomas, Associate Vice President of Institutional Advancement
- Kerri McKay, Vice President of Finance
- Val Weiss, Director Wellness Center

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

Notification Procedures for Emergency Situations

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

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

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

Emergency Evacuation Procedures

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

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

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

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

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

Security Awareness and Crime Prevention

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

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

Sexual Misconduct Prevention Strategies

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

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

The Student Activities Board in collaboration with the Director of Civil Rights and Title IX Compliance offer programming for students during Sexual Assault Awareness Month in April.

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

The College's Director of Civil Rights and Title IX Compliance conducts a Sexual Misconduct Prevention training module asynchronously. All employees are required to participate in the online training via Easy Llama. The training module software will record which employees have successfully completed the training and passed the exam at the end of the module. As new employees are hired, they will be required to participate in the Sexual Misconduct Prevention training as part of their orientation process.

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

Drug and Alcohol Abuse Prevention Strategies

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

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

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

New Student and Family Orientation

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

CPR, Standard First Aid and Stop the Bleed Training

Each year Resident Assistant staff members, professional staff in Residence Life, and members of the CCS Campus Safety & Security Office either renew or receive their CPR and Automated External Defibrillator usage certified endorsements. The training is provided by a certified independent contractor to train our staff members as a first line of response to students/staff that experience a medical emergency. The training of our staff is meant to augment existing emergency personnel, not replace the usage of 911 medical emergency services. Other professional staff members in the Student Affairs Office receive similar training as funding is available.

Active Shooter Training Course

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

Resident Life Staff Training

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

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

New Employee Orientation

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

Alcohol and Other Drug Policy for Students, Faculty and Staff

(Updated July 2023)

Introduction

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

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

Scope

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

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

Definitions

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

College refers to the College for Creative Studies.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

CCS Alcohol and Drugs Policy

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

Alcohol

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

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

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

Drug/Controlled Substance

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

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

CCS Alcohol and Other Drug Prevention Strategies

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

- Students, employees and campus guests, regardless of age, are expected to refrain from the possession, consumption or transportation of alcoholic beverages on campus. (see details and exceptions described in the above section)

- Alcohol and drug awareness education is provided to all new students during New Student Orientation
- Providing education and awareness activities
- All student social, extracurricular, and public service options are substance-free
- Prohibiting the marketing and promotion of alcohol and other drugs
- Developing and enforcing campus policies and enforce laws to address high-risk and illegal alcohol and other drug use
- Providing early intervention and referral for treatment

Health Risks

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

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

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

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

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

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

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

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

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

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

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

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

Counseling and Treatment Programs

Students

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

The College offers the following alcohol and drug abuse services:

Information and Referral

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

Individual Counseling

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

Contact Information

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

College Nurse – 313-664-7982

Employees

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

Contact Information

Human Resources – 313-664-7652

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

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

Blue Care Network – 800-662-6667

Community Resources

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

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

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

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

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

CCS Sanctions

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

Students

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

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

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

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

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

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

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

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

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

Employees

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

External Sanctions

Federal Law

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

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

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

Michigan Law

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

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

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

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

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

- A minor (under the age of 21) who, after consuming alcohol, voluntarily presents themselves to a health facility or agency for treatment or observation, including medical examination and treatment for any condition as a result of sexual assault (as defined in Michigan law).

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

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

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

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

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

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

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

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

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

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

Employee Reporting Requirement

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

Distribution of Policy

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

Review of the College's Prevention Program and Policy

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

For More Information

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

College for Creative Studies Hazing Policy

(June 2025)

I. PURPOSE

The Stop Campus Hazing Act (SCHA) amends the Higher Education Act of 1965 to require all colleges and universities to disclose hazing incidents in their Annual Security Reports (ASR). The SCHA mandates that colleges define hazing, compile statistics on reported cases, and establish transparent policies for reporting and prevention. The purpose of this policy is to establish CCS's Anti-Hazing Policy, identify how CCS will implement this policy, and identify resources for reporting violations of this policy.

II. POLICY STATEMENT

Pursuant to the Stop Campus Hazing Act (SCHA) and Michigan's Anti-Hazing Law, CCS does not tolerate hazing. Organizations or individuals found responsible for hazing under this policy, whether occurring on or off campus, may be subject to disciplinary action and or civil or criminal prosecution.

III. STATE OF MICHIGAN LAW ON HAZING

In addition to CCS's Anti-Hazing Policy, the State of Michigan has criminalized certain types of hazing at educational institutions, including colleges and universities, under "Garrett's Law," MC750.411t - <https://www.legislature.mi.gov/Laws/MCL?objectName=mcl-750-411t>.

Under Garrett's Law, hazing includes an intentional, knowing, or reckless disregard act by a person acting alone or acting with others that is directed against an individual and that person knew or should have known endangers the physical health or safety of the individual, and that is done for the purpose of pledging, being initiated into, affiliating with, participating in, holding office in, or maintaining membership in any organization. It is not a defense to a prosecution under Garrett's Law that the individual against whom the hazing was directed, consented or acquiesced in the hazing.

IV. DEFINITIONS

Hazing – any intentional, knowing, or reckless act committed by a person, whether individually or in concert with other persons, regardless of the student's willingness to participate, that:

- Is connected with the institution, in affiliation with, or pertains to the initiation and or maintenance of membership in, a student organization (e.g., a club, athletic team, fraternity, or sorority); and
- Causes or creates a risk, above the reasonable risk in the course of participation at the College of physical injury, psychological harm, or degradation.
- Hazing may include the following or similar acts: whipping, beating, striking, electric shocking, placing of a harmful substance on someone's body, or similar activity.
- Causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or other similar activity;
- Causing, coercing, or otherwise inducing another person to consume food, liquids, alcohol, drugs, or other substances;
- Causing, coercing, or otherwise inducing another to perform sexual acts;
- Any activity that places another person in reasonable fear of bodily harm through the use of threatening words or conduct;
- Any activity against another person that includes a violation of local, state, tribal, or federal law; and
- Any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, state, tribal, or federal law.

Student Organization - An organization at College for Creative Studies (CCS), such as a club, society, association, athletic team, club sports team, or student government, in which two or more members are students, whether or not the organization is established or recognized by the college.

V. APPLICATION

This policy applies to:

- Students of the college;
- Minors participating in college-sponsored youth programs and educational programs;
- Any organization operating as a reorganized student organization by the college;

- A group of two or more student members, whether or not established or recognized by the college.

VI. REPORTING

Any person should report a hazing concern if they believe it has occurred or have reasonable cause to believe it will happen. Reasonable cause means a person who witnesses hazing or receives a credible written or oral report of hazing, or potential or planned hazing activity.

- To report a hazing concern, please file the report: [submit here](#)
- In the report, please provide a description of the hazing behavior, individuals and/or organizations involved, where the hazing occurred, and whether the hazing is ongoing.
- Include any photos or videos you would like to submit.
- You may receive a response from a CCS staff member during normal business hours to ask questions pertaining to the report and acknowledge receipt.
- A case will be created and will follow the appropriate process of hazing investigations.

A case involving a crime, emergency, or immediate threat to the health or safety of any person should be reported immediately to the Wayne State Police or local law enforcement by calling 911.

VII. CCS RESOURCES

- Title IX
 - **Michelle Hamilton**
 - **Director of Civil Rights and Title IX Compliance**
 - **mhamilton@ccsdetroit.edu**
- Wellness and Counseling Services
- Student Affairs
- Student Advocate

VII. EXTERNAL RESOURCES

- <https://stophazing.org/about/>
- Organization that provides hazing research and created “We Don’t Haze” [documentary video](#)
- National non-profit committed to preventing hazing and educating society about the harms of hazing: <https://hazingpreventionnetwork.org/hazingprevention-org-is-now-the-hazing-prevention-network/>

CAMPUS HAZING TRANSPARENCY REPORT - 2025

Date of Incident	Name of Student Organization	Description of Violation	Date Investigation Began	Date Investigation Ended	Date of Notice to Organization
None Reported					

Missing Student Policy

(Updated September 2023)

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

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

Student Contact Information

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

Procedure

Notification:

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

The following information will be collected:

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

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

When a student is reported missing the two offices shall:

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

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

Student Notification of this Policy

The CCS Missing Student Policy will be:

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

Violence Against Women Act (VAWA)

The College's statements, definitions, and policies related to the Violence Against Women Act (VAWA) can be found within the following Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence (Title IX Policy).

Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence (Title IX Policy)

September 2025

OVERVIEW

College for Creative Studies (hereinafter, “CCS” or “the College” is committed to providing an educational and employment environment that is free from Discrimination based on Protected Characteristics, Harassment, and Retaliation for engaging in protected activity. CCS’s Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence (“Title IX Policy”) and Policy on Preventing and Addressing Discrimination, Harassment and Retaliation, are designed to further these goals.

CCS’s Title IX Commitment

The College is committed to providing a safe and non-discriminatory learning, living, and working community for all members of CCS’s community. CCS does not discriminate on the basis of sex in any of its programs and activities. To that end, CCS’s “Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence” (“Title IX Policy”) prohibits specific forms of behavior that violate Title IX of the Education Amendments of 1972 (“Title IX”), Title VII of the Civil Rights Act of 1964 (“Title VII”) and Michigan’s Civil Rights Laws, including the Elliott Larsen Civil Rights Act. Such behavior also requires CCS to fulfill certain obligations under the Violence Against Women Reauthorization Act of 2013 (“VAWA”) and the Jeanne Clery Campus Safety Act (“Clery Act”).

CCS’s Commitment to Eliminating Discrimination and Harassment

The College must define and respond to certain types of misconduct as required by Title IX, codified at 34 C.F.R. Part 106 and related guidance (the “Title IX Regulations”). The Title IX Regulations allow the College to define and regulate misconduct that falls outside the scope of the Title IX Regulations, but which CCS is committed to addressing as a matter of CSS policy or as required by other law. These guidelines are set for CSS’s Policy, “Preventing and Addressing Discrimination, Harassment and Retaliation”.

CCS values and upholds the equal dignity of all members of its community and strives to balance the rights of the Parties in the resolution process during what is often a difficult time for all involved. Employees, including Faculty and Student Employees, or Students who violate these policies may face disciplinary action up to and including termination of employment or expulsion. The College will take prompt and equitable action to eliminate conduct that violates its policies, prevent recurrence, and remedy its effects. CCS conducts ongoing prevention, awareness, and training programs for Employees and Students to facilitate the goals of these policies.

CCS’s Commitment to a Fair Process for Resolving Disputes

To ensure compliance with federal, state, and local civil rights laws and regulations, and to affirm its commitment to promoting the goal of fairness in all aspects of the Education Program or Activity, CCS has developed policies and procedures that provide a prompt, equitable, and impartial resolution of allegations of violation of the Title IX Policy, in **Process A**, and violation of Policy on Preventing and Addressing Discrimination, Harassment and Retaliation, in **Process B**.

I. POLICY STATEMENT

CCS is committed to providing a safe and non-discriminatory campus community that is free from Sexual and Gender Based Misconduct and that enables individuals engaged in Programs or Activities to participate in the scholarly, research, educational and services of CCS. The College does not discriminate on the basis of sex or gender in any of its Programs or Activities.

It is a violation of CCS’s Title IX Policy to engage in Sexual Assault, Quid Pro Quo Sexual Harassment (as defined by the Title IX Policy or the Policy on Preventing and Addressing Discrimination, Harassment and Retaliation), Hostile Environment Sexual Harassment, Sexual Exploitation, Dating Violence, Domestic Violence and Stalking and Complicity in the commission of any act prohibited by this Policy, and Retaliation against a person for the good faith reporting of any of these forms of conduct or participation in any investigation or proceeding under this Policy (collectively “Prohibited Conduct”).

Prohibited Conduct under this Policy extends beyond the definitions of “sexual harassment” adopted by the Department of Education in the Title IX Regulations.

Some forms of Prohibited Conduct may also constitute crimes under Michigan law, which may subject a person to criminal prosecution and punishment in addition to any sanctions under this Policy. Complainants have the right to notify or decline to notify law enforcement in addition to any actions taken under this Policy. Complainants may also simultaneously pursue criminal and CCS complaints.

II. SCOPE AND APPLICABILITY

This policy applies to Students, defined under this policy as those who are registered or enrolled for credit-or non-credit-bearing coursework ("Students"); College employees, defined under this policy as all full-time and part-time faculty, College Staff, Student employees, wage workers, (including temporary employees), professional research staff, and post-doctoral fellows ("Employees"); and third parties, consisting of contractors, vendors, visitors, applicants, guests, or other third parties ("Third Parties").

Once the Grievance Process has been initiated following the issuance of a Notice of Investigation letter, the College retains the jurisdiction to investigate and resolve the matter even if Complainant or Respondent is no longer a member of the College community due to changes in enrollment (including graduation), employment, or other status in the College community.

This Policy covers acts of **Prohibited Conduct**, as defined in this Policy, that are committed by or against Students, Employees, and as applicable Third Parties, when the **Prohibited Conduct** occurs:

- On campus or other property owned or controlled by CCS;
- In the context of College Employment or Education Program or Activity including but not limited to College-sponsored study abroad, research, field work, practicums, internship programs, online programs, employment, a Program or Activity conducted by CCS for individuals who are neither College employees nor students (such as sports or academic camps offered to non-students); or
- Outside of a College Employment or Program or Activity, but potentially poses a serious threat of harm, has a continuing adverse effect on, or creates a hostile environment for Students, Employees or Third Parties while on campus or other property owned or controlled by CCS, or in any College Program or Activity.

CCS retains discretion to determine whether **Prohibited Conduct** occurring outside of the College Program or Activity is within the College's jurisdiction. In determining whether the College has jurisdiction over off-campus or online conduct that did not occur in a College Program or Activity, CCS will consider the severity of the alleged conduct, the risk of on-going harm, whether both parties are members of the CCS Community, the impact on the College Employment or Program or Activity, and whether off-campus conduct is part of a series of actions that occurred both on and off campus.

III. DIRECTOR OF CIVIL RIGHTS AND TITLE IX COMPLIANCE

The CCS president and Assistant Vice President of Campus Life created a full-time position titled the Director of Civil Rights and Title IX Compliance (the "Director"), to coordinate the CCS's compliance Title IX, and other federal, state or local law or ordinances.

The Director is responsible for providing comprehensive education and training; coordinating CCS's timely, thorough, and fair response; investigation and resolution of all alleged Prohibited Conduct under the Policy; and monitoring the effectiveness of, and any barriers to, accessing the Policy and related procedures to ensure an education and employment environment free from sex harassment and retaliation, or other violations under Title IX.

IV. PROHIBITED CONDUCT UNDER THIS POLICY

Prohibited Conduct under this Policy is defined as conduct defined as sexual harassment under Title IX and includes:

- A. **Sexual Assault:** Any sexual act directed against another person, without the Consent of the Complainant including instances where the Complainant is incapable of giving consent.
1. **Rape**— Penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
 2. **Sodomy**—Oral or anal sexual intercourse with another person, without the Consent of the victim, including instances where the victim is incapable of giving Consent because of age or because of temporary or permanent mental or physical incapacity.
 3. **Sexual Assault with An Object**—To use an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, without the Consent of the victim, including instances where the victim is incapable of giving Consent because of age or because of temporary or permanent mental or physical incapacity. An "object" or "instrument" is anything used by the offender other than the offender's genitalia, e.g., a finger, bottle, handgun, stick.

4. **Fondling**— The touching of the private body parts of another person for the purpose of sexual gratification, without the Consent of the victim, including instances where the victim is incapable of giving Consent because of age or because of temporary or permanent mental or physical incapacity.
- B. **Sexual Assault:** Nonforcible sexual intercourse
1. **Incest**—Nonforcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
 2. **Statutory Rape**—Nonforcible sexual intercourse with a person who is under the statutory age of consent.
- C. **Quid Pro Quo Sexual Harassment:** An employee of the College conditioning the provision of aid, benefit, or service on another individual's participation in unwelcome sexual conduct.
- D. **Hostile Environment Sexual Harassment as Defined in Title IX Regulation** ("Title IX Hostile Environment Sexual Harassment"): Unwelcome conduct based on sex that would be determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to CCS's Employment or Education Program or Activity.
- E. **Dating Violence:** Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the Complainant. The existence of such a relationship shall be determined based on the Complainant's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such Dating violence does not include acts covered under the definition of domestic violence.
- F. **Domestic Violence:** Violence committed by a current or former spouse or intimate partner of the Complainant; a person with whom the Complainant shares a child in common; a person who is cohabitating with, or has cohabitated with, the Complainant as a spouse or intimate partner; a person similarly situated to a spouse of the Complainant under the domestic or family violence laws of Michigan; by any other person against an adult or youth Complainant who is protected from that person's acts under the domestic or family violence laws of Michigan. To categorize an incident as Domestic Violence, the relationship between the Respondent and the Complainant must be more than just two people living together as roommates. The people cohabitating must be current or former spouses or have an intimate relationship.
- G. **Stalking:** Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others or suffer substantial emotional distress. Stalking may include the concept of "cyber-stalking," a particular form of stalking in which a person uses electronic media, such as the internet, social networks, blogs, cell phones, texts, or other similar devices to pursue, harass, or to make unwelcome contact with another person in an unsolicited fashion. When allegations of stalking are unrelated to sex and/or gender-based harassment, cases may be referred to the appropriate office and governed by Policy on Preventing and Addressing Discrimination, Harassment and Retaliation, or other CCS Policy, Code, Handbook or Manual.

V. PRESERVATION OF EVIDENCE

- A. Preservation of evidence is critical to potential criminal prosecution and to obtaining restraining/protective orders and is particularly time sensitive. The College will inform the Complainant of the importance of preserving evidence by taking actions, if applicable, such as the following:
1. **Sexual Assault**
 - a. Seek forensic medical assistance at the nearest hospital, ideally within 12 hours of the incident (sooner is better);
 - b. Avoid urinating, showering, bathing, washing hands or face, or douching, if possible, but evidence may still be collected even if you do;
 - c. If oral sexual contact took place, refrain from smoking, eating, drinking, or brushing teeth;
 - d. If clothes are changed, place soiled clothes in a paper bag (plastic destroys evidence) or secure evidence container (if provided by law enforcement); and/or

- e. Seeking medical treatment can be essential even if it is not for the purpose of collecting forensic evidence.
2. Stalking/Dating Violence/Domestic Violence/Sexual Harassment
- a. Evidence in the form of text and voice messages will be lost in most cases if a party or witness changes their phone number;
 - b. Make a secondary recording of any voice messages and/or save the audio files to a cloud server;
 - c. Take screenshots and/or a video recording of any text messages or other electronic messages (e.g., Instagram, Snapchat, Facebook);
 - d. Save copies of email and social media correspondence, including notifications related to account access alerts;
 - e. Take time-stamped photographs of any physical evidence including notes, gifts, etc. in place when possible;
 - f. Save copies of any messages, to include those showing any request for no further contact;
 - g. Obtain copies of call logs showing the specific phone number being used rather than a saved contact name if possible;
 - h. If changing devices, make sure to transfer any files needed to the new device; and/or
 - i. During the initial meeting between the Complainant and the Director, the importance of taking these actions will be discussed, if timely and appropriate.

VI. ADDITIONAL PROHIBITED CONDUCT UNDER THIS POLICY

To the extent that conduct does not fall under the definition of Title IX Quid Pro Quo Sexual Harassment, the following conduct violates CCS Policy, and will be investigated and addressed under Process A:

- A. **College Policy Quid Pro Quo Sexual Harassment:** Unwelcome conduct based on sex where submission to or rejection of such conduct is used, explicitly or implicitly, as the basis for decisions affecting an individual's education, employment, or participation in a College program or activity.
- B. **Sexual Exploitation:** Purposely or knowingly doing one or more of the following without Consent:
 - 1. Taking sexual advantage of another person.
 - 2. Taking advantage of another's sexuality.
 - 3. Exceeding the boundaries of consensual Sexual Contact without the knowledge of the other individual.
 - 4. Sexual Exploitation may be committed for any purpose, including sexual arousal or gratification, financial gain, or other personal benefit.
 - 5. Examples include, but are not limited to, purposefully or knowingly:
 - a. Causing the incapacitation of another person through alcohol and/or drugs (or any other means) for the purpose of compromising that person's ability to give Affirmative Consent to sexual activity;
 - b. Allowing third parties to observe private sexual activity from a hidden location (e.g., closet) or through electronic means (e.g., Video Calls by any media or livestreaming of images) without consent of all parties;

- c. Engaging in voyeurism (e.g., watching private sexual activity without the consent of the participants or viewing another person's intimate parts (including genitalia, groin, breasts or buttocks) in a place where that person would have a reasonable expectation of privacy);
- d. Recording or photographing private sexual activity and/or a person's intimate parts (including genitalia, groin, breasts or buttocks) without consent;
- e. Disseminating or posting images of private sexual activity and/or a person's intimate parts (including genitalia, groin, breasts or buttocks) without consent;
- f. Maliciously threatening to disclose or disclosing an individual's Sexual Orientation, Gender Identity, or Gender Expression;
- g. Prostituting another person;
- h. Possessing, creating, or distributing child pornography;
- i. Exposing another person to a sexually transmitted infection or virus without the other's knowledge; or
- j. Failing to use contraception or deliberately removing or compromising contraception (Stealth) without the other party's knowledge.

C. **Complicity:** Complicity is any act taken with the purpose of aiding, facilitating, promoting or encouraging the commission of an act of Prohibited Conduct under this Policy by another person. Examples of complicity include, but are not limited to, restraining another individual during a sexual assault, encouraging someone to commit dating violence or sexual assault, or intentionally not intervening for the purpose of facilitating another person committing Prohibited Conduct

D. **Retaliation:** No person may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX or this Policy, or because the individual has made a report or complaint, testified, assisted, participated, or refused to participate in any manner in an investigation, proceeding, or hearing under Title IX or this Policy.

E. **Violation of Supportive Measures**

- 1. **Supportive Measures** are discussed in more detail in Section IX. Failure to comply with **Supportive Measures** as required is a separate violation of this Policy.

VII. DEFINITIONS

A. "Complainant" is used to refer to a Student, Employee, or Third Party who is reported to have experienced **Prohibited Conduct**. A Complainant also typically participates in a process undertaken by CCS to address a report of **Prohibited Conduct**. In some instances, the person who is reported to have experienced **Prohibited Conduct** may not wish to participate in the process. In those cases, CCS may pursue a resolution process under this Policy without a participating Complainant. "Complainant" will be used throughout this Policy and related procedures to refer generally to an individual who is reported to have experienced **Prohibited Conduct**, even if their specific identity is unknown to CCS and/or if they do not participate in any related process.

B. "Confidential And Non-Confidential Resources:

- 1. "Confidential Resources" are available to provide individuals with assistance, support, and additional information and are prohibited from disclosing confidential information unless: (1) given permission by the person who disclosed the information; (2) there is an imminent threat of harm to self or others; (3) the conduct involves suspected abuse of a minor under the age of 18; or (4) as otherwise required or permitted by law or court order. Confidential Resources may be required to report non-identifying information to CCS's Security Department for crime reporting purposes.
- 2. "Non-Confidential Resources" are available to provide individuals with assistance, support, and additional information, but may have broader obligations than Confidential Resources to report information that is

shared with them. Non-Confidential Resources will make reasonable efforts to respect and safeguard the privacy of the individuals involved. Privacy means that concerns about Prohibited Conduct will only be shared with College representatives responsible for assessment, investigation, or resolution of the report or otherwise properly responding to issues raised; to CCS's Security Department for crime statistics reporting; and to the extent required by law or court order.

C. "Confidential Employees" and "Non-Confidential Employees"

1. "Confidential Employees" are those employees who provide confidential, trauma informed counseling and support. Confidential Employees will not disclose information about Prohibited Conduct reported to them by a student or employee to the Director without the individual's permission, unless there is a continuing threat of serious harm to the patient/client or to others or there is a legal obligation to reveal such information (e.g., where there is suspected abuse or neglect of a minor).
2. "Non-Confidential Employees" are required to report to the Director all relevant details (obtained directly or indirectly) about any incident of Prohibited Conduct that involves a student or an employee as a Complainant, Respondent, and/or witness, including dates, times, locations, and names of parties and witnesses. This includes reports related to on- or off-campus conduct. Non-Confidential Employees are not required to report information disclosed
 - a. at public awareness events (e.g., "Take Back the Night," candlelight vigils, protests, "survivor speak-outs" or other public forums in which students may disclose incidents of Prohibited Conduct; collectively, "Public Awareness Events");
 - b. during a student's participation as a subject in an Institutional Review Board-approved human subjects research protocol; or
 - c. peer support groups.

D. "Consent" is a clear and unambiguous agreement, expressed outwardly through mutually understandable words or actions, to engage in "Sexual Activity."

1. CCS will consider the following issues to determine whether there has been consent within the meaning of this Policy.
 - a. Did the person initiating Sexual Activity know that the conduct in question was not consensual?
 - b. If not, would a Reasonable Person who is unimpaired by alcohol or drugs have known that the conduct in question was not consensual?
 - c. If the answer to either of these questions is "Yes," Consent was absent.
2. Consent is not to be inferred from silence, passivity, or a lack of resistance, and relying on non-verbal communication alone may not be sufficient to determine Consent.
3. Consent is not to be inferred from an existing or previous dating or sexual relationship. Even in the context of a relationship, there must be mutual Consent to engage in any Sexual Activity each time it occurs. In cases involving prior or current relationships, the manner and nature of prior communications between the parties and the context of the relationship may have a bearing on the presence of Consent.
4. Consent to engage in a particular Sexual Activity at one time is not Consent to engage in a different Sexual Activity or to engage in the same Sexual Activity on a later occasion.
5. Consent can be withdrawn by any party at any point. An individual who seeks to withdraw Consent must communicate, through clear words or actions, a decision to cease the Sexual Activity. Once Consent is withdrawn, the Sexual Activity must cease immediately.
6. Given the inherent power differential in the context of a professional faculty-student, staff-student or supervisor-supervisee interactions, when the Respondent is the faculty member, staff member, or supervisor, the College will generally apply heightened scrutiny to an assertion of Consent.

- E. "Employee" means all faculty (i.e., regular instructional, supplemental instructional, research track, and visiting faculty), librarians, archivists, curators, graduate student instructors, graduate student staff assistants, graduate student research assistants, postdoctoral research fellows, and all regular and temporary staff.
- F. "Force" includes the use of physical violence, threats, and/or coercion.
1. Physical violence means that a person is exerting control over another person through the use of physical force. Examples of physical violence include hitting, punching, slapping, kicking, restraining, strangling, and brandishing or using any weapon.
 2. Threats are words or actions that would compel a Reasonable Person to engage in unwanted Sexual Activity. Threats may be implicit or explicit but must be of such a nature that they would reasonably cause fear.
 3. Examples include threats to harm a person physically or to cause a person academic, employment, reputational, or economic harm.
 4. Coercion is the use of an unreasonable amount of pressure that would overcome the will of a Reasonable Person. Coercion is more than an effort to persuade, entice, or attract another person to engage in Sexual Activity. When a person makes clear a decision not to participate in a particular Sexual Activity, a decision to stop, or a decision not to go beyond a certain sexual interaction, continued pressure can become coercive.
 5. In evaluating whether Coercion was used, CCS will consider:
 - a. the frequency, intensity, and duration of the pressure;
 - b. the degree of isolation of the person being pressured; and
 - c. any actual or perceived power differential between the parties in the context of their respective roles within the College.
- G. "Formal Complaint" means a document signed/filed by a Complainant or by the Title IX Coordinator or an electronic submission (e.g. email) containing the allegations that a Respondent engaged in Prohibited Conduct and requesting initiation of the CCS's resolution processes.
- H. "Incapacitation" or "Incapacitated" means that a person lacks the ability to make informed, deliberate choices about whether or not to engage in Sexual Activity.
1. Consent cannot be gained by taking advantage of the Incapacitation of another, where the person initiating Sexual Activity knows or reasonably should know that the other is Incapacitated.
 2. A person who is Incapacitated is unable to give Consent because of mental or physical helplessness, sleep, unconsciousness, or lack of awareness that Sexual Activity was requested, suggested, initiated, and/or is taking place. A person may be Incapacitated as a result of the consumption of alcohol or other drugs, or due to a temporary or permanent physical or mental health condition.
 3. When alcohol or other drugs are involved, Incapacitation is a state beyond drunkenness or intoxication. A person is not necessarily Incapacitated solely as a result of drinking or using drugs; the level of impairment must be significant enough to render the person unable to give Consent.
 4. In evaluating Consent in cases of alleged Incapacitation, CCS considers:
 - a. Did the person initiating Sexual Activity know that the other party was Incapacitated?
 - b. If not, would a REASONABLE PERSON who is unimpaired by alcohol or drugs have known that the other party was Incapacitated?
 - c. If the answer to either of these questions is "Yes," Consent was absent.
 5. One is not expected to be a medical expert in assessing Incapacitation by drugs or alcohol. One must look for the common and obvious signs that show that a person may be Incapacitated, regardless of the amount

of alcohol or drugs consumed. Although every individual may manifest signs of Incapacitation differently, typical signs include slurred or incomprehensible speech, unsteady manner of walking, combativeness, emotional volatility, vomiting, unconsciousness, or incontinence.

6. A person who is Incapacitated may not be able to understand some or all of the following questions:
 - a. Do you know where you are?
 - b. Do you know how you got here?
 - c. Do you know what is happening?
 - d. Do you know whom you are with?
 7. It is important to be cautious before engaging in Sexual Activity when any person involved has been drinking alcohol or using drugs. The use of alcohol or other drugs may impair an individual's ability to determine whether Consent has been sought or given. If there is doubt about an individual's level of intoxication, the safe thing to do is to refrain from engaging in Sexual Activity. Being impaired by alcohol or other drugs is not a defense to a failure to obtain Consent.
- I. "Mandatory Reporters" are individuals who are required to share with the Director of Civil Rights and Title IX Compliance, information they receive about alleged Prohibited Conduct. Individuals With Reporting Obligations are:
1. College administrators and supervisors;

CCS Faculty and Employees (including Student-Employees), other than those deemed Confidential Employees, are Mandated Reporters and are expected to promptly report all known details of actual or suspected Title Prohibited Conduct to appropriate officials immediately, although there are some limited exceptions.
- J. A "Program or Activity" includes:
1. any location, event, or circumstance where the College exercises substantial control over both the Respondent and the context in which conduct occurs;
 2. any building owned or controlled by a Student Organization recognized by CCS; and
 3. a College campus.
 4. Conduct that occurs off campus in locations or at events with no connection to the College is unlikely to occur in a Program or Activity of CCS.
- K. "Protected Activity" includes most elements of participation in CCS's processes related to this Policy, including but not limited to reporting Prohibited Conduct; pursuing a resolution of Prohibited Conduct; providing evidence in any investigation or Hearing related to Prohibited Conduct; or intervening to protect others who may have experienced Prohibited Conduct. Retaliation against any person because of Protected Activity is prohibited under this Policy.
- L. "Reasonable Person" means a person using average care, intelligence, and judgment in the known circumstances.
- M. "Respondent" is an individual who is reported to have engaged in conduct that could constitute Prohibited Conduct. "Respondent" will be used throughout this Policy and related procedures to refer generally to an individual who is reported to have engaged in conduct that could constitute Prohibited Conduct, even if their specific identity is unknown to CCS and/or unknown to the Complainant, and/or even if they do not participate in any related process.
- N. "Sexual Activity" refers to any conduct of a sexual nature for which **Consent** is required under this Policy. A person who initiates Sexual Activity is responsible for obtaining Consent for that conduct. Consent cannot be obtained by Force or in circumstances involving Incapacitation, which are defined in this Section.
- O. "Student" generally means an individual who has gained admission to, and/or an individual who was admitted for enrollment in, an academic Program or Activity operated by the College, from the time they are admitted until either

degree conferral or they are otherwise ineligible to register for courses without seeking readmission, and/or a person who has gained admission to CCS (to the extent to which CCS has a reasonable opportunity to control the environment in which the conduct is alleged to have occurred and/or the interactions between the parties).

- P. "Supportive Measures" are individualized services, accommodations, and other assistance that CSS offers and may put in place, without fee or charge. Supportive Measures are designed to restore or preserve equal access to the College's Programs and Activities, protect the safety of all parties and the College's educational environment, and/or deter Prohibited Conduct, without being punitive or disciplinary in nature or unreasonably burdening the other party.
- Q. "Third Party" means all CCS regents, contractors, guests, vendors, visitors, volunteers, and any individual who is participating in a College Program or Activity, but who, for purposes of alleged Prohibited Conduct, has not gained admission to and/or is not enrolled in an academic program and/or course at the College and/or who is not acting as an Employee (e.g., an individual who is participating in a summer camp; an individual who is attending a Program or Activity by invitation or that is open to the public; or an individual who is not enrolled in an academic program and/or course at CCS, but who is participating in a College study abroad program).

VIII. REPORTING

A. Report of a Violation of Title IX

1. A report provides the Notice of an allegation or concern about Prohibited Conduct or Other Prohibited Conduct. It allows the Director to provide information, resources, and supportive measures.
2. Reporting carries no obligation to file a Formal Complaint, and in most situations, the College is able to respect a Complainant's request not to initiate an investigation or other appropriate resolution procedures.
 - a. However, there may be circumstances, such as pattern behavior, allegations of severe misconduct, or a compelling threat to health and/or safety, where the College may need to initiate an investigation or other appropriate resolution procedures.
3. If a Complainant does not wish to file a Formal Complaint, the College will maintain the privacy of information to the extent possible. The Complainant should not fear a loss of privacy by submitting a report that allows the College to discuss and/or provide supportive measures, in most circumstances.

B. Formal Complaint

A Formal Complaint informs the College that the Complainant would like to initiate an investigation or other appropriate resolution procedures. A Complainant or individual may initially make a report and may decide at a later time to make a Formal Complaint. Reports or Formal Complaints may be made using any of the following options:

1. Verbal Notice to the Director or one of the Director's staff in the Director's Office.
2. Written report or Formal Complaint may be made at any time (including during non-business hours) by email or by mail, to the office of the Director.
 - a. mhamilton@ccsdetroit.edu or Michelle Hamilton, 201 E. Kirby, Detroit, MI 48202

C. Anonymous Reports.

Anonymous reports are accepted but the report may give rise to a need to determine the Parties' identities. Anonymous reports typically limit the College's ability to investigate, respond, and provide remedies, depending upon what information is shared. Measures intended to protect the community or redress or mitigate harm may be enacted. It also may not be possible to provide supportive measures to Complainants who are the subject of anonymous reports.

D. Reports by Mandated Reporters

1. All CCS Faculty and Employees (including Student-Employees), other than those deemed Confidential Employees, are Mandated Reporters and are expected to promptly report all known details of actual or suspected Prohibited Conduct to appropriate officials immediately, although there are some limited

exceptions. Supportive measures may be offered as the result of such disclosures without formal CCS action.

2. If a Complainant wishes to pursue formal action regarding their allegations, they may report the incident to any Mandated Reporter. The Mandated Reporter will connect the Complainant with appropriate resources for reporting potential crimes and/or policy violations and will promptly forward the report to the Director.
 - a. Mandated Reporters are obliged to notify the Director of any potential allegations. Upon receiving the report, the Director will reach out to the Complainant to discuss next steps, including the option of involving law enforcement.
 - b. If a Complainant specifically asks that law enforcement be contacted, the Mandated Reporter will first inform the Director Civil Rights and Title IX Compliance, then immediately notify the appropriate authorities.

E. Anonymous Notice to Mandated Reporters

1. At the request of a Complainant, a Mandated Reporter may give the Director notice without identifying the Complainant. The Mandated Reporter cannot remain anonymous themselves.
2. If a Complainant has requested that a Mandated Reporter maintain the Complainant's anonymity, the Mandated Reporter may do so unless it is reasonable to believe that a compelling threat to health or safety could exist. The Mandated Reporter can consult with the Director on that assessment without revealing personally identifiable information.
3. Anonymous notices will be investigated by the Director to the extent possible, both to assess the underlying allegation(s) and to determine if supportive measures or remedies can be provided. However, anonymous notices typically limit the Director's ability to investigate, respond, and provide remedies, depending on what information is shared.
4. When a Complainant has made a request for anonymity, the Complainant's personally identifiable information may be withheld by a Mandated Reporter, but all other details must be shared with the Director. Mandated reporters may not be able to maintain requests for anonymity for Complainants who are minors, elderly, and/or disabled, depending on state reporting of abuse requirements. Consult with the Director in such situations.
5. Mandated Reporters who fail to report an incident of Prohibited Conduct of which they become aware, violate CCS policy and can be subject to disciplinary action for failure to comply/failure to report.
 - a. This also includes situations when a Respondent is a Mandated Reporter. Such individuals are obligated to report their own misconduct, and failure to do so is a chargeable offense under the Policy.

F. Reporting options for a Complainant or third party (including parents/guardians when appropriate) seeking Confidential Resources only:

1. Confidential Resources

To enable Complainants to access support and resources without filing a Formal Complaint, CCS has designated specific employees as Confidential Resources. Those designated by the College as Confidential Resources are not required to report Prohibited Conduct in a way that identifies the Parties. They will, however, provide the Complainant with the Director's contact information and offer options and resources without any obligation to inform an outside agency or CCS official unless a Complainant has requested the information be shared.
2. If a Complainant would like the details of an incident to be kept confidential, the Complainant may speak with the following:
 - a. On-campus licensed professional counselors and staff;
 - b. U-will, online telehealth platform for students and employees; or

- c. Institutional counselors are available to help free of charge and may be consulted on an emergency basis during normal business hours.
- 3. In addition, Complainants may speak with individuals unaffiliated with the CCS without concern that the Policy will require them to disclose information to the institution without permission. Such individuals include:
 - a. Licensed professional counselors and other medical providers
 - b. Local rape crisis counselors
 - c. Domestic Violence resources
 - d. Local or state assistance agencies
 - e. Clergy/Chaplains
 - f. Attorneys
- G. Confidential Employees, as defined in this policy, who receive reports within the scope of their confidential roles, will timely submit anonymous statistical information for Clery Act purposes unless they believe it would be harmful.
- H. Time Limits on Reporting
 - 1. There is no time limitation on providing Notice/Formal Complaints to the Director. However, if the Respondent is no longer subject to the College's jurisdiction and/or significant time has passed, the ability to investigate, respond, and/or provide remedies may be more limited or impossible.
 - 2. Acting on Notice/Formal Complaints significantly impacted by the passage of time (including, but not limited to, the rescission or revision of Policy) is at the Director's discretion; they may document allegations for future reference, offer supportive measures and/or remedies, and/or engage in informal or formal action, as appropriate.

IX. CONFIDENTIAL AND NON-CONFIDENTIAL RESOURCES

- A. Supportive (Interim) Measures are available at CCS. Some of these are designated as Confidential Resources. Others provide support but may need to involve the Director of Civil Rights and Title IX or the Security Department.
 - 1. Regardless of whether the College determines that Prohibited Conduct occurred, the College will offer resources or assistance to Complainants, Respondents, Witnesses, and other affected Community members after receiving notice of Alleged Prohibited Conduct. CCS will also assist those individuals in identifying and contacting external law enforcement agencies and community resources.
 - 2. Confidential Resources and Non-Confidential Resources are generally available regardless of whether an individual reports, makes a Formal Complaint, participates in a resolution process under this Policy, whether the alleged conduct occurred outside the scope of this Policy, or whether the Complainant knows the specific identity of the Respondent.
- B. The Director of Civil Rights and Title IX may, in their discretion, designate specific programs or events as confidential, under appropriate circumstances.
- C. Non-Confidential Resources

Non-Confidential Resources are available to provide individuals with assistance, support, and additional information, but who are not designated as confidential and may have broader obligations to report information that is shared with them. Non-Confidential Resources will make reasonable efforts to respect and safeguard the privacy of the individuals involved. Privacy means that concerns about Prohibited Conduct will only be shared with CCS representatives for assessment, investigation, or resolution of the report or otherwise properly responding to issues raised; to the Security Department for crime statistics reporting; and to the extent required by law or court order.

D. Emergency Measures.

1. The College can act to remove a Student Respondent accused of Title IX Sexual Harassment from its Education Program or Activities, partially or entirely, on an emergency basis when an individualized safety and risk analysis has determined that an immediate threat to the physical health or safety of any Student or other individual justifies removal.
 - a. This risk analysis is performed by the Director and may be done in conjunction with the Behavioral Intervention Team using its standard objective violence risk assessment procedures.
2. Students accused of other forms of Discrimination, Harassment, or Other Prohibited Conduct (not Sex-based) are subject to interim suspension, which can be imposed for safety reasons.
3. Employees are subject to existing procedures for interim actions and leaves.

X. AMNESTY

The CCS community encourages the reporting of misconduct and crimes by Complainants and witnesses. Sometimes, Complainants or witnesses are hesitant to report alleged misconduct to CCS officials or participate in resolution processes because they fear that they themselves may be in violation of certain policies, such as underage drinking or use of illicit drugs at the time of the incident. Respondents may hesitate to be forthcoming during the process for the same reasons.

It is in the best interests of the CCS community that Complainants choose to report misconduct to CCS officials, that witnesses come forward to share what they know, and that all Parties be forthcoming during the process.

A. Amnesty for Minor Policy Violations

To encourage reporting and participation in the process, CCS offers Parties and witnesses amnesty from minor policy violations, such as underage alcohol consumption or the use of illicit drugs, related to the incident. Granting amnesty is a discretionary decision made by the College, and amnesty does not apply to more serious allegations, such as physical abuse of another or illicit drug distribution.

1. Students

The College also maintains an amnesty policy for Students in addition to witnesses who offer help to others in need.

2. Employees

Sometimes, Employees are hesitant to report for fear that they may get in trouble themselves. The College may, at its discretion, offer Employee Complainants amnesty from such policy violations (typically more minor policy violations) related to the incident.

XI. CLERY ACT COMPLIANCE AND TIMELY WARNINGS

If a report of Prohibited Conduct discloses a serious and immediate threat to the campus community, CCS Campus Safety and Security Department will issue a timely notification to protect the health or safety of the community as required by the Clery Act. The notification will not include identifying information about a Reporting Party.

Pursuant to the Clery Act and the 2019 Amendments to the Violence Against Women Act, anonymous statistical information regarding reported criminal incidents must be shared with the CSS Campus Safety and Security Department for inclusion in the Daily Crime Log. This information will also be included in the College's Annual Security Report. CCS may also share aggregate and not personally identifiable data about reports, outcomes, and sanctions.

XII. PREVENTION AND AWARENESS TRAINING PROGRAMS

CCS provides training to students and employees on this Policy and topics and issues related to maintaining an education and employment environment free from harassment and discrimination. All employees are required to attend Title IX training as part of orientation and then complete an in-person online training annually.

The Director, Title IX Investigators, Title IX Case Managers and supporting Staff, and Title IX Hearing/Appeal Officers shall all receive training as required in the Title IX Regulations, including training on the definition of sexual harassment under the Title

IX Regulations and this Policy, the scope of the College's education program or activity, how to conduct an investigation and grievance process including hearings, appeals, and informal resolution processes, as applicable, and how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. Additionally, Title IX Hearing/Appeal Officers shall receive training on any technology to be used at a hearing and on issues of relevance of questions and evidence, including when questions and evidence about the Complainant's sexual predisposition or prior sexual behavior are not relevant. Title IX Investigators shall receive training on issues of relevance to create an investigative report that fairly summarizes relevant evidence. All trainings shall be available on the Title IX website.

XIII. OBLIGATION TO PROVIDE TRUTHFUL INFORMATION

All CCS community members are expected to provide truthful information in any report or proceedings under this Policy. Submitting or providing false or misleading information in bad faith or with a view to personal gain or intentional harm to another in connection with an incident of Prohibited Conduct is prohibited and subject to disciplinary sanctions under the College's Student Code of Conduct and disciplinary action under the appropriate employee disciplinary policy. This provision does not apply to reports made or information provided in good faith, even if the facts alleged in the report are not later substantiated.

XIV. EXTERNAL CONTACT INFORMATION

Concerns about the College's application of the Policy and compliance with certain federal civil rights laws may be addressed to:

Office for Civil Rights (OCR)
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202-1100
Customer Service Hotline: (800) 421-3481
Facsimile: (202) 453-6012
TDD: (877) 521-2172
Email: OCR@ed.gov
Web: <http://www.ed.gov/ocr>

XV. EFFECTIVE DATE

A. Effective Date: September 17, 2025

This Policy will become effective upon the date of approval by the President.

B. Date of Most Recent Review:

September 18, 2025

APPENDIX

PROCESS A

PROCEDURES FOR ALLEGED VIOLATIONS OF ITS SEXUAL MISCONDUCT AND OTHER ACTS OF INTERPERSONAL VIOLENCE

(TITLE IX POLICY)

1. Overview

The College will act on any Notice/Formal Complaint of violation of the College for Creative Studies Sexual Misconduct and Other Acts of Interpersonal Violence Policy ("the Title IX Policy"), or the Policy on Preventing and Addressing Discrimination, Harassment and Retaliation that the Director of Civil Rights and Title IX Compliance ("the Director") or any other Official with Authority receives. The College uses two sets of procedures, known as Process A and Process B. Process A is compliant with the federal Title IX regulations. It involves an investigation and live hearing, including cross-examination. It also includes an Informal Resolution option.

Process A is applicable to all Formal Complaints of Title IX Policy.

All other behaviors occurring off campus and/or outside of the College's Education Program or Activity that are covered by the Policy are subject to resolution under Process B, which is less formal than Process A. Occasionally, a Formal Complaint will include conduct that falls within both Processes A and B. When that occurs, Process A will typically be used to address all allegations. The choice between applying Process A or B is solely at the Director's discretion.

2. Notice/Complaint

Upon receipt of Notice or a Formal Complaint of an alleged Policy violation, the Director will initiate a prompt initial assessment to determine the College's next steps. The Director will contact the Complainant to offer supportive measures, provide information regarding resolution options, and determine how they wish to proceed.

3. Initial Assessment

The Director conducts an initial assessment, typically within five (5) business days of receiving Notice or a Formal Complaint. The initial assessment typically includes:

- Assessing whether the reported conduct may reasonably constitute a Policy violation
- Determining whether the reported conduct falls within the scope of the Policy
- Offering and coordinating supportive measures for the parties
- Notifying the Complainant, or the person who reported the allegation(s), of the available resolution options
- Determining whether the Complainant wishes to file a Formal Complaint
- Notifying the Respondent of the available resolution options if a Formal Complaint is made

4. Helping a Complainant Understand Resolution Options

If the Complainant indicates they wish to file a Formal Complaint, the Director will work with the Complainant to determine which resolution option they prefer. The Director will seek to abide by the Complaint's wishes but may have to take another approach depending upon their assessment of the situation.

If the Formal Grievance Process is pursued, the Director will initiate an investigation.

If any party indicates that they want to pursue an Informal Resolution option, the Director will refer the matter to the appropriate individuals(s) if the Director determines Informal Resolution is available and the other Parties consent to participate. Informal Resolution cannot be used to resolve a Formal Complaint of Title IX Sexual Harassment involving an Employee Respondent and a Student Complainant.

If the Complainant does not want any action taken, the Director will consider that request. Typically, allegations of Student-on-Student and Employee-on-Employee misconduct will not prompt the Formal Grievance Process unless deemed necessary by the Director, though the Complainant can elect to pursue the formal process in the future. The Director may need to refer allegations of Employee-on-Student misconduct to the Formal Grievance Process regardless of the Complainant's wishes, depending on the nature of the allegations.

The Director may consider elements such as patterns of behavior, predation, grooming behaviors, threats, violence, use of weapons, or involvement of minors in determining whether to sign a Formal Complaint.

5. Administrator Authority to Initiate a Complaint

The Director has ultimate discretion as to whether a Formal Complaint is made and may consult with appropriate CCS Employees, and/or conduct a violence risk assessment to aid their determination whether to sign a Formal Complaint on behalf of the Complainant.

If a Complainant is not participating or attempting to participate in the CCS's Education Program or Activity at the time of making a Formal Complaint, they can request that the Director sign a Formal Complaint. When the Director signs a Formal Complaint, they do not become the Complainant. The Complainant is the person who experienced the alleged misconduct. If the Director declines to sign a Formal Complaint, alternative processes may be available and can be explored with the Director.

6. Collateral Misconduct

Collateral misconduct includes potential violations of other CCS policies that occur in conjunction with alleged violations of the Policy, or that arise through the course of the investigation, for which it makes sense to provide one resolution for all allegations. Thus, the collateral allegations may be charged along with potential violations of the Policy, to be resolved jointly under these Procedures. In such circumstances, the Director may consult with other CCS officials who typically oversee such conduct (e.g., Human Resources, Student Conduct, Academic Affairs) to solicit their input as needed on what charges should be filed, but the exercise of collateral charges under these procedures is within the Director's discretion. All other allegations of misconduct unrelated to incidents covered by the Policy will typically be addressed separately through procedures described in the Student, Faculty, and Staff handbooks.

7. Dismissal (Mandatory and Discretionary)

- a. The College must dismiss a Formal Complaint or any allegations therein if, at any time during the investigation or hearing, it is determined that:
 - i. The conduct alleged in the Formal Complaint would not constitute Title IX Sexual Harassment as defined above, even if proven;
 - ii. The Sex-based conduct did not occur in the College's Education Program or Activity (including buildings or property controlled by recognized student organizations) and/or the College does not have control of the Respondent;
 - iii. The Sex-based conduct did not occur against a person in the United States and was not affiliated with any international CCS program such as study abroad programs; and
 - iv. The Complainant alleging Sex-based conduct is not participating in or attempting to participate in the CCS's Education Program or Activity at the time of filing the Formal Complaint, and based on the available information, the Director has determined that they do not need to sign a Formal Complaint on behalf of the College.
- b. The Director may dismiss a Formal Complaint or any allegations therein if at any time during the investigation or hearing:
 - i. A Complainant notifies the Director of Civil Rights and Title IX Compliance in writing that the Complainant would like to withdraw the Formal Complaint or any allegations therein;
 - ii. The Respondent is no longer enrolled in or employed by the College;
 - iii. Specific circumstances prevent the College from gathering sufficient evidence to reach a determination as to the Formal Complaint or allegations therein
- c. A Complainant who decides to withdraw a Formal Complaint may later request to reinstate it or refile it.
- d. Upon any dismissal, the Director will promptly and simultaneously send the parties written notice of the dismissal and the rationale for doing so.
- e. This dismissal decision is appealable by any party. The decision not to dismiss is also appealable by any party claiming that a dismissal is required or appropriate.
- f. When the Director has signed a Formal Complaint and later determines that the basis for signing is no longer compelling, the Director may rescind the Formal Complaint and notify the parties accordingly. This is not a dismissal,

and there is no opportunity to appeal because the Complainant may still file a Formal Complaint if they wish to, in most circumstances.

- g. A complaint that has been dismissed may still be referred to other relevant CCS departments if the conduct described constitutes a violation of additional CCS policies.

8. Appeal of Dismissal

The parties may appeal a decision to dismiss or not to dismiss their Formal Complaint. All dismissal appeal requests must be filed within three (3) business days of the notification of the dismissal decision.

- i. A dismissal may be appealed on the following grounds:
 - (1) A procedural irregularity affected the outcome of the matter;
 - (2) New evidence that was not reasonably available at the time the determination regarding dismissal was made, that could affect the outcome of the matter;
 - (3) The Director, Investigator(s), or Decision-maker(s) had a conflict of interest or bias for or against Complainants or Respondents generally or the specific Complainant or Respondent that affected the outcome of the matter; and
 - (4) The dismissal was erroneously granted or denied.
- ii. The appeal should specify at least one of the grounds above and provide any reasons or supporting evidence for why the ground is met. Upon receipt of a written dismissal appeal request from one or more parties, the Director will share the request and supporting documentation with all other parties and provide three (3) business days for other parties and the Director to respond to the request. At the conclusion of the response period, the Director will forward the request, as well as any response provided by the other parties and/or the Director to the Dismissal Appeal Decision-maker for consideration.
 - (1) If the appeal request does not provide information that meets the grounds in the Policy, the Dismissal Appeal Decision-maker will deny the request, and the parties, their advisors, and the Director will be notified in writing of the denial and the rationale.
 - (2) If any of the asserted grounds in the appeal satisfy the grounds described in the Policy, then the Dismissal Appeal Decision-maker will notify all parties and their advisors, and the Director of their decision and rationale in writing. The effect will be to reinstate the Complaint.
- iii. In most circumstances, appeals are confined to a review of the written documentation or record of the original determination and pertinent documentation regarding the specific appeal grounds. The Dismissal Appeal Decision-maker has seven (7) business days to review and decide on the appeal, though extensions can be granted at the Director's discretion, and the parties will be notified of any extension.
- iv. Appeal decisions are deferential to the original determination, making changes only if there is a compelling justification to do so.
- v. The Dismissal Appeal Decision-maker may consult with the Director and/or legal counsel on questions of procedure or rationale for clarification, if needed. The Director will maintain documentation of all such consultations.

9. Emergency Removal/Interim Suspension of a Student

The College may remove a student accused of Title IX Policy violations emergently upon receipt of a Formal Complaint or at any time during the Formal Grievance Process.

- a. Prior to an emergency removal, the College will conduct an individualized risk assessment and may remove the student if that assessment determines that an immediate threat to the physical health or safety of any student or other individual justifies removal.

- b. When an emergency removal or interim suspension is imposed, wholly or partially, the affected student will be notified of the action, which will include a written rationale, and the option to challenge the emergency removal or interim suspension within two (2) business days of the notification.
- c. Upon receipt of a challenge, the Director will meet with the student (and their Advisor, if desired) as soon as reasonably possible thereafter to allow them to show cause why the removal/action should not be implemented or should be modified.
 - (1) This meeting is not a hearing on the merits of the allegation(s), but rather is an administrative process intended to determine solely whether the emergency removal or interim suspension is appropriate, should be modified, or should be lifted.
 - (2) When this meeting is not requested within two (2) business days, objections to the emergency removal or interim suspension will be deemed waived.
 - (3) A student can later request a meeting to show why they are no longer an immediate threat because conditions related to the threat have changed.
 - (4) A Complainant and their Advisor may be permitted to participate in this meeting if the Director determines it is equitable for them to do so.
 - (5) The Respondent may provide information, including expert reports, witness statements, communications, or other documentation for consideration prior to or during the meeting. When applicable, a Complainant may provide information to the Director for review.
- d. An emergency removal or interim suspension may be affirmed, modified, or lifted as a result of a requested review or as new information becomes available. The Director will communicate the final decision in writing, typically within three (3) business days of the review meeting.

10. Placing Employees on Leave

When the Respondent is an Employee, or a Student-Employee accused of misconduct in the course of their employment, existing provisions in the [Staff Handbook](#) and [Faculty Handbook](#) for interim action are typically applicable instead of the above emergency removal process.

11. Counter-Complaints

The College is obligated to ensure that the Formal Grievance Process is not abused for retaliatory purposes. Although the College permits the filing of counter-complaints, the Director will use an initial assessment, described above, to assess whether the allegations in the counter-complaint are made in good faith. When counter-complaints are not made in good faith, they will not be permitted. They will be considered potentially retaliatory and may constitute a Policy violation.

Counter-complaints determined to have been reported in good faith will be processed using the Formal Grievance Process. At the Director's discretion, investigation of such claims may take place after resolution of the underlying initial Formal Complaint.

12. Advisors in the Formal Grievance Process

The parties may each have an Advisor of their choice present with them for all meetings, interviews, and hearings within the Formal Grievance Process, if they choose.

Choosing an Advisor who is also a witness in the process creates potential for bias and conflict of interest. A party who chooses an Advisor who is also a witness can anticipate that issues of potential bias will be explored by the Decision-maker.

- a. Who Can Serve as an Advisor
 - i. The parties may each have an Advisor (friend, mentor, family member, attorney, or any other individual a party chooses) present with them for all meetings, interviews, and hearings within the resolution process, including intake. The parties may select whomever they wish to serve as their Advisor as long as the Advisor is eligible and available. Parties have the right to choose not to have an Advisor in the initial stages of the Formal Grievance Process, prior to a hearing.

- ii. The Director will offer to assign a trained Advisor to any party. If the parties choose an Advisor from the College's Resolution Process Pool, the Director will have trained the Advisor and familiarize them with the College's Formal Grievance Process. College-appointed advisors are employees of the college and are bound by rules of confidentiality. Therefore, they do not need to have a signed release.
 - iii. The College cannot guarantee equal advisory rights, meaning that if one party selects an Advisor who is an attorney, but the other party does not, or cannot afford an attorney, the College is not obligated to provide an attorney to advise that party. However, all institutionally appointed Advisors will be provided with similar training.
 - iv. If the parties choose an Advisor from outside the Resolution Process Pool, the Advisor may not have been trained by the College and may not be familiar with CCS's policies and procedures.
 - (1) Any Advisor outside of the Resolution Process Pool will need to have a signed release from the Complainant/Respondent stating the Director can share all case information with the Advisor. Until that release is signed, the Director must not share any case information with that Advisor.
 - v. A party may elect to change Advisors during the process and is not obligated to use the same Advisor throughout. Parties are expected to provide the Director with timely notification if they change Advisors.
 - (1) If a party changes Advisors, consent to share information with the previous Advisor is assumed to be terminated, and a release for the new Advisor must be submitted.
 - vi. The College may permit parties to have more than one Advisor, or an Advisor and a support person, upon special request to the Director. The decision to grant this request is at the Director's sole discretion and will be granted equitably to all parties.
 - vii. If a party requests that all communication be made through their attorney Advisor instead the College will agree to copy both the party and their Advisor on all communications.
- b. Advisor's Role in the Formal Grievance Process
- i. Advisors should help the parties to prepare for each meeting or hearing and are expected to advise ethically, with integrity, and in good faith. Advisors may not provide testimony or speak on behalf of their advisee unless given specific permission to do so.
 - ii. The parties are expected to respond to questions on their own behalf throughout the Formal Grievance Process. Although the Advisor generally may not speak on behalf of their advisee, except for conducting cross-examination during a hearing, the Advisor may consult with their advisee, either privately as needed,. For longer or more involved discussions, the parties and their Advisors should ask for breaks to allow for private consultation.
 - iii. The Title IX Regulations require a form of indirect questioning during the hearing, which must be conducted by the Parties' Advisors. The parties are not permitted to directly question each other or any witnesses. If a party does not have an Advisor for a hearing, the College will appoint a trained Advisor for the limited purpose of conducting any questioning of the parties and witnesses.
- c. Records Shared with Advisors
- i. Advisors are entitled to the same opportunity as their advisee to receive copies of the Draft and Final Investigation Reports, as well as the Directly Related Evidence file. Parties will be asked to sign releases for the Director to share materials with an Advisor.
 - ii. Advisors are expected to maintain the confidentiality of the records the Director shares with them. The Director may restrict the role of any Advisor who does not respect the sensitive nature of the process or who fails to abide by the college's confidentiality expectations.
- d. Advisor Expectations
- i. The Director generally expects an Advisor to adjust their schedule to allow them to attend investigative meetings/interviews/hearings when planned, but the Director may change scheduled meetings/interviews/hearings to accommodate an Advisor's inability to attend, if doing so does not cause an unreasonable delay.

- ii. The Director may also make reasonable provisions to allow an Advisor who cannot be present in person to attend a meeting/interview/hearing by telephone, video conferencing, or other similar technologies as may be convenient and available.
 - iii. All Advisors are subject to the same CCS policies and procedures, whether they are attorneys or not, and whether they are selected by a party or appointed by the College. Advisors are expected to advise without disrupting proceedings.
- e. Advisor Policy Violations

Any Advisor who oversteps their role as defined by the Policy, who shares information or evidence in a manner inconsistent with the Policy, or who refuses to comply with the College's established rules of decorum will be warned. If the Advisor continues to disrupt or otherwise fails to respect the limits of the Advisor role, the meeting/interview/hearing may be ended, or other appropriate measures implemented, including the College requiring the party to use a different Advisor or providing a different CCS-appointed Advisor. Subsequently, the Director will determine how to address the Advisor's non-compliance and future role.

13. Resolution Options Overview

a. Formal Resolution Process

The Formal Grievance Process is the College's primary resolution approach unless all parties and the Director agree to an Informal Resolution. The process considers the parties' preferences but is ultimately determined at the Director's discretion.

- i. Resolution proceedings are private. All persons present at any time during a resolution process are expected to maintain the privacy of the proceedings in accordance with the Policy. If the privacy of the case is compromised, the Director will open an additional investigation to preserve the integrity of the case.
- ii. There is an expectation of privacy around what Investigators share with parties during interviews and for any materials the institution shares with the Parties during the resolution process. The parties have discretion to share their own knowledge and evidence with others if they choose, except for information the parties agree not to disclose as part of an Informal Resolution. CCS encourages parties to discuss any sharing of information with their Advisors before doing so.
- iii. The procedures for the Formal Grievance Process are described in Section 14.

b. Informal Resolution

To initiate Informal Resolution, a Complainant or Respondent may make such a request to the Director at any time prior to a Final Determination, or the Director may offer the option to the parties. The Director will obtain voluntary, written confirmation that all parties wish to resolve the matter through Informal Resolution before proceeding and will not pressure the parties to participate in Informal Resolution. To engage in Informal Resolution, a Complaint must first submit a Formal Complaint.

- i. Three approaches to Informal Resolution are detailed in this section.
 - (1) **Supportive Resolution**. When the Director can resolve the matter informally by providing supportive measures (only) designed to remedy the situation. Supportive Resolution involves only the party who opts for it.
 - a. Most commonly offered once a Formal Complaint is filed (whereas supportive measures, as described in Section 9 of the Policy, are offered in response to Notice). The Director will meet with the Complainant to determine reasonable supports that are designed to restore or preserve the Complainant's access to the College's Education Program and Activity.
 - b. Such supports can be modified as the Complainant's needs evolve over time or circumstances change.
 - c. If the Respondent has received the Notice of Investigation and Allegations, the Director may also provide reasonable support for the Respondent as deemed appropriate.
 - d. This option is available when the Complainant does not want to engage the other resolution

options and the Director does not believe there is a need to sign a Formal Complaint.

- e. At the discretion of the Director, this resolution option can result in an agreement between the Complainant and the College that does not require assent from any other party, as long as it does not unduly burden any other party or function punitively with respect to them.

(2) **Accepted Responsibility.** When the Respondent accepts responsibility for violating Policy and accepts the recommended sanction(s), and the Complainant(s) and the Director are agreeable to the resolution terms.

- a. The Respondent may accept responsibility for any or all of the alleged Policy violations at any point during the Formal Grievance Process. If the Respondent indicates an intent to accept responsibility for all alleged Policy violations, the ongoing process will be paused, and the Director will determine whether Informal Resolution is an option.
- b. If Informal Resolution is available, the Director will determine whether all parties and the College are able to agree on responsibility, restrictions, sanctions, restorative measures, and/or remedies. If so, the Director implements the accepted Finding that the Respondent is in violation of CCS Policy, implements agreed-upon restrictions and remedies, and determines any other appropriate responses in coordination with other appropriate administrator(s), as necessary.
- c. This resolution is not subject to appeal once all parties indicate their written agreement to all resolution terms. When the parties cannot agree on all terms of resolution, the Formal Grievance Process will either begin or resume.
- d. When a resolution is reached, the appropriate sanction(s) or responsive actions are promptly implemented to effectively stop the Discrimination or Harassment, prevent its recurrence, and remedy the effects of the discriminatory conduct, both on the Complainant and the community.

(3) **Alternative Resolution.** When the parties agree to resolve the matter through an alternative resolution mechanism (which could include, but is not limited to, mediation, shuttle negotiation, restorative practices, facilitated dialogue, etc.), as described below.

- a. The College offers a variety of alternative resolution mechanisms to best meet the specific needs of the parties and the nature of the allegations.
 - i. Alternative resolution may involve agreement to pursue individual or community remedies, including targeted or broad-based educational programming or training; supported direct conversation or interaction between the parties; indirect action by the Director or other appropriate CCS officials; and other forms of resolution that can be tailored to the needs of the parties. Some alternative resolution mechanisms will result in an agreed-upon outcome, while others are resolved through dialogue.
- b. All parties must consent to the use of an alternative resolution approach, and the parties may, but are not required to, have direct or indirect contact during an alternative resolution process.
- c. The Director has the authority to determine whether alternative resolution is available or successful, to facilitate a resolution that is acceptable to all Parties, and/or to accept the parties' proposed resolution, usually through their Advisors, often including terms of confidentiality, release, and non-disparagement.
- d. Parties do not have the authority to stipulate restrictions or obligations for individuals or groups that are not involved in the alternative resolution process. The Director will determine whether additional individual or community remedies are necessary to meet the institution's compliance obligations in addition to the alternative resolution.
- e. The Director maintains records of any resolution that is reached and will provide notification to the parties of what information is maintained. Failure to abide by the resolution agreement may result in appropriate responsive/disciplinary actions (e.g., dissolution of the agreement).

and resumption of the Formal Grievance Process, referral to the conduct process for failure to comply, application of the enforcement terms of the agreement). Where the failure to abide by the Informal Resolution agreement terms results in a failure to remedy a Policy violation, the Director must consider whether to dissolve the agreement and reinstate the Formal Grievance Process to remedy the impact as required by law. The results of Formal Complaints resolved by alternative resolution are not appealable.

- f. If an Informal Resolution option is not available or selected, the Director will initiate or continue an investigation and subsequent Formal Grievance Process to determine whether the Policy has been violated.
- ii. It is not necessary to pursue Informal Resolution first in order to pursue a Formal Grievance Process. Any party participating in Informal Resolution can withdraw from the Informal Resolution process at any time and initiate or resume the Formal Grievance Process.
- iii. The parties may agree, as a condition of engaging in Informal Resolution, on what statements made or evidence shared during the Informal Resolution process will not be considered in the Formal Grievance Process should Informal Resolution not be successful.
- iv. If an investigation is already underway, the Director has discretion to determine if the investigation will be paused, if it will be limited, or if it will continue during the Informal Resolution process.
- v. Prior to engaging in Informal Resolution, the Director will provide the parties with written notice of the reported misconduct and any sanctions (only in the case of Accepted Responsibility) or measures that may result from participating in such a process, including information regarding any records that the Director will maintain and under which circumstances they may be released.

14. Formal Grievance Procedure Process

- a. Notice of Investigation and Allegations (NOIA)
 - i. The Director will provide the parties written Notice of the Investigation and Allegations (the “NOIA”) upon commencement of the Formal Grievance Process. Amendments and updates to the NOIA may be made as the investigation progresses and more information becomes available. For climate/culture investigations that do not have an identifiable Respondent, the NOIA will be sent to the department/office/program head for the area/program being investigated.
 - ii. Notification will be made in writing and may be delivered by one or more of the following methods: in person, mailed to the parties’ local or permanent address(es) as indicated in official CCS records, or emailed to the Parties’ CCS-issued email or other approved accounts. Once mailed, emailed, and/or received in-person, notice is presumptively delivered.
- b. The NOIA will include:
 - A meaningful summary of all allegations;
 - The names of the parties involved (if known);
 - The precise misconduct being alleged;
 - The date and location of the alleged incident(s) (if known);
 - The specific policies/offenses implicated;
 - A description of, link to, or copy of the applicable procedures;
 - A statement that the College presumes the Respondent is not responsible for the reported misconduct unless and until the evidence supports a Final Determination that the Policy has been violated;
 - The name(s) of the Investigator(s), along with a process to notify the Director of any conflict of interest that the Investigator(s) may have in advance of the interview process;

- A statement that determinations of responsibility are made at the conclusion of the process and that the Parties will be given an opportunity during the review and comment period to inspect and review all Relevant and Directly Related Evidence obtained;
- A statement of the potential sanctions/responsive actions that could result;
- A statement about the CCS's policy on Retaliation;
- Information about process confidentiality;
- Information on the need for each party to have an Advisor of their choosing and suggestions for ways to identify an Advisor;
- A statement informing the parties that the CCS's Policy prohibits knowingly making false statements, including knowingly submitting false information during the Formal Grievance Process;
- Information about how a party may request disability accommodations or other support assistance during the Formal Grievance Process; and
- An instruction to preserve any evidence that is directly related to the allegations.

c. Investigations

i. Purpose

The Formal Grievance Process involves an objective evaluation of all Relevant Evidence obtained, including evidence that supports that the Respondent violated the Policy and evidence that supports that the Respondent did not violate the Policy. Credibility determinations may not be based solely on an individual's status or participation as a Complainant, Respondent, or witness. All parties have a full and fair opportunity, through the investigation process, to suggest witnesses and questions, to provide evidence, and to receive a written Investigation Report that accurately summarizes this evidence.

ii. All investigations are thorough, reliable, impartial, prompt, neutral, and fair. They involve interviewing all available, relevant parties and witnesses, obtaining Relevant Evidence, and identifying sources of expert information, as necessary.

iii. Investigation Process:

- Determining the names of and contacting all involved parties and potential witnesses to participate in an investigation interview;
- Identifying issues and developing a strategic investigation plan, including a witness list, evidence list, intended investigation timeframe, and order of interviews for the parties and witnesses;
- Providing written notification of the date, time, and location of all investigation meetings, including the expected participants and purpose;
- Conducting any necessary follow-up interviews with parties or witnesses;
- Providing the parties and witnesses an opportunity to verify the accuracy of either a summary or transcript of their interview(s);
- Soliciting the names of suggested witnesses and questions each party wishes to have asked of another party or witness;
- Writing a Draft Investigation Report that gathers, assesses, and synthesizes the evidence, accurately summarizes the investigation and party and witness interviews, and provides all Relevant Evidence;
- Compiling a Directly Related Evidence File;
- Providing the parties and their respective Advisors an electronic or hard copy of the Draft Investigation Report as well as an opportunity to inspect and review all of the evidence obtained as

part of the investigation that is directly related to the reported misconduct, including evidence upon which the Investigation does not intend to rely in reaching a determination, for a ten (10)-business-day review and comment period so that each party may meaningfully respond to the evidence. The parties may elect to waive the full ten (10) days.

- Incorporating any new, Relevant Evidence and information obtained through the parties' review of the Draft Investigation Report and any follow-up meetings into the Final Investigation Report;
- Responding in writing (typically within the Final Investigation Report) to the relevant elements of the Parties' responses to the Draft Investigation Report;
- Sharing the Final Investigation Report with the Director and/or legal counsel for their review and feedback; and
- Providing the Director with the Final Investigation Report and Directly Related Evidence File.

d. Investigation Interviews.

- i. Witnesses who are CCS employees are strongly encouraged to cooperate with and participate in the College's investigation and Formal Grievance Process.
- ii. Student witnesses and witnesses from outside the CCS community are encouraged to cooperate with any CCS investigations and to share what they know about a Formal Complaint.
- iii. Interviews may be conducted in person, via online video platforms (e.g., Zoom, Microsoft Teams, FaceTime, WebEx), or, in limited circumstances, by telephone. The Director will take appropriate steps to ensure the security/privacy of remote interviews.
- iv. Parties and witnesses may also provide written statements in lieu of interviews or choose to respond to written questions, if deemed appropriate by the Investigator(s), though not preferred.
- v. Interview Recording
 - (1) It is standard practice for Investigators to create a record of all interviews pertaining to the Formal Grievance Process, by recording, transcript, or written summary. All involved persons should be made aware that they are being recorded. The parties may review copies of their own interviews upon request. No unauthorized audio or video recording of any kind is permitted during investigation meetings.
 - (2) A summary will be prepared by the Investigator from the witness interviews and review of the recorded interview.
 - (3) After an interview, parties and witnesses will be asked to verify the accuracy of the summary of their interview. They may submit changes, edits, or clarifications. If the parties or witnesses do not respond within the time period designated for verification, objections to the accuracy of summary will be deemed to have been waived, and no changes will be permitted.

e. Neither the investigation nor the hearing will consider:

- i. Questions or evidence about the Complainant's sexual predisposition;
- ii. Questions or evidence about the Complainant's prior sexual behavior, unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the alleged conduct, or if the questions or evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent;
- iii. Questions or evidence about a party or witness's records that are made or maintained by a physician, psychologist, or psychiatrist unless the party or witness provides voluntary, written consent for the records to be considered;

f. The parties must provide all evidence to the Investigator(s) prior to completion of the Final Investigation Report. Evidence offered after that time will be evaluated by the Hearing Officer for relevance. If deemed relevant, the parties

and Hearing Officer must agree to admit it into the record. If the evidence is deemed not relevant, the Hearing Officer may proceed with the hearing absent the new evidence.

- i. The new Relevant Evidence will be admitted to the record if:
 - (1) All parties and the Hearing Officer assent to the new evidence being included in the hearing without remanding the Formal Complaint back to the Investigator;
 - (2) The evidence is not duplicative of evidence already in the record; and
 - (3) The new evidence was either not reasonably available prior to the conclusion of the Final Investigation Report, or the failure to provide it in a timely manner was not the result of bad faith by the parties, witnesses, or others.
- ii. If the above criteria are not met, but the evidence is deemed materially relevant and not duplicative, the Hearing Officer may, at their discretion, engage in any of the following actions:
 - (1) Delay the hearing;
 - (2) Provide the parties with at least five (5) business days to review the Relevant Evidence;
 - (3) Remand the Formal Complaint back to the Investigator for further investigation or analysis;
 - (4) Allow the parties time to review and comment on the new evidence;
 - (5) If the evidence is deemed not relevant, the Hearing Officer may proceed with the hearing without allowing the new evidence.

g. Time Line

- i. Investigations are completed expeditiously, normally within sixty (60) business days, though some investigations may take longer, depending on the nature, extent, and complexity of the allegations, witness availability, law enforcement involvement, and other factors.
- ii. The investigation may be briefly delayed, ranging from several days to a few weeks—if warranted by specific circumstances. Such circumstances include, but are not limited to, a request from law enforcement to temporarily delay the investigation, the need for language assistance, the absence of parties and/or witnesses, and/or health conditions. The College will promptly resume its Formal Grievance Process as soon as feasible. During such a delay, the Director will implement and maintain supportive measures for the parties as deemed appropriate.
- iii. Criminal Charges

CCS action(s) or processes are not typically altered or precluded on the grounds that civil or criminal charges involving the underlying incident(s) have been filed or that criminal charges have been dismissed or reduced.

15. Ensuring Impartiality

- a. No individual materially involved in the administration of the Formal Grievance Process, including the Director, Investigator(s), and Decision-maker(s), may have or demonstrate a conflict of interest or bias for a party generally, or for a specific Complainant or Respondent.
- b. The Director will vet the assigned Investigator(s), Hearing Officer (s), and Appeal Officer (s) for impartiality by ensuring there are no actual or apparent conflicts of interest or disqualifying biases. The parties may raise a concern regarding bias or conflict of interest at any time during the Formal Grievance Process, and the Director will determine whether the concern is reasonable and supportable. If so, another Pool member, or other trained individual, will be assigned, and the impact of the bias or conflict, if any, will be remedied. If the source of the conflict of interest or bias is the Director, concerns should be raised with the Assistant Vice President of Campus Life.

16. Referral for Hearing

- a. Provided that the Formal Complaint is not resolved through Informal Resolution, once the Final Investigation Report is shared with the parties, the Director will refer the matter for a hearing.
- b. The hearing cannot be held less than ten (10) business days from the conclusion of the investigation – when the Final Investigation Report is transmitted to the parties and the Decision-maker – unless all Parties and the Decision-maker agree to an expedited timeline.
- c. The Director will select an appropriate Decision-maker from the Pool and provide a copy of the Final Investigation Report and the file of Directly Related Evidence.

17. Hearing Officer – Neutral Decision-maker

- a. Hearing Officer (Neutral Decision-maker) will not have had any previous involvement with the Formal Complaint. The Director may elect to have an alternate from the Pool sit in throughout the hearing process if a substitute is needed for any reason.
- b. Those who have served as Investigators will be witnesses in the hearing and therefore may not serve as Hearing Officers. Those who are serving as Advisors for any party may not serve as Hearing Officers in that matter.
- c. The Director of Civil Rights and Title IX Compliance may not serve as a Hearing Officer in the matter but may serve as an administrative facilitator of the hearing if their previous role(s) in the matter does not create a conflict of interest. Otherwise, a designee, such as case manager or hearing coordinator may fulfill the facilitator role. The hearing will be convened at a time and venue determined by the Director.
- d. Conflicts of Interest or Bias.
 - i. The Decision-maker must not have a bias for or against Complainants or Respondents generally or the individual Complainant or Respondent involved in the Formal Complaint.
 - ii. The Decision-maker must recuse themselves if such bias or conflict of interest exists.
 - iii. If the Decision-maker believes there is possible conflict of interest or bias, they will consult with the Director about possible recusal or removal.
 - iv. The Parties may raise challenges that the Decision-maker is biased or has a conflict of interest. The Parties must raise challenges with the Director within two (2) business days of receiving the hearing notice.
 - (1) The Director will only remove and replace a Decision-maker in situations of demonstrated bias or conflicts of interest. Perceptions of bias or conflict are not sufficient to cause removal.
 - (2) If a Decision-maker recuses themselves as the result of a conflict of interest or bias, or is removed, the Director will promptly appoint a new Decision-maker who does not have a conflict of interest or bias and notify the parties accordingly.

18. Live Hearing Requirements

- a. Hearing Notice
 - i. The Director will send the parties a notice of hearing letter no less than ten (10) business days prior to the hearing. Once mailed, emailed, and/or received in-person, notice is presumptively delivered. The notice includes:
 - ii. A description of the alleged violation(s), a list of all policies allegedly violated, a description of the applicable hearing procedures, and a statement of the potential sanctions/responsive actions that could result
 - iii. The time, date, and location of the hearing
 - iv. A description of any technology that will be used to facilitate the hearing

- v. Relevant information regarding hearing logistics, pre-hearing meetings, the Final Investigation Report, the parties and witnesses participating in the hearing, the identity of the Hearing Officer, details related to questioning, the role of Advisors, impact/mitigation statements, and how to request disability accommodations or other assistance
- b. The Hearing Officer or the Case Manager/Scheduling Coordinator will offer to convene pre-hearing meeting(s) with the parties and their Advisors to familiarize them with the hearing process and invite them to submit the questions or topics they wish to ask or discuss at the hearing. This allows the Hearing Officer to consider their relevance ahead of time to avoid any improper evidentiary introduction in the hearing or to provide recommendations for more appropriate phrasing.
 - i. However, this advance review opportunity does not preclude the Advisors from asking a question for the first time at the hearing or from asking for a reconsideration of a Hearing Officer's pre-hearing decision based on any new information or testimony offered at the hearing. The Hearing Officer will consider arguments that evidence identified as relevant in the Final Investigation Report is, in fact, not relevant. Similarly, evidence identified by the Investigator(s) as directly related but not relevant may be argued to be relevant. The Hearing Officer will document and share their rationale for any evidence or question exclusion or inclusion, if any, at a pre-hearing meeting with each party.
 - ii. The Hearing Officer or the Case Manager/Scheduling Coordinator will work with the parties to finalize a witness list for the hearing, and the Director will notify any witnesses of the hearing's logistics. The Hearing Officer, only with the agreement of all parties, may decide in advance of the hearing that certain witnesses do not need to be present if their testimony can be adequately summarized by the Investigator(s) in the Final Investigation Report or during the hearing, and their presence is not essential to assess their credibility.
 - iii. Pre-hearing meeting(s) will not be recorded. The pre-hearing meetings will typically be conducted as separate meetings with each party/Advisor, and can be done remotely, or as a written communication exchange. The Hearing Officer or the Case Manager/Scheduling Coordinator will work with the parties to establish the format and timing of the meetings and will circulate a summary of any rulings made to ensure all parties and advisors are aware.
 - iv. During the pre-hearing meeting, and live hearing, parties may only be accompanied by their Advisor. No other persons (e.g., additional support persons, advisors, friends, family) may accompany, attend, or listen in on the hearing unless explicitly authorized by the Director, with each party being provided the same opportunity.
- c. Evidence provided to the Hearing Officer and parties.
 - i. The Hearing Officer will be provided electronic copies of the Final Investigation Report and all relevant but not impermissible evidence, including the names of all parties, witnesses, and Advisors, at least ten (10) business days in advance of the hearing.
 - ii. The parties will be provided with electronic copies of all the materials provided to the Hearing Officer as part of the hearing notice, unless those materials have already been provided.
- d. Witness Participation
 - i. Witnesses are encouraged to participate in, and make themselves reasonably available for, the hearing. They may participate in-person or via video technology that allows the Hearing Officer and the parties to see and hear the witness while that person is speaking.
 - (1) Witnesses are not permitted to be accompanied by an Advisor without the Director's express permission. At the discretion of the Hearing Officer, a witness may participate by phone if no other reasonable alternative is available.
 - ii. The Director will notify all witnesses of their requested participation in the hearing at least five (5) business days prior to the hearing. Witnesses will be present for the hearing only during their testimony.
 - iii. If any party or witness does not appear at the scheduled hearing, the hearing may be held in their absence. For compelling reasons, the Director may reschedule the hearing.
 - iv. Any witness scheduled to participate in the hearing must have been first interviewed by the Investigator(s), unless:

- (1) All parties and the Hearing Officer assent to the new witness's participation in the hearing without remanding the Formal Complaint back to the Investigator,
- (2) The Hearing Officer deems the evidence presented by the new witness to be relevant and not information already established in the record, and
- (3) The witness's late involvement was not the result of bad faith by the witness, the parties, or others.
- (4) If the above criteria are not met, but the witness's evidence is deemed relevant and not duplicative, the Hearing Officer may, at their discretion, engage in any of the following actions:
 - a. Delay the hearing
 - b. Provide the parties with at least five (5) business days to review the relevant portions of the new witness' statements, if such statements are submitted
 - c. Remand the Formal Complaint back to the Investigator for further investigation or verification
 - d. Allow the parties to review and comment on the testimony of the new witness
 - e. If the evidence is deemed not relevant, the Hearing Officer may proceed with the hearing absent the new witness's participation.

e. The following provisions apply to a live hearing:

- Hearing Venue Options and Recordings. The live hearing will be via video technology. The Hearing Officer and parties must be able to simultaneously see and hear a party or witness while that person is speaking. Both options are considered fair and equitable. Alternative arrangements including a live hearing may also be made at the Director's discretion.
- The Parties may make a request to the Director that the hearing be held in person or via video technology, but they must do so at least three (3) business days prior to the hearing. The Director retains discretion to determine whether the hearing will occur in person or via video technology.
- All hearings will be recorded, and parties may request a copy of the recording from the Administrator following the live hearing.
- No unauthorized recordings are permitted.
- The College may use AI technology to assist in the preparation of a transcript of the recording of the hearing. The AI will preserve the confidentiality of the process.
- Hearing Participants. Persons who may be present for a hearing include the Hearing Officer, hearing facilitator, Investigator(s), the Parties and their Advisors, anyone providing authorized accommodations, interpretation, and/or assistive services, and anyone else deemed necessary by the Hearing Officer. Witnesses are present only during their portion of the testimony.
- Advisors. The parties may have the assistance of an Advisor of their choice at the hearing or can request that the College appoint a trained Advisor for them. Appointed Advisors are not attorneys. If a party wishes to have an attorney as their Advisor, they must locate and pay for that attorney themselves.
- Parties and Advisors may be requested to turn off their phones and acknowledge, if the hearing is being held remote, that they are alone with no other persons present in their location.

f. Scheduling. Hearings for possible violations that occur near or after the end of an academic term (assuming the Respondent is still subject to the Policy) and are unable to be resolved prior to the end of term will typically be held immediately after the end of the term, including during the summer, as needed, to meet the College's resolution timeline and ensure a prompt resolution. Employees, including parties and witnesses, who do not have 12-month contracts are still expected to participate in Formal Grievance Processes that occur during months between contracts.

- g. Disability Accommodations and Other Assistance. Parties should contact the Director at least three (3) business days prior to the hearing to arrange any disability accommodations, language assistance, and/or interpretation services that may be needed at the hearing, if possible.

- h. Introductions and Hearing Procedure Explanation

- i. The Hearing Officer will:

- (1) Explain the hearing procedures;
 - (2) Introduce the participants;
 - (3) Answer any procedural questions prior to and as they arise throughout the hearing;

- i. Investigator Presentation of Final Investigation Report

The Investigator(s) will present a summary of the Final Investigation Report, including a review of the facts that are contested and those that are not. The Investigator may be questioned first by the Hearing Officer and then by the parties through their Advisors. The Investigator may attend the duration of the hearing or be excused after their testimony at the Hearing Officer's discretion.

- j. Testimony and Questioning

The parties and witnesses may provide relevant information in turn, beginning with the Complainant's opening statement, then the Respondent's, and then questioning in the order determined by the Hearing Officer. The Hearing Officer will facilitate questioning of the parties and witnesses first by the Hearing Officer and then by the parties through their Advisors.

- i. All questions are subject to the Hearing Officer's relevance determination. The Advisor will pose the proposed question orally, electronically, or in writing (orally is the default, but other means of submission may be permitted). The proceeding will pause to allow the Hearing Officer to consider the question (and state it if it has not already been stated aloud), and the Hearing Officer will determine whether the question will be permitted, disallowed, or rephrased. The Hearing Officer will explain any decision to exclude a question as not relevant, or to reframe it for relevance.
 - ii. The Hearing Officer will limit or disallow questions they deem not appropriate on the basis that they are irrelevant, unduly repetitious (and thus irrelevant), seek or pertain to impermissible evidence, or are abusive and has the final say on all questions and relevance determinations. The Hearing Officer may consult with legal counsel on any admissibility questions.
 - iii. If the parties raise an issue of bias or conflict of interest of an Investigator or Hearing Officer at the hearing, the Hearing Officer may elect to address those issues, consult with legal counsel, refer them to the Director, and/or preserve them for appeal. If bias is not an issue at the hearing, the Hearing Officer should not permit irrelevant questions that probe for Investigator bias.

- k. Refusal to Submit to Questioning and Inferences

- i. Any party or witness may choose not to offer evidence and/or answer questions at the hearing, either because they do not attend the hearing, or because they attend but refuse to participate in some or all questioning. The Hearing Officer can only rely on the available Relevant Evidence in making a Final Determination. The Hearing Officer may not draw any inference solely from a party's or witness' absence from the hearing or refusal to answer any or all questions. Typically, after brief opening statements, the order of questioning will be questions from the Hearing Officer, questions from the party's own Advisor, then questions from the other parties' Advisors. The same order will be used for questioning witnesses, who do not typically make opening statements. The parties then make brief closing statements, and then the hearing transitions into closed session for deliberation.
 - ii. An Advisor may not be called as a witness at a hearing to testify to what their advisee has told them during their role as an Advisor unless the party being advised consents to that information being shared.

- l. Advisor's Role During the Hearing.

- i. all questions that a party wishes to ask must be posed by the Advisor, not the Parties;

- ii. If the party does not have an Advisor, the Director will provide the party with an Advisor for the purpose of Advisor-conducted questioning.
- m. **Evidentiary Considerations**
 - i. The Investigator(s) and the Hearing Officer (s) will only consider Relevant or Directly Related Evidence.
 - ii. Within the boundaries stated above, the investigation and the hearing can consider character evidence, if offered, but that evidence is unlikely to be relevant unless it is fact evidence or relates to a pattern of conduct.
 - iii. Previous disciplinary action of any kind involving the Respondent may not be considered unless there is an allegation of a pattern of misconduct. Such information may also be considered in determining an appropriate sanction upon a determination of responsibility. Barring a pattern allegation, this information is only considered at the sanction stage of the process and is not shared until then.
- n. The Director may consolidate Complaints against more than one Respondent, or by more than one Complainant against one or more Respondent(s), when the allegations arise from the same facts or circumstances or implicate a pattern, collusion, and/or other shared or similar actions.
- o. **Impact Statements.** Each party may submit an impact and/or mitigation statement to the Director that the Decision-maker will review during any sanction determination.
 - i. Upon receipt of an impact and/or mitigation statement, the Director will review the impact/mitigation statement to determine whether any immediate needs exist (i.e. homelessness, suicidal thoughts, or threats of violence).
 - ii. The Director will only provide the impact statements to the Decision-maker if the Hearing Officer determines that the Policy has been violated. When the Director shares the impact statements with the Hearing Officer, they will also be shared with the Parties.

19. Collateral Misconduct

The Hearing Officer has the authority to hear and make determinations on all allegations of Discrimination, Harassment, Retaliation, and Other Prohibited Conduct under the Policy and may also hear and make determinations on any additional alleged collateral misconduct that occurred in concert with the Discrimination, Harassment, Retaliation, or Other Prohibited Conduct, even though those collateral allegations may not specifically fall within the Policy.

20. Joint Hearings

In Complaints involving more than one Respondent and/or involving more than one Complainant accusing the same person of substantially similar conduct, the default procedure will be to hear the allegations jointly.

However, the Director may permit the investigation and/or hearings pertinent to each Respondent or Formal Complaint to be conducted separately if there is a compelling reason to do so. In joint hearings, separate determinations of responsibility will be made for each Respondent and/or for each Formal Complaint with respect to each alleged policy violation.

21. Hearing Recordings

- a. The College records hearings (but not deliberations) for purposes of review in the event of an appeal. No unauthorized audio or video recording of any kind is permitted during the hearing.
- b. The Hearing Officer, the parties, their advisors, Appeal Hearing Officers, and other appropriate CCS officials will be permitted to review the recording or review a transcript of the recording upon request to the Director. No unauthorized disclosure, including sharing, copying, or distribution of the recording or transcript, is permitted.

22. Deliberation and Determination

- a. After closing statements from the parties, the Hearing Officer will deliberate in closed session to determine whether the Respondent is responsible for the alleged Policy violation(s) based on the standard of evidence. If a panel is used, a simple majority vote is required to determine the Finding. Deliberations are not recorded.
- b. The Hearing Officer will then prepare a written statement detailing all Findings and Final Determinations, the rationale(s) explaining the decision(s), the evidence used in support of the determination(s), the evidence not relied upon in the

determination(s), any credibility assessments, and any sanction(s) and rationales explaining the sanction(s) and will deliver the statement to the Director.

- c. This statement must be submitted to the Director within twenty (20) business days of the end of deliberations unless the Director grants an extension. If an extension is granted, the Director will notify the parties.

23. Notice of Outcome

- a. When there is a Finding of responsibility on one or more of the allegations, the Hearing Officer may make a recommendation for sanctions or the continuation of supportive measures, including consideration of any party impact and/or mitigation statement(s) for these recommendations.
- b. The Hearing Officer will also review any pertinent conduct history provided by the CCS Student Affairs or the Human Relations Office in regard to the appropriate sanction(s) in consultation with other appropriate administrators, if required.
- c. The Director will provide the sanctioning authority with Notice of the Hearing Final Determination and a copy of any Impact or Mitigating Statements submitted by the Parties.
 - i. Where the Student is the Respondent, the sanctioning authority lies with the Office of Student Affairs in consultation with the Director and legal counsel as appropriate.
 - ii. Where a Faculty Member is the Respondent, the sanctioning authority lies with the Human Relations Office in consultation with the Director and legal counsel as appropriate.
 - iii. Where an Employee is the Respondent, the sanctioning authority lies with the Office of Student Affairs in consultation with the Director and legal counsel as appropriate.
- d. The Director will provide the parties with a written outcome notification within ten (10) business days of the conclusion of the Formal Grievance Process, which concludes with the sanctioning authority's imposition of the sanction. The outcome notification will specify the Finding for each alleged Policy violation, any sanction(s) that may result, which the College is permitted to share pursuant to federal or state law, and a detailed rationale, written by the Hearing Officer, supporting the Findings to the extent the College is permitted to share under federal or state law.
- e. If the Hearing Officer does not find a violation of any CCS Policy, the Director will provide the parties with a written outcome notification within ten (10) business days of the conclusion of the Formal Grievance Process, which in this case concludes with the Hearing Officer issuing the Final Determination.
- f. The notification will also detail the parties' equal rights to appeal, the grounds for appeal, the steps to request an appeal, and when the determination is considered final if no party appeals.
- g. The Director will provide the parties with the outcome notification simultaneously, or without significant time delay between notifications. The written outcome notification may be delivered by one or more of the following methods: in person, mailed to the parties' local or permanent address as indicated in official Recipient records, or emailed to the parties' CCS-issued or other approved email account. Once mailed, emailed, and/or received in person, the outcome notification is presumptively delivered.

24. Sanctions.

- a. Factors the sanctioning authority may consider when determining sanctions and responsive actions include, but are not limited to:
 - i. The nature, severity of, and circumstances surrounding the violation(s);
 - ii. The Respondent's disciplinary history;
 - iii. The need for sanctions/responsive actions to bring an end to the Policy violations;
 - iv. The need for sanctions/responsive actions to prevent the future recurrence of Policy violations;
 - v. The need to remedy the effects of the Policy violation on the Complainant and the community;
 - vi. The impact on the Parties;

- vii. The Respondent's acknowledgement of responsibility or contrition;
 - viii. Any other information deemed relevant by the sanctioning authority.
 - ix. The sanctions will be implemented as soon as is feasible once a Determination is final, either upon the outcome of any appeal or the expiration of the window to appeal, without an appeal being requested.
- b. The sanctions described in the Procedures are not exclusive of, and may be in addition to, other actions taken, or sanctions imposed, by external authorities.

i. Student Sanctions

The following are the common sanctions that may be imposed upon students singly or in combination:

- (1) Reprimand: A formal statement that the conduct was unacceptable and a warning that further violation of any CCS policy, procedure, or directive will result in more severe sanctions/responsive actions
- (2) Required Counseling: A mandate to meet with and engage in either Recipient-sponsored or external counseling to better comprehend the misconduct and its effects
- (3) Restrictions: A student may be restricted in their activities, including, but not limited to, being restricted from locations, programs, participation in certain activities or extracurriculars, study abroad, or holding leadership roles in student organizations
- (4) Probation: An official sanction for violation of CCS policy, providing for more severe disciplinary sanctions if the student is found in violation of any CCS policy, procedure, or directive within a specified period of time. Terms of the probation will be articulated and may include denial of specified social privileges, exclusion from co-curricular activities, exclusion from designated areas of campus, no-contact orders, and/or other measures deemed appropriate.
- (5) Suspension: Separation from the College, or one or more of its facilities, for a defined period of time, typically not to exceed two (2) years, after which the student is eligible to return. Eligibility may be contingent upon satisfaction of specific conditions noted at the time of suspension, on successfully applying for readmission, or upon a general condition that the student is eligible to return if the College determines it is appropriate to re-enroll/readmit the student.
 - a. The student is typically required to vacate CCS property within 24 hours of notification of the action, though this deadline may be extended at the discretion of the Director or other appropriate official.
 - b. During a college-wide suspension, the student is banned from CCS property, functions, events, and activities unless they receive prior written approval from an appropriate CCS official. This sanction may be enforced with a trespass action, as necessary. This sanction may be noted as a Disciplinary Suspension on the student's official academic transcript, per CCS policy and/or state law.
- (6) Expulsion: Permanent separation from the College. The student is banned from CCS property, and the student's presence at any CCS-sponsored activity or event is prohibited. This action may be enforced with a trespass action, as necessary. This sanction may be noted as Disciplinary Expulsion on the student's official academic transcript, per CCS policy and/or state law.
- (7) Withholding Diploma: The College may withhold a student's diploma for a specified period of time and/or deny a student participation in commencement activities as a sanction if the student is found responsible for violating the Policy
- (8) Revocation of Degree: While very rarely exercised, the College reserves the right to revoke a degree previously awarded by the College for fraud, misrepresentation, and/or other violation of CCS policies, procedures, or directives in obtaining the degree, or for other serious violations committed by a student prior to graduation
- (9) Other Actions: In addition to, or in place of, the above sanctions, the College may assign any other sanctions as deemed appropriate

ii. Student Organization Sanctions

The following are the common sanctions that may be imposed upon student groups organizations singly or in combination:

- (1) Reprimand: A formal statement that the conduct was unacceptable and a warning that further violation of any CCS policy, procedure, or directive will result in more severe sanctions/responsive actions
- (2) Probation: An official sanction for violation of CCS policy, providing for more severe disciplinary sanctions if the group or organization is found in violation of any CCS policy, procedure, or directive within a specified period of time. Terms of the probation will be articulated and may include denial of specified social and event privileges, denial of CCS funds, ineligibility for honors and awards, restrictions on new member recruitment, no-contact orders, and/or other measures deemed appropriate.
- (3) Suspension: Termination of student group or organization recognition and/or CCS support for a defined period of time not to exceed two (2) years and/or until specific criteria are met. During the suspension period, a student group or organization may not conduct any formal or informal business or participate in CCS-related activities, whether they occur on or off campus. Re-recognition is possible but not guaranteed and will only be considered after the end of the suspension period and based on meeting all re-recognition criteria and obtaining clearance from the Director.
- (4) Termination: Permanent termination of student group or organization recognition and revocation of the privilege to congregate and conduct business on campus as an organization for any reason
- (5) Loss of Privileges: Restricted from accessing specific CCS privileges for a specified period of time
- (6) Other Actions: In addition to, or in place of, the above sanctions, the Director may assign any other sanctions as deemed appropriate

iii. Employee Sanctions/Responsive/Corrective Actions

Responsive actions for an Employee who has engaged in Discrimination, Harassment, Retaliation, and/or Other Prohibited Conduct include:

- (1) Verbal or Written Warning
- (2) Performance Improvement Plan/Management Process
- (3) Enhanced Supervision, Observation, or Review
- (4) Required Counseling
- (5) Required Training or Education
- (6) Probation
- (7) Denial of Pay Increase/Pay Grade
- (8) Loss of Oversight or Supervisory Responsibility
- (9) Demotion
- (10) Transfer
- (11) Shift or schedule adjustments
- (12) Reassignment
- (13) Delay of (or referral for delay of) Tenure Track Progress

- (14) Assignment to a New Supervisor
- (15) Restriction of Stipends, Research, and/or Professional Development Resources
- (16) Suspension/Administrative Leave with Pay
- (17) Suspension/Administrative Leave without Pay
- (18) Termination
- (19) Other Actions: In addition to, or in place of, the above sanctions/responsive actions, the Director may assign any other responsive actions as deemed appropriate

25. Rights of the Parties (See Appendix E)

26. Resolution Timeline

- a. The College will make a good faith effort to complete the Formal Grievance Process within ninety (90) business days, excluding any appeals, which the Director can extend as necessary for appropriate reasons. The parties will receive regular updates on the progress of the Formal Grievance Process, as well as notification and a rationale for any extensions or delays, and an estimate of how much additional time will be needed to complete the process.
- b. It shall not be grounds for appeal, or a procedural irregularity, that the resolution process is not concluded within ninety (90) days. Many factors can impact the timeline for the Resolution Process including, for example, unavailability of witnesses for interviews, unavailability or scheduling conflicts of advisors, re-opening of the Investigation for new evidence, school breaks, leaves of absence, and other causes.

27. Withdrawal or Resignation Before Complaint Resolution

a. Students

Should a Respondent decide not to participate in the Formal Grievance Process, the process proceeds absent their participation to a reasonable resolution. If a Student Respondent withdraws from the College, the Formal Grievance Process typically ends with a dismissal, as the College has lost primary disciplinary jurisdiction over the withdrawn student. However, the College may continue the Formal Grievance Process when, at the discretion of the Director, doing so may be necessary to address safety and/or remedy any ongoing effects of the alleged Policy violation.

Regardless of whether the Formal Complaint is dismissed or pursued to completion of the Formal Grievance Process, the College will continue to address and remedy any systemic issues or concerns that may have contributed to the alleged violation(s), and any ongoing effects of the alleged Policy violation.

When a student withdraws or takes a leave of absence while the process is pending, the Student may not return to the College in any capacity until the Formal Complaint is resolved and any sanctions imposed are satisfied. If the student indicates they will not return, the Director has the discretion to dismiss the Formal Complaint and bar the student from returning. The Registrar, Office of Student Affairs, and HR will be notified accordingly.

If the Student Respondent takes a leave of absence for a specified period of time (e.g., one semester or term), the Formal Grievance Process may continue remotely. If found in violation, that student is not permitted to return to the College unless and until all sanctions, if any, have been satisfied.

b. Employees

Should an Employee Respondent decide not to participate in the Formal Grievance Process, the process proceeds absent their participation to a reasonable resolution. If an Employee Respondent leaves their employment with the College with unresolved allegations pending, the Formal Grievance Process typically ends with dismissal, as the College has lost primary disciplinary jurisdiction over the former Employee. However, the College may continue the Formal Grievance Process when, at the discretion of the Director, doing so may be necessary to address safety and/or remedy any ongoing effects of the alleged Discrimination, Harassment, Retaliation, and/or Other Prohibited Conduct.

Regardless of whether the Formal Complaint is dismissed or pursued to completion of the Formal Grievance Process, the College will continue to address and remedy any systemic issues or concerns that may have contributed to the alleged violation(s), and any ongoing effects of the alleged Policy violation.

When an Employee resigns and the Formal Complaint is dismissed, the employee may not return to the College in any capacity. The CCS HR department will be notified accordingly. A note will be placed in the employee's file that they resigned with allegations pending and are not eligible for rehire with the College. The records retained by the Director will reflect that status.

28. Appeal of the Final Determination

The Director will designate an Appeal Decision-maker from the pool, or other trained internal or external individuals, to hear the appeal. No Appeal Decision-maker will have been previously involved in the Formal Grievance Process for the Formal Complaint. If a panel is used, the Director will designate a voting chair.

a. Appeal Grounds

Appeals are limited to the following grounds:

- i. A procedural irregularity affected the outcome of the matter;
- ii. There is new demonstrable evidence that was not reasonably available at the time the determination regarding responsibility was made that could affect the outcome of the matter;
- iii. The Director, Investigator(s), or Hearing Officer(s) had a conflict of interest or bias for or against Complainants or Respondents generally or the specific Complainant or Respondent that affected the outcome of the matter.

b. Appeal Request

Any party may submit a written appeal request to the Director within five (5) business days of the delivery of the notice of outcome.

The appeal request will be forwarded to the Appeal Officer for consideration to determine if the request meets the appeal grounds (a Review for Standing). This is not a review of the merits of the appeal, but solely a determination as to whether the request could reasonably be construed to meet the grounds and is timely filed.

If the appeal request does not provide information that meets the grounds in the Procedures, the request will be denied by the Appeal Officer, and the parties and their Advisors will be simultaneously notified in writing of the denial and the rationale.

If any of the information in the appeal request meets the grounds in the Procedures, then the Appeal Officer will notify all parties and their Advisors, the Director, and, when appropriate, the Investigator(s) and/or the original Hearing Officer.

- i. All other parties and their Advisors, the Director, and, when appropriate, the Investigator(s) and/or the Hearing Officer will be provided a copy of the appeal request with the approved grounds and then be given ten (10) business days to submit a response to the portion of the appeal that was approved and involves them. The Appeal Officer will forward all responses, if any, to all Parties for review and comment.
- ii. The non-appealing party (if any) may also choose to appeal at this time. If so, that appeal request will be reviewed by the Appeal Officer to determine if it meets the grounds in the Procedures and will either be approved or denied. If approved, it will be forwarded to the party who initially requested an appeal, the Director, and the Investigator(s) and/or original Decision-maker, as necessary, who will submit their responses, if any, within ten (10) business days. Any such responses will be circulated for review and comment by all parties. If denied, the parties and their Advisors will be notified in writing.
- iii. No party may submit any new appeal request after this time period. The Appeal Officer will collect any additional information needed and all documentation regarding the approved appeal grounds, and the subsequent responses will be shared with the Appeal Officer, who will promptly render a decision.

c. Appeal Determination Process

In most circumstances, appeals are confined to a review of the written documentation or record of the original determination and pertinent documentation regarding the specific appeal grounds. The Appeal Officer will deliberate as soon as is practicable and discuss the merits of the appeal.

Appeal decisions are to be deferential to the original determination, making changes to the Finding/Final Determination only if there is a compelling justification to do so. All decisions are made by majority vote and apply the preponderance of the evidence OR the clear and convincing standard of evidence.

An appeal is not an opportunity for the Appeal Officer to substitute their judgment for that of the original Hearing Officer merely because they disagree with the Finding and/or sanction(s).

The Appeal Officer may consult with the Director and/or legal counsel on questions of procedure or rationale, for clarification, if needed. The Director will maintain documentation of all such consultation.

d. **Appeal Outcome**

An appeal may be granted or denied. Appeals that are granted should normally be remanded (or partially remanded) to the original Investigator(s) and/or Hearing Officer with corrective instructions for reconsideration. In rare circumstances where an error cannot be cured by the original Investigator(s) and/or Hearing Officer or the Director (as in cases of bias), the Appeal Officer may order a new investigation and/or a new hearing with new pool members serving in the Investigator and Hearing Officer roles.

A notice of appeal outcome letter will be sent to all parties simultaneously, or without significant time delay between notifications. The appeal outcome letter will specify the Finding on each appeal ground, any specific instructions for remand or reconsideration, all sanction(s) that may result which the College is permitted to share according to federal or state law, and the rationale supporting the essential Findings to the extent the College is permitted to share under federal or state law.

Written notification may be delivered by one or more of the following methods: in person, mailed to the parties' local or permanent address as indicated in official institutional records, or emailed to the parties' CCS-issued email or other approved account. Once mailed, emailed, and/or received in person, the appeal outcome letter will be presumptively delivered.

Once an appeal is decided, the outcome is final and constitutes the Final Determination; further appeals are not permitted, even if a decision or sanction is changed on remand (except in the case of a new determination). When appeals result in no change to the finding or sanction, that decision is final.

e. **Sanction Status During the Appeal**

Any sanctions imposed as a result of the Final Determination are stayed (i.e., not implemented) during the appeal process, and supportive measures may be maintained or reinstated until the appeal determination is made.

If any of the sanctions are to be implemented immediately post-determination, but pre-appeal, then the procedure discussed in regarding Emergency Removal/Interim Suspension of a Student shall be followed.

29. Long-Term Remedies/Other Actions

Following the conclusion of the Formal Grievance Process, and in addition to any sanctions implemented or Informal Resolution terms, the Director may implement additional long-term remedies or actions with respect to the Parties and/or the CCS community that are intended to stop the Discrimination, Harassment, Retaliation, and/or Other Prohibited Conduct, remedy the effects, and prevent recurrence.

These remedies/actions may include, but are not limited to:

- Referral to counseling and health services
- Referral to the Employee Assistance Program
- Course and registration adjustments, such as retroactive withdrawals
- Education to the individual and/or the community
- Permanent alteration of housing assignments
- Permanent alteration of work arrangements for employees

- Provision of campus safety escorts
- Climate surveys
- Policy modification and/or training
- Provision of transportation assistance
- Implementation of long-term contact limitations between the parties
- Implementation of adjustments to academic deadlines, course schedules, etc.

At the Director's discretion, the Parties may be provided certain long-term support or measures even if no Policy violation is found.

When no Policy violation is found, the Director will address any remedies the College owes the Respondent to ensure no effective denial of educational access.

The Director will maintain the confidentiality of any long-term remedies/actions/measures, provided confidentiality does not impair the College's ability to provide these services.

30. Failure to Comply with Sanctions and/or Responsive Actions

All Respondents are expected to comply with the assigned sanctions, responsive actions, corrective actions, and/or Informal Resolution terms within the timeframe specified by the final Hearing Officer, including the Appeal Officer or the Informal Resolution agreement.

Failure to abide by the sanction(s)/action(s) imposed by the date specified, whether by refusal, neglect, or any other reason, may result in additional sanction(s)/action(s), including suspension, expulsion, and/or termination from the College.

Supervisors are expected to enforce completion of sanctions/responsive actions for their employees.

A suspension imposed for non-compliance with sanctions will only be lifted when compliance is achieved to the Director's satisfaction.

31. Recordkeeping

For a period of at least seven (7) years following the conclusion of the Formal Grievance Process, the College will maintain records of:

- a. Each Discrimination, Harassment, Retaliation, and Other Prohibited Conduct Formal Grievance Process, including any Final Determination regarding responsibility or appeal, and any audio or audiovisual recording or transcript required under federal regulation;
- b. Any disciplinary sanctions imposed on the Respondent;
- c. Any supportive measures provided to the parties and any remedies provided to the Complainant or the community designed to restore or preserve equal access to the College's Education Program or Activity;
- d. Any appeal and the result therefrom;
- e. Any Informal Resolution and the result therefrom;
- f. All materials used to train the Director of Civil Rights and Title IX Compliance and designees, Investigators, Decision-makers, Appeal Decision-makers, Informal Resolution Facilitators, and any person who is responsible for implementing the College's resolution processes. CCS will make these training materials publicly available on CCS's website;
- g. Any other actions taken in response to a report or Formal Complaint including:
 - i. The basis for all conclusions that the response was not deliberately indifferent;
 - ii. Any measures designed to restore or preserve equal access to the CCS's Education Program or Activity; and

- iii. CCS will also maintain any and all records in accordance with federal and state laws.

32. Disability Accommodations

CCS is committed to providing reasonable accommodations and support to qualified students, employees, or others with disabilities to ensure equal access to the College's resolution processes.

Anyone needing such accommodations or support should contact the Director, who will work with disability support as appropriate to review the request and, in consultation with the person requesting the accommodation, determine which accommodations are appropriate and necessary for full process participation.

33. Other Support

CCS will address other reasonable requests for support for the parties and witnesses, including:

- Language services/Interpreters
- Access and training regarding use of technology throughout a resolution process
- Other support as deemed reasonable and necessary to facilitate participation in a resolution process

Process A is applicable to all Formal Complaints of that fall within the scope of CCS' Title IX Policy. If the Formal Complaint involves violations of the Title IX Policy and the Policy on Preventing Discrimination, Harassment, and Retaliation, the Director has the option to follow the Formal Grievance Process outlined in Process A or B in the Director's sole discretion.

34. <<Resolution Process Pool>>

The Recipient relies on a pool of individuals <<("the Pool")>> to carry out the resolution options.

a. <<Pool>> Member Roles

<<Pool>> members are trained annually, and can serve in any of the following roles at the Administrator's discretion:

- Appropriate intake of and initial guidance pertaining to Formal Complaints
- Perform or assist with initial assessment
- Advisor to Parties
- Informal Resolution Facilitator
- Investigator
- Hearing Facilitator
- Decision-maker
- Appeal of Dismissal Decision-maker
- Appeal Decision-maker

b. <<Pool>> Member Appointment

The Administrator [, in consultation with senior administrators as necessary,] appoints the <<Pool>>, which acts with independence and impartiality. Although members of the <<Pool>> are typically trained in a variety of skill sets and can rotate amongst the different roles listed above in different Formal Complaints, the Recipient can also designate permanent roles for individuals in the <<Pool>>.

c. [<<Pool>> Member Training (See training materials posted online)]

Weapons Policy

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

- all handguns, rifles, and shotguns
- all longbows, crossbows, and arrows
- all knives having a blade length of three inches or more that are not solely used for the purpose of creating art or for the preparation and eating of meals
- all BB guns, pellet guns, air/CO2 guns, blow guns, paint guns, splat balls and altered toy guns
- all fireworks
- all explosives, laboratory chemicals, dangerous compounds, gunpowder, firearm ammunition, and flammable petroleum fuels
- any martial arts weapons, e.g., numb chucks and throwing stars
- any substance that is considered poisonous
- any item used as a weapon in the commission of a crime
- any operative animal trap or other device that is used to ensnare animals.
- any 3D printed firearm, bladed weapon, bow and arrow, or other items considered weapons
- any improper use of a prop weapon and/or the use of a prop weapon to threaten or intimidate

Sex Offenders

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

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

The Michigan State Police is responsible for maintaining this registry. Follow the link below to access the Michigan State Police website. <https://mspsor.com/>

Motor Vehicle Assistance Programs

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

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

Fire Safety Policies, Statistics and Logs Policies

(Updated January 2021)

Housing Facility Fire Systems

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

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

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

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

Fire Safety Education

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

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

Fire Policy Restrictions

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

Smoking

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

Hookahs & Water Pipes

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

Vaporizers And Electronic Cigarettes

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

Wax

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

Incense

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

Candles

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

Electronics

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

Lamps

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

Lighting

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

Machinery

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

Dangerous Items

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

Motorcycles

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

ACB-Specific Policies*Cooking*

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

Radiators

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

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

Taubman-Specific Policies*Cooking*

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

Reporting a Fire

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

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

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

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

Evacuation Procedures

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

When evacuating you should:

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

Carelessness Related to Fire Alarms

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

Fire Drills for 2024

Art Centre Building Student Housing - 3

Taubman Center Student Housing - 3

Student Housing Fire Statistics for 2024

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

Student Housing Fire Statistics for 2023

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

Student Housing Fire Statistics for 2022

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