



POLICY MANUAL

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Mitchell College Policy Manual

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ACADEMIC AFFAIRS

Academic Dishonesty (Plagiarism, Multiple Submissions, and Cheating)

THE POLICY

While plagiarism, whether from print or electronic sources, is often based on premeditated cheating in written assignments, it may result from the unintentional lifting of words, phrases, sentences, or paragraphs from other writers. Unfortunately, students often have received insufficient instruction about plagiarism during their secondary education. For this reason, inadvertent plagiarism committed by students who have not taken CW 101 and the First Year Seminar will not be subject to the same

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penalties as those who have completed these courses. It is recommended that professors require students who have committed inadvertent plagiarism, but have not taken these courses or comparable courses at other institutions, to revise the assignment with a writing tutor from the Academic Success Center. At the same time, if there is a clear indication of deliberate plagiarism by students who have completed CW101 and the First Year Seminar, they will be subjected to the more severe penalties, cited below.

Multiple submissions is the practice of submitting a single paper for credit in two or more different classes (in the same or in different semesters). This is prohibited and is a violation of the College standard of conduct of academic honesty.

Cheating involves looking at the work of another person and intentionally using that person's answers or information as one's own. Cheating during quizzes, tests or exams, both in class and out of class, are a serious violation of the College standard of conduct of academic honesty.

Academic Dishonesty (Reports and Penalties)

THE POLICY

After students have taken CW101 and the First Year Seminar, all offenses of academic dishonesty, including the unintentional kind, must be reported to the Office for Academic Affairs/Dean of the College. Penalties during the student's enrollment at Mitchell College are as follows:

1. First offense involving:
 - (a) –Academic dishonesty with No evidence of premeditation: F in the quiz , exam, project, etc.
 - (b) –Academic dishonesty with definite evidence of premeditation: F in the course, with a notation of academic dishonesty in the permanent record.
2. Second offense involving academic dishonesty of any kind in any course: F in the course involved with notation of academic dishonesty in the permanent record.
3. Third offense involving academic dishonesty of any kind: Immediate dismissal from the College with notation of reason for dismissal in the permanent record.

In every case, the student will be advised by the instructor in writing of the violation of the standard of academic honesty and the sanction imposed. Students have the right to appeal a sanction.

The Appeal Process

1. Upon notification of the charge by the professor, the student may appeal to the professor.

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2. Within five working days of receiving the professor's response, the student may appeal in writing to the chair of the department in which the course is offered.
3. Within ten (10) working days of receiving the student's appeal, the department chair will communicate his/her decision in writing to the student and a copy to the Office for Academic Affairs.
4. If the student is not satisfied with the finding, the student may appeal in writing to the Dean of the College. This must be done within ten (10) working days of the date of the communication from the department chair.
5. The Dean will convene the Academic Standing and Review Committee and notify the student in writing of the date of the hearing. The student has the right to appear before the committee and provide evidence and supporting witnesses.
6. The finding of the Academic Standing and Review Committee is final.

Academic Honesty and Integrity Policy

PURPOSE

The Policy on Academic Integrity Standards is designed to provide protocols and procedures around academic honesty, student plagiarism, electronic plagiarism and multiple submissions, including an explanation of the appropriate and escalating nature of disciplinary actions established for repeat offenses.

THE POLICY

Academic Honesty

Students at Mitchell College are expected to maintain the highest standards of academic conduct. Most students conduct themselves with integrity and are disturbed when they observe others cheating or plagiarizing. Any form of academic dishonesty is condemned at Mitchell College, whether it occurs through cheating within a testing session or in the form of plagiarism in reports, term papers, themes or essays. The Dean of the College will be notified by instructors of any grade or course penalty related to academic dishonesty. The Dean ensures that appropriate sanctions for offenders who have committed multiple violations of the academic honesty standards are applied.

Plagiarism

This is a serious offense involving premeditated cheating in written assignments. It involves claiming credit for certain aspects of work and thoughts not strictly

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one's own. Besides being a matter of dishonesty, plagiarism undermines one primary purpose of the education experience: learning to reason and communicate for one's self. A student will be subject to punishment, therefore, if at any time s/he presents an aspect of the words, logic, ideas, phrasing or organizations of others without giving due credit to the real source. It should be emphasized that the possibility of plagiarism along with its attending penalties applies equally within all courses at Mitchell, whatever the department or course.

Electronic Plagiarism

Students using electronic resources are required to do so in a manner completely consistent with in-class and library instruction and/or on-line instructions and menus. High standards of academic honesty must be applied. The act of copying papers and programs, e.g., subroutines from a textbook or from another individual, and submitting them as your own work constitutes plagiarism and is prohibited.

Multiple Submissions

"Multiple submissions" is the practice of submitting a single paper for credit in two different classes (in the same semester or in different semesters). This is prohibited and is a violation of the College standard of conduct of academic honesty.

Academic Review Policy

PURPOSE

The purpose for this policy is to identify students who are not meeting academic expectations and, where possible, offer assistance as well as a warning of the likely consequence of the student's failure to improve.

THE POLICY

After each full semester (fall and spring) is completed, the College will conduct an academic review to determine the status of students who have had academic difficulty. The Academic Standing and Review Committee made up of representatives from the faculty, the advising staff and the senior staff will convene as soon as feasible after the four week early warning period, after mid-terms and at the end of each full semester.

There are two (2) criteria that must be addressed: academic progress and academic performance. The Academic Standing and Review Committee will review the records of

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each student failing to meet either of the two criteria delineated in the following paragraphs. Students may become ineligible for Financial Aid if they fail to maintain satisfactory academic progress and academic performance.

Financial Aid Status

Financial Aid Probation: The student will be placed on Financial Aid Probation after any semester in which they fail to meet the minimum requirements for Satisfactory Academic Progress.

Ineligible for Financial Aid: The student becomes ineligible for financial aid if, at the end of a given semester in which they were on Financial Aid Probation, they fail to meet the minimum requirements for Satisfactory Academic Progress.

Satisfactory Academic Progress

Consistent with the philosophy of Mitchell College that a student should profit from and be responsible for the academic experience is the notion of Satisfactory Academic Progress.

Satisfactory Academic Progress is the accrual of a significant number of credits attempted by each student. Credits attempted in this definition cover all courses for which the student was enrolled, including courses from which the student withdrew, courses in which the student has an incomplete grade and all repeated courses. Courses audited by the student are not included. All students are expected to complete their program of study while attempting no more than 150% of the credit hours required for their program. For example, if a student is in a program of study that requires 120 credits, they cannot exceed 180 attempted credits (that is, 120×1.5) in completing their program.

A graduated academic progress scale is used. If a student has completed 30 or less credits, they must have completed at least 50% of all credits attempted to achieve satisfactory academic progress. Between 31 and 45 credits completed, the percentage is 60% of all credits attempted. The rate is set at 67% above 45 credits completed. This academic progress standard applies to all matriculated students full and part time. Students failing to meet the academic progress standard may be subject to dismissal from the College.

Satisfactory Academic Performance

Satisfactory academic performance and academic status is based on the Grade Point Average (GPA) achieved at defined levels of completed credits. At the end of every full semester, each student will be evaluated for academic performance and will be placed in one of five academic status categories: Acceptable, Warning, Probation, Suspension, or Dismissal.

After completing more than 60 credits, a student is expected to maintain a cumulative GPA of 2.00. A student falling below 2.00 will be placed on Academic Probation for one

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semester. The cumulative GPA must be brought up to a 2.00 by the end of the given semester or the student will be subject to dismissal. At the recommendation of the Academic Standing and Review Committee, a student may be placed on Academic Suspension for one semester rather than dismissed. A student placed on Academic Suspension may not enroll for the semester (Fall or Spring) following the academic suspension. The student may enroll for the subsequent semester but must achieve a satisfactory Semester and Cumulative GPA in the semester of their return or be subject to dismissal from the College.

Academic Status

Based on the results of the Academic Standing and Review Committee or as a result of a disciplinary hearing, a student may be placed under one of several Academic Status categories. The table below delineates the criteria for the different academic categories at defined levels of credits completed.

Academic Warning: The student's performance is such that continued performance at this level is likely to diminish or eliminate the possibility of academic success and graduation. Performance must be improved or the student may be subject to Academic Probation or Dismissal.

Academic Probation: The student is in academic danger. Continued performance at this level will require separation from the College. The student is expected to secure additional help, curtail nonacademic activities and reassess his or her participation in an academic program. The Dean of the College will set the academic expectations to be met. Failure to meet these expectations could result in dismissal from the College.

The table below delineates the criteria for the different academic categories at defined levels of credits completed.

| Credits Completed | Academic Status | | | Unsatisfactory Progress |
|-------------------|-----------------|-------------|-----------|----------------------------|
| | Warning | Probation | Dismissal | |
| 0 - 15 | 1.50 - 1.99 | 0.00 - 1.49 | Note 1 | < 50% of all Credits Taken |
| 16 - 30 | 1.50 - 1.99 | 0.00 - 1.49 | < 1.00 | < 50% of all Credits Taken |
| 31 - 45 | 1.75 - 1.99 | 1.40 - 1.74 | < 1.40 | < 60% of all Credits Taken |
| 46 - 60 | N/A | 1.60 - 1.99 | < 1.60 | < 67% of all Credits Taken |
| > 60 | N/A | 1.80 - 1.99 | < 1.80 | < 67% of all Credits Taken |

Note 1: Students are not normally subject to dismissal after their first semester, however, the Academic Status Review Committee may recommend dismissal if the committee determines that further association with the College would not be beneficial to the student.

Suspension: Circumstances require the student to be separated from the institution. Either for social or academic reasons the student is not profiting from his or her association with Mitchell College. Suspended students may be allowed to return to the College if it can be demonstrated that the suspension has allowed the student to recommit his or her energy to the completion of a degree program.

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Dismissal, Academically or Socially: The student cannot profit from the Mitchell experience and is not likely to in the future. The student's presence may be deemed detrimental to the success of other students. Dismissal is generally irrevocable. A first semester, full-time student with a GPA that falls below 0.50 at the end of the 1st semester will be academically dismissed with the right to appeal.

Appeal: The student has a right to appeal the College's decision regarding suspension or dismissal to the Dean of the College. The appeal must be in writing and must be received by the office of the Vice President for Academic Affairs/Dean of the College no later than a date specified in the dismissal letter. The appeal should contain any new information or extenuating circumstances that the student feels would mitigate the decision of the Committee.

Academic Standing

THE POLICY

The Academic Standing and Review Committee made up of representatives from the faculty, the advising staff and the senior staff will convene as soon as feasible after the four week early warning period, after mid-terms, and at the end of each full semester to conduct an academic standing and review to determine the status of students who have had academic difficulty.

Two (2) criteria must be addressed: academic progress and academic performance. The Academic Standing and Review Committee will review the records of each student failing to meet either of the two criteria delineated in the following paragraphs. Students may become ineligible for Financial Aid if they fail to maintain satisfactory academic progress and academic performance.

Academic Status

THE POLICY

Based on the results of the Academic Standing and Review Committee or as a result of a disciplinary hearing, a student may be placed under one of several Academic Status categories. The table below delineates the criteria for the different academic categories at defined levels of credits completed.

Academic Warning: The student's performance is such that continued performance at this level is likely to diminish or eliminate the possibility of academic success and graduation. Performance must be improved or the student may be subject to Academic Probation or Dismissal.

Academic Probation: The student is in academic danger. Continued performance at this level will require separation from the College. The student is expected to secure additional help, curtail nonacademic activities, and reassess his or her participation in an academic program. The Dean of the College will set the academic expectations to be met. Failure to meet these expectations could

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result in dismissal from the College.

Academic Dean's Hold: A hold will be placed on a student's academic record if a student with an academic standing of "Probation" withdraws from the College during a semester. Since the student will likely be unable to meet the academic progress standards toward a degree because of the withdrawal, the student must review academic standards with the Academic Dean prior to being given the opportunity to return to the College.

*Students who qualify for financial aid should also see financial aid requirements on page 11 of the catalog.

Suspension: Circumstances require the student to be separated from the institution. Either for social or academic reasons the student is not profiting from his or her association with Mitchell College. A suspended student may be allowed to return to the College if it can be demonstrated that the suspension has allowed the student to recommit his or her energy to the completion of a degree program.

Dismissal, Academically or Socially: The student cannot profit from the Mitchell experience and is not likely to in the future. The student's presence may be deemed detrimental to the success of other students. Dismissal is generally irrevocable.

A first semester, full-time student with a GPA that falls below 0.50 at the end of the 1st semester will be academically dismissed with the right to appeal.

Appeal: The student has a right to appeal the College's decision regarding suspension or dismissal to the Dean of the College. The appeal must be in writing and must be received by the office of the Vice President for Academic Affairs/Dean of the College no later than a date specified in the dismissal letter. The appeal should contain any new information or extenuating circumstances that the student feels would mitigate the decision of the Academic Standing and Review Committee.

The table below delineates the criteria for the different academic categories at defined levels of credits completed.

| Credits Completed | Academic Status | | | Unsatisfactory Progress |
|-------------------|-----------------|-----------|-----------|----------------------------|
| | Warning | Probation | Dismissal | |
| 0-15 | 1.50-1.99 | 0.00-1.49 | Note 1 | < 50% of all Credits Taken |
| 16-30 | 1.50-1.99 | 0.00-1.49 | < 1.00 | < 50% of all Credits Taken |
| 31-45 | 1.75-1.99 | 1.40-1.74 | < 1.40 | < 60% of all Credits Taken |
| 46-60 | N/A | 1.60-1.99 | < 1.60 | < 67% of all Credits Taken |
| >60 | N/A | 1.80-1.99 | < 1.80 | < 67% of all Credits Taken |

Note 1: Students are not normally subject to dismissal after their first semester, however, the Academic Status Review Committee may recommend

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dismissal if the committee determines that further association with the College would not be beneficial to the student.

Add-Drop Policy

PURPOSE

The purpose of this policy is to define the process for a student to make a valid schedule change without reflection on a transcript.

THE POLICY

Once the semester starts, it may be determined that the previously arranged schedule is no longer appropriate and a change is desirable. For that purpose, Mitchell College has set aside the first six (6) days of classes as an Add-Drop period where a student may make valid schedule changes.

Students falling below 12 credits are no longer considered full time students and this could affect their financial aid, residential status, and athletic eligibility (NCAA Bylaw 14.01.2).

Please add course before dropping course so as not to affect a student's academic standing.

To effect a change a student must meet with an academic advisor who approves the change and enters details into the computer. If there are seats available in the class requested and the new schedule will produce no time conflicts for the student, a change will be allowed.

Class availability during Add-Drop is severely limited. It is imperative that a student develop an acceptable schedule during the registration period. Courses dropped during this period are not reflected on the student's transcript.

PROCEDURE

Students must meet with their Academic Advisor during the first six (6) days of the start of classes each semester in order to request the addition or withdrawal of a class.

Advisors must first add a class to a student's roster before processing a withdrawal.

Students and Advisors must be cognizant of NCAA rules pertaining to status before processing withdrawals from classes for athletes (add course before dropping). If a student athlete falls below 12 credits (full time student), it will result in a Level 1 NCAA

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Violation resulting in the student athlete's loss of eligibility and forfeiture of games. The NCAA will also require the Academic Advisor to attend the next NCAA Rules Conference.

Articulation Agreements

THE POLICY

The College has in place a comprehensive transfer policy which allows for the consistent transfer of credit from regionally accredited institutions for appropriate coursework completed. In addition, the College has several articulation agreements with institutions from which there is significant interest and a pattern of student transfer. These agreements are revised periodically as curriculum changes occur.

Auditing a Course

THE POLICY

Full-time students (12 credits or more) may audit any Mitchell College course with the permission of the instructor. They must register as an auditor at the Registrar's Office. No credit is earned. Part-time students also may audit courses on a space-available basis. Total credits for a part-time student may not exceed 11 in any combination of courses taken for credit or audit. There is a fee for an audited course.

City of New London Scholarship and Tuition Program

PURPOSE

This policy establishes tuition awards for employees of the City of New London.

THE POLICY

- a. The program is available to employees of the City of New London and the City of New London Board of Education, whether they live in the City or elsewhere.
- b. The total academic year award pool for all applicants in this program is limited to \$15,000.
- c. The award covers tuition only and does not include fees and books.
- d. Individual awards are limited to two courses per semester for a part-time student only, not to include summer or winter sessions.
- e. A student must be in good standing at their position and must apply for the award through the City of New London Personnel Office.
- f. Requests will be considered in the order in which they are received.
- g. The application deadlines are as follows: Fall Semester – May 30th ; Spring Semester – November 30th .

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- h. Accepted applicants will be required to comply with all College policies relating to students.
- i. This policy is subject to revocation, suspension, revision or amendment by the College at any time in its sole discretion.
- j. There will be no refund if an applicant withdraws after classes have started. If the applicant withdraws before the beginning of class, scholarship funds will be released for late applicants. The Financial Aid Office will notify the City of New London.
- k. Students who withdraw more than two times before completing a semester will be prohibited from applying for future scholarships.

PROCEDURE

- a. Applicants will submit to the Financial Aid Office an approved City of New London application, a written supervisor acknowledgement with an employer statement of good standing prior to registration at the college.
- b. The Financial Aid Office will process the application and notify the student of an approved award through the College Award process. The Financial Aid Office will also forward a copy of the award to the City of New London. The applicant will be responsible for complying with all Financial Aid processes related to award acceptance. Once the award letter is accepted, the student may register for class.
- c. The Financial Aid Office will reconcile all awards given and advise the City of New London Personnel Office once the annual limit has been reached.
- d. Students must follow college policies related to registration and applying for part-time enrollment.

College Policy on Student Devices in the Classroom

THE POLICY

It is the right of every college student to be educated in an environment that is free from distraction from the educational activities being conducted in the classroom. To support students' right to a distraction-free educational environment, the following policy on use of electronic devices in the classroom is recommended to all faculty and students at Mitchell College:

- All electronic devices, including cell phones, MP3 players, iPods, or pagers, must be turned off during class time.
- In the case of medical emergency, or family need, when contact with the student is required, a cell phone may be left on during class time, with permission from the instructor. The cell phone must be set to vibrate to minimize the level of distraction for other students.
- Laptops are to be used only in the following circumstances:
 - As an approved reasonable accommodation for a student with a disability certified by the Office of Disability Support Services/Learning

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Resource Center.

- Laptops used for the purpose of disability accommodation are restricted to this purpose only and may not be used for other purposes.
 - There has been prior permission granted by the instructor to an individual student.
 - There is a classroom requirement for laptop use initiated by the instructor.

A student's use of electronic devices in the classroom without prior permission, including cell phones, MP3 players, iPods, or pagers may result in the student being requested to leave the classroom, and an absence may be recorded for the student for that class.

Course Registration

THE POLICY

During the spring semester for the subsequent fall and during fall semester for the following spring, Mitchell College provides students with the opportunity to select the courses they wish to take during the next semester. Prior to the actual dates of Registration, students are provided with copies of the Semester Schedule and the necessary registration materials so that they may plan their schedule. The student is expected to meet with an academic advisor to ensure that his/ her selection of courses is academically and programmatically sound. The academic advisor enters registration details into the computer and spaces are reserved in classes pending payment of the tuition bill.

Course Substitution

THE POLICY

There may be times when the requirements of a particular degree program do not exactly match the student's needs. Under special circumstances, it may be possible for a student to arrange to substitute one particular class for another within the curriculum that the student is pursuing. Since the purpose of a course substitution is to tailor the curriculum to a particular student's needs, permission for the substitution must be obtained before the student registers for the course. To obtain permission for substitution within a curriculum, the student must first obtain a Course Substitution form from his/her academic advisor or the Registrar's Office. The student must then make an appointment with his/her academic advisor. The form requires the signature of the Department Chair. The form is then forwarded to the Office for Academic Affairs, and then to the Registrar's Office where the curriculum notation will be made.

Determination of Enrollment Status

THE POLICY

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There are three different types of enrollment status. Please read the following carefully and consult with an academic advisor if there are any questions.

- I. Full-time status: Full-time status is defined as being registered for twelve semester hours or above at the end of the add/drop week during each of the Fall and Spring semesters. Full-time students are eligible for on-campus residency privileges and athletic participation. They pay the full College Fee.
- II. Fewer than twelve credits:
 - a. Modified Status: the LRC student who, with the approval of the Director of the Learning Resource Center, is enrolled in fewer than twelve credits (at the end of the add/drop period).
 - b. LRC students with modified status are eligible for on-campus residency privileges and may qualify for athletic participation. The Director of the Learning Resource Center will be responsible for informing the Director of Residence Life with the names of modified status LRC students eligible for on-campus housing. Modified Status students pay the tuition fees on the published part-time scale, the general College fees, and full room/board costs. They are eligible for full LRC services and pay the full fee for them. Their eligibility for financial aid is in accordance with federal and state regulations.
 - c. Part-time Status: all other students (i.e. not in the Modified Status) enrolled in fewer than twelve credits as of the end of add/drop week. Part-time students are billed for tuition on the existing scale. The issue of their contribution to the College Fee needs to be addressed.

Examination and Testing

THE POLICY

Because of the requirement to submit interim semester grades, testing or some assessment procedure before four and seven weeks is necessary in first and second year courses. In third and fourth year courses, semester tests are given at the discretion of the faculty member. However, the results of this testing provides valuable information to the Academic Standing and Review Committee in determining student status and it is urged in all courses, irregardless of level.

Final Examination and Assessment

THE POLICY

- A final assessment of outcomes in terms of student ability is mandatory in all courses.
- Final assessments may take many forms, including traditional final examinations at

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the conclusion of each semester according to a schedule published by the Registrar.

- Missed final examinations and other assessments cannot be made up unless there are exceptional circumstances.
- Assessment is the decision of the faculty member. However, the method of assessment, percentage of grade and calculation of final grades must be made clear to the student on the course syllabus.
- Faculty members are also required to keep on file records of assessments and final grades for one year.

Final Examination Requiring Accommodations

THE POLICY

Any final examination accommodation requested by a student and supported through documentation on file in the LRC is the responsibility of the faculty member. As noted, the LRC staff is available to assist with any testing accommodation requests. If assistance is requested from the LRC, the same procedure must be followed: Testing Accommodation Request Forms are to be completed by the student and signed by the Learning Specialist at the Learning Resource Center.

The student delivers the signed form to the faculty member. The faculty member will stipulate on the form any special material (i.e., use of a calculator, class notes, outlines, etc.) that may be permitted during the test/exam. Please ensure that the form is completely and accurately completed.

Due to the large number of requests for final examination accommodations, students are instructed to return completed Testing Accommodation Forms to the LRC at least one week prior to the last day of classes.

If the accommodation is to take place in the LRC, a copy of the exam must be delivered by the faculty member to the LRC one day prior to the exam date.

The faculty member must retrieve the completed exam from the LRC no later than one day after the exam date.

Please note: The LRC staff will not proctor a final examination that has been hand-carried to the Center by the student, and will not allow a student to hand-carry an exam back to the faculty member.

Financial Aid Status

THE POLICY

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Financial Aid Probation: The student will be placed on Financial Aid Probation after any semester in which they fail to meet the minimum requirements for Satisfactory Academic Progress.

Ineligible for Financial Aid: The student becomes ineligible for financial aid if, at the end of a given semester in which they were on Financial Aid Probation, they fail to meet the minimum requirements for Satisfactory Academic Progress.

Grade Changes

THE POLICY

If a student believes an error has been made, the student has the right to appeal a grade received in a course. Within ten days of receiving the grade, the student should request, in writing, that the faculty member review the grade. The faculty member will explain, in writing, how the grade was calculated.

If the student is dissatisfied with the outcome, the student has a right to appeal, in writing, to the department chair of the department in which the course is taught. The department chair notifies the student and the Dean of the College of his or her recommendation.

If the faculty member or department chair is unavailable in the summer or during the winter break, the student must wait until the College reopens to resolve the issue. No grade may be changed without completing the Grade Change Form.

Incomplete

THE POLICY

Students are expected to complete all course requirements during the normal semester. The 'Incomplete' mark is given only when, due to nonacademic circumstances beyond the student's control, the student has not completed a relatively small portion of course requirements. The work done to date of the petition must be of passing quality. The "I" is given only to students who have been attending and have been making regular progress.

In exceptional circumstances when a student determines s/he may be unable to meet all course requirements during the scheduled course period, the following guidelines and process are in place:

1. Students who believe they have legitimate reasons for missing a final examination or failing to complete course work may petition for a makeup examination or an extension to course work deadlines by completing a Petition for an Incomplete Grade in a Course Form and giving the completed form to the Office for Academic Affairs.

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2. The “Incomplete” is entered by the Registrar only with prior approval. In all other circumstances, the instructor will assign a grade of F to course work or to examination requirements not met, and then calculate the final grade for the course in the usual way.
3. If no grade is submitted by the instructor by the last day of classes of the semester, the Registrar will assign a grade of F for the course.
4. Any student who is granted an Incomplete must complete all outstanding work, at the latest, by the last day of classes of the following semester. Therefore, incomplete work for fall semesters must be completed and submitted by the last day of classes in May and incomplete work for spring and summer semesters must be submitted by the last day of classes in December. Failure to meet these deadlines means that the Incomplete will revert to the original grade submitted by the faculty member or an F if no grade was submitted.
5. The final grade for the course will be calculated by the instructor and submitted to the Registrar upon completion of course requirements by the last day of classes of the semester.

Please note that because a GPA cannot be calculated for the semester in which the Incomplete is entered: (i) any student who has an Incomplete mark on the transcript is not eligible for inclusion on the Dean’s List or Commendable Scholars List for that semester; (ii) eligibility for financial aid may not be determined until the Incomplete is removed, thereby delaying essential decisions which are made by the Financial Aid Office.

Independent Study

THE POLICY

The opportunity to pursue Independent Studies is extended to a small number of sophomores, juniors and seniors who wish to explore areas that are not represented in the curriculum. It is defined as an individual library or laboratory research or creative arts project under the direct sponsorship of a full-time faculty member. Independent Study requires traditional academic work involving reading, writing and experimental or special projects.

To arrange for an Independent Study, the student must define the project, find a faculty sponsor, and obtain approval from the department chair for the course prior to the start of the semester in which the Independent Study will be taken. The faculty member, the department chair and the Academic Dean must approve the project in order for the student to register for the course.

Approval will be based on a written application form available from the faculty sponsor or the Registrar’s Office. It will require evidence of:

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- The academic merit of the study
- The availability of resource material
- The student's own capacity to undertake the work, including a copy of the student's transcript

The minimum GPA for being considered for an Independent Study is 2.5. Once approved, the student will meet with the instructor once each week for one hour, although in some circumstances the nature of the subject matter may dictate less frequent meetings of longer duration. However, the minimum number of instructional hours in any given semester must be 15. The course is graded and normally carries three credits.

Major Change

THE POLICY

Once students have embarked on a particular academic program, they may discover that the major selected does not fit their skills, interests and abilities. If they decide to change majors, they must meet with their academic advisor to discuss the proposed change. A change of major may require a reexamination of transfer credits, a change in the applicability of currently completed credits and possibly a delay in graduation. Changing a major may affect their graduation date. It is important to realize this before the change is completed. A student must obtain signatures from the Academic Advisor and the Department Chairs of the Exiting and Entering Departments. The Change of Major form is then forwarded to the Registrar's Office so the permanent record can be updated. Students wanting to move from an associate degree program to a bachelor degree program must apply for the status change through the Admissions Office.

Repeating a Course

THE POLICY

Any student wishing to repeat a course at Mitchell College may do so. The higher grade will be used to calculate the Grade Point Average. Both courses will be listed on the transcript.

Students also have the option of repeating the course at another accredited institution, with prior approval from the Mitchell College Registrar. They must earn a grade of C or better to transfer the credit back to Mitchell College. If the transfer course is accepted, it will fulfill their graduation requirement and both courses will be listed on their transcript; however, neither grade will be used to calculate their Grade Point Average.

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Satisfactory Academic Performance

THE POLICY

Satisfactory academic performance and academic status is based on the Grade Point Average (GPA) achieved at defined levels of completed credits. At the end of every full semester, each student will be evaluated for academic performance and will be placed in one of five academic status categories: Acceptable, Warning, Probation, Suspension, or Dismissal.

After completing more than 60 credits, a student is expected to maintain a cumulative GPA of 2.00. A student falling below 2.00 will be placed on Academic Probation for one semester. The cumulative GPA must be brought up to a 2.00 by the end of the given semester or the student will be subject to dismissal.

At the recommendation of the Academic Standing and Review Committee, a student may be placed on Academic Suspension for one semester rather than dismissed. A student placed on Academic Suspension may not enroll for the semester (fall or spring) following the academic suspension. The student may enroll for the subsequent semester but must achieve a satisfactory Semester and Cumulative GPA in the semester of the student's return or be subject to dismissal from the College.

Satisfactory Academic Progress

THE POLICY

Consistent with the philosophy of Mitchell College that a student should profit from and be responsible for the academic experience is the notion of Satisfactory Academic Progress.

Satisfactory Academic Progress is the accrual of a significant number of credits attempted by each student. Credits attempted in this definition cover all courses for which the student was enrolled, including courses from which the student withdrew, courses in which the student has an incomplete grade and all repeated courses. Courses audited by the student are not included. All students are expected to complete their program of study while attempting no more than 150% of the credit hours required for their program. For example, if a student is in a program of study that requires 120 credits, they cannot exceed 180 attempted credits (that is, 120×1.5) in completing their program.

A graduated academic progress scale is used. If a student has completed 30 or less credits, s/he must have completed at least 50% of all credits attempted to achieve satisfactory academic progress. Between 31 and 45 credits completed, the percentage is 60% of all credits attempted. The rate is set at 67% above 45 credits completed. This academic progress standard applies to all matriculated students full and part time.

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Students failing to meet the academic progress standard may be subject to dismissal from the College.

Student Leave of Absence

THE POLICY

The purpose of a Leave of Absence is to allow a student to separate from the institution for a finite period of time and to reserve the right to return within two (2) years without requiring readmission to the College. A leave of absence must be requested prior to the start of a semester and include a definite return date at the start of a semester, accruing to no more than two (2) full years after the student departs.

A formal request for the leave needs to be made by the student.

To request a leave of absence, the student should review the option with his/her academic advisor and to ensure that the decision is in the student's best interest. The student writes a letter to the Academic Dean requesting the leave and explaining the circumstances and then delivers it to the Academic Affairs Office in Mitchell Hall. The Academic Dean will review the request, consult with the Academic Advisor and Department Chairperson, and then notify the student of the decision regarding the request.

While on a Leave of Absence, the student is expected to inform the College of any changes in the planned return date. Under no circumstances will a leave of absence be extended beyond two (2) years. If a student does not comply with the leave of absence regulations, s/he must apply for readmission at the Admissions Office.

Testing Requiring Accommodations

THE POLICY

Any testing or final examination accommodation requested by a student and supported through documentation on file in the Learning Resource Center is the responsibility of the faculty member. However, the Learning Resource Center (LRC) staff is available to assist with any testing accommodation requests. If assistance is requested from the LRC, the following procedure must be followed:

- Testing Accommodation Request Forms are to be completed by the student, the course instructor and signed by the Learning Specialist at the LRC.
- The student delivers the signed form to the faculty member.
- The faculty member will stipulate on the form any special test conditions (i.e., use of a calculator, class notes, outlines, etc.) that may be permitted during the test/exam.

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- Due to the large number of requests for testing accommodations, students are instructed to return completed Testing Accommodation Forms to the LRC at least three days prior to the test date and, in the case of Final Exams, one week prior to the last day of classes.
- If the accommodation is to take place in the LRC, a copy of the test/exam must be delivered to the LRC one day prior to the test/exam date by the faculty member.
- The faculty member must retrieve the completed test/exam from the LRC no later than one day after the test/exam date.

Please note: The LRC staff will not proctor a test or exam that has been hand-carried to the Center by the student, and will not allow a student to hand-carry a test or exam back to the faculty member.

Title III Policy: Requesting Funds

PURPOSE

This policy establishes the processes through which Title III funds can be requested for disbursements related to Title III projects.

THE POLICY

- a. Disbursements to support Title III funded projects & activities that are not individually specified in the Title III narrative may be submitted for funding from Title III.
- b. Individuals receiving approval to use Title III funds must also follow all Mitchell College policies and procedures, including those related to purchasing and hiring. Funds cannot be released until all paperwork (Title III, Business Office, and Human Resources) is complete and on file.
- c. Disbursements related to Title III funded projects and activities listed in the approved Title III budget, do not require this form as approvals are incorporated into the existing paperwork.

PROCEDURE

- a. The individual requesting funds (Requestor) must complete the "Request for Title III Funds" form (Appendix A) found on the Title III Policies & Procedures page at mariner.mitchell.edu.

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- b. The completed and signed form is submitted to the Title III Administrative Assistant prior to any purchase being made or activity being scheduled. When completing the Request for Funds for, Requestor must include billing and or/contact information for any vendor(s).
- c. The Title III Administrative Assistant records the request, and
 - i. If the request is equal to or greater than \$500, forwards it to the Title III Task Force for review.
 - ii. If the request is less than \$500, forwards it to the Title III Activity Director of signature. The Activity Director reserves the right to submit requests of any amount for committee approval prior to signing.
- d. If Task Force denies request, the Title III Administrative Assistant will record and notify the Requestor.
- e. If Task Force approves request, the Title III Administrative Assistant will record and notify the Requestor, and forward to the Title III Activity Director for first signature.
- f. The Title III Activity Director signs and forwards to the Title III Program Coordinator for second signature.
- g. The Title III Program Coordinator signs and forwards to the Business Office.
- h. Requestor must follow all Mitchell College policies and procedures related to purchasing and hiring.

Transferring Credit to Mitchell

THE POLICY

Any student who, prior to acceptance at Mitchell College has accumulated college credits at another institution must submit transcripts of those credits, prior to acceptance as a degree candidate, if the student wishes to have those credits applied to a Mitchell curriculum. In order to be accepted as transfer credit, a course must have a grade of "C-" or better (except in the case of a repeat course, which must have a grade of "C" or better), fit into the Mitchell curriculum, satisfying a requirement or elective and carry credit from an accredited institution. Credits which are not applicable to the student's curriculum at Mitchell, even though they may otherwise be perfectly acceptable for transfer, will not be accepted. If a student changes majors, it may be necessary to review the original award of transfer credit in reference to the newly selected major. The grades earned for transfer credits cannot in any way be used to calculate the student's grade point average at Mitchell.

Transferring Courses to Mitchell (Matriculated Student)

THE POLICY

There are circumstances, such as the need to make up a missed course, where it may benefit a student to take a course away from Mitchell College. This is especially common during the summer. However, bachelor degree candidates must earn their last thirty

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(30) credits at Mitchell College.

Should such circumstances arise, it is necessary that the student secure permission from Mitchell College to take the course, prior to registration for the course. In order to secure permission, the student must obtain a catalog description of the course and submit a hard copy to the Registrar's Office at Mitchell College. The Registrar will review the description and verify that it is an appropriate equivalent to the course at Mitchell College. If the replacement is valid, a notation will be made on the student's file. The student is responsible for making sure that an official transcript is submitted to Mitchell. The course must always satisfy the same requirements as any course reviewed for transfer credits.

Withdrawal from a Course

THE POLICY

After the Add-Drop period has ended, a student may discover that special circumstances warrant discontinuation of a particular course. Withdrawal from any course without academic penalty may be permitted up until the date specified on the Academic Calendar. To withdraw from a course, a student must obtain a Course Withdrawal Form from the academic advisor or at the Registrar's office, assure the form is completed and signed by all parties noted on the form, and deliver the form to the Registrar's Office. A notation of W is recorded for the course in question. A grade point value is not assigned to the W notation.

If a full-time student withdraws to below twelve credits during the semester, s/he could lose eligibility to live in College housing. In the case of a non-LRC student who drops below twelve semester hours, the Dean of Students will make the decision about residence hall status. In the case of an LRC student, the Director of the LRC and the Dean of Students will make the decision.

If a student withdraws to below twelve semester hours, s/he will lose eligibility to participate in the athletic program.

Process for withdrawal to below twelve (12) semester hours:

1. In order to withdraw to below twelve semester hours, the full-time student must meet with the Academic Advisor who will sign a withdrawal form and, if approved, provide a rationale for the approval.
2. An LRC student must consult with the Learning Specialist.
3. The student must meet with the instructor, who must sign the form.
4. The student must then sign the withdrawal form, indicating that s/he has read the above policy and understands the implications on housing, athletic participation, and financial aid status.

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5. A resident student wanting to remain in campus housing must, at the same time as preparing the withdrawal form, get written permission from the Dean of Students. That letter will accompany the withdrawal form when delivered to the Registrar's Office for recording.

The decision will be copied to the Director of the LRC, Dean of Students, Director of Academic Advising and, as necessary, the Director of Financial Aid, the Academic Advisor, and the Bursar.

Withdrawal from the College

THE POLICY

In the course of a student's enrollment at Mitchell, it may become necessary for him or her to discontinue participation in all classes during a given semester and leave the College for the remainder of that term. To ensure that a student does not receive grades of "F" on all courses in progress, it is important to withdraw officially from the College.

A student may officially withdraw from the College anytime during the semester up until Noon on the last full day of classes prior to the start of the Final Exam period. The Bursar's Office maintains a chart of refund amounts associated with the date of withdrawal. It is the student's responsibility to understand in advance of the request, the implications (including financial) in withdrawing.

To withdraw officially from the College, a student must meet with an academic advisor. The purpose of this meeting is not to question the student's decision but rather to make sure that all options have been explored and that the best possible resolution of the circumstances is achieved.

Once a determination has been made that a withdrawal is the best course for a student to follow, the academic advisor will generate an electronic Withdrawal Form which is sent to necessary campus offices and the student's faculty. This form officially notifies specific administrative offices that the student will be ending his/her attendance at Mitchell for that semester. This notice will also allow the Registrar's Office to convert the final grades for all of the student's courses to "W".

Withdrawal/Dismissals (Occurring During the Semester)

THE POLICY

1. Administrative Dismissal for Non-Compliance with Academic Requirements -- A student who, after review by the Academic Standing and Review Committee (ASRC), is deemed not to be meeting basic academic requirements in all course work, attendance, and attention to responsibilities and who started the semester on probationary status, may be dismissed from the College any time after the fifth

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week of the academic semester. The student will be notified in writing of the possibility of dismissal and will be given five week days from the date of the letter to meet with the advisor and instructors to resolve the situation. If the student does not contact his or her advisor and instructors and the situation is not resolved, the student may be dismissed by the ASRC.

Re-admittance to the College is not possible within the same semester. For subsequent semesters, re-admittance is by appeal to the Academic Standing and Review Committee. The appeal should be filed through the office of the Dean of the College.

2. **Administrative Withdrawal for Non-Attendance or Non-Compliance with Course/Faculty Standards** Students who are absent one-half or more of all class meetings in all courses by week five of a semester may be notified in writing by the instructor of the possibility of their being administratively withdrawn from the College. The student so notified will be given until five week days from the date of the notice to meet with advisors and instructors to resolve the situation. If attendance has not improved by week ten, the student may be withdrawn by the ASRC. The Academic Standing and Review Committee may administratively withdraw a student from all courses.

An individual instructor may request the ASRC to process an administrative withdrawal from his or her course if attendance is unsatisfactory. Re-admittance to the College is by appeal to the Academic Standing and Review Committee. The appeal should be filed through the office of the Dean of the College.

3. If a student does not attend class during the first two weeks of the semester, he or she will be removed from that class list by the Registrar.

ATHLETICS

Athletic Eligibility

THE POLICY

Eligibility to represent Mitchell College in intercollegiate athletics competition: A student-athlete shall maintain satisfactory progress toward a baccalaureate degree at Mitchell as defined in the College Catalog: page 31.

*A student on unsatisfactory status who has not achieved satisfactory progress, after summer and/ or fall study and is therefore ineligible for athletic participation.

*Please refer to Student Athlete Handbook for further information on athletic eligibility.

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COMMUNICATIONS

College Publications Policy

PURPOSE

The principal goal of the Publications Policy is to establish consistency and accuracy in College publications and to provide a consistent brand identity for Mitchell College publications.

THE POLICY

Any printed piece that is intended for distribution to an external audience (readership beyond the Mitchell College faculty, staff, and currently enrolled students), is produced using College funds, and/or bears the name or logo of Mitchell College must be routed through the Office of Communications. The final authority for design and format of publications rests with the professional staff of the Office of Communications. The Office of Communications coordinates design and printing of publications, event programs, college catalogs, business cards, stationery, citations, etc., using the bid process established by the College's Purchasing Department. It is mandatory that all departments requesting publications design and production adhere to the timelines outlined in procedure section below.

PROCEDURE

1. **Plan early.** Contact the Office of Communications early in the planning stages of your publication. We need to allow for sufficient time to schedule editing, designing, bidding, and printing of your publication. *We require a minimum of six weeks advance notice (two weeks for writing and editing; two weeks for design and photos; two weeks for printing) for Large Publications. We require a minimum of three weeks advance notice for Small Publications.*
2. **Make an appointment** with a Office of Communications staff member. Be prepared to discuss the intended audience for your publication, your deadline, your budget, quantity needed, and your plans for distributing the publication.
3. **Supply the information.** While the Office of Communications staff will write and/or edit copy for your publication, we depend on you for the information. It is preferred that draft copy be brought to the initial meeting and in a format that can be sent to the Office of Communications electronically. If the case is no copy is available it is required there is a rough outline provided and the Office of Communications will produce a finished version, subject to the ordering

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department's approval.

4. **Costs.** We will secure cost estimates for your piece when a design has been worked up; however, it is helpful to us to have an idea of your budget before design begins. Some printed publications meet the standards by which we can print them internally. Larger publication projects would require the printing and production be outsourced to one of the College's preferred vendors.
5. **Project approval.** You will be asked to approve your project before it goes to the printer. If anyone other than you must also approve copy or be involved at various decision points, it is your responsibility to get that approval.
6. **Schedule.** As a rule, publications will be logged into the publication schedule on a first-come, first-served basis

FACILITIES

FINANCE AND ACCOUNTING

College Purchase Policy

PURPOSE

The purpose of this policy is to establish a purchasing process that provides the procurement of goods and services in a cost-effective and timely manner.

THE POLICY

Mitchell College has purchasing program to serve the following purposes:

- Providing a convenient method of purchasing for all departments of the College.
- Providing approval and documentation requirements for purchases based on the value of good.

All purchasers must adhere to this policy in order to ensure timely payment for purchases and correct budgetary recording.

All purchases must be for College purposes. Purchases for goods and services with credit cards are within the scope of this policy.

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PROCEDURE

A. Purchases

1. Purchases of Goods and Services Less than \$250

Within three days of receipt of goods/services, requester should submit the following to Accounts Payable:

- a. Proof of delivery (packing slip) or notice of receipts, noting any exceptions or defects in materials.
- b. Approval of payment by appropriate Vice President with includes the appropriate account code.

2. Purchases of Goods and Services Equal to or Greater than \$250 but Less than \$5000

- a. **Prior to purchase**, the requester should submit a WebPurchasing Requisition for Vice President's approval. The Purchasing Manager can assist with the research process.
- b. When the Requisition is approved by the appropriate Vice President, Purchasing will generate a Purchase Order and submit the Purchase Order to the vendor.
- c. Upon receipt of goods or services, requester should submit initialed proof of delivery (packing slip) or notice of receipt to Accounts Payable, as well as notice of any exceptions or defects in materials.

3. Purchases of Goods and Services Equal to or Greater than \$5000

- a. Requester should submit their request to the appropriate Vice President before submitting a WebPurchasing Requisition. The Purchasing Manager can assist with the bidding process and may obtain additional bids.
- b. Upon selection of a bid, requester should submit a WebPurchasing Requisition for Vice President's approval.
- c. When the Requisition is approved by the appropriate Vice President, Purchasing will generate a Purchase Order and submit the Purchase Order to the vendor.

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- d. The Purchasing Manager can consider another supplier and will relay that information to the requester.
 - e. Upon receipt of goods or services, requester should submit initialed proof of delivery (packing slip) or notice of receipt to Accounts Payable, as well as notice of any exceptions or defects in materials.
4. Contracts for Goods and Services
- a. All contracts must be approved and signed by the Vice President for Finance and Administration or Purchasing Manager, depending on the value of items included in the contract.
 - b. The Purchasing Manager will generate a Purchase Order for payments under the contract.

Credit Card Policy

PURPOSE

To establish appropriate use of the Mitchell College credit card by Mitchell employees for College-related expenses. Employees who are extended a credit card are expected to exercise prudence in the use of the card to ensure that there is a benefit to the College for the resources expended.

THE POLICY

1. Mitchell College has a credit card program to accommodate expenses for employees that are required to travel on college business and for the occasional purchase of goods that fall below the purchase order threshold.
2. College credit cards may be used, on an exception basis, when purchase orders are required only when the purchases are processed through the Purchasing Department and the Purchasing Manager's credit card is used.
3. Travel-related expenditures are governed by the Travel and Reimbursement and Reporting Policy.
4. Expenses that are specifically unallowable for credit card use are:
 - a. Personal expenses
 - b. Purchases that require a Purchase Order
 - c. Furniture
 - d. Technology including software
 - e. Alcohol
 - f. Traffic fines
 - g. Tips in excess of 20% and tips in addition to pre-applied gratuity
 - h. Cash advance

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PROCEDURE

Obtaining a College Credit Card

- a. Employee completes the College Credit Card Application
- b. Application is approved by the employee's Vice President and submitted to the VPFA for review and approval.
- c. After approval, the application is forwarded to the Purchasing Manager for processing.
- d. When the employee is notified that the credit card has been received, the employee will meet with the Purchasing Manager to obtain the card and sign the College Cardholder Agreement.
The Purchasing Manager will review with the employee their obligations including applicable policies and their month-end tasks related to account coding.

Retaining a College Credit Card

- a. Prior to the beginning of the Fall semester, the Purchasing Manager will provide a list to each vice President of the current card holders within their organization.
- b. Each Vice President will review the list, including the credit limits, to determine if the current needs are consistent with the cardholders.
- c. Vice Presidents can recommend cards for removal from the program but newly requested cards must be initiated through the application process.

Recording Monthly Expenses

- a. The credit card is supported by a website for the review and account coding of the expenses.
- b. Each month, employees will code their charges on this website.
- c. The Purchasing Manager is responsible for supporting the use of this website and the employees. This includes researching account codes, resetting passwords and reports that the employees can utilize to manage their charges.
- d. Consistent with IRS regulations, meals and entertainment expenses must include the name and business relationship if other than the employee. These codes can be entered directly into the website.
- e. After the employee completes the website coding the following reports will be printed for approval by their Vice President:
 - i. Cost Allocation Detail Report
 - ii. Account Spending Analysis Detail Report
- f. If the charges include travel expenses, the Travel and Reimbursement Form is completed consistent with the Travel Reimbursement and Reporting Policy.
- g. All reports and forms including applicable receipts are submitted to the employees Vice President for approval.
- h. After approval by department Vice President, the documents are forwarded to the Business Office for processing.

Important Dates for Credit Card Processes

- a. Most charges are posted to the website within three business days of the transaction which allow for the employee to code periodically throughout the

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month thereby reducing the amount of work performed at the end of the month.

- b. Reports are processed on a monthly cycle with a monthly reporting cycle at or about the end of each month.
- c. Employee coding is due within five business days after the close of the cycle.

Accounting Cycle Close and Outstanding Credit Card Coding

- a. Employees will receive a reminder that there are outstanding credit card charges
- b. If credit card charges are not coded by the morning of the sixth business day and no communication has been received notifying the Purchasing Manager of the reason, the credit card will be suspended until the situation is resolved.
- c. According to IRS Publication 15, Employer's Tax Guide, if expenses on a company credit card is not accounted for within a reasonable period of time, those expenses will be treated as supplemental wages and subject to the withholding and payment of income, social security, Medicare and FUTA taxes. This policy sets the reasonable time period as ten days after the transaction has been posted to the website.

Sales Tax

Mitchell College is a not-for-profit organization and is exempt from certain sales taxes for purchase of goods. Employees should notify the vendor of the tax exempt status and take steps to assure that the exemption is applied. The employee may contact the Business Office for information about the tax exempt status.

Surrendering a College Credit Card

- a. Upon notice of termination or change in job responsibilities, an employee must surrender their credit card to the Business Office. If an exception is necessary, the employee should consult with their Vice President.
- b. Purchasing Manager will retrieve the College Cardholder Agreement on file when the credit card was issued and indicate the date the card was surrendered and have the employee sign the agreement.

Lost or Stolen College Credit Card

1. The employee should exercise due care in assuring that the credit card is not lost or stolen. The employee is responsible for keeping a record of their credit card number and the credit card company's toll-free number in a secure location separate from the credit card.
2. Should the card be lost or stolen, the employee should:
3. Immediately contact the credit card company at the toll-free number listed on the card.
4. Report the incident to the Business Office during the next available business hours.

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Credit Card Payment Acceptance Policy

PURPOSE

The purpose of this policy is to define the method in which credit cards will be accepted for any payment including student account balances, parking fines, donor gifts, etc.

THE POLICY

Effective July 1, 2010, Mitchell College will only accept credit cards as a valid form of payment when submitted online to <https://payment.mitchell.edu>.

PROCEDURE

Mitchell College accepts Visa, MasterCard and Discover as valid forms of payment. In order to satisfy a balance due or generate a donation to the College via credit card, individuals must log onto a secure site for online processing:
<https://payment.mitchell.edu>

All credit card payments will be processed electronically so that no paper documentation exists for a specific transaction.

The Business Office will not retain any credit card numbers for any reason. No recurring charges will be processed on any account.

All campus departments with printed matter regarding credit card payments will reference the above web address for appropriate processing.

Gift Acceptance Policy

PURPOSE

This policy statement is designed to ensure that all gifts to, or for the use of, Mitchell College are structured to provide maximum benefits for the donor and the College. Because some gift situations may be complex, or more costly than beneficial, or restricted in a manner not in keeping with the mission and goals of the College, this policy has been developed to establish standards by which all gifts will be evaluated. This policy also establishes a formal process for carrying out such evaluations. This policy is intended as a guide and allows for some flexibility on a case-by-case basis.

THE POLICY

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- Mitchell College encourages gifts in support of its mission as a private higher educational institution.
- Mitchell College seeks to implement a gift acceptance policy that will protect:
 - The best interests of the donor;
 - The welfare of Mitchell College; and
 - The Mitchell College employees charged with the oversight of gifts
- Donors are encouraged to consult with their own personal advisors (accountants, certified estate or financial planners, attorneys, investment brokers, etc.) prior to making any gift to the College, particularly a planned gift.
- The College reserves the right not to accept certain gifts, including those from which the College will realize little or no financial gain, or which are made for purposes that are inconsistent with the College's mission, or which have restrictions that violate the College's ethical standards or require illegal discrimination.
- Donations of gifts for unrestricted, general purposes are encouraged because of the flexibility they provide in meeting the most pressing needs of Mitchell College.
- The College shall acknowledge all gifts and donations in an appropriate and timely manner that respects and honors the donor.
- In accepting a gift, the College incurs a responsibility to the donor to steward that gift. This includes administering the gift properly, providing the donor with appropriate financial information about the gift, and, when appropriate, reporting to the donor about the use of the funds.

Administrative Responsibility for Gift Acceptance

Overall responsibility for assuring compliance with the requirements of this policy is assigned to the Vice President for Institutional Advancement. All gift proposals shall be screened initially by the Office for Advancement. In appropriate cases, as set forth with more particularity below, gift proposals shall be further screened by the Office of the Vice President for Administration and Finance, the President of the College, the Gift Acceptance Committee, and/or the Board of Trustees, or a committee thereof.

Gift Acceptance Committee

1. Role of the Committee. The Gift Acceptance Committee shall serve on an ad hoc basis in circumstances described with more particularity below.
2. Members of the Committee. The Committee shall be composed of the Vice President for Institutional Advancement, the Vice President for Administration and Finance, and the chairs of the following Board of Trustees Committees: Development and Finance.
3. Counsel to the Committee. The General Counsel shall serve in a consultative role to the Gift Acceptance Committee.

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4. Consensus required. All decisions of the Committee must be made by consensus. If consensus cannot be reached, gift proposals will be forwarded to the Office of the President for review and decision, in consultation with the Chair of the Board of Trustees.

Appraisals

Legal and ethical requirements, designed to protect both the donor and the College, prohibit the College itself from appraising gifts. Such appraisals, if required by law or particular circumstances, are to be conducted by appraisers independent from the College. Generally, the cost of such an appraisal will be the donor's responsibility. In unusual circumstances, the Vice President for Institutional Advancement may approve payment of the cost of an outside appraisal.

Evaluation of Costs Associated with Acceptance of Certain Gifts

Proposed gifts of property and gifts-in-kind must be evaluated to determine whether the costs to the College associated with receiving the gift can prudently be accommodated. For example, accepting real property may require payment of closing costs, payoff of debt secured by the property, and physical changes to the property necessary to assure safety or control environmental hazards. Likewise, the cost to retrofit space on campus and provide necessary utilities to make a proposed gift of equipment usable for College purposes may be deemed excessive. Occasionally, associated costs may weigh against the benefits of accepting the gift.

The authority and responsibility for prompt, careful evaluation of such costs rests with the Vice President for Institutional Advancement, who shall, after conferring with other departments as appropriate, confer with the Vice President for Administration and Finance regarding acceptance of the gift. In the event that the Vice President for Institutional Advancement and the Vice President for Administration and Finance disagree as to whether to accept a gift, the matter shall be referred to the Gift Acceptance Committee for a final determination.

Gift Acknowledgment

All donors are to be furnished gift acknowledgment letters and receipts in a reasonable time frame. Where appropriate, donors shall also be given tokens of appreciation. Assuring compliance with the requirements regarding gift acknowledgment and receipts is the responsibility of the Vice President for Institutional Advancement or his/her designee.

Acceptance and Administration of Restricted Gifts

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Frequently, donors require that gifts be used by the College in particular ways. It is the responsibility of the College to comply with such requirements if the gift is accepted.

The Vice President for Institutional Advancement is responsible for assuring that arrangements are made to achieve compliance with such requirements in consultation with other Departments as appropriate.

Where the restrictions imposed by a donor are reduced to writing and require signed agreement by a College official, as in the case of trust agreements, such agreements are to be signed on behalf of the College only by the Vice President for Administration and Finance or the Vice President for Institutional Advancement or another official designated in writing.

Pledge Agreements and Endowment Agreements

Prior to completing major and/or planned gift arrangements with donors, the Vice President for Institutional Advancement, on behalf of the College, and the donor will sign a Pledge Agreement. This agreement shall include the purpose and description of the gift/fund to be established, how the gift or fund will be spent, the College's responsibilities and a schedule of payments. The agreement may also include future considerations, and the academic or fiscal year in which the fund will be activated. In certain cases, such as the establishment of an endowed fund, an Endowment Agreement or Memorandum of Understanding may be necessary, and signed by the Vice President for Administration and Finance.

PROCEDURE

The following procedures relate to the more common types of gifts to the College. It is understood that special gifts or circumstances may require a case-by-case review and may not be covered by this document.

Outright Gifts

1. Cash
 - a. Gifts in the form of cash and checks shall be accepted by Mitchell College regardless of amount unless, as with any gift, there is a question as to whether the donor has sufficient title to the assets or is mentally competent to legally transfer the funds.

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- b. Checks shall be made payable to "Mitchell College." In no event shall a check be made payable to an employee, agent or volunteer who represents Mitchell College.

2. Gifts of Securities

- a. Publicly Traded Securities. Securities that are traded on any recognized stock exchange and are readily marketable shall be accepted by Mitchell College and shall be immediately sold by the College, unless otherwise directed by policies established by the Board of Trustees.
- b. For Mitchell College gift crediting and accounting purposes, the value of the securities is the average of the high and the low on the date the ownership of the securities are out of control of the donor, in accordance with IRS regulations.
- c. Closely Held Securities. Non-publicly traded securities shall be accepted only after consideration of the costs associated with such a gift and after approval of the Gift Acceptance Committee.

3. Gifts of Personal Property

- a. The procedure set forth in paragraph 111.0. Will be followed in evaluating the acceptability of gifts of personal property.
- b. In evaluating the cost associated with receiving a gift of personal property, including jewelry, artwork, collections, motor vehicles, equipment and other personal property the following will be taken into consideration:
 - Transportation cost;
 - Storage cost;
 - Cost of selling;
 - Cost of maintenance and repairs;
 - Location of property; and
 - Cost of insurance.
- c. Gifts of personal property shall be used or sold for the benefit of Mitchell College, at the sole discretion of the College.
- d. The value of a gift of personal property shall be determined by a qualified appraisal at the donor's expense (see section 111c) under the terms of the Internal Revenue Code. For gifts over the specific level determined by the IRS, donors must complete IRS form 8283 and all other required government documents.

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- e. Donors will be informed at the time of the acceptance of such a gift that Mitchell College will, as a matter of policy, cooperate fully in all matters related to IRS investigations of non-cash charitable gifts.
- f. No personal property shall be accepted under conditions that obligate the College to own the property in perpetuity.

4. Gifts of Real Estate

The following restrictions on acceptance of gifts of real estate apply unless waived by the Gift Acceptance Committee:

- a. No gift of residential commercial-industrial or agricultural real estate shall be accepted without approval of the Gift Acceptance Committee, regardless of the purpose or value of the proposed gift.
- b. The donor is responsible for obtaining an appraisal of the property by a qualified appraiser.
- c. All gifts of real estate shall be evaluated in light of the need for an environmental audit. Qualified environmental professionals selected and directed by the Gift Acceptance Committee shall perform an environmental audit. The cost of such audit is to be paid for by the donor. An environmental professional is an individual who, through academic training or occupational experience, is qualified to conduct such an audit. The environmental audit is to determine whether a hazardous substance is, or in all likelihood could be, present on the property and shall contain in writing all information required by the Gift Acceptance Committee.
- d. If the environmental audit discloses the presence or likely presence of, or a release or threatened release of, a hazardous substance on the property, the transfer of the property to Mitchell College will not be accepted until satisfactory documentation is provided to. The Gift Acceptance Committee that federal state and local environmental authorities have determined that such condition has been remediated. The donor bears the cost of any environmental clean-up.
- e. No gift of real estate encumbered by a mortgage or lien shall be

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accepted.

- f. Prior to the presentation to the Gift Acceptance Committee, a member of the staff of the Office of Advancement must conduct a visual inspection of the property. If the property is located in a geographically remote area, a local real estate broker, contracted by the College, may substitute for a member of the staff in conducting the visual inspection.
- g. Prior to presentation of the gift proposal to the Gift Acceptance Committee, the donor must provide the following documents:
 - Real estate deed;
 - Most recent real estate tax bill;
 - Plot plan;
 - Substantiation of zoning status; and
 - Environmental site assessment.
- h. Prior to presentation to the Gift Acceptance Committee, the donor must certify in writing that:
 - No violations of state, local or federal law exist on the property;
 - There are no restrictions on the title to the property;
 - No unrecorded rights of way, easements or encumbrances are attached to the property.
 - No contractual or other donatives to other individuals, corporations or groups are attached to the property.
 - The property is neither the subject of, nor threatened with, litigation.
- i. If the donor is giving a retained life estate gift, the donor shall pay for all or a portion, as mutually agreed with the College, of the following during the donor's lifetime:
 - Maintenance costs;
 - Real estate taxes;
 - Insurance;
 - Real estate broker's commission and other costs of sale; and
 - Appraisal costs.
- j. The donor must be advised before making a gift of real estate that the property may be sold upon receipt.

5. Gifts of Life Insurance

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- a. Mitchell College will accept life insurance policies as gifts only when Mitchell College is named as the irrevocable owner and beneficiary of 100% of the policy.
- b. If the policy is a paid up policy, the value of the gift for Mitchell College's gift crediting and accounting purposes is the policy's replacement cost.
- c. If the policy is partially paid up, the value of the gift for Mitchell College's gift crediting and accounting purposes is the policy's cash surrender value.

Deferred Gifts

1. Bequests

- a. Mitchell encourages alumni and friends to disclose their bequest intentions to the Advancement Office in writing to ensure that the College is able to carry out their future wishes and that the gifts conform to this Policy Statement.
- b. All bequests should conform to the principles set out in Section II of this policy.
- c. Gifts from estates of deceased donors which do not conform to Mitchell College's policies may be accepted or rejected pursuant to the procedures outlined above and such decision communicated to the legal representative of the estate. If possible, a mutually agreeable plan shall be negotiated between the College and the representative to make the gift acceptable.
- d. Suggested Bequest Language:

*"If I give and bequeath to Mitchell College, a liberal arts college located in New London Connecticut, and a non-profit corporation established under the laws of the State of Connecticut, (state percentage of estate, residue, sum of money, or otherwise described property)
... "*

2. Charitable Trusts

- a. The Gift Acceptance Committee and other employees acting on behalf of Mitchell College should become familiar with the types of trusts generally accepted by corporate fiduciaries as

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suitable contributions to charitable trusts. Only suitable types of trusts shall be encouraged as gifts to Mitchell College.

- b. Neither the Gift Acceptance Committee nor any employee or other person acting on behalf of Mitchell College shall recommend to a potential donor any corporate fiduciary.

3. Charitable Gift Annuities

- a. No gift annuity which names an income beneficiary less than 60 years of age, or any Deferred Payment Gift Annuity which names a beneficiary less than 45 years of age, shall be accepted without approval of the Gift Acceptance Committee.
- b. Gift Annuities and Deferred Payment Gift Annuities will be accepted for a single life or two life-joint and survivor only, unless the Gift Acceptance Committee approves acceptance under other circumstances.
- c. The minimum initial contribution for a Gift Annuity shall be \$10,000. The minimum contribution for an additional gift annuity shall be \$5,000.
- d. The College will use the payout rate schedule suggested by the American Council on Gift Annuities as a representative guide.

4. Life Estate Gifts

Mitchell may accept such life estate gifts when the Gift Acceptance Committee is satisfied that the donor is fully aware of the possible future ramifications of the transaction. The Committee must approve all such gifts. (See also section IV.4)

Restricted Gifts/Endowments

1. Gifts to Mitchell College may be restricted in their use if the proposed use is consistent with the College's educational mission and the restrictions do not violate the College's ethical standards or require illegal discrimination.
2. Significant restricted gifts and endowments shall be approved by the Gift Acceptance Committee after consultation with the appropriate committee of the Board of Trustees.

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3. The Gift Acceptance Committee reserves the right to recommend changing the designated purpose or purposes of any restricted gift if the restriction prevents the College from using the gift to fulfill the donor's intentions or becomes impractical, unnecessary or undesirable. Approval of such change shall require the vote of the Board of Trustees.
4. Potential donors will be made aware of the discretion to change the purpose of a restricted gift, and no changes will be made before a reasonable effort is made to hold a discussion with the donor, or if then deceased, his or her surviving spouse or children, or such other persons designated by the donor.
5. Types of Restricted Gifts
 - a. Designated gifts of any size may be made to an existing endowment fund of Mitchell College.
 - b. A Named Endowment gift carrying the name or names of the donor may be established with a minimum of \$ 25,000 assuming the purpose of the endowment is acceptable to the Gift Acceptance Committee. However, under certain circumstances and at the College's discretion, an endowment may be created for a lesser amount, but never for an amount less than \$10,000. The College reserves the right to revise the minimum funding level or to establish other minimum levels, depending on the purpose of the gift.

Payment of Fees Related to Gifts

1. Mitchell College may incur and pay reasonable fees for the professional services rendered to the College in direct connection with the completion of a gift to Mitchell College.
2. Where advisors retained by Mitchell College prepare documents or render service of any kind to Mitchell College and/or the donor to Mitchell College, the donor shall be informed that the professional involved is in the employ of Mitchell College and is not acting on behalf of the donor and that any advice given or documents prepared should be reviewed by counsel for the donor prior to completion of the gift.

Investment Policy

PURPOSE

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This policy statement provides a framework for the management of the investable assets of Mitchell College. This policy will assist the Board of Trustees in supervising and monitoring the investments of the Fund. A subcommittee of the Board of Trustees, or Investment Committee (the Committee), may be established to implement and monitor the Fund in accordance with this policy statement. The guidelines allow for flexibility and a process to capture investment opportunities, while prudently and carefully setting forth reasonable risk control parameters for the investment program.

The statement of investment policy is intended to address asset deployment, liquidity and diversification requirements, which should not be violated over the rolling five year period. Policy issues relate directly to the return requirements and risk parameters of the Fund and are to be considered the general principles governing the investment management of the Fund. The management of the Fund will follow basic fiduciary responsibilities. The investments of the Fund will be diversified to help minimize the overall risk of the portfolio, unless, under the circumstances, it is clearly prudent not to do so. The investment policy is intended to be applied to the Mitchell College Endowment Fund and the Mitchell Woods Fund with the same asset allocations and return expectations.

This policy addresses the following issues:

- The goals and objectives of the Fund and the investment program; and
- The investment strategy including asset allocations, spending policy, rebalancing procedures and investment guidelines.

GOALS AND OBJECTIVES

Objective of the Fund

The primary investment objectives of the Fund are to:

- Preserve the real purchasing power of the principal; and
- Provide a stable source of perpetual financial support.

Performance Goals

On an annualized, net-of-fees basis, the total return of the portfolio will be expected to:

- Equal or exceed the spending rate plus inflation (HEPI) over a rolling five-year period.

Additionally, the returns should show favorable, relative performance characteristics.

These returns should:

- Equal or exceed the average return of appropriate capital market indices weighted by the asset allocation target percentages over a rolling five-year period; and
- Equal or exceed the average return of a universe of similarly managed funds such as NCSE (NACUBO Common fund Study of Endowments).

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Performance goals are based upon a perpetual investment horizon; therefore, interim variations should be expected.

Investment Philosophy

The Fund has a perpetual investment horizon and believes that asset allocation is the major determinant of investment performance. Consequently, a long-term asset allocation plan, consistent with the Fund's investment objectives and performance goals will be developed.

The assets will be managed on a total return basis. Although the policy recognizes the importance of preserving capital, it also must reflect that varying degrees of investment risk are generally rewarded with increased returns that compensate for the additional risk. Additionally, risk greater than that of stable long-term low risk securities will be required to preserve the purchasing power of the Fund. It is appropriate to pursue riskier investment strategies if such strategies are consistent with the goals of this policy. Selection of investment strategies will be evaluated on a risk-adjusted basis as needed to meet the investment objectives of the Fund with a view of minimizing drawdown activity.

Risk management of the investment program is focused on understanding the Fund's investment and operational risks. The investment program will seek to minimize operational risks and achieve appropriate compensation as defined in the performance goals above.

Mitchell College shall diversify the investments of its Fund unless Mitchell College reasonably determines that because of special circumstances the purposes of the Fund are better served without diversification.

THE POLICY

The investment program shall invest according to an asset allocation plan that is designed to meet the goals of the Fund. The plan will be based on a number of factors, including:

- The projected spending needs;
- The maintenance of sufficient liquidity to meet spending payments; and
- The return objectives and risk tolerances of the Fund as defined in the Investment Philosophy

This asset allocation plan provides for diversification of assets in an effort to maximize the investment return and manage the risk of the Fund consistent with market conditions. Due to the fluctuation of market values, allocations within a specified range constitute compliance within the Policy. An extended period of time may be required to fully implement the asset allocation plan, and periodic revisions will be required.

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In managing and investing the Fund, Mitchell College: (1) may incur only costs that are appropriate and reasonable in relation to the assets, the purposes of the institution and the skills available to the institution and (2) shall make a reasonable effort to verify facts relevant to the management and investment of the Fund. In managing and investing the Fund, the following factors, if relevant, shall be considered: (a) general economic conditions; (b) the possible effect of inflation or deflation; (c) the expected tax consequences, if any, of investment decisions or strategies; (d) the role that each investment or course of action plays within the overall investment portfolio of the Fund; (e) the expected total return from income and the appreciation of investments; (f) other resources of Mitchell College; (g) the needs of Mitchell College and the fund to make distributions and to preserve capital; and (h) an asset's special relationship or special value, if any, to the charitable purposes of Mitchell College.

Management and investment decisions about an individual asset shall be made not in isolation, but rather in the context of Mitchell College's Fund's portfolio of investments as a whole and as a part of its overall Investment Philosophy.

Mitchell College's management and investment of its Fund shall be done in good faith and with the care an ordinarily prudent person in a like position would exercise under similar circumstances.

Subject to any specific limitation set forth in a gift instrument, Mitchell College may delegate to an external agent the management and investment of its Fund to the extent that Mitchell College could prudently delegate under the circumstances. Mitchell College shall act in good faith, with the care that an ordinarily prudent person in a like position would exercise under similar circumstances in: (1) selecting an agent; (2) establishing the scope and terms of the delegation, consistent with the purposes of Mitchell College and the Fund; and (3) periodically reviewing the agent's actions in order to monitor the agent's performance and compliance with the scope and terms of the delegation.

Investment Program Strategy

The Fund shall be allocated across a number of investment classes to provide diversification and achieve the Fund's investment objectives. The following table defines the Fund's target asset allocation and range for each asset class:

Target Asset Allocation Table

| Asset Class | Min Wt. | Target Wt. | Max Wt. | Representative Index |
|---------------------|----------------|-------------------|----------------|-------------------------------|
| Equities | 50% | 65% | 75% | S&P 500 |
| Private Equities | 0% | 5% | 10% | S&P 500 + 400 Basis Points |
| Fixed Income Index | 25% | 30% | 35% | Barclays Capital US Aggregate |
| Private Real Estate | 0% | 5% | 10% | NCREIF Index |

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The Committee will place assets with qualified external professional Investment Managers that show competence in each asset class. The external Investment Managers will have full discretion and authority for determining investment strategy, security selection and timing of purchases and sales of assets subject to the guidelines specific to their allocation.

Spending Policy

It is Mitchell College's policy to distribute annually, with Board of Trustees approval, the minimum percent of a three-year moving average necessary to balance the budget. In implementing this Spending Policy, and subject to the intent of a donor expressed in a gift instrument, Mitchell College may appropriate for expenditure or accumulate so much of its Fund as it determines to be prudent for the uses, benefits, purposes and duration for which its Fund is established. In making a determination to appropriate or accumulate, Mitchell College shall act in good faith, with the care of an ordinarily prudent person in a like position would exercise under similar circumstances and shall consider, if relevant, the following factors: (1) the duration and preservation of the Fund; (2) the purposes of Mitchell College and the Fund; (3) general economic conditions; (4) the possible effect of inflation or deflation; (5) the expected total return from income and the appreciation of investments; (6) other resources of Mitchell College; and (7) its investment policy

Rebalancing

The purpose of rebalancing is to maintain the long-term policy asset allocation within the targeted ranges while contributing to controlling portfolio risk. The assets will be rebalanced within the stated ranges on a uniform basis to reduce portfolio expenses as far as practicable as defined in the Target Asset Allocation Table. The portfolio will be evaluated quarterly by the members of the Committee charged with the oversight of the portfolio's investments and rebalanced at least annually. Tactical rebalancing of asset classes within their ranges is also permissible to take advantage of near-term market conditions as long as the changes or reallocations do not cause unnecessary risk or expense to the portfolio.

Roles and Responsibilities

The Investment Committee, within the framework of policy set by the Board of Trustees, shall have direct responsibility for the oversight and management of the Fund and for the establishment of investment policies and procedures. Upon recommendation of the Investment Committee, the Board of Trustees shall have the power to employ or discharge fiscal agents or advisors.

The Chief Financial Officer shall be responsible to the Investment Committee for maintaining detailed records on all investment funds and for carrying out the investment policies and procedures established by the Board of Trustees and/or the

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Investment Committee. Reports on the Fund will be provided quarterly to the Investment Committee.

Policy Review

These policies will be reviewed by Mitchell College's Investment Committee annually. Recommendations for changes will be made prior to presentation to the full Board of Directors at a meeting of the Board of Directors.

PROCEDURE

The investment policies, guidelines and restrictions in this policy statement are a framework to help the Fund and its Investment Manager(s) achieve the investment objectives at a level of risk deemed acceptable. The Fund will be diversified both by asset class and within asset classes. Within each asset class, securities will be diversified among economic sector, industry, quality, and size. The purpose of diversification is to provide reasonable assurance that no single security or class of securities will have a disproportionate impact on the performance of the total fund. As a result, the risk level associated with the portfolio investment is reduced.

Equity Securities

The purpose of equity investments, both domestic and international, in the Fund is to provide capital appreciation, growth of income, and current income. This asset class carries the assumption of greater market volatility and increased risk of loss, but also provides a traditional approach to meeting portfolio total return goals. This component includes domestic and international common stocks, American Depository Receipts (ADRs), preferred stocks, and convertible stocks traded on the world's stock exchanges or over-the-counter markets.

Public equity securities shall be restricted to high quality, readily marketable securities of corporations that are traded on the major stock exchanges, including NASDAQ and have the potential for meeting return targets. Equity holdings must generally represent companies meeting a minimum market capitalization requirement of respective asset class profiles with reasonable market liquidity where customary. Decisions as to individual security selection, number of industries and holdings, current income levels and turnover are left to broad Investment Fund Manager(s) discretion, subject to the standards of fiduciary prudence. However, no single major industry shall represent more than 10 percent of the Fund's total market value, and no single security shall represent more than five percent of the Fund's total market, unless approved by the Committee.

Within the above guidelines and restrictions, the Investment Manager(s) has complete discretion over the timing and selection or sale of equity securities.

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Fixed Income Securities

Domestic and International fixed income investments provide diversification and a dependable source of current income. Diversification within fixed income investments will be flexibly allocated among maturities of different lengths according to interest rate prospects and the goals of the fund. The objective of the fixed income instruments is to reduce the overall volatility of the Fund's assets, and provide a deflation or inflation hedge, where appropriate.

Fixed income includes both the domestic fixed income market and the markets of the world's other developed economies. It includes, but is not limited to, U.S. Treasury and government agency bonds, non-U.S. dollar denominated securities, public and private corporate debt, mortgages and asset-backed securities, and non-investment grade debt. Fixed income also includes money market instruments, including, but not limited to, commercial paper, certificates of deposit, time deposits, bankers' acceptances, repurchase agreements, and U.S. Treasury and agency obligations. The Investment Fund Manager(s) must take into account credit quality, sector, duration and issuer concentrations in selecting an appropriate mix of Fixed Income securities. Investments in fixed income securities should be managed actively to pursue opportunities presented by changes in interest rates, credit ratings, and maturity premiums. Within the above guidelines and restrictions, the Investment Manager(s) has complete discretion over timing the sale, purchase, and selection of fixed income securities.

Cash and Equivalents

The Investment Manager(s) may invest in the highest quality commercial paper, repurchase agreements, Treasury Bills, certificates of deposit, and money market funds to provide income, liquidity for expense payments, and preservation of the Fund's principal value. No more than 5% of the Fund's total market value may be invested in the obligations of a single issuer, with the exception of the U.S. Government and its agencies.

Un-invested cash reserves shall be kept to a minimum since short term, cash equivalent securities are usually not considered an appropriate investment vehicle for long-term investments. However, such vehicles are appropriate as a depository for income distributions from longer-term investments, or as needed for temporary placement of funds directed for future investment to the longer-term capital markets. Also, such investments are the standard for contributions to the current fund or for current operating cash.

Within the above guidelines and restrictions, the Investment Manager(s) has complete discretion over timing the purchase, sale, and selection of cash equivalent securities.

Alternatives

Private Capital Partnerships - Investment allocations may include venture capital, private equity and international private capital investments, held in the form of professionally managed pooled limited partnership investments. Such investments must be made through funds offered by professional Investment Fund Manager(s).

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Marketable Alternative Strategies - Investments may include equity-oriented or market-neutral hedge funds (i.e. Long/Short, Macro Event Driven, Convertible Arbitrage, and Fixed Income strategies), which can be both domestic and international market oriented. These components may be viewed as equity-like or fixed income-like strategies as defined by their structures and exposures.

Natural Resources – Investments may include oil, gas, and timber investments, held in the form of professionally managed pooled limited partnership investments. Such investments must be made through funds offered by professional Fund Manager (s).

Real Estate - Investments may include equity real estate, held in the form of professionally managed, income producing commercial and residential property. Such investment may be made only through professionally managed pooled real estate investment funds, as offered by leading real estate managers with proven tracks records.

Derivatives and Derivative Securities - Certain of the Investment Fund Manager(s) will be permitted under the terms of their specific investment guidelines to use derivative instruments. Derivatives are contracts or securities whose market value is related to the value of another security, index, or financial instrument. Investments in derivatives include (but are not limited to) futures, forwards, options, options on futures, warrants, and interest-only and principal-only strips. No derivative positions can be established that create portfolio characteristics outside of portfolio guidelines.

Examples of appropriate applications of derivative strategies include hedging market, interest rate, or currency risk, maintaining exposure to a desired asset class while making asset allocation changes, gaining exposure to an asset class when it is more cost-effective than the cash markets, and adjusting duration within a fixed income portfolio. All derivative positions must be fully collateralized. Investment Fund Manager(s) must ascertain and carefully monitor the creditworthiness of any third parties involved in derivative transactions.

Each manager using derivatives shall (1) exhibit expertise and experience in utilizing such products; (2) demonstrate that such usage is strategically integral to their security selection, risk management, or investment processes; and (3) demonstrate acceptable internal controls regarding these investments. The total amount of all alternative investments is limited to a maximum of 15% of total investments.

Restrictions

The Investment Committee may waive or modify any of the restrictions in these guidelines in appropriate circumstances. Any such waiver or modification will be made only after a thorough review of the Investment Fund Manager (s) and the investment strategy involved. An addendum supporting such investments will be maintained as a permanent record of the Investment Committee. All waivers and modifications will be

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reported to the Board of Trustees at the meeting immediately following the granting of the waiver or modification.

Any investment that is made in a mutual funds and/or commingled funds will be reviewed and approved by the Investment Committee on a case by case basis and if approved, may vary from this Policy. For mutual and other commingled funds, the prospectus or Declaration of Trust documents of the fund(s) will govern the investment policies of the fund investments. While the Investment Committee understands that such funds have their own stated guidelines, which cannot be changed for individual investors, in principle and spirit, those guidelines should be similar in nature to the guidelines stated above. To the extent that a fund allows any or all of the above stated restrictions, the Investment Committee must be aware of their possible use and be confident that the Investment Fund Manager (s) thoroughly understands the risks being taken, has demonstrated expertise in their usage of such securities, and has guidelines in place for the use and monitoring of those securities.

Investment Fund Manager(s) Reporting and Evaluation

The Investment Fund Manager (s) responsible for the investment of the Fund's assets shall report quarterly on the performance of the portfolio, including comparative returns for the funds and their respective benchmarks. Included will be a complete accounting of all transactions involving the Fund during the quarter, and a statement of beginning market value, fees, capital appreciation, income and ending market value, for each account. Investment Fund Manager (s) should review the portfolio with the Investment Committee annually; and will be supplemented by other meetings as necessary for proper review.

The Committee recognizes market conditions may greatly influence the ability of a manager to meet year-to-year investment goals and objectives. Further, the Committee realizes that significant cash flow may also affect the ability of a manager to meet a specific short-term objective. Accordingly, the Fund expects to monitor performance through absolute return objectives, relative performance against identified benchmarks, and comparatively against other Investment Fund Manager (s) when possible.

Petty Cash Fund Policy

PURPOSE

The purpose of this policy is to define the disbursement of petty cash funds for Mitchell College.

THE POLICY

Mitchell College will disburse petty cash funds as required during the normal course of business. Petty cash funds are issued to designated cashiers who will accept responsibility of managing the funds including reconciliation and closing duties.

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Cashiers are required to sign an agreement prior to being granted a petty cash fund and understand that the fund is subject to unannounced audits by Business Office Staff.

All petty cash funds must be reconciled and closed as applicable by end fiscal year end, June 30th.

PROCEDURE

Petty cash funds will be disbursed only with department VP approval. Funds in excess of \$300 also require CFO approval.

Funds will be managed by one cashier, who will be responsible for ensuring that funds are kept in a locked unit at all times. Cashiers will reconcile funds at least monthly and agree to abide by Mitchell College guidelines for reimbursements from petty cash. Petty cash receipts are required for all disbursements from funds; vendor receipts are required for all amounts exceeding \$10. No disbursement over \$50 is allowed from petty cash funds.

Temporary borrowing of petty cash funds for any reason is strictly prohibited. Petty cashiers found to be abusing the petty cash procedures or not following the policy may be subject to disciplinary action.

Major Gifts Institutional Naming Policy

PURPOSE

Major gifts made to Mitchell College can have a lasting impact – not only for the College but for the donor as well. Gifts at these levels provide an opportunity for the donor to name professorships, scholarship and program funds, buildings or rooms at the College. With such gifts, a donor may permanently associate his/her name with the College or honor a beloved faculty member, family member or friend.

THE POLICY

The following guidelines exist for naming opportunities at Mitchell College:

- **Campus Buildings ~ 50 percent of the projected total cost**
As the College implements its strategic plan and responds to growing national recognition, new facilities must be built that meet the needs of students in the 21st century. A donation of half the projected or estimated total cost of the new building allows the donor to name the facility with a name of the donor's choice. Such a gift will change the landscape of Mitchell, literally and figuratively, and benefit generations of students to come.

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- **Rooms within Campus Buildings ~ \$25,000 minimum**

As a general rule, gifts of \$25,000 or more provide the donor the opportunity to have his/her/their name listed on a plaque identified with a room within a new or renovated building. The specific amount for a naming opportunity will depend upon the size and purpose of the space being considered. There may be exceptions to this minimum amount in instances involving smaller spaces. Such gifts ensure that new or renovated buildings provide a state-of-the-art learning/living environment for Mitchell students.

- **Endowments**

While all gifts to Mitchell College contribute to the quality of education, endowments are particularly meaningful. They offer a dependable, perpetual source of funding. Endowed gifts actually allow more funds to be given to Mitchell over the years than a gift for current use. The investment made in Mitchell with the creation of an endowment provides support that makes a difference in the lives of our students, faculty, and staff by enhancing their education, daily work, and academic excellence.

Endowments may be established to support student scholarships, endowed professorships, lecture series, equipment and library needs, and funds for excellence for academic and non-academic programs.

The preferred minimum for established endowed funds is \$25,000 payable over five (5) years, or through a future gift (a bequest from an estate, or a charitable remainder trust).

However, under certain circumstances and at the College's discretion, an endowment may be created for a lesser amount, but never for an amount less than \$10,000.

- **Endowed Professorships (supplemental) ~ \$250,000 minimum**

At a college like Mitchell with its focus on educating students with learning differences, it is absolutely essential that faculty be committed to outstanding teaching. Endowments to supplement faculty positions represent an important recognition of scholarly excellence as well as provide competitive salaries and resources for research, travel and professional development while providing the donor the opportunity to honor the person for whom it is named.

- **Endowed Scholarship Funds ~ \$25,000 minimum**

Mitchell provides a unique educational opportunity for students with learning difference and untapped potential. In order to assure access to a Mitchell education for promising students (merit-based) and students with limited financial resources (need-based) in every academic field, the College must expand financial aid assistance offered to students. Named, endowed scholarship funds do just that by providing awards for students in

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perpetuity. A scholarship endowed for \$25,000 will generate approximately \$1,250 a year.

- **Endowed Funds for Excellence ~ \$25,000 minimum**

A donor may establish an endowment that will enrich or benefit a particular department or curriculum, by providing the program an on-going source of flexible funds to meet academic needs of students and faculty in ways beyond the scope of the College's budgeted funds. The minimums to establish a Fund for Excellence endowment begin at \$25,000 and go higher based on a department's or curriculum's size, budget and visibility.

- **Annual Funds for Excellence ~ \$2,500 minimum**

A donor may establish an "expendable" Fund for Excellence that will provide a source of flexible funds in the current fiscal year to meet academic needs of students, faculty and programs. The minimum to establish an Annual Fund for Excellence begin at \$2,500.

PROCEDURE

All named gift opportunities are subject to availability at the time of the gift. The College reserves the right to adjust minimum naming levels without prior notice, and any gift restrictions are subject to the acceptance of the institution. Certain endowments and facilities may require higher minimum levels if funded through deferred gift instruments. Gifts for naming of facilities or portions therein are subject to approval by the Board of Trustees.

Records Retention Policy for Printed Material

PURPOSE

The purpose of the Records Retention Policy is to ensure the adequate maintenance and retention of records and documents and appropriate disposition and/or destruction of the same.

THE POLICY

The Records Retention Policy pertains to all records of Mitchell College. Regardless of record format, each document will be retained and/or disposed of according to specific guidelines as outlined in the Records Retention Schedule. The policy seeks to:

- ensure the preservation of records that have permanent value;
- promote compliance with Federal, State or other legal requirements for the retention of records; and
- provide uniform guidelines for retention and disposition of records.

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PROCEDURE

Administration

Each department is responsible for assigning a Records Retention Officer to administer the policy within their own department. Records Retention Officers shall:

1. prepare a list of records that are generated and/or maintained by the department and compare such list to the records listed in the Records Retention Schedule;
2. report in writing any omissions and/or discrepancies to the Policy Committee for evaluation and/or revision of the Schedule;
3. annually review records generated and/or maintained by the department in order to ensure compliance with the Schedule;
4. determine the prescribed records retention period and destroy records pursuant to the Policy guidelines.

Storage and Safeguarding Records

At the end of the active period when records are no longer required on a regular basis pursuant to the Schedule, records must be stored for the prescribed retention period in a location that provides appropriate confidentiality and protection from unauthorized inspection, theft and physical damage due to fire, water and/or natural disaster. The outside of the file cabinet/storage boxes containing the records should be labeled numerically, including a date for destruction. Each department is responsible for its own records storage and its destruction, if applicable. In addition, each department must maintain a log that describes the contents of the file cabinet/storage boxes, and their location. Once records are destroyed the date of the destruction should also be noted in the log.

Disposition of Records

Retention period established in the Schedule are minimum retention requirements. When the prescribed records retention period expires, records are to be destroyed in one of the following ways:

1. recycle non-confidential paper records; or
2. shred confidential paper records.

If records having one retention period cannot be separated from records having a longer retention period, both records should be retained for the longer period.

Duplicate copies of records (i.e., records that are not originals or official copies) do not need specific approval for their destruction.

Retention of departmental copies is at the discretion of the department.

Suspension of Records Destruction

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A document's destruction may be suspended by the Chief Financial Officer. Upon the knowledge and/or receipt of a subpoena, summons, investigation, audit, claim (whether formal or informal), or a dispute, the relevant records must not be destroyed. The Chief Financial Officer is responsible for lifting a document's destruction suspension.

Education

Each department is responsible for assigning a designated Records Retention Officer and providing relevant training to implement the Records Retention Policy according to the Schedule for each area.

Restricted Gift Spending Policy

PURPOSE

This policy sets forth the process for managing temporarily restricted gifts to ensure the College properly administers these funds and honors fiduciary responsibilities. Managing includes recommending use of the funds to President's Cabinet, monitoring the expenditures and, if required, reporting to the Advancement Office for donor communications.

THE POLICY

Temporarily restricted gifts may be received immediately. This policy applies to all temporarily restricted gifts and supersedes any previous policies or procedures that have been adopted related to the management of these accounts.

- A. The cash or asset may be received immediately or be part of a pledged gift.
- B. The donor does not receive something of equal value in return.

There are donor-imposed restrictions that specify how the funds are to be used. The College has separate policies and procedures relating to the solicitation and acceptance of gifts, pledges, and bequests that are maintained by the Advancement Office. This policy on the management of the restricted current use gift accounts is not meant to encompass or supersede such documents. The College reserves the right to implement more stringent requirements on certain transactions.

Intentional disregard for the College's policy and procedures on the management of temporarily restricted gifts will be considered grounds for disciplinary action and possibly dismissal.

PROCEDURE

Use:

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Upon receipt of a gift or pledge, the Advancement Office will advise President's Cabinet of the anticipated funds. This notification will include the amount, gift use restrictions, anticipated payment terms, and, if applicable, reporting requirements to the donor.

At President's Cabinet, the President will determine the appropriate Vice President to have oversight of the gift and each Vice President is responsible for the compliance of gift policies.

If they choose to, the Vice President has the option to assign a gift manager to manage individual gifts. At a minimum, this designee should be a department manager or department chairperson.

Once responsible person is assigned, they will become familiar with the donor-imposed restrictions of the gift and the expected payment schedule of a pledged gift. In addition, this designee will be comfortable with the College budgetary expectations needs. This information should be provided by the Vice President from the information shared at President's Cabinet. The completed Temporarily Restricted Gift Assignment Form, as shown in Appendix A, will be submitted to the Business Office for their records.

Periodically, the President's Cabinet will receive a summary report of the status of the gifts including remaining balances and accumulated expenditures. The President's Cabinet reserves the right to recommend and determine uses of funds as long as donor restrictions are followed. This may be considered integral to the budget process.

The gift manager may not modify the donor-imposed restrictions in any way. Departments are responsible for the timely use of these funds. If a gift cannot be expended in a timely manner or cannot be used in a manner consistent with the donor intent, the designee should bring the issue to the attention of his or her Vice President and the Advancement Office. The College's Accounting Manager or Vice President of Finance and Administration can also be contacted for information related to the restrictions.

Account Structure:

Temporarily restricted gifts have a specific project fund code assigned when recorded by the Advancement Office in the Raiser's Edge system. The selected code can be one that is currently in use or a new one may be established. Existing codes can be used only if the donor's intent is consistent with the definition of the existing codes.

The project fund code is designated based on specific and intent, or based on broad use restricted to a specific department or area (i.e. to fund a scholarship with specific qualifying events, or to support the Criminal Justice program). A gift that is assigned a project fund code may span multiple departments as necessary for the satisfaction of donor restrictions. Gift managers are responsible for ensuring that all transactions related to the gift use the appropriate gift codes. Proper coding of all gift related

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expenses must appear on all Personnel Action Forms, check requisitions, purchase orders, and invoices.

Gift Receipts:

In order to ensure that gifts are properly documented and donors receive appropriate acknowledgement, all temporarily restricted are first received by the Advancement Office. If any personnel (other than Advancement Office personnel) at the College receive a gift, all information and the proceeds are sent to the Advancement Office.

Transactions:

All transactions against temporarily restricted gifts must be authorized by the assigned gift manager. All authorizations of disbursements must follow existing college policies, i.e. purchasing, personnel expenses, etc. Each Vice President is responsible for the implementation of this control. Gift supported expenses should be charged, whenever practical, directly to the applicable restricted gift account.

Oversight and Reporting:

In conjunction with the periodic financial reporting process, the gift managers will receive financial reports which will reflect the activity of the individual gifts.

The Vice President of Finance and Administration and the Vice President of Advancement will receive periodic reports of all temporarily restricted activity.

Any College personnel with concerns about the gift manager's fiduciary conduct should be reported to the President of the College.

Authorized Spending Levels:

As part of the College's budget process, Vice Presidents may specify what portion of a temporarily restricted gift may be used in a given fiscal year. If such a determination has been made, the Vice President should enter a budget into the accounting system for the restricted current use gift account. If there is no budget in the accounting system, the department may spend the balance available.

Account Deficits and/or Over Expenditures:

Gift managers are responsible for monitoring their restricted current use gift accounts to ensure the expenditures do not exceed the amount of the gift.

Account Maintenance:

The Advancement Office and the Business Office determine the appropriate temporarily restricted gift project fund code.

After a gift manager has been assigned, the Accounting Manager will be notified of the designee. This will facilitate monthly reports to the responsible person. It is the responsibility of each department to notify the Accounting Manager's area when there is a change in responsible person.

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Satisfactory Academic Progress Policy for Financial Aid Recipients

PURPOSE

Students must maintain satisfactory academic progress in order to receive federal and/or institutional financial aid.

THE POLICY

In keeping with the mission of Mitchell College a student's academic progress for continuance of financial aid will not be measured until the end of the first year of attendance. At that point academic progress will be measured both quantitatively and qualitatively. A student must meet both standards to be making satisfactory academic progress. No student will be given financial aid for more than 150% of the normal completion time for their program. A student, who at the time of measurement, fails to make satisfactory academic progress will be placed on probation for the following semester. At the end of that time they must have achieved satisfactory progress or they will be denied federal and institutional financial aid.

Standards for Satisfactory Progress for a Full Time Student (enrolled for at least 12 credits per semester)

| Credits | Cumulative GPA | Time Frame |
|---------|----------------|------------|
| 20 | 1.5 | Year 1 |
| 40 | 1.75 | Year 2 |
| 60 | 2.0 | Year 3 |
| 80 | 2.0 | Year 4 |
| 100 | 2.0 | Year 5 |
| 120 | 2.0 | Year 6 |

Standards for Satisfactory Progress for a Part-Time Student (enrolled for at least 6 credits per semester)

| Credits | Cumulative GPA | Time Frame |
|---------|----------------|------------|
| 10 | 1.5 | Year 1 |
| 20 | 1.5 | Year 2 |
| 30 | 1.5 | Year 3 |
| 40 | 1.75 | Year 4 |
| 50 | 1.75 | Year 5 |

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| | | |
|-----|-----|---------|
| 60 | 2.0 | Year 6 |
| 70 | 2.0 | Year 7 |
| 80 | 2.0 | Year 8 |
| 90 | 2.0 | Year 9 |
| 100 | 2.0 | Year 10 |
| 110 | 2.0 | Year 11 |
| 120 | 2.0 | Year 12 |

Reinstatement

Reinstatement after termination from financial aid can occur only once at Mitchell College and can be accomplished by one of two steps:

1. Successful attainment of satisfactory academic progress at the student's own expense
2. Via a written letter of appeal to the Financial Aid Director, along with any necessary documentation which must be received within 2 weeks of the termination letter

Reinstatement cannot be approved without the completion of one of these steps. A student will be notified in writing of the decision of the Financial Aid Director. If the student is not satisfied with the Financial Aid Director's decision, he/she may appeal to the Vice President of Enrollment Management and Marketing.

Time Limitation Policy

A student will be eligible to apply for and receive Mitchell aid for the number of semesters required for completion of his/her particular curriculum plus one additional semester as a full-time student. The Federal Government requires that a student cannot exceed more than 150% of the normal published time frame for his/her program. In cases involving extenuating circumstances, an appeal may be made in writing to the Financial Aid Director. Financial aid is not intended to pay for repeated courses.

PROCEDURE

If a student is notified that he/she lost financial aid eligibility, he/she has the right to appeal to the Director of Financial Aid in writing within 2 weeks of the date of the letter informing the student of the loss. This letter should state the mitigating circumstances which contributed to the poor academic performance. An appeal committee will make an evaluation and notify the student of the results by letter within 2 weeks of the date of the letter of appeal. This decision will be final. If the student's letter of appeal is accepted, one more semester of probation will be granted.

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Student Account Policy

PURPOSE

To define the policies that apply to Student Accounts held by the Bursar's Office for Mitchell College and Thames Academy students.

THE POLICY

A student account is created when the Admissions Office formally accepts a new student and the tuition deposit is received.

PROCEDURE

The student is required to complete a Financial Responsibility Statement, which stipulates the student's financial responsibilities for the term of enrollment.

Breakage Deposit

All full-time students are required to provide a one-time breakage deposit. Breakage deposits are held until a student graduates or withdraws, at which time deductions from this deposit will be used to satisfy outstanding damage assessments, fines, parking tickets, or other costs billed to a student account before being refunded to the student.

Student Health Insurance

Mitchell College requires that all full-time students maintain adequate health insurance, either under their own private plan or under the Student Health Insurance Plan sponsored by the College. A waiver form must be completed by all students who have their own private plan. If a waiver is not received by the designated due date, the student will be automatically enrolled in the sponsored plan and the annual premium will be charged to the student's account.

Waivers may be completed online, or the forms may be completed and forwarded to the Bursar's Office.

Bookstore Vouchers

Students who have a credit balance may request a Bookstore voucher from the Bursar's Office. Vouchers may be used to purchase textbooks and supplies at the Mitchell College Bookstore.

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Billings

Students returning at full-time status for the subsequent fall semester are required to submit a non-refundable deposit by April 1st of each year. New students accepted for the subsequent fall semester are required to submit a deposit by May 1st of each year, which becomes non-refundable after May 1st.

Statements are mailed to each student 30 days prior to the due date. The fall semester balance is due by July 1st. The spring semester balance is due by January 1st.

Part-time students are required to pay at the time of registration.

Payment

Tuition payments may be made by cash, check, money order, VISA, Discover, and MasterCard or through a monthly payment plan. Payments may be mailed to: Mitchell College, Bursar's Office, 437 Pequot Avenue, New London, CT, 06320. Students will be charged a \$25 returned check fee if any payment made by check is later returned to Mitchell College by the bank for any reason.

Payment Plans

Mitchell College offers students and their families an optional monthly payment plan to help them pay educational expenses interest-free over a period of several months. Enrollment in a payment plan requires an annual fee of 1% of the net amount due (with a minimum fee of \$50). Four payment options are currently offered with plans beginning April 1st, May 1st, June 1st or July 1st.

Withdrawal

Tuition and fees are cancelled in full if a student officially withdraws from the College prior to the start of classes. Withdrawals after the first day of classes are subject to the refund calculation based on the Federal Refund Policy. Once the student has reached 60% of the attendance period, no refund will be issued for a withdrawal.

Refunds

Enrolled students with a credit balance on their account may be eligible for a refund. Credits resulting from a Parent Plus loan will be refunded directly to the parent, unless written authorization is received directing the refund to the student. Refunds will be processed within two weeks from the time the credit is generated on the student's account. Checks are mailed to the home address on file unless the student requests to pick up a check in the Bursar's Office.

Bursar Holds

Students with a past due balance may not register for classes for a future term until all current term charges have been paid in full. In addition, students will

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also be prevented from receiving transcripts and/or a diploma until the account has been satisfied.

Student Refund Policy

PURPOSE

The intent of our refund policy is to protect the financial interest of the College, a nonprofit institution, to insure the facilities will be used by students who genuinely seek a college education, to protect the financial rights of the students, and to meet legal requirements.

THE POLICY

- i. The College's refund policy will adhere to the following schedule with the exception of Title IV Financial Aid Funding:

| | |
|---|-------------|
| • Before the first day of classes | 100% refund |
| • Within the first week of classes and before add/drop period | 100% refund |
| • By the end of second week of classes | 80% refund |
| • By the end of third week of classes | 60% refund |
| • By the end of fourth week of classes | 40% refund |
| • By the end of fifth week of classes | 25% refund |
| • After the end of the fifth week | 0% refund |
- j. Withdrawal from Mitchell College shall entitle the student to a refund of tuition, room and/or board, breakage deposit, less the advance deposit for that semester. This refund will be calculated based on the above-referenced schedule.
- k. Enrollment period is defined as the first day of classes to the last day of final exams within a semester.
- l. Any student who receives Title IV (federal student) aid and withdraws from the college will have the tuition, room and/or board prorated for up to 60 percent of the enrollment period for the portion related to federal aid. After the 60 percent point in the period of enrollment there are no unearned funds. Title IV funds must be returned no later than 45 days from the determined date of the student's withdrawal.
- m. If the student was awarded a MVP Scholarship and it has not been earned, the award will be reversed and the amount owed would be the student's responsibility.
- n. Institutional aid will be calculated using Mitchell College's refund policy.

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- o. All other outside grants and scholarships will be refunded based on the guidelines of the grantors.
- p. Registration fees are not refundable unless Mitchell College cancels a course.
- q. Any charges for other fees, such as library fees, parking tickets are not eligible for refund. Group health insurance is not eligible for pro rata withdrawal credit or tuition withdrawal credit.

PROCEDURE

- a. Refunds are initiated when a student has officially withdrawn from Mitchell College.
- b. The Registrar will determine the last date of attendance for credit purposes.
- c. Students who withdraw from the College before the end of the academic year will have their financial aid adjusted accordingly.

Title III Policy: Required Signatures for Title III Funds

PURPOSE

This policy establishes the signatures required for approval to use Title III funds.

THE POLICY

- a. Requests for Title III funds must be approved by obtaining two signatures.
- b. The Title III Activity Director and the Title III Program Coordinator have the authority to sign for Title III funds.
- c. Requests may require prior approvals by the Title III Task Force, ABE Task Force and/or First-year College Task Force. It is the responsibility of the individual requesting funds to follow the appropriate Title III and college purchasing procedures.

PROCEDURE

- a. Completed forms are submitted to the Title III Administrative Assistant to record.

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- i. The Title III Administrative Assistant records the request and forwards to the Title III Activity Director for 1st signature.
- b. In the Title III Activity Director's absence, the Title III Program Coordinator may sign the 1st signature.
 - i. The Title III Activity Director forwards the form to the Title III Program Coordinator for 2nd signature.
- c. In the Title III Program Coordinator's absence, or if the Program Coordinator has signed the 1st signature, the College President or Chief Financial Officer may sign the 2nd signature

Title III Policy: Time and Effort Reporting for Title III Personnel

PURPOSE

This policy establishes how to track personnel time and effort expended upon the Title III Part A Strengthening Institutions Grant (hereafter referred to as "Title III"). This policy does not impact personnel wages, but solely tracks time and effort expended toward the successful implementation of grant activities.

THE POLICY

- A. For the duration of the Title III grant, we will track the time and effort of (A) all grant-funded personnel, (B) those personnel who have a percentage of their position dedicated to grant activity as outlined in the Project Narrative, and (C) key positions that impact the successful execution of grant activity.
- B. For those grant-funded personnel, as the college assumes an increased percentage of their salary and fringe benefits, the percentage of work that must be Title III related with adjust accordingly.
- C. Key positions that do not have a percentage of work dedicated to Title III related activity will be part of our final grant report's calculation of indirect costs related to the execution of the grant.

PURPOSE

- A. For all personnel identified in Section 2, a monthly report of time and effort on Title III related activity is required. Personnel are responsible for tracking their time and effort. It is recommended that personnel use the Outlook Calendar's 'categorize' button to identify all Title III related work; though any system that accurately and successfully tracks time and effort is acceptable.
- B. Personnel will follow the following process for submission of their monthly reports:

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- i. Title III Administrative Assistant will email a reminder in the last week of the month to all personnel reminding them to complete their report by the fifth day of the subsequent month.
- ii. Personnel will complete the monthly report and obtain their supervisor's signature.
- iii. Personnel will forward the signed monthly report to the Title III Administrative Assistant.
- iv. Title III Administrative Assistant will record receipt of each report.
- v. Title III Administrative Assistant will forward reports to the Title III Activity Director and Title III Program Coordinator for signatures.
 1. Exception: the Program Coordinator will have his/her reports signed by the President and the Chief Financial Officer in compliance with the Title III Two Signatures Policy.
- vi. Signed reports will be returned to the Title III Administrative Assistant, who will track and retain all records.

GOVERNANCE AND ORGANIZATION

Board of Governance

Conflict of Interest

PURPOSE

This policy is to protect Mitchell College's interests when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer, director or employee of the College or might result in an excess benefit transaction. In the event there is an inconsistency between this policy and federal or state law, the law shall control.

THE POLICY

- a. It is the duty of the College's directors, officers and employees to be aware of this policy and to identify conflicts and situations that may result in the appearance of a conflict.
- b. All interested persons have a duty to disclose any actual or possible conflicts or appearances of a conflict to the President of the College, Chairman of the Board, or Board committee chairperson.

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- c. A interested person may have and must disclose the following contracts or transactions or relationships if they exist:
- Receiving gifts, gratuities or entertainment from an entity or organization that has a business relationship with the College
 - Is seeking, is receiving or has received a loan from an entity that has a contract or transaction with the College
 - Is in a contract or transactions with College
 - Has a family member who has a contract or transacts with the College
 - Competes with the College in a transaction or contract
 - Has a financial interest with an entity or organization that provides goods and services to the College individual

PROCEDURE

- a. Annual review and disclosure:
- i. Each year, all interested persons shall receive a copy of this policy. If changes to the policy occur, then the revised policy will be distributed upon approval.
 - ii. Each interested person shall annually complete a disclosure form identifying any relationships, positions, or circumstances in which the Interested Person is involved that could contribute to a conflict.
 - iii. This information shall be treated as confidential and made available only to the President, Chairman of the Board, Committee Chairpersons, and the Chief Financial Officer.
- b. Determine is a conflict exists:
- i. Any interested persons or members of the College will disclosure relationships that can be viewed as a Conflict of Interest.
 - ii. Disclosure will be made to the Chairman of the Board or any member of the Executive Committee
 - iii. Before the Executive Committee acts on a potential Conflict of Interest, the committee will meet with the interested person with

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the financial interest to ascertain the facts related to the relationship

- iv. The Executive Committee will discuss the matter without the interested person present to prevent the exertion of personal influent on the matter.
- v. If interested persons are not member of the board of directors of the College that have an actual or potential conflict of Interest shall disclose to the Chairperson or the Executive Committee
- vi. In the event that there is a lack of clarity as to whether the conflict exists, the interested person with the potential conflict will conduct themselves as if the conflict does exist and perform the applicable procedures

Compensation Policy (non-executive)

PURPOSE

Mitchell College is committed to attracting and retaining the optimum personnel to accomplish the College's mission.

THE POLICY

Objectives

- a. To attract and retain a qualified and diverse faculty and staff
- b. To provide compensation that is both externally competitive and internally equitable.

Applicability

This Policy applies to employees of the College whose compensation is not governed by a collective bargaining agreement negotiated with a union representing members of a collective bargaining unit. The terms of the applicable collective bargaining agreement shall control compensation provided to employees subject to that agreement.

PROCEDURE

- a. In order to remain externally competitive Mitchell College participates in relevant salary and benefit surveys by gathering current benchmarking data.
- b. Mitchell benchmarks with other colleges that have similar enrollment size and operating budgets which are located in the northeastern United States.
- c. In order to maintain internal equity, each staff and faculty position is evaluated objectively to ensure it is assigned fair value within the College.
- d. Each staff and faculty position at Mitchell College is assigned to a salary range
- e. For positions where benchmarking data is available, the salary range Mid-Point is equal to the median base salary derived from the relevant data.
- f. For positions where benchmarking is not available the salary range Mid-Point is established based upon job evaluation and internal equity.
- g. Salary ranges are reviewed annually and adjusted as appropriate.

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- h. Individual salaries are determined based on education, experience and performance.
- i. Benefits are reviewed annually and modified as appropriate to remain competitive and fiscally responsible.

Executive Compensation Policy

PURPOSE

The goal of Mitchell's compensation program is to enable the College to attract, motivate, reward and retain the senior staff required to fulfill its mission and meet its strategic objectives.

THE POLICY

The Policy objectives are:

- 1. That executive compensation at Mitchell College is competitive with similar positions in comparable institutions and
- 2. That compensation and benefit levels are reasonable, not excessive, and meet the standards of reasonableness under §4958 of the Internal Revenue Code.

PROCEDURE

- a. This policy will consider all aspects of compensation, including salary and benefits, for the most highly compensated executive positions at Mitchell College.
- b. Approval; Disclosure; and Recusal
 - i. A voting member of the Board of Trustees, or any Committee with governing board delegated powers, who receives compensation, directly or indirectly, from the College for services is precluded from voting on matters pertaining to that individual's compensation.
 - ii. When approving compensation for Trustees, Officers, employees, contractors and any other compensation contract or arrangement, the Board of Trustees or Committee, as applicable, shall comply with the following requirements and procedures in addition to the conflict of interest procedures set forth in the College's Conflict of Interest Policy:
 - 1. the terms of compensation shall be approved by the Board of Trustees or Committee prior to the first payment of compensation; and
 - 2. all Trustees approving the compensation arrangement must not have a conflict of interest with respect to the compensation arrangement as specified in Internal Revenue Service Regulation Section 53-4958-6(c)(iii);
- c. **Comparable Data**
 - i. The College will benchmark job compensation to the market that best reflects current recruiting practices at comparable institutions.

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- ii. The market includes institutions with similar enrollment size, annual revenues, academic ranking and operating budgets which are located in the northeastern United States.
 - iii. The Human Resources Department will participate in and utilize data from relevant, recent salary and benefit surveys in order to maintain the most current benchmarking data on the market.
 - iv. Base salary for executives will be targeted between the 35th and 65th percentiles of similar positions in peer institutions. The College may also consider actual written offers from similar institutions competing for the services of the employee and the availability of similar services in the geographic area of the College.
- d. **Adjustments**
- i. Executives are eligible for a base salary adjustment on January 1 of each year.
 - ii. Benefits will be modified as needed in accordance with this policy in order to remain competitive within our peer group.
 - iii. [The College shall include a clause in all employment agreements that the recipient of any amounts deemed to constitute an “excess benefit” by the Internal Revenue Service shall be responsible for the correction of such amount.]
- e. **Records**
- i. The College shall maintain in its minutes records of the: (1) terms of the compensation arrangement, (2) date of approval, (e) Trustees who were present for discussion of the compensation agreement or amendment, (4) voting Trustees, (5) votes cast, (6) method of obtaining comparability data, (7) comparability data relied upon and how it was obtained, (8) basis for determination of compensation which is higher or lower than the comparability data, (9) geographic or other adjustments made to comparability data, (10) procedure used to determine whether a conflict of interest exists with respect to the subject compensation agreement, (11) any action taken by a person with a conflict of interest and (12) action taken upon a determination of the existence of a conflict of interest.
 - ii. The minutes must be prepared before the later of (1) the date of the next Board of Trustees or Committee meeting or (2) sixty (60) days after the College takes action with respect to the compensation arrangement or agreement. The minutes shall be reviewed and approved by the Board of Trustees or Committee within a reasonable time thereafter.
- f. **Periodic Reviews**
- i. To ensure the College operates in a manner consistent with its charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

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1. Whether compensation arrangements and benefits are reasonable, based on competent survey information, and the result of arm's length bargaining.
2. Whether partnerships, joint ventures, and arrangements with management organizations conform to the College's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit or in an excess benefit transaction.

Form 990 Review Policy

PURPOSE

To establish the procedure for review of the College's Form 990 by the Board of Trustees, prior to the annual filing of the form.

THE POLICY

Mitchell College recognizes that the Board of Trustees has the right to review the Form 990 prior to its filing.

PROCEDURE

- a. Mitchell College senior management is responsible for the timely preparation of Form 990.
- b. The completed Form 990 will be provided to the Finance Committee of the Board of Trustees sufficiently in advance of the filing deadline to enable a comprehensive and careful review by all members of the Committee. Questions and concerns of the Finance Committee members will be addressed by Mitchell's Chief Financial Officer and incorporated into the Form 990 as appropriate.
- c. All members of the Board of Trustees will be invited to view the completed Form 990 in advance of the filing deadline. Questions and concerns of the Trustees will be addressed by Mitchell's Chief Financial Officer and incorporated into the Form 990 as appropriate.
- d. After all of the input from the Board of Trustees and Finance Committee has been appropriately addressed, senior management of Mitchell College will file the final Form 990 as required.

Identity Theft Prevention Program

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PURPOSE

Identity Theft Red Flags is a federal regulation that was effective November 1, 2009 and is part of the Fair and Accurate Credit Transactions Act (FACTA). The regulation requires companies and institutions where goods or services are sold on deferred payment to detect, prevent and mitigate identity theft. The policy is designed to prevent, to detect and to mitigate identity theft in connection with the opening of a covered account or with the administration of any new or existing covered accounts within the college.

THE POLICY

The College Senior Administrators recognizes that some activities of the College are subject to the provisions of the Fair and Accurate Credit Transactions Act (FACT Act) and its “Red Flag” rules. Therefore, the College adopts the following initial program Identity Theft Prevention program for Mitchell College.

Program Adoption

Mitchell College has adopted this initial Identity Theft Prevention Program ("Program") in compliance with the “Red Flag” rules issued by the Federal Trade Commission pursuant to the Fair and Accurate Credit Transactions ACT (“FACTA”). The College is engaging in activities which are covered by the FACTA Red Flag rules. After consideration of the size and complexity of the College’s operations and account systems, and the nature and scope of the College’s activities, it has determined that this Program is appropriate for the College.

Program Purpose

Under the Red Flag rules, the College is required to establish an “Identity Theft Program” with reasonable policies and procedures to detect, identify, and mitigate identity theft in its covered accounts. The College must incorporate relevant Red Flags into a Program to enable the College to detect and respond to potential identity theft. The College shall ensure that the Program is updated periodically to reflect changes in risks to customers or creditors or the College from identity theft.

Responsible College Official

The President shall designate a senior College official to serve as “Program Administrator”. The Program Administrator shall exercise appropriate and effective oversight over the Program and shall report regularly to the President on the Program.

Program Administration and Maintenance

The Program Administrator is responsible for developing, implementing and updating the Program throughout the College system. The Program Administrator will be responsible for ensuring appropriate training of College staff on the Program, for reviewing any staff reports regarding the detection of Red Flags and the steps for identifying, preventing and mitigating identity theft,

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determining which steps of prevention and mitigation should be taken in particular circumstances and considering periodic changes to the Program.

The Program will be periodically reviewed and updated to reflect changes in identity theft risks and technological changes. The Program Administrator will consider the College's experiences with identity theft, changes in identity theft methods; changes in identity theft detection, mitigation and prevention methods; changes in types of accounts the College maintains; changes in the College's business arrangements with other entities, and any changes in legal requirements in the area of identity theft. After considering these factors, the Program Administrator will determine whether changes to the Program, including the listing of Red Flags, are warranted.

The Program Administrator shall confer with all appropriate College personnel as necessary to ensure compliance with the Program. The Program Administrator shall annually report to the President on the effectiveness of the Program. The Program Administrator shall present any recommended changes to the President for approval. The President's approval shall be sufficient to make changes to the College Identity Theft Program.

Identification of Red Flags

In order to identify relevant Red Flags, the College considers the types of accounts that it offers and maintains, the methods it provides to open its accounts, the methods it provides to access its accounts, and its previous experiences with Identity Theft. The following are relevant Red Flags, in each of the listed categories, which employees should be aware of and diligent in monitoring for:

Notifications and Warnings from Credit Reporting Agencies

- Report of fraud accompanying a credit report;
- Notice or report from a credit agency of a credit freeze on a customer or applicant;
- Notice or report from a credit agency of an active duty alert for an applicant; and
- Indication from a credit report of activity that is inconsistent with a customer's usual pattern or activity.

Suspicious Documents

- Identification document or card that appears to be forged, altered or inauthentic;

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- Identification document or card on which a person's photograph or physical description is not consistent with the person presenting the document;
- Other document with information that is not consistent with existing customer information (such as if a person's signature on a check appears forged); and
- Application for service that appears to have been altered or forged.

Suspicious Personal Identifying Information

- Identifying information presented that is inconsistent with other information the customer provides (example: inconsistent birth dates);
- Identifying information presented that is inconsistent with other sources of information (for instance, an address not matching an address on a credit report);
- Identifying information presented that is the same as information shown on other applications that were found to be fraudulent;
- Identifying information presented that is consistent with fraudulent activity (such as an invalid phone number or fictitious billing address);
- Social security number presented that is the same as one given by another customer;
- An address or phone number presented that is the same as that of another person;
- A person fails to provide complete personal identifying information on an application when reminded to do so (however, by law social security numbers must not be required); and
- A person's identifying information is not consistent with the information that is on file for the customer.

Suspicious Account Activity or Unusual Use of Account

- Change of address for an account followed by a request to change the account holder's name;
- Payments stop on an otherwise consistently up-to-date account;

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- Account used in a way that is not consistent with prior use (example: very high activity);
- Mail sent to the account holder is repeatedly returned as undeliverable;
- Notice to the College that a customer is not receiving mail sent by the College;
- Notice to the College that an account has unauthorized activity;
- Breach in the College's computer system security; and
- Unauthorized access to or use of customer account information.

Alerts from Others

Notice to the College from a customer, identity theft victim, law enforcement or other person that it has opened or is maintaining a fraudulent account for a person engaged in Identity Theft.

PROCEDURE

Detecting Red Flags

The Program's general Red Flag detection practices are described in this document. The Program Administrator and each campus will develop and implement specific methods and protocols appropriate to meet the requirements of this Program.

New Accounts

In order to detect any of the Red Flags identified above associated with the opening of a new account, College personnel will take the following steps to obtain and verify the identity of the person opening the account:

- Require certain identifying information such as name, date of birth, residential or business address, driver's license or other identification;
- Verify the customer's identity (for instance, review a driver's license or other identification card);
- Independently contact the customer.

Existing Accounts

In order to detect any of the Red Flags identified above for an existing account, College personnel will take the following steps to monitor transactions with an account:

- Verify the identification of customers if they request information (in person, via telephone, via facsimile, via email);
- Verify the validity of requests to change billing addresses; and

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- Verify changes in banking information given for billing and payment purposes.

Responding to Red Flags and Mitigating Identity Theft

In the event College personnel detect any identified Red Flags, such personnel shall all appropriate steps to respond and mitigate identity theft depending on the nature and degree of risk posed by the Red Flag, including but not limited to the following examples:

- Continue to monitor an account for evidence of Identity theft;
- Contact the customer;
- Change any passwords or other security devices that permit access to accounts;
- Not open a new account;
- Close an existing account;
- Reopen an account with a new number;
- Notify law enforcement; or
- Determine that no response is warranted under the particular circumstances.

Staff Training and Reporting

College employees responsible for implementing the program shall be trained under the direction of the Program Administrator in the detection of Red Flags, and the responsive steps to be taken when a Red Flag is detected. Appropriate staff shall provide reports to the Program Administrator on incidents of identity theft, the effectiveness of the Program and the College's compliance with the Program.

Service Provider Arrangements

In the event the College engages a service provider to perform an activity in connection with one or more accounts, the College will take the following steps to ensure the service provider performs its activity in accordance with reasonable policies and procedures designed to detect, prevent, and mitigate the risk of identity theft:

- Require, by contract, that service providers have such policies and procedures in place; and require, by contract, that service providers review the Utility's Program and report any Red Flags to the Program Administrator.

Institutional Policies

PURPOSE

This policy establishes the processes through which Mitchell College's policies and procedures are developed, approved, communicated and published for use by

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the College community.

THE POLICY

- a. College policies are applicable to the general College community and are created to ensure consistency within the operations in the institution.
- b. Individual College departments will be required to implement departmental procedures to assure compliance.
- c. These departmental procedures must be developed in compliance with established College policies and, should a conflict exist, the College-wide policy will take precedence.

PROCEDURE

- a. A College Policy Committee is comprised of a group of College employees that are considered representative of the College community. Committee members are recommended from the President's Cabinet and approved by the President.
- b. The President will designate a member of the College Policy Committee to serve as Policy Director.
- c. The College Policy Committee will review and recommend policies for approval. Departments, individuals, and committees of the College can draft a new policy or recommend a revision to an existing policy by submitting a proposal to the College Policy Committee, using the template provided in *Appendix A*.
- d. Draft policies will be submitted to the College Policy Committee for review prior to the next scheduled meeting. The policy author should attend the College Policy Committee meeting for the policy review to respond to questions and provide additional information.
- e. The College Policy Committee will either recommend a draft policy to be placed on the agenda for the President's Cabinet or recommend changes in the policy to the policy author. The policy author will make the changes and resubmit to the Council for review and consideration, using email to expedite the process.

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- f. Should the policy author not agree with the Council recommendations, they can request that the policy be submitted for Cabinet review and President's approval without the recommended changes. In that case, the Policy Director will communicate the Committee's concerns about the policy to the Cabinet.
- g. When the College Policy Committee recommends a policy for approval, it should be sent to the President's Cabinet via College email for review and discussion on the Cabinet agenda.
- h. The President's Cabinet can approve, reject, or request amendments to College policies after the Cabinet review and discussion. If a policy is not accepted, it can be referred back to College Policy Committee to consider possible amendments, and the process will be followed, beginning with section d) above.
- i. Approved policies will be numbered using the organization numbering system provided in *Appendix B*.
- j. After the President has approved the new or revised policy, the Policy Director will be responsible for posting the policy to the policy website and informing the College community that the policy has been created or revised.

Policy Guidelines

PURPOSE

This policy establishes the processes through which Mitchell College's policies and procedures are developed, approved, and communicated and published for use by the College community.

THE POLICY

- a. College policies are applicable to the general College community and are created to ensure consistency within the operations in the institution.
- b. Individual College departments will be required to implement departmental procedures to assure compliance.
- c. These departmental procedures must be developed in compliance with established College policies and, should a conflict exist, the College-wide policy will take precedence.

PROCEDURE

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- a. A College Policy Committee is comprised of a group of College employees that are considered representative of the College community. Committee members are recommended from the President's Cabinet and approved by the President.
- b. The President will designate a member of the College Policy Committee to serve as Policy Director.
- c. The College Policy Committee will review and recommend policies for approval. Departments, individuals, and committees of the College can draft a new policy or recommend a revision to an existing policy by submitting a proposal to the College Policy Committee, using the template provided in Appendix A.
- d. Draft policies will be submitted to the College Policy Committee for review prior to the next scheduled meeting. The policy author should attend the College Policy Committee meeting for the policy review to respond to questions and provide additional information.
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- f. Should the policy author not agree with the Council recommendations, they can request that the policy be submitted for Cabinet review and President's approval without the recommended changes. In that case, the Policy Director will communicate the Committee's concerns about the policy to the Cabinet.
- g. When the College Policy Committee recommends a policy for approval, it should be sent to the President's Cabinet via College email for review and discussion on the Cabinet agenda.
- h. The President's Cabinet can approve, reject, or request amendments to College policies after the Cabinet review and discussion. If a policy is not accepted, it can be referred back to College Policy Committee to consider possible amendments, and the process will be followed, beginning with section d) above.
- i. Approved policies will be numbered using the organization numbering system provided in Appendix B.
- j. After the President has approved the new or revised policy, the Policy Director will be responsible for posting the policy to the policy website and informing the College community that the policy has been created or revised.

INSTITUTIONAL RESEARCH

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PERSONNEL

Affirmative Action Policy

PURPOSE

The purpose of this policy is to emphasize that Mitchell College supports affirmative action in all processes of recruiting, hiring, and promoting of staff and faculty at the College.

THE POLICY

Mitchell College is an affirmative action-equal opportunity employer. Mitchell College is committed to selecting faculty and staff without discrimination against individuals on the basis of race, color, sex, sexual orientation, religion, creed, national origin, age, veteran status, or disability unrelated to job requirements. The President calls upon every member of the college to engage wholeheartedly in the effort to ensure a wholly nondiscriminatory process of recruiting, hiring, and promoting women, members of minority groups, qualified handicapped individuals, and disabled and Vietnam-era veterans at all levels of employment throughout the college in accordance with applicable state and federal laws.

Diversity within the college community advances the academic purposes of the college, and an affirmative action policy is essential to achieving such diversity. The college endorses the goals of equal employment opportunity and affirmative action as supportive of college values and of the values of a democratic and pluralistic society.

PROCEDURE

All advertisements for employees placed by or on behalf of the College shall state that the College is an affirmative action-equal opportunity employer in accordance with regulations adopted by the State of Connecticut Commission on Human Rights and Opportunities.

Attendance and Punctuality Policy

PURPOSE

The purpose of this policy is to establish the guidelines for attendance and punctuality requirements at Mitchell College.

THE POLICY

The success of this College depends on your good attendance. Absenteeism detracts from our mission and causes an unfair burden for those employees who must fill in for

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absent employees. Most people will be late or sick at one time or another, but when short-term absences become frequent, they often signal personal or job-related problems.

Excused absences

The following are considered excused:

- (1) Absences because of illness. However, for absences of seven (7) or more successive days, the absence will only be considered excused if the employee complies with the Medical Verification policy set forth in the Sick Leave subsection of the Paid Time Off Policy.
- (2) Absence approved by your Supervisor/Department Head in advance.
- (3) Absence because of death in the immediate family.
- (4) Absence or delayed arrival because of extreme weather conditions.
- (5) Absence or delayed arrival because of a bona fide personal emergency as determined by the Director of Human Resources.
- (6) Absence because of a work-related injury.

Excessive Absenteeism or Lateness

If you are absent for three (3) consecutive days without notifying the College, it is assumed that you have voluntarily abandoned your position with the College, and you will be removed from the payroll and your final paycheck will be mailed to your home.

While there may be times when an absence or lateness is unavoidable, there are also times when absences or tardiness become excessive. You will be counseled regarding absenteeism or tardiness if it is determined that you have not met College expectations. If the problems persist, disciplinary action up to and including termination may occur.

The absence of an employee from work, including an absence for a single day or portion of a day that is not authorized, shall be deemed as absent without leave, unless otherwise prohibited by law. Be aware that excessive absenteeism, lateness, or leaving early may lead to disciplinary action, up to and including, termination.

PROCEDURE

Avoid letting minor difficulties keep you from performing your jobs. At the same time, good judgment should be used with respect to contagious ailments which might have an adverse effect on other employees and our patients.

Attend to personal affairs during non-working hours.

Be at the appointed workplace, ready to work, at the regular starting time and to remain at such workplace and at work until the regularly scheduled ending time.

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In regard to attendance, employees are expected to:

Notify your Supervisor/Department Head as soon as possible if you are ill or unable to report to work for any reason. It is understood that emergencies do occur. However, employees are expected to notify the College before the scheduled start of their workday and each morning thereafter that he or she is unable to report to work. If you are unable to call personally, have a friend or relative call for you.

Code of Ethics

PURPOSE

The purpose of this Code of Ethics Policy (“Code”) is to establish and maintain high standards of honesty, integrity and quality of performance for all employees of Mitchell College. Ethical conduct is of critical importance in our relationships with the community, students, co-workers and private contractors. This Code is intended to be a general guide to conduct that is prohibited.

THE POLICY

The following provisions are applicable to all employees of Mitchell College:

Outside Employment

A. Introduction

Mitchell College recognizes the right of employees to engage in outside employment, as defined below. Full-time exempt and non-exempt salaried and hourly employees are permitted, but not encouraged, to engage in outside employment. If a person is a full-time employee of Mitchell College, the employee’s primary responsibility is to Mitchell College. Without regard to time requirements or the nature of the work, full-time outside employment is deemed to interfere with the fulfillment of the employee’s obligation to Mitchell College. If a full-time employee chooses to engage in outside employment, Mitchell College has established policies and procedures requiring that such outside employment be disclosed and submitted for administrative review and approval.

B. Definition of Outside Employment

Outside employment is all work for which one is compensated by any source other than Mitchell College. Such work includes self-employment as well as part-time employment, consulting, advising, research, and teaching for other employers. Compensation for

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published or creative work in one's field or honoraria for commissioned papers and occasional lectures is not included in outside employment. Any outside employment should, if possible, enhance the full time employee's role as a Mitchell College employee. Outside employment should never diminish the full-time employee's ability to fulfill his/her role.

C. Policy and Procedures

A full time member of the faculty or staff shall not engage in such outside employment (or continue such employment if already so engaged) without the written approval of the Vice-President of Finance and Administration. A full-time member of the faculty or staff who is presently engaged, or who plans to engage, in employment outside of his/her broad college responsibilities during any period of full-time employment by the College, shall report to his Supervisor or Department Head in writing the number of days of outside employment, the identity of the employer, the general nature and extent of the employment and the amount of time the work will require, but shall not include the amount of compensation.

In all such instances, the Supervisor or Department Head shall disclose these facts to the Vice-President of Finance and Administration. The Vice-President of Finance and Administration may consider the outside employment to interfere with the employee's fulfillment of his or her obligations to Mitchell College if the Vice-President of Finance and Administration believes that such outside employment involves, or may involve, a conflict of interest; impinges upon the employee's duties to the College; is detrimental to the quality or extent of the fulfillment of the employee's obligations to Mitchell College; and/or compromises the College's relationship with the outside employer. In light of such interference, the Vice-President of Finance and Administration may limit or restrict the outside employment. The Vice-President of Finance and Administration will first provide the employee an opportunity to demonstrate that his or her outside employment does not interfere with the fulfillment of his or her obligations to Mitchell College. The employee whose outside employment has been so limited may appeal the decision to the President, who will render a final decision.

Employees are cautioned to consider carefully the demands that additional work activity will create before seeking or accepting outside employment. Outside employment will not be considered an excuse for poor job performance, absenteeism, tardiness, leaving early, refusal to travel or refusal to work overtime or different hours. If outside employment does cause or contribute to job-related problems, such employment must be discontinued and job-related problems corrected; and, if necessary, normal disciplinary procedures will be followed to deal with the specific problem.

D. Restrictions to Outside Employment

The general conditions under which Mitchell College will approve an employee's engaging in outside employment include but are not limited to the following:

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The employee's outside employment will not compromise Mitchell College's interest or raise substantial concerns about possible conflicts of interest. Employees of Mitchell College shall not seek or accept employment with or compensation from any consultant, contractor, appraiser, or any other organization or individual under contract or agreement with the College or that does a significant amount of business with the College.

The employee shall not have, directly or indirectly, a financial interest in any business, firm, or enterprise doing business with the College which could cause a conflict or influence the performance of the employee's duties. The financial interest referred to in this provision is not intended to apply to individuals who own less than five percent 5% of the stock of a publicly-owned corporation

The employee's outside employment will not adversely affect and/or impinge on the employee's job performance and ability to fulfill all assigned duties and responsibilities to Mitchell College.

The employee shall provide notification to all outside employers that 1) he/she accepts such employment as an individual; 2) is acting in a private capacity, and not, in any manner, as a representative of Mitchell College; and 3) Mitchell College is in no way a party to the outside employment and is not liable or responsible for the performance thereof. The employee must include with any oral testimony or written reports a statement to the effect that the views expressed are those of the employee and do not necessarily reflect the views of Mitchell College. Mitchell College recognizes that a person may qualify as an expert because of his/her training and experience. Therefore, biographical data, including a statement of employment by Mitchell College, may be included as introductory material to written reports (but not incorporated in the body of the written report) by the outside employer, or orally in the case of expert witness, by way of establishing the writer/speaker as a qualified expert.

Employees are not to conduct any outside business during paid working time. Any time devoted to outside employment must be outside the employee's normal work schedule. An employee is not allowed to post or distribute advertising material for personal business purposes without the express permission of his/her Supervisor or Department Head. An employee is not allowed to use his/her college address, telephone number, title or status in any way to promote or advertise a personal business.

Employees who have accepted outside employment are not eligible for unpaid leave when the absence is used to work on the outside employment.

Mitchell College resources shall not be used for personal gain and/or outside employment. All employees are prohibited from the unauthorized use of any Mitchell College property, facilities, materials, supplies, tools, equipment and/or resources.

Other conditions may be applicable based on the circumstances of each situation.

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Any questions concerning this policy should be directed to the Director of Human Resources.

Confidentiality

Many employees of the College have access to confidential information. Unauthorized release of confidential information is prohibited. Information that is confidential must not be discussed with anyone, including family members. If an employee is unsure whether certain information is deemed confidential, he/she should seek advice from his/her Supervisor, Department Head, or the Director of Human Resources, prior to releasing such information. Dissemination of confidential information is grounds for immediate dismissal.

Employment of Relatives

For purposes of this policy, the term “relative” shall mean one of the following: spouse, life partner, child, child’s spouse, parent, brother, sister, or dependent relative.

The employment of family members within an organization can create both actual and perceived problems in the workplace. However, Mitchell College recognizes that family members can also be valuable employees, and that existing employees can become family members by marriage. While relatives of employees are not prohibited from seeking or accepting employment with Mitchell College, no employee shall use his/her position or influence to gain employment for a relative. Further, no employee is permitted to supervise, either directly or indirectly, a relative working in a college position.

Relatives of current employees may be hired at the discretion of the College. However, family members of the President or any Senior Cabinet member will not be employed by Mitchell College on a full-time or part-time basis because of the extensive involvement and influence of the management team throughout the College.

Other Conflicts of Interest

You must avoid all situations which might be detrimental to the College or its reputation. No employee of Mitchell College, or his/her immediate family, shall either individually or as a member of a group, directly or indirectly, accept or request any gift, object, gratuity, fee, or payment, including an incentive payment, from any person or organization which currently has or is seeking a business relationship with his or her department or with the College, or with whom the College does or may do business, or take advantage of any business or teaching opportunity that should be channeled through the College, unless it is approved by the Director of Human Resources or the President. Gift or gratuity refers to any object or payment which is not offered for the benefit of the College at large. Included among the items are luncheon and/or dinner payments, golfing fees, and/or fees for other social events and bottles of liquor. Social gifts among co-workers, supervisors or subordinates for birthdays, holidays and special

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occasions are permitted provided they are reasonable. An employee should avoid those situations which may result in his/her being found in a conflict of interest or which may give the appearance of a conflict of interest.

PROCEDURE

The provisions of this document shall apply to all employees of the Mitchell College. All current and future employees of Mitchell College shall be supplied with a copy of this document, and it shall be the responsibility of each employee to be familiar with these provisions and to comply with them. It is strongly suggested that employees avoid these situations which are ethically questionable or which may give the appearance of being so. When in doubt or unsure about these provisions, an employee should contact either his or her Supervisor, Department Head, or Director of Human Resources.

Compliance with Immigration Law Policy

PURPOSE

Mitchell College is committed to employing only persons who are authorized to work in the United States.

THE POLICY

Mitchell College does not discriminate on the basis of citizenship or national origin. In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility.

Former employees who are rehired must also complete the form if they have not completed an I-9 with the College within the past three years, or if their previous I-9 is no longer retained or valid.

Drug and Alcohol Use Policy

PURPOSE

Mitchell College is committed to a safe, healthy, and productive workplace for all employees.

THE POLICY

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It is the policy of the College that its students and fellow employees have the absolute right to expect that persons employed by the College will be free from the effects of drugs and alcohol. The College, as the Employer, has the right to expect its employees to report to work fit and able for duty. Employees are prohibited from selling, purchasing, or delivering any illegal drug at any time and at any place.

Prescription Drugs

Employees who use a prescription drug which may, as indicated on the prescription label, cause possible adverse side effects (e.g., drowsiness or impaired reflexes or reaction time) must inform the Director of Human Resources that they are taking such medication on the advice of a physician. Employees are responsible for informing the Director of Human Resources of the possible effects of the drug on performance and expected duration of use.

Drug Testing

Where the College has reasonable suspicion to believe that a current employee (1) is under the influence of drugs or alcohol, which at that time, adversely affected or could adversely affect the employee's job performance; (2) has abused prescribed drugs; (3) or has used illegal drugs, the College may require the employee to submit to alcohol or drug testing. The College also may conduct drug tests for individuals seeking employment (prior to the date of their hire) or upon promotion to another position within the College.

The College requires that an employee notify the Director of Human Resources within five (5) days after a conviction of any criminal drug statute for a violation occurring outside the workplace.

PROCEDURE

Employees with questions on this policy or issues related to drug or alcohol use in the workplace should raise their concerns with the Director of Human Resources.

Employee Classification Policy

PURPOSE

The purpose of this policy is to define the classification of all employees of Mitchell College.

THE POLICY

All employees of Mitchell College are categorized in one of the following classifications:

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Senior Management: Executive, high level administrative and professional employees who are responsible for establishing broad plans and contributing to policy decisions which often affect more than their own individual areas of responsibility.

Supervisor/Department Head: Administrative personnel responsible for delegating and/or supervising daily work assignments.

Employee: A person who receives wages or salary from the College.

Exempt: Employees who are not subject to the overtime provisions of the wage and hour law. They have qualified for exemption under the law as executive, administrative, or professional employees and outside salespersons, under the Fair Labor Standards Act ("FLSA").

Hourly/Nonexempt: Employees who are compensated hourly or are eligible for overtime as provided in applicable Federal and State Wage and Hour Laws

Introductory/New Employee: A newly hired non-academic person who has not yet completed six (6) months of active employment. The six (6) month period may be interrupted and not continuous, depending upon the nature of the position of employment.

Regular Full-Time: An employee who is not in a temporary or introductory status and who is regularly scheduled to work more than thirty (30) hours per week/twelve (12) months per annum in Mitchell College's full-time schedule.

Regular Part-Time: An employee who is not in a temporary or introductory status, is regularly scheduled to work twenty (20) or more, but less than thirty (30) hours per week/twelve (12) months per annum, and maintains continuous employment.

Academic Year Full-Time: Employees who are regularly scheduled to work more than thirty (30) hours per week for the academic year of either nine or ten months.

Academic Year Part-Time: Employees who are regularly scheduled to work at least twenty (20) but not more than thirty (30) hours per week during the academic year of either nine or ten months.

Faculty Full-Time: Employees who teach twenty four (24) semester hours per academic year.

Faculty Part-Time(Adjunct): Employees who teach a minimum of three (3) and not more than twenty-one (21) credit hours per academic year.

Temporary: Any individual hired for a specific period of time or for the completion of a specific project. The job assignment, work schedule, and duration of the position will be determined on an individual basis. Employment beyond any initially-stated period does not in any way imply a change in employment status. Temporary employees retain that

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status unless and until notified of a change. Those temporary employees who qualify as “nonexempt” (see definition set forth above) and who work more than forty (40) hours during any work week will receive overtime pay pursuant to applicable Federal and State Wage and Hour laws.

Employee Relations / Open Door Policy

PURPOSE

All Mitchell College employees have the freedom to speak for themselves and discuss their concerns, suggestions, and problems with the College.

THE POLICY

All employees should utilize the College’s Open Door Policy to raise all problems, complaints, or concerns they may have regarding employment with the College. We firmly believe we have much to offer and will continue to listen and endeavor to respond to the concerns and needs of our employees. If you have any questions, we urge you to talk with the Director of Human Resources.

PROCEDURE

We believe that the interests of our employees and the College are best served by direct communications between the Employer and Employee rather than through an outside organization. Our open door policy allows all questions regarding your employment to be discussed through both informal and formal procedures.

Most of your questions and concerns regarding employment issues may be satisfactorily settled by your Supervisor/Department Head or the Director of Human Resources. If these discussions prove unsatisfactory, your Supervisor/Department Head or the Director of Human Resources will present your issue to the President.

By using this open door procedure, you may raise questions, bring suggestions, and discuss problems at the highest levels of the organization, if necessary. Mitchell College hopes that you take constructive advantage of this procedure. Employees will be not be subjected to any form of retaliation for identifying issues or raising a problem.

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Equal Employment Opportunity Policy

PURPOSE

The purpose of this policy is to enforce Mitchell College as an equal opportunity employer.

THE POLICY

Mitchell College is an affirmative action-equal opportunity employer. It is our policy to provide equal employment opportunity without regard to race, color, sex, age, disability, religion, national origin, citizenship status, ancestry, marital status, veteran's status, sexual orientation, or any other criteria protected by federal, state, or local law.

This policy applies to all areas of employment, including recruitment, hiring, training and development, promotion, transfer, termination, layoff, compensation, and all other conditions and privileges of employment in accordance with applicable federal and state laws.

We are fully committed to this principle and to obtaining the cooperation and understanding of this effort by all our employees.

PROCEDURE

All advertisements for employees placed by or on behalf of the College shall state that the College is an affirmative action-equal opportunity employer in accordance with regulations adopted by the State of Connecticut Commission on Human Rights and Opportunities.

Family and Medical Leave Policy

PURPOSE

The purpose of this policy is to establish the parameters for family and medical leave at Mitchell College.

THE POLICY

Both the federal Family and Medical Leave Act of 1993 (29 USC §2601) and Conn. §31-51kk-qq require certain employers to grant unpaid leave of absence to qualified workers in case of birth or adoption of a child, or serious health condition of a child, spouse, parent, or the employee. Employees will be restored to their original or equivalent

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position. These laws work in parallel, i.e., the section of the law that affords the greatest benefit to the worker is the one that will be followed. In most cases, this will be the federal law. The general parameters of Mitchell College's Family and Medical Leave policy, as listed below:

Covered Employers

The Family and Medical Leave Act ("FMLA") covers smaller employers (50 or more employees) than the CFMLA (75 or more employees).

Reasons for Leave

Both the Connecticut Family and Medical Leave Act ("CFMLA") and the FMLA provide leave for:

- (1) the birth, adoption, or foster placement of a child,
- (2) to care for a child, spouse or parent with a serious health condition, and
- (3) the employee's own serious health condition. The CFMLA also includes leave to care for a parent-in-law with a serious health condition, which is not covered by the federal law.

PROCEDURE

Leave Eligibility/Entitlement

- A. Federal: An employee who has been employed by the College for twelve (12) months and who completed 1250 hours of work during the twelve (12) month period immediately preceding the commencement of such leave, will be entitled to up to twelve (12) weeks leave in a one-year period under the Family and Medical Leave Act of 1993 ("Act") in accordance with its provisions and the provisions of this policy.
- B. State: An employee who has been employed by the College for twelve (12) months and who completed 1000 hours of work during the twelve (12) month period immediately preceding the commencement of such leave, will be entitled to up to sixteen (16) weeks of job protected leave in a two-year period under Connecticut law.
- C. An Employee must substitute any paid accrued leave for all or part of any leave under either Act.

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Year for Purposes of Determining Leave Entitlement

For purposes of determining an employee's leave entitlement under either Act, the fifty-two (52) week period immediately preceding the commencement of leave under the Act shall be the applicable measuring period.

Payment of Group Insurance Premiums During Leave: Each employee on unpaid leave under the Act shall remain responsible for paying the employee share, if any, of the premium for coverage elected by the employee and shall directly submit to the College, not later than the employee's normal payday, the amount of the premium owed by the employee.

Employees applying for and granted a family leave of absence are required to meet notification and documentation requirements as outlined further in this policy. Failure to meet these requirements may result in the denial or revocation of family leave.

Employee Notice and Scheduling Requirements:

- (1) An employee requesting family leave is required to give thirty (30) days' notice before the date the leave is to begin, except for bona fide emergencies, which will be accommodated as soon as practicable.
- (2) When a family leave is related to a serious health condition, the employee must make a reasonable effort to schedule treatment(s) so as not to unduly disrupt the College's operations.

Medical Certification and Reporting Requirements:

- (1) The College may require that a family leave related to a serious health condition be supported by a certification issued by the health care provider of the employee or issued by the health care provider of the employee's spouse, son, daughter, or parent, as appropriate. A copy of this certification shall be provided to the College in a timely manner.
- (2) The certification shall include:
 - (a) The date on which the serious health condition commenced.
 - (b) The probable duration of the condition.
 - (c) The appropriate medical facts within the knowledge of the health care provider regarding the condition.
 - (d) A statement that the employee is needed to care for the son, daughter, spouse or parent.
 - (e) An estimate of the amount of time that the employee is needed to care for the son, daughter, spouse, or parent.

If the College questions the validity of the certification, it may require, at the College's expense, that the employee obtain a second opinion. If the second opinion conflicts

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with the original opinion, the College may require, at its expense, that the employee obtain the opinion of a third health care provider designated or approved jointly by the College and the employee. This third opinion will be considered final and binding on both parties.

The College may require that the employee obtain subsequent re-certification on a reasonable basis.

The employee on a family leave must notify his or her Supervisor/Department Head periodically of his or her status and intention to return to work. The Supervisor/Department Head has the authority to determine how often the employee must provide this notification.

General Conduct and Work Rules Policy

PURPOSE

Mitchell College is committed to ensuring the best possible work environment for all employees.

THE POLICY

To ensure orderly operations and provide the best possible work environment, Mitchell College expects employees to follow rules of conduct that will protect the interests and safety of all employees and the organization. It is not possible to list all the forms of behavior that are considered unacceptable in the workplace. The following are examples of infractions of rules of conduct that may result in immediate termination of employment:

- Theft or inappropriate removal or possession of property.
- Falsification of timekeeping records.
- Working under the influence of alcohol or illegal drugs.
- Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace, while on duty, or while operating employer-owned vehicles or equipment.
- Fighting or threatening violence in the workplace.
- Disruptive activity in the workplace or negligence or improper conduct leading to damage of employer-owned property.
- Sexual or other unlawful or unwelcome harassment.
- Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace.
- Violation of personnel policies.
- Unsatisfactory performance or conduct.

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- Insubordination or other disrespectful conduct (e.g. refusal or intentional failure to obey orders or perform a task assigned by an employee's immediate Supervisor/Department Head; threats, intimidation, coercion or interference with supervision; abusive language; false, vicious or malicious statements about management, staff or the College, published or openly spoken.)

Inspections and Searches on College Property

In order to enhance the safety and security of the workplace for all employees, Mitchell College reserves the right to search College premises or worksites as well as any College vehicles wherever they are located. Mitchell College also reserves the right to inspect the property of employees including but not limited to, work stations, briefcases, lunchboxes, backpacks, purses, toolboxes, coats, hats or any other personal property of employees brought onto Mitchell College's premises. Such searches will be conducted for the purpose of detecting illegal drugs, alcohol, weapons, stolen property, or any other material associated with a violation of Mitchell College's work rules or federal, state, or local law.

Responsibility for College Property

Employees are responsible for all college property provided to them by Mitchell College and are expected to maintain it in a safe and satisfactory condition. Employees are personally responsible for all college supplied portable equipment such as cellular telephones and portable computers.

If any portable equipment is lost or damaged due to an employee's gross negligence or willful misconduct, the employee may be disciplined and in accordance with applicable law, employees may be held financially responsible for any loss suffered by Mitchell College.

Use of Equipment and Vehicles

Equipment and vehicles essential in accomplishing job duties are expensive and may be difficult to replace. When using College property, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards, and guidelines.

Please notify your Supervisor/Department Head if any equipment, machines, tools, or vehicles appear to be damaged, defective, or in need of repair. Prompt reporting of damages, defects, and the need for repairs could prevent deterioration of equipment and possible injury to employees or others. The Supervisor/Department Head can answer any questions about an employee's responsibility for maintenance and care of equipment or vehicles used on the job.

Employees who are involved in an accident while traveling on business must promptly report the accident to their immediate Supervisor/Department Head.

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Anyone using College owned, leased, or rented vehicles for College purposes, either on or off campus, must first pass a Motor Vehicle Record Check annually. Vehicles owned, leased, or rented by Mitchell College may not be used for personal use without prior approval.

The improper, careless, negligent, destructive, or unsafe use or operation of equipment or vehicles, as well as excessive or avoidable traffic and parking violations, may result in disciplinary action, up to and including termination of employment.

PROCEDURE

If you become aware of any violation of these rules, contact your Vice-President or the Director of Human Resources.

Paid Time off Policy

PURPOSE

Eligible employees at Mitchell College are provided a wide range of benefits, including paid time off for vacation (with blackout date exceptions), holidays, jury duty, bereavement, sick leave and personal time.

THE POLICY

Eligibility for paid time off benefits will be based on employee classification as follows:

- Full Time Faculty - Sick Time, Holidays, Jury Duty
- Part Time Faculty – Holidays, Jury Duty
- Regular Full Time - Sick Time, Vacation Time, Personal Time, Holidays, Jury Duty, Bereavement
- Regular Part Time - Sick Time, Vacation Time, Holidays, Jury Duty, Bereavement
- Academic Year Full Time - Sick Time, Holidays, Personal Time, Jury Duty
- Academic Year Part Time - Sick Time, Holidays, Jury Duty

Temporary employees are generally not eligible for benefits, except as granted on occasion, or to the extent required by provision of state and/or federal laws.

Types of Paid Time Off

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Paid time off consists of vacation (with blackout date exceptions), holidays, jury duty, bereavement, sick leave and personal time. Each type of paid time off follows the policies that follow.

Vacation

Vacation time off with pay is available to eligible employees to provide opportunities for rest, relaxation, and personal pursuits.

Vacation accruals begin the month following employment. The benefit year for vacation time is January 1st to December 31st.

The amount of paid vacation full-time employees receives each year increases with the length of their employment as shown in the following schedule:

Vacation Earning Schedule – Regular Full Time

| <i>YEARS OF ELIGIBLE SERVICE</i> | <i>VACATION DAYS MONTHLY</i> | <i>VACATION DAYS PER ANNUM</i> |
|---|-------------------------------------|---------------------------------------|
| <i>Upon initial eligibility</i> | .833 days | 10 days |
| <i>After Completion of 4 years</i> | 1.25 days | 15 days |
| <i>After Completion of 5 years</i> | 1.33 days | 16 days |
| <i>After Completion of 6 years</i> | 1.41 days | 17 days |
| <i>After Completion of 7 years</i> | 1.50 days | 18 days |
| <i>After Completion of 8 years</i> | 1.58 days | 19 days |
| <i>After Completion of 9 years</i> | 1.66 days | 20 days |

Department heads, Directors and members of the Cabinet receive twenty (20) days paid vacation per year.

Regular part-time employees earn five (5) days per year accrued at .416 days per month.

Academic year part-time hourly employees hired prior to 7/1/03, accrue 4.16 days per academic year accrued at .416 days for each month worked.

The length of eligible service is calculated on the basis of a "benefit year." This is the twelve (12) month period that begins when the employee starts to earn vacation time.

To take vacation time, employees must submit to their Supervisor/Department Head Employee Request For Time Off forms at least forty-eight (48) hours prior to the requested time off. All requests for time off must be approved in writing by the employee's Supervisor/Department Head, and are subject to the operational requirements of the College. Requests will be reviewed for approval based on a number of factors including operational needs and staffing requirements.

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Vacation time off is paid at the employee's per diem base rate at the time vacation is taken. The vacation year is from January 1st to December 31st.

No vacation time may be taken before it is accrued without the approval of the Director of Human Resources.

Any accrued vacation time carried forward must be taken within the next twelve (12) month period. Unused vacation time or vacation "on the books" can never exceed the amount of vacation earned in two (2) years (e.g., if you earn two (2) weeks vacation a year, the maximum amount you can have on the books is four (4) weeks). Vacation time accrued, but unused beyond this amount is forfeited.

Upon termination of employment, employees who leave on good terms will be paid for accrued unused vacation time that has been earned through the last day of work, as set forth above. The employee must provide two (2) week written notice of resignation, must fully work through their final weeks, and not have been terminated.

Blackout Dates

The college respects the employee's need and right to utilize vacation time, however there are times within the academic year that need the participation of specific departments or the entire campus community. The following annual periods have been designated as such "high priority" times where limited (if any) vacation time will be approved:

- Winter Open House
- Spring Open House
- Week of Spring Final Exams & Graduation
- Spring and Summer - New Student Orientation(s)
- August/September - Two weeks prior to the first day of classes
- January – One week prior to the first day of classes
- Fall Open House
- October - Fall Weekend

Holidays

Eligible employees enjoy the following paid holidays:

- New Year's Day
- Martin Luther King Day
- President's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Day after Thanksgiving
- Christmas Day
- The days between Christmas and New Year's

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If the College schedule dictates that the College will be open on a paid holiday, all exempt employees who work on that day will be granted one floating holiday. The floating holiday must be taken before September of the following year and cannot be carried over to the next year.

In addition to the above paid holidays, the College will close early as indicated below:

| | | |
|-------------------------|---|---------------------|
| Good Friday | - | close at 3:00 p.m. |
| Day before Thanksgiving | - | close at 3:00 p.m. |
| Christmas Eve | - | close at 12:00 p.m. |

Employees who do not actually work their last scheduled work day before and the first scheduled work day after a holiday shall be ineligible for the paid holiday benefits set forth in this policy, unless the employee has requested this time off in advance and the request has been approved by the employee's Supervisor/Department Head.

Eligible part-time employees will be paid for hours normally scheduled for the holiday.

Holiday pay is paid at the employee's per diem base pay rate at the time the holiday is taken.

If eligible hourly employees are required to work on a recognized holiday, they will receive their holiday pay in addition to pay at the rate of time and one-half (1 ½) for all hours worked.

Jury Duty

All employees should comply with orders to appear for jury duty. Employees summoned to perform jury duty should notify their Supervisor/Department Head as soon as they receive the order to appear for jury duty.

All employees will be paid their regular wages while on jury duty up to a maximum of five working days. Employees are required to produce evidence of their jury duty service.

Additional paid leave for jury duty may be approved at the sole discretion of the College.

Sick Leave

Mitchell College provides paid sick leave benefits to all eligible employees (See Section 5-Benefits) for periods of temporary absence due to illnesses or injuries. Full time employees accrue sick leave benefits at the rate of one day for every

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full month of service. Part time employees accrue sick leave benefits at the rate of one-half day for every month of service.

Eligible employees may use sick leave benefits for an absence due to their own illness or injury or that of a family member who resides in the employee's household. If an eligible employee becomes sick and leaves work during the day, the sick pay will be recorded for the balance of the hours in the workday.

Employees who are unable to report to work due to illness or injury must notify their direct Supervisor/Department Head before the scheduled start of their workday. The direct Supervisor/Department Head must also be contacted on each additional day of absence.

Employees may be required to provide medical verification of an illness at any time, including, but not limited to the following:

- Before returning to work from a sick leave absence of seven (7) calendar days or more, an employee must provide a physician's verification that he or she may safely return to work.
- For sick leave absences of any duration, but usually three (3) days or more, the employee's Supervisor/Department Head has the option of requiring a doctor's note which sets forth the nature of the illness and the fact that the employee is able to resume his/her normal duties.
- The fourth (4th) sick leave occurrence and each subsequent sick leave occurrence for the duration of the calendar year.
- Whenever an employee has used sick leave during vacation, before or after a holiday, or has a pattern of absenteeism.

The medical certificate from a licensed physician shall state 1) the nature of the illness or injury, and 2) a statement that in the opinion of said physician the employee is capable of returning to work.

Failure to provide a medical certificate, if required by the College, shall result in the employee not being paid for said sick leave occurrence. In addition, should the College request a medical certificate and the same is not provided by the employee, the College may take further disciplinary action, including but not limited to termination.

Sick leave benefits will be calculated based on the employee's per diem base rate at the time of leave.

As an additional condition of eligibility for sick leave benefits, an employee on an extended absence must apply for any other available compensation and benefits, such as workers' compensation. Sick leave benefits will be used to supplement any payments that an employee is eligible to receive from state disability insurance, workers' compensation or Mitchell-provided disability

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insurance programs. The combination of any such disability payments and sick leave benefits cannot exceed the employee's normal weekly earnings.

An employee may accumulate a maximum of 45 days sick leave.

Sick leave benefits are intended solely to provide income protection in the event of illness or injury, and may not be used for any other absence or purpose. The College will not pay employees accrued sick leave benefits upon termination of employment.

Abuse of sick leave places unfair burdens on other members of the Mitchell College community and may lead to disciplinary action, up to and including termination.

Personal Time

The College provides three personal days to allow eligible employees the flexibility to meet family obligations or emergencies, handle personal business, schedule doctors' appointments which cannot be scheduled outside of business hours, or celebrate a holiday not recognized by the College.

Personal leave days are accrued immediately on January 1st. The personal leave year is from January 1st to December 31st of each year. Personal leave days must be used in the year they are accrued and cannot be carried over to the following year.

Because personal leave days are granted to employees to use as they wish to meet any number of separate obligations which may arise in the course of the year, they are intended to be used, (except in family emergencies), in hourly increments, but no more than one (1) day at a time.

All employee benefits continue during personal leave days.

Personnel File Policy

PURPOSE

This policy refers to the maintenance of personnel files for all Mitchell College employees.

THE POLICY

Mitchell College maintains a personnel file for each employee. The personnel file may include, but is not limited to the following:

- Employee's application

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- Resume
- Personnel action forms
- Training records
- Performance appraisals
- Disciplinary documents
- Other employment records

Coverage or benefits that you and/or your family receive could be negatively affected if the information in your personnel file is incorrect. Please inform the Director of Human Resources of any change(s) in the following items, as soon as possible:

- Legal name
- Home address
- Home telephone number
- Person to contact in case of emergency
- Number of dependents
- Marital status
- Change of beneficiary
- Military or draft status
- Exemptions for your W-4 tax form
- Driving record or status of driver's license and proof of insurance, if the employee operates a vehicle to conduct College business.

Since Mitchell College refers to your personnel file to make decisions in connection with your employment, it is to your benefit to make sure your personnel file includes information concerning the completion of educational or training courses, work-related areas of interest, and skills that may not be part of your current position.

Personnel files are the property of Mitchell College. Access to the information contained in the personnel files is restricted. In addition to the employee, generally only the President, Human Resources, and other designated personnel are allowed to review information in a file. Information provided to external agencies (e.g., credit agencies, potential employers, etc.) is limited to name, title, wage or salary history, and dates of employment. No other information will be released unless the employee or former employee has given written permission for release, or unless the College is required to disclose such information by law.

Employees and former employees may review their own personnel file upon written request. Requests should be submitted to the Director of Human Resources. The review of a personnel file must be conducted in the presence of the Director of Human Resources or his/her designee. Nothing may be added to or removed from a personnel file without the prior approval of the Director of Human Resources.

A copy of documents contained in the employee's personnel file will be provided upon written request, within a reasonable period of time.

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Medical Records. Medical records, if any, are maintained in separate, confidential files in the Director of Human Resource's office. Copies of medical records may be provided in compliance with State and/or Federal regulations.

HIPAA. The College shall comply with the rules and regulations promulgated under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA").

Pet Policy for Professional Personnel Residing in Mitchell College Residence Halls

PURPOSE

The following Pet Policy Agreement is designed to recognize and accommodate the needs of staff residing in Mitchell College residence halls.

THE POLICY

Staff members and family are allowed to have a pet on campus, provided the following conditions are met:

1. The pet may be one (1) medium/small dog or cat, no more than 24 inches high and weighing no more than twenty-five (25) pounds.
2. Communication with the Dean of Students prior to acquisition of the pet is required.
3. The dog or cat must be maintained under a standard measure of restraint when outside of the staff member's apartment. The animal is allowed in the pet owner's apartment, main lobby, and basement of the residence halls (NOT in individual student rooms).
4. The animal must have all required up to date vaccinations and a copy of the vaccination records must be kept on file with the Dean of Students.
5. The animal must be licensed, if applicable, and a copy of the license must be kept on file with the Dean of Students.

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6. All animal feces must be disposed of properly. It is the owner's responsibility to remove feces from college grounds; disposal of all feces must be in a plastic bag and placed in an outside receptacle. Cats must be litter-box trained.
7. Pets that constitute a nuisance to other residents, as determined by the Dean of Students, will be removed from college grounds within seven (7) days of notification by the same. This clause can include, but is not limited to: allergic reaction of residents or staff, failure to follow any pet policy guidelines, inappropriate animal behavior, etc.
8. Any and all damages caused by the animal will be the responsibility of the owner. An initial apartment inventory will be taken prior to the animal's arrival.
9. The Dean of Students reserves the right to inspect the condition of the apartments twice a semester.
10. All liability for the actions of the animal in direct contact with others (bites, scratches, etc.) will be the sole responsibility of the owner. Insurance is highly suggested.
11. The owner of the animal will take any and all reasonable precautions to protect the property and students of the institution.
12. The owner of the animal must be receptive to complaints by residents or college personnel, in addition to grievances that may be filed with the Dean of Students Office.

PROCEDURE

The residing pet owner must fill out the Pet Policy Agreement form.

Tuition Remission Policy

PURPOSE

Mitchell College recognizes that the skills and knowledge of its employees are critical to the success of the organization. The tuition remission program encourages personal development through formal education so that employees can maintain and improve job-related skills or enhance their ability to compete for reasonably attainable jobs

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within the College. In addition, as an institution of higher education, the College acknowledges the importance of providing employee spouses and children the benefit of a college education and is willing to extend the benefit of tuition remission to the spouses and children of eligible employees.

THE POLICY

Tuition remission is available the first semester following the successful completion of the employee's first six (6) months of employment. To maintain eligibility, employees must remain on the active payroll and be performing their job satisfactorily through completion of each course.

PROCEDURE

Full-time Employees

Full-time employees, their spouses and their dependent children (to age 24) are eligible for remission of tuition for a maximum of fifteen (15) credit hours per semester and a maximum of four (4) credits for summer courses at Mitchell College.

Full-time employees hired prior to 7/1/02, their spouses and their dependent children are eligible for remission of tuition for a maximum of eighteen (18) credit hours per semester at Mitchell College.

Full-time employees are also eligible for a ten (10) percent tuition remission for courses taken at the University of New Haven (the "University"). This benefit may not be available for certain degree programs at the University and may be discontinued at any time at the discretion of the University. The University should be contacted directly for specific information.

Part-time Employees

All part-time employees, their spouses and their dependent children are eligible for tuition remission for coursework at Mitchell College for a maximum of six (6) credit hours per semester.

All Part-time employees hired prior to 7/1/02, their spouses and their dependent children are eligible for tuition remission for coursework at Mitchell College for a maximum of nine (9) credit hours per semester.

Conditions and Restrictions

Employees, their spouses and dependent children are admitted into a course on a space-available basis. Employees may be asked to withdraw if space is required to accommodate regular students.

Because of limited staffing, it is difficult for an employee to take time off during the workday to attend class. Permission for an employee to schedule courses during the workday is a special arrangement and privilege and should not be considered as a right.

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Permission is granted only upon approval from the Supervisor/ Department Head, who determines that the scheduling of courses will not interfere with the efficient operation of the employee's regular College duties. If approved, the work will be made up by adjusting the employee's work schedule. The College reserves the right to refuse permission, if it determines that the needs and workload of the College would be adversely affected by a change in the employee's work schedule.

No employee, spouse or dependent may get tuition remission for coursework over 15 credits until he/she has been accepted for admission to Mitchell College by the Admissions Office.

Tuition remission for the Information Technology ("IT") Academy is available for employees only, and only with approval of their Supervisor/Department Head. Contact the Director of Community and Professional Programs for further details.

Application Procedure

Employees desiring tuition remission for themselves, spouse or children must complete an Application for Tuition Remission form and submit the form to the Human Resources Office according to the following deadlines:

| | |
|-----------------|---------------------------------|
| Fall Semester | July 1st |
| Spring Semester | January 1st |
| Summer Courses | May 1st (limit of four credits) |

Only one semester will be approved per application. Eligible participants will be placed on a waitlist until all regular students have registered for classes. Non-tuition remission students will be given priority for registering for all classes.

Tuition remission is not available for the STEP/PASS Program or for the January mini-semester.

Tuition remission cannot be approved retroactively for courses taken in previous semesters for which no application for waiver of tuition has been made. Tuition remission will not be granted for more than the equivalent of full-time undergraduate study occurring within five years. If the form is not received on, or prior to the deadlines, tuition remission will not be granted for the semester requested. Payment of fees, including special instruction expenses, board and room charges and student fees, is the responsibility of the Mitchell College employee.

Termination of Employment

Tuition remission as described in the preceding paragraphs will continue only as long as the student, whether employee, spouse or dependent child(ren), maintains a good standing in the school and the employee remains employed at the College.

Since the rationale for Mitchell College in providing tuition remission is that such education will contribute to the enhanced work quality and performance of the employee or that the employee's spouse or dependent children will receive the benefit

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of a college degree, any employee who voluntarily resigns or is terminated for cause may be requested to refund all or some portion of the tuition remission granted to the employee by the College, either for the employee him/herself or the employee's spouse and/or children. The schedule for the amount of refund is as follows:

| TERMINATION PERIOD | REFUND |
|--|--------|
| Employee leaves within one (1) year from completion of course | 75% |
| Employee leaves within two (2) years from completion of course | 50% |
| Employee leaves within three (3) years from completion of course | 25% |
| Employee leaves within four (4) years from completion of course | 0% |

Children of retired, deceased or totally disabled employees with at least seven (7) years of full-time service at the College will retain the tuition remission benefit. To be eligible, a child must have been a legal dependent at the time of the employee's retirement, death or disability. Tuition remission for children of retired, deceased or disabled employees with less than seven (7) years of service is restricted to those students already enrolled and receiving the benefit at the time of the employee's retirement, death or disability.

The College also participates in a Tuition Exchange Program with other independent colleges. Please contact the Director of Human Resources for further information.

Whistleblower Policy

PURPOSE

The purpose of the Mitchell College Whistleblower Policy is to encourage timely and honest reporting of suspected fraudulent or dishonest conduct without fear of retaliation and ensure an appropriate, consistent and timely institutional response.

THE POLICY

Mitchell College will investigate any suspected fraudulent or dishonest conduct by the faculty or staff. Anyone found to have engaged in fraudulent or dishonest conduct is subject to disciplinary action by the College up to and including dismissal and may also be subject to civil and/or criminal prosecution in state or federal courts.

An employee should report his or her concerns to a supervisor verbally or in writing. If for any reason an employee finds it difficult to report his or her concern to a supervisor, the employee can report it directly to the Director of Human Resources. Supervisors are required to report suspected fraudulent or dishonest conduct to the Vice-President of Finance and Administration. The Vice-President of Finance and Administration or a designee will conduct or direct a timely investigation of all suspected fraudulent or dishonest conduct in consultation with such College officials as may be necessary or

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appropriate at the discretion of the Vice-President of Finance and Administration and/or the President of the College.

Confidentiality

Confidentiality will be maintained to the extent possible within the limitation of the law and the need to conduct a thorough investigation.

Retaliation

Mitchell College prohibits retaliation against anyone who makes a good faith effort to appropriately disclose suspected fraudulent and dishonest conduct. Mitchell College employees may not retaliate against a whistleblower with the intent or effect of adversely affecting the terms or conditions of employment, including but not limited to, discharge, demotion, suspension, impact on salary or wages, punitive work assignments and/or threats of physical harm. A whistleblower who believes that they have been retaliated against may file a written complaint with the Director of Human Resources. A substantiated complaint of retaliation shall result in a proper remedy for the person harmed and the initiation of disciplinary action, up to and including dismissal from employment, against the retaliating person. This prohibition against retaliation is not intended to prevent supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors and does not include immunity for any personal wrongdoing by the whistleblower that is substantiated.

Any questions regarding the Mitchell College Whistleblower Policy should be directed to the Director of Human Resources.

Workers Compensation Insurance Policy

PURPOSE

The purpose of the workers' compensation law is to provide financial assistance to you if you are injured on the job. On-the-job injuries are covered by workers' compensation insurance. How much you will be paid, for how long, and when benefits become payable may vary.

THE POLICY

The College has the option of placing the employee on medical leave as set forth in the provisions of the Leave under the Family and Medical Leave Act.

While absent from work on Workers' Compensation, the employee will not continue to accumulate sick and vacation time.

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Neither the College nor the insurance carrier will be liable for the payment of workers' compensation benefits for injuries that occur during an employee's voluntary participation in any off-duty recreational, social, or athletic activity sponsored by the College, or during an employee's employment by another employer.

Work Place Harassment Policy

PURPOSE

The College depends upon a work environment of tolerance and respect for the achievement of its goals. The College is committed to providing a working environment that is free of all forms of abuse or harassment. Mitchell College recognizes the right of all individuals to be treated with respect and dignity.

THE POLICY

Workplace harassment, including but not limited to verbal slurs, negative stereotyping, overt hostility and the dissemination of written or graphic material designed to attack someone based on their race, color, sex, age, disability, religion, national origin, ancestry, marital status, or sexual orientation is prohibited.

Because Mitchell College takes allegations of workplace harassment seriously, we will endeavor to respond promptly to complaints of workplace harassment and where it is determined that inappropriate conduct has occurred, we will endeavor to act promptly to eliminate the conduct and impose such corrective action as is necessary, including discipline where appropriate.

It is important to note that while this policy sets forth our goals of promoting a workplace that is free of any form of harassment, the policy is not designed or intended to limit our authority to take disciplinary or remedial action for workplace conduct that we deem unacceptable regardless of whether that conduct satisfies the definition of workplace harassment.

Sexual Harassment

Sexual harassment is a form of behavior which adversely affects the employment relationship. It is prohibited by State and Federal law. Sexual harassment of individuals occurring in the workplace or in other settings in which individuals of Mitchell College may find themselves in connection with their employment is unlawful and will not be tolerated by the College. The College also condemns and prohibits sexual or other harassment by any vendor, student, or member of the general public.

Definition of Sexual Harassment

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Sexual harassment does not refer to purely voluntary and welcome social activities. It refers to behavior that is not welcome by the individual, is personally offensive to him or her, and undermines morale and/or interferes with the ability of the individual to work effectively. While it is not possible to list all of the circumstances that may constitute sexual harassment, the following are some examples of conduct that, if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances, including the severity of the conduct and its pervasiveness:

- Verbal abuse of a sexual nature;
- Use of sexually degrading words;
- Jokes or language of a sexual nature;
- Conversation or gossip with sexual overtones;
- Obscene or suggestive gestures or sounds;
- Sexually-oriented teasing;
- Inquiries into one's sexual experiences;
- Verbal comments of a sexual nature about an individual's appearance or sexual terms used to describe an individual;
- Discussion of one's sexual activities;
- Comments, jokes or threats directed at a person because of his/her sexual preference;
- Unwelcome and repeated invitations (for lunch, dinner, drinks, dates, sexual relations);
- Physical contact such as touching, hugging, kissing, stroking, fondling, patting, pinching, or repeated brushing up against another's body;
- Demands or requests for sexual favors accompanied by implied or overt threats concerning an individual's employment status or promises of preferential treatment.
- Deliberate bumping, cornering, mauling, grabbing;
- Assaults, molestations, or coerced sexual acts;
- Posting or distributing sexually suggestive objects, pictures, cartoons, or other materials;
- Sexually-oriented letters or notes;
- Sending offensive or discriminatory messages or materials through the use of electronic communications (e.g., electronic mail, including the Internet, voice mail, and facsimile) which contain overt sexual language, sexual implications or innuendo, or comments that offensively address someone's sexual orientation;
- Staring at parts of a person's body;
- Sexually suggestive gestures, leering; and
- Condoning sexual harassment.

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Sexual harassment is not limited to prohibited behavior by a male employee toward a female employee. Sexual harassment can occur in a variety of circumstances. Here are some things to remember.

- ✓ A man as well as a woman may be the victim of sexual harassment, and a woman as well as a man may be the harasser;
- ✓ The harasser does not have to be the victim's supervisor;
- ✓ The victim does not have to be of the opposite sex from the harasser; and
- ✓ The victim does not have to be the person at whom the unwelcome sexual conduct is directed. The victim may be someone who is affected by the harassing conduct, even when it is directed toward another person, if the conduct creates an intimidating, hostile, or offensive working environment for the co-worker or interferes with the co-worker's work performance.

It is, therefore, against the policies of the College for any individual of the College, male or female, to harass another individual sexually, that is, by making unwelcome sexual advances, requests for sexual favors, or other uninvited verbal or physical conduct of a sexual nature when:

1. Submission to such conduct is made either implicitly or explicitly a term or condition of an employee's employment;
2. Submission to, or rejection of, such conduct by an individual is made the basis for employment decisions affecting the employee;
3. Such conduct has the purpose or effect of interfering with an individual's work performance;
4. Retaliation is threatened or undertaken against an individual who complains that such conduct is interfering with his or her work performance; or
5. A hostile or intimidating work environment is created for the employee.

Individual Responsibilities for Preventing Workplace Harassment

Each individual of Mitchell College is personally responsible for:

1. Ensuring that his or her conduct does not sexually harass any other person with whom he or she comes in contact on the job, such as an outside vendor, student, or member of the general public;

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2. Cooperating in any investigation of alleged sexual harassment by providing any information he or she possesses concerning the matter being investigated;
3. Actively participating in efforts to prevent and eliminate sexual harassment and to maintain a working environment free from such discrimination;
4. Ensuring that an individual who files a sexual harassment claim or cooperates in an investigation may do so without fear of retaliation or reprisal;

Any individual who believes he or she has been the subject of any form of sexual harassment may advise the individual of the offensive nature of the conduct or action being objected to or bring the alleged incident or situation to the attention of the Director of Human Resources or the Director of Campus Safety.

It is also against the policy of Mitchell College for an individual to harass any person with whom the individual comes in contact on the job or to engage in any harassment or inappropriate or unprofessional conduct in the workplace.

Retaliation

Retaliation against an individual for filing a complaint of workplace harassment or for cooperating in an investigation of a complaint is against the law. The College will take appropriate disciplinary action, up to and including termination, against employees who retaliate against those who object to or report harassment or participate in an investigation.

PROCEDURE

Procedures for Complaints

- A. *Complaint.* The College has designated a EEO Grievance Officer. The current EEO Grievance Officer is the Director of Human Resources. If any individual believes he or she has been subjected to workplace harassment, the individual should initiate a complaint by contacting the EEO Grievance Officer, their Supervisor or Department Head as soon as possible. The individual should file the complaint promptly following any incident of alleged harassment. The employee should be aware that the longer the period of time between the event giving rise to the complaint and the filing, the more difficult it will be for the College to determine what occurred. The employee will be requested to write out his or her complaint to document the charge.

Note: If an individual prefers to discuss a possible harassment problem with his or her Supervisor or Department Head, the individual may always do so. However, individuals do not have to go through the regular chain of reporting procedures when reporting

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workplace harassment. Moreover, if the individual is uncomfortable contacting the EEO Grievance Officer because he or she believes the EEO Grievance Officer may not receive the complaint impartially, the individual may contact the Director of Campus Safety.

- B. *Investigation.* On receiving the complaint, the EEO Grievance Officer will promptly conduct an investigation into the matter. The charged employee will be requested to respond to the complaint. Additional investigation will be made to the extent appropriate in each case. If, after the completion of the investigation, it is determined that there is reasonable cause for finding a violation of this policy, Mitchell College will notify the complainant and the charged individual of the finding verbally. This process will be confidential to the extent consistent with an effective investigation, subject to the operational needs of Mitchell College.
- C. *Decision.* After the charged employee has responded, and any further investigation that may be warranted has been concluded, the college will make a final decision. If the College finds that the investigation substantiates the allegations in the complaint, the College will discipline the charged employee. Disciplinary action will be appropriate to the offense and employees involved, and may include termination. The complainant will be notified of the disposition of the investigation.

Workplace Safety Policy

PURPOSE

Safety can only be achieved through teamwork. Each employee, supervisor and/or department head and manager must enforce College safety awareness by thinking defensively, anticipating unsafe situations and reporting unsafe conditions immediately.

THE POLICY

It is the policy of the College to endeavor to provide safe working conditions for all employees, to provide instructions concerning safe working methods, and to make available the necessary equipment required to protect employees against particular hazards. It is the obligation of each employee to observe the safety regulations, to use the safety equipment provided and to College safety at all times. Each Supervisor/department head shall enforce the safety regulations and use of the safety equipment. Employees who refuse to use the safety equipment provided, or fail to adhere to College safety guidelines at all times, will be subject to disciplinary action.

Please observe the following precautions:

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- 1) Notify your Supervisor/department head of any emergency situation. If you are injured or become sick at work, no matter how slightly, you must inform your Supervisor/department head immediately.
The use of alcoholic beverages or illegal drug substances, or the abuse of legal prescription drugs during working hours will not be tolerated. The possession of alcoholic beverages or illegal drug substances on the College's property is forbidden.
- 2) Use, adjust and repair machines and equipment only if you are trained and qualified.
- 3) Get help when lifting or pushing heavy objects.
- 4) Understand your job fully and follow instructions. If you are not sure of the safe procedure, don't guess...ask your Supervisor/department head.
- 5) Wear personal protective equipment in accordance with the job you are performing.
- 6) Avoid overloading electrical outlets with too many appliances or machines.
- 7) Use flammable items, such as cleaning fluids, with caution.
- 8) Walk – don't run.
- 9) Smoke only in designated smoking areas.
- 10) Keep cabinet doors and file and desk drawers closed when not in use.

- 11) Avoid "horseplay" or practical jokes.
- 12) Start work on any equipment only after safety procedures and requirements have been explained (and you understand them).
- 13) Keep your work area clean and orderly, and the aisles clear.
- 14) Stack materials only to safe heights.
- 15) Watch out for the safety of fellow employees.
- 16) Use the right instrument for the job, and use it correctly.
- 17) Know the location of all alarms and fire extinguishers, and familiarize yourself with the proper procedure for using them, should the need arise. Know the locations, contents, and use of first aid equipment.
- 18) When you leave the College's premises make sure that all entrances are properly locked and secured.

The violation of any safety rule or College of engaging in any conduct which tends to create a safety hazard may subject an employee to disciplinary action, up to and including termination.

PROCEDURE

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Reporting an Injury

State Workers' Compensation laws require that you report any illness or injury on the job, no matter how slight. If you hurt yourself or become ill, please contact your Supervisor/Department Head for assistance and report the incident within 24 hours. If you fail to report an injury, you may jeopardize your right to collect workers' compensation payments as well as health benefits.

Falsely stating or making claims of injury or the failure to report an injury, may subject an employee to disciplinary action, up to and including termination.

Workplace Violence Prevention Policy

PURPOSE

Acts and threats of violence in the workplace are one of the most serious and frustrating problems facing employers and employees alike. Mitchell College will endeavor to be consistent in the handling of these behavioral issues, which potentially could cause a serious problem for employees, students and the general public. Employees need to know that hostility, threats, intimidation, and assaults will not be tolerated.

THE POLICY

Mitchell College seeks to have a workplace free of violence and the threat of violence. All employees should note that **THERE WILL BE ZERO TOLERANCE OF ACTS OR THREATS OF VIOLENCE IN OUR WORKPLACE BY EMPLOYEES, STUDENTS, MEMBERS OF THE GENERAL PUBLIC, AND/OR ANYONE WHO CONDUCTS BUSINESS WITH MITCHELL COLLEGE.**

It is the intent of Mitchell College to provide a workplace which is free from physical attacks, harassment, property crimes, threats, or any other violent act(s). The College has developed the following procedures and principles with regard to violence in the workplace. It is imperative that each employee familiarizes him/herself with these policies and regulations in order to facilitate the goals of the College in this regard.

Workplace Misconduct

- A. The possession of firearms, whether or not licensed, and including, but not limited to, models, replicas, or an object whose outline represents a firearm, and/or ammunition, in the workplace is grounds for discipline up to and including termination. The use of a weapon or any other dangerous instrument in a fight or disagreement with another employee or member of the general public is grounds for an immediate termination. Similarly, threatening anyone with a weapon also may be treated as grounds for immediate termination.

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- B. An employee who starts a fight with anyone will be subject to discipline, up to and including termination.
- C. Employees who feel they are being provoked or harassed by co-workers or a member of the general public should discuss this problem with the Director of Human Resources or the Director of Campus Safety.
- D. All employees are required to meet the College's standards of courtesy to students, members of the general public, co-workers, and College officials.

Prevention

The College subscribes to the concept of a safe work environment and supports the prevention of workplace violence. Prevention efforts include, but are not limited to, informing employees of this policy, instructing employees regarding the dangers of workplace violence, communicating the sanctions imposed for violating this policy, and providing a reporting system within which to report incidents of violence without fear of reprisal.

PROCEDURE

Reporting Procedures

- A. It is the duty and obligation of all employees who either experience or observe any act or threat of violence in the workplace to immediately report such behavior to his or her Supervisor/Department Head. Failure to report such behavior may result in disciplinary action, up to and including termination, for the employee involved.
- B. Employees may sometimes be involved in personal disputes with family members, neighbors, etc., that can sometimes escalate to the point that injunctions, restraining orders, and other court orders are sometimes sought. We request that employees who have experienced domestic violence or who have restraining orders against individuals or who have experienced "stalking" problems, advise their Supervisor/Department Head and provide a description of the individual(s). Even in the case where an employee has not secured a court order but fears for his or her safety, we request that the employee notify the police department immediately, and inform the Director of Human Resources and/or the Director of Campus Safety as soon as practicable.

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- C. The Supervisor/Department Head will immediately investigate and evaluate the situation. In situations involving weapons, or, in situations where the threat of bodily harm is immediate and readily apparent, the Supervisor/Department Head may suspend the individual(s) in question and provide a written summary of the incident to the Director of Human Resources and/or Director of Campus Safety for further action. Each incident of violent behavior, whether the incident is committed by another employee or an external individual such as a member of the general public or vendor, must be reported. The College (police, or representatives, as appropriate) will assess and investigate the incident and determine the appropriate recommended action to be taken.
- D. In situations involving physical altercations or weapons, a Supervisor/Department Head may request the aid and presence of police personnel.
- E. Call 911 or 9-911, if you believe there is an immediate emergency.

Disciplinary Remedies

- A. Each incident will be evaluated independently and a proper remedy will be provided based upon the nature of the offense, duration, totality of the circumstances, and past offenses. Remedies could range from an oral reprimand to suspension and/or immediate termination, depending upon the severity of the offense. The employee may be subject to criminal charges and penalties.
- B. Incidents involving weapons or other dangerous instruments are grounds for immediate suspension and may be subject to further disciplinary action, up to including termination from employment.
- C. Any employee who acts in good faith by reporting real or implied violent behavior will not be subjected to any form of retaliation or harassment. Any action of this type resulting from a report of violence must be reported to the Director of Human Resources and/or the Director of Campus Safety for investigation and decision regarding proper action and sanctions. Conversely, false or malicious reporting will also result in investigation and appropriate sanctions.

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Exceptions

Police called to the campus are exempted from these regulations concerning weapons or dangerous instruments.

STUDENT AFFAIRS

Bookstore: Book Returns and Check Cashing Policy

PURPOSE

The purpose of this policy is to outline the protocol for book returns and check cashing services at the Mitchell College Bookstore.

THE POLICY

The Mitchell College Bookstore is located on DeBiasi Drive between Yarnall Athletic Center and Michael's Dairy. Hours of operation are 8:30 a.m. to 4:30 p.m. Monday through Thursday, and 8:30 a.m. to 2:00 p.m. on Friday. In addition, at the beginning of each semester, the Bookstore is open evening hours that will be posted each semester. Besides required books and supplies for course use, the Bookstore also has additional merchandise available and offers check cashing services to the college community.

Book Returns

The Bookstore extends return privileges on course books under the following terms:

- All returns must be accompanied by the register receipt and add/drop form
- Books purchased new, must be returned in new condition (no writing, bent covers, etc.)
- Any shrink wrapped books are not returnable if opened
- Returns will be allowed until add/drop ends (date will be posted in the bookstore) or within two business days on purchases made after this "Return Period"
- Textbooks purchased the last week of classes or during examination periods are not eligible for refunds

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Check Cashing Service

The Bookstore also provides a student check cashing service. Hours for this service are Monday through Friday 10:00 a.m. to 2:00 p.m. The following policies are strictly enforced:

- Starter checks cannot be accepted
- Personal checks must be made payable to Mitchell College Bookstore
- A valid Driver's License must be presented
- There is a \$26 limit on personal checks (checks from parents to students are acceptable provided they are written to "Mitchell College Bookstore" - but are limited to \$51 at a time)
- There is a fee of \$1.00 per check
- There is a charge of \$25 on returned checks

Campus Conduct and Behavior

PURPOSE

These policies are established for all students, who are enrolled at Mitchell College students are bound by the policies of the College which are included but not limited to the ones listed as follows. All campus policies and procedures are subject to change at the discretion of the College.

THE POLICY

Administrative Withdrawal

Mitchell College reserves the right to institute a mandatory administrative withdrawal from campus housing or from the College for, medical, emotional, or psychological reasons. Administrative withdrawal can be initiated if in the judgment of the Dean of Students:

1. remaining at Mitchell College could lead to a deterioration in physical, emotional, and/or mental health of the student
2. the student's presence poses a threat to self/others or is deemed detrimental to the College's best interest

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In the case of an administrative withdrawal, the student will be required to leave the campus until such time as the College can be assured the issue is no longer a significant concern. This requires assessment and may require evidence of treatment by qualified health professionals.

No refund of tuition, room/board or fees will be awarded to a student in such a case. The Dean of Students or designee may also require the student to undergo a professional psychological and/or medical evaluation to determine condition and plan of treatment prior to making a decision about the status of the student or as a condition of reinstatement. In either instance, the student's continuation at the College is contingent upon the release of all psychological and/or medical information to the Dean of Students who will, in consultation with the Director of Health and Wellness, determine the appropriateness and conditions of the student's return. All Mitchell College students must meet the Standards for Independent Living (see Appendix B). In such cases, the student is financially responsible for all costs associated with such evaluation(s) and all costs related to any follow-up treatment identified. In the event of emergency hospitalization, the Dean of Students or designee may enact an interim suspension.

Alcoholic Beverages

The College enforces Federal Alcohol Laws on campus grounds, including Mitchell Woods, Mitchell Beach, the dock and all other college property. For other alcohol guidelines particular to the residence halls, please refer to the residential life section of this handbook.

Mitchell College is a "dry" campus; no alcohol is permitted on campus. Empty alcoholic beverage containers (liquor, wine, or beer bottles, cans, kegs, etc., even for a decorative nature) are not allowed anywhere on campus. Students should also know use of alcohol does not excuse any behavior exhibited by a student. The Center of Health and Wellness provides assistance to students who are considering treatment for substance dependence or addiction.

Students who violate Mitchell College's alcohol policy shall be subject to sanctions in accordance with the College's Code of Conduct which may result in suspension, dismissal, or expulsion from the College.

Assault

Assault is defined as any unwanted or unlawful threat or attempt to do injury to another. This includes the act or an instance of unlawfully threatening or attempting to injure another. Physical assault is considered a serious offense

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and is subject to disciplinary action. Assaulting a Mitchell College employee will result in immediate disciplinary action.

Assembly

All members of the community have the right to assemble, peacefully, providing the assembly does not interfere with classroom, educational or other Mitchell College activities.

Behavior

Students are expected to conduct themselves responsibly at all times, respecting the rights of others. Behavior that shows disregard for the personal/property rights of others will not be tolerated. All students must meet and adhere to Mitchell College expectations for independent living. Expectations for Independent living are available in the Health and Wellness as well as in the appendix of this document.

Damage

Students damaging property are required to pay for damages and may be subject to disciplinary action.

Discrimination

Mitchell College does not discriminate on the basis of sex, race, color, religion, national/ethnic origin, sexual orientation or physical/educational challenge. Any behavior or action that excludes, harasses, or embarrasses someone based on any of the above characteristics is subject to disciplinary action.

Harassment or other acts of hatred or violence, whether based on gender, race, ethnicity, religion, sexual orientation, or other disability, are inconsistent with the tenets of community behavior and will not be tolerated. The College community is committed to the promotion of fair and equitable dealings with racial, sexual, ethnic and other differences.

Students who feel they have been discriminated against should seek counsel with the Dean of Students.

Disruptive Behavior

Disruptive behavior is that which disturbs function of the College as a whole, or the rights of the individuals therein.

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Drugs

It is unlawful, to possess, manufacture, dispense or sell a controlled substance/ illicit drug except as expressly authorized within law. Students violating this policy are subject to disciplinary action and may be subject to the local legal system.. Mitchell College expects that students will not choose to use illegal substances, on or off campus, during their enrollment as a Mitchell student.

The odor of marijuana smoke may be considered enough evidence, when identified by a Campus Safety Officer and/ or a Residence Hall Staff member, to subject a student to disciplinary action as an illegal substance violation.

For students with drug addictions, the Center for Health and Wellness serves as a resource to assist the student in receiving the appropriate assistance for recovery. The Center of Health and Wellness provides assistance to students who are considering treatment for substance dependence or addiction.

In compliance with the Drug Free Workplace Act (1988) and the Drug Free Schools/ Communities Act (1989), the College distributes, in writing, to each student & employee:

- Standards of conduct prohibiting the unlawful possession, use or distribution of illicit drugs/alcohol by students/employees
- Disciplinary sanctions for violations of standards of conduct that include dismissal from the College
- A description of applicable local, state/federal sanctions for unlawful possession, use or distribution of illicit drugs or alcohol
- A description of health risks associated with the usage of illicit drugs or abuse of alcohol (see Appendix C)
- Resource information on drug and alcohol counseling, treatment, rehabilitation and re-entry programs (see Appendix C)

Students should be aware of the following Connecticut state statutes regarding drugs and illegal substances:

Illegal Possession-Sec.21a-279 (a) - For the first offense, not more than 7 years imprisonment, or not more than \$50,000 fine, or both; for second offense, not

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more than 15 years imprisonment, or not more than \$100,000 fine, or both; for each subsequent offense, not more than 25 years imprisonment, or not more than \$250,000 fine, or both. 1. A person possesses or has under his control any quantity of any narcotic substance, and 2. The actor is not authorized under this Chapter (42b) to do so.

Illegal Possession-Sec.21a-279 (b) - For the first offense, not more than 5 years imprisonment, or not more than \$2,000 fine, or both; for each subsequent offense, not more than 10 years imprisonment, or not more than \$5,000 fine, or both. 1. A person possesses or has under his control any quantity of a hallucinogenic substance other than marijuana or four or more ounces of cannabis-type substance, and 2. The actor is not authorized under this Chapter (420b) to do so.

Illegal Possession-Sec.21a-279 (c) - For the first offense, not more than \$1,000 fine, or not more than 1 year imprisonment, or both; each subsequent offense, not more than 5 years imprisoned, or not more than \$3,000 fine, or both. 1. A person possesses or has under his control any quantity of a controlled substance that is not a narcotic substance and not a hallucinogenic substance or less than four ounces of a cannabis type substance, and 2. The actor is not authorized under this Chapter (420b) to do so.

Any student or employee of Mitchell College who violates federal, state, or local laws, may be prosecuted by the federal, state or local authorities, and may be sentenced in accordance with the laws of those jurisdictions. Mitchell College does not protect individuals from legal consequences of violations. Any student in violation of the College's drug policy shall be subject to sanctions in accordance the Mitchell College judicial system and will be subject to disciplinary actions up to separation from the College.

Emergencies

For any emergency situation on campus, Campus Safety must be contacted (x459 or 860-443-0214). In the Residence Halls, if possible the Residence Hall Director or Resident Assistant should be the first person notified.

Events

Student groups or individuals may sponsor Mitchell College related events on or off campus provided they have the prior approval of the Student Activities Office.

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Failure to Comply: At all times students must comply with reasonable requests/orders by Mitchell College personnel who are acting in their official capacity. Students are asked to work with Mitchell College officials for the benefit of the campus.

Gambling: Gambling, in any form, is prohibited in and around the campus. Special student activities or various raffles must be approved by the Student Activities Office to ensure state laws are followed. Students who believe they may have a problem or would like more information on problems associated with gambling may contact the Health and Wellness Department at 860-701-5195.

Harassment/Intimidation/Threats

Anyone attempting by word/action to harass, threaten or intimidate a member of the Mitchell College community is subject to disciplinary action. Students may not leave voice mails, make phone calls, and send emails instant messages or otherwise contact to students with threatening or intimidating comments, graphics or words. Students found to be using electronic, written and/or verbal messaging in a threatening fashion will be held accountable. This also includes symbols that are commonly associated with intimidation or harassment such as swastikas, those that are sexually lode and/or derogatory and any and all symbols that historically have been associated with intimidation.

Hazing

Hazing by any group/ team/individual for induction purposes or as a condition of membership is not permitted and will subject group/team/individual to disciplinary action.

ID Cards

All students are required to carry a Mitchell College photo ID card at all times, and are expected to produce that card when requested by a Mitchell College Official. There is no cost for the original ID card; however, if a replacement card is needed the cost is \$25. ID cards are replaced at the Library.

Immunization

Residential students must provide the College with an up to date immunization record that includes a second dose of MMR after 1984, and a current meningitis vaccine, other standard vaccines are also required. Students who are not up to date on their health record will be barred from the residence halls until they can supply a current and compliant record. Commuting students must also provide

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evidence that their health record is up to date, and are subject to the same expectations, students who are not in compliance will be banned from classes until they can show proof of an up to date record. Students who have religious or medical reasons that they are not in compliance with their vaccines must petition the Health Office to get a waiver. For more information please call the Health and Wellness Office at 860- 701-5195.

Language

Mitchell College supports each person's first amendment rights to freedom of speech. However, the College also enforces a community standard that does permit engage in the use of offensive language. Using vulgar language, playing music with explicit lyrics loudly from a car or residence hall room, repeating jokes that are intended to make fun of a person or group, can create a hostile living or work environment and can be considered to be in violation of the Mitchell College standards.

Liability

The College does not assume any responsibility nor does it provide insurance coverage for the loss of or damage to a student's personal property/effects when stolen, damaged or destroyed through willful, malicious or careless acts or by causes beyond the control of the College.

Motor Vehicles & Parking

The provision or removal of parking and driving privileges is primarily the responsibility of the Director of Campus Safety although students can lose these privileges via the judicial system. Appeals for suspension or denial of privilege may be made to the Dean of Students. All Mitchell students are eligible to have a motor vehicle at the College, provided that privilege has not been revoked and the following requirements are met:

1. Students must register their vehicle to obtain a parking pass with Campus Safety via demonstrating:
 - a. Proof of insurance
 - b. Valid driver's license
 - c. Valid registration
2. Student must display their parking pass on left lower windshield of their vehicle in order to park on campus and the front fender for motorcycles
3. Parking Rules (see Appendix D)

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Poster and Sign Policy

Only Mitchell College organizations or departments may post posters and signs in the College's buildings. Off-campus groups must receive permission from the Student Activities Office to advertise their event in campus buildings. Solicitors, other than those approved by the Student Activities Office, are not allowed in any of the residence halls or campus facilities. Poster paints and large rolls of colored paper are available for use by any college organization or department through the Student Activities Office.

Sexual Harassment

All Mitchell College community members are responsible for assuring that the institution is free of sexual harassment. Conduct of a sexual nature constitutes sexual harassment when (1) submission to such conduct is made either explicitly or implicitly a term/condition of an individual's employment or academic standing, (2) submission to or rejection of such conduct by an individual is used as the basis of employment or academic decisions affecting the individual or (3) such conduct has the purpose/effect of unreasonably interfering with an individual's academic work performance or creating an intimidating/offensive working/ educational environment. Incidences of sexual harassment should be reported to the Dean of Students. Allegations of sexual harassment will require a statement and will be investigated fully.

Sexual Misconduct

The College defines sexual misconduct as actual or attempted sexual assault, rape, inappropriate sexual acts, non-consensual sexual behavior and sexual harassment. Sexual misconduct also includes non consensual intercourse, sexual touching, exhibitionism, or sexual language of a threatening nature, committed by physical force, coercion or threat, actual or implied by a person(s) known or unknown the victim. Non-consensual activity shall include, but not be limited to, situations where the victim is unable to consent because she/he is mentally incapacitated, fearful of harm or physically helpless due to drug or alcohol consumption or is unconscious. Any sexual activity, even if consensual, may not occur in common areas of any building or public spaces on Mitchell College campus grounds.

Mitchell College also supports Connecticut laws and will notify local authorities of sexual misconduct when the victim chooses to involve the local authorities. Victims of rape or sexual assault are strongly encouraged to seek medical and emotional assistance and counseling resources are available at the Center for

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Health and Wellness. For resolution within the College's judicial system, students are encouraged to immediately file a report with Campus Safety. Questions and concerns can be posed to the Sexual Assault Crisis Center, a 24 hour hot line, at 860-437-7766, please ask for the college counselor.

Smoking

Effective October 2003, State of Connecticut (Public Act 03-45) prohibits smoking in any college residence hall or within the buildings on any institution of higher learning. To comply with this State law, all Mitchell College residence halls are completely smoke free. In addition to all interior spaces being smoke-free, all entrance areas and porches of residence halls are considered smoke-free. Smokers may not be within 50 feet of any building while smoking. Smokers are expected to properly dispose of their cigarette butts. There is no smoking on the Main Campus between Pequot and Montauk Avenue. Mitchell Woods is also a non-smoking area, as is anywhere around the Mitchell College Children's Learning Center. Smoking is permitted by the Residence Halls at a distance of 50 feet until August 2010. Mitchell College intends to be a completely smoke free campus by 2011.

All faculty and staff are responsible to enforce the smoking policy. Those who do not comply will be documented for this violation and students will be subject to disciplinary action.

Solicitation

Any solicitors who wish to sell articles or survey students must gain approval in advance from the Student Activities Office.

Student Right-to-Know and Campus Security Act

In accordance with requirements of the Student Right-to-Know and Campus Security Act of 1990 (Public Law 101-542) and Connecticut State Law (90-259), Mitchell College distributes, upon request, an annual security report to all enrolled students, employees, and prospective students. Copies of this report are available from the Admissions or Campus Safety Offices. The report includes the following information:

1. Campus policies regarding reporting of crimes; policies regarding drugs, alcohol, and weapons; policies regarding the identification and admission of visitors to campus; description of campus safety and their

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relationship to local and state police; orientation programs for students regarding campus safety

2. A uniform campus crime report concerning crimes committed in the two preceding calendar years
3. A crime report concerning arrest for alcohol and drug violations and for weapons possessions for the preceding calendar year
4. Students' statistics on undergraduate student graduation rates

Theft

Theft from Mitchell College and its members is not permitted and is subject to judicial action. If one finds an item on campus not belonging to them is expected to contact Campus Safety to turn over the item(s) to the officer on duty.

Campus Safety maintains the campus lost and found items. Those violating this rule will be subject to disciplinary action.

Visitor's Pass Policy

Mitchell College has a policy which requires all visitors to obtain a visitor's pass. If a visitor wishes to spend the night in one of the College's residence halls, they must follow the guest policy as outlined in that section of this Handbook.

Anyone without a visitor's pass will be considered trespassing, and subject to removal from the campus. Passes are obtained from the Residence Hall Director or the Residence Life Office. A copy of the pass is to be on the visitor's person at all times and will be presented if requested by Campus Safety Officers or other College officials.

Weapons

Weapons are not permitted and include but not limited to firearms, explosives, and knives. Violators are subject to disciplinary action.

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Food Services: Dining Hall Operations and Protocol

PURPOSE

The College offers various complete and balanced dining options to accommodate the demanding schedules of campus life. The main dining commons, catering, and retail operations are managed by Sodexo Campus Services with offices located in the Clarke Center. Sodexo is responsible for all aspects of the food service operation including employment of personnel, menu development, licenses and adherence to regulatory agency standards. Additional details concerning the operation of the dining program can be obtained by the Director of Dining Services.

THE POLICY

Dining Hall Operations and Protocol:

1. All students living in campus residences are required to participate in the 19 meal plan
 - a. Each resident student receives a \$50.00 snack allowance enhancement at the beginning of each semester. Funds can be added to this account by the individual at any time throughout the year.
 - b. The 19 meal plan offers access into the dining room one time per meal block
 - i. Breakfast, Lunch and Dinner Monday thru Friday.
 - ii. Brunch and Dinner Saturday and Sunday.
2. All resident students are required to present their college ID as their meal pass. If you do not present your ID, you will not be able to exercise this benefit, and retail pricing will be in effect. ID cards are presented after your meal selection is made, hence the importance of this item.
3. Pre-paid meal plans are not transferable
4. If you allow someone to use and/or present your card as a meal pass, the card will be confiscated and you will face disciplinary action through the student code. You will not be allowed into the dining room until the fine is paid or your judicial case is resolved
5. If you lose your ID, it must be replaced immediately at a nominal cost and can be obtained in the Library.

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6. Commuter students are eligible to participate in a campus meal plan offered through Sodexo Dining Services. A variety of options are available and students can arrange individual plans directly with the Director of Food Services.
7. Students are required to clear their own tables and bring their trays/ dishes to the dish room window
8. Al fresco dining is also available on the patio. We ask that no china is brought outside.
9. Please see the Director of Food services if arrangements of special diets are necessary, providing the meals are within the capabilities of the dining hall staff and its preparatory operation.

In order to assure all guests have an enjoyable and pleasant dining experience, any inappropriate behavior will be addressed by dining Management staff. Typically, unacceptable behaviors in the dining areas are forwarded to the Resident Director and/or Dean of Students for consequences per the College judicial system.

Family Educational Rights and Privacy Act (FERPA) Policy

PURPOSE

To outline FERPA and how it relates to the everyday operations of Mitchell College.

THE POLICY

FERPA is the Family Educational Rights and Privacy Act, a federal law that was enacted in 1974. FERPA protects the privacy of student education records. All educational institutions that receive federal funding must comply with FERPA. It was amended in December 2008, to assist Colleges for better operation in times of emergencies. This law refers to discussion or release of the actual educational record, not discussions about a student. When a college official speaks directly or shares in writing any part of the educational record they are releasing protected information. Note that discussion/release with any non student party of said student's educational records, discipline records and some parts of student behavior records, constitutes release of educational related record and can result in legal action. Opinions and observations are not protected by FERPA, however Mitchell College strongly encourages college officials to use caution in the sharing of opinion based information.

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A college may disclose educational information without consent to other college officials with legitimate educational interests on a need to know basis, this includes contractors and relevant parties at other colleges.

Student Rights under FERPA:

Under FERPA there are two types of students FERPA eligible and dependent students. FERPA eligible and therefore protected by the law are students who are enrolled in college and no longer claimed as dependents on their parent/guardian's tax forms.

FERPA gives eligible students four basic rights with respect to their education record:

1. The right to control disclosure of their education record means that a student's education records may be disclosed only with the student's prior written consent. The prior written consent must:
 - a. Specify the records to be released
 - b. State the purpose of the disclosure
 - c. Identify the party(ies) to whom disclosure may be made
 - d. Be signed and dated by the student
2. The right to review their education record within a reasonable amount of time Mitchell College; sets 10 business days as its maximum
3. The right to request amendment of inaccurate or misleading portions of their education record. Mitchell College has a set the reasonable amount of time for review or hearing regarding this at 45 business days.

The right to file a complaint regarding non-compliance of FERPA with the Family Policy Compliance Office of the U.S. Department of Education. The name and address of the Office that administers FERPA is:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-5901

There are conditions under which eligible student's education records may be disclosed without the student's consent.

FERPA does contain some exceptions to the written consent rule. Those exceptions allow disclosure without consent:

- In a health and safety emergency as determined by appropriate college officials
- To College officials (including third parties under contract) with legitimate educational interests
- To comply with a judicial order or lawfully issued subpoena
- To appropriate parties in a health or safety emergency in order to protect the student or others

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- To parents with proof of dependency via tax forms (and the student still has the right to refuse, placing the burden of proof back on the family, not the college).
- To parents in cases of drug or alcohol violation when the student is under the age of 21 (student must still be under 21 when the disclosure is made, however)
- To the provider or creator of a record to verify the validity of that record (e.g. in cases of suspected fraud)
- To organizations conducting research studies on behalf of the College, provided there is a written agreement between the College and the research organization
- To officials at an institution in which the student seeks or intends to enroll or is currently enrolled
- The Patriot Act can compel and request the release of all student records without student consent; however we can notify the student about the request. It is recommended in such cases that College consult legal counsel before notifying students/parents about the government's request.
- FERPA permits each institution to define a class of information as "directory information." FERPA permits public disclosure of directory information without the student's consent. Directory information is information contained in a student's education record that would not generally be considered harmful or an invasion of privacy if disclosed.

A College is not required to release a student's directory information. The only required disclosure of education records is to the student. All other disclosures, including those with student consent and disclosures of directory information are at the discretion of the institution.

FERPA requires each institution to allow students to block disclosure of their directory information. At Mitchell College, we refer to this action as "confidentiality." The following are consequences of a student placing confidentiality on their record:

- Student name/address is excluded from any Mitchell College directory and printed telephone directories.

NOTE: Student name will not appear in the commencement program.

- Verification of enrollment, graduation, or degrees awarded will not be provided to third parties, including potential employers and insurance companies.
- No information will be released to any person on the telephone or via e-mail.
- Requests for confidentiality are permanent until removed in writing by the student.

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Mitchell Colleges Policy Response to FERPA:

Mitchell Adheres to the Family Educational Rights and Privacy Act ("FERPA" - 20 U.S.C. § 1232g; 34 CFR Part 99) as outlined in the policy itself which can be reviewed at <http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

Mitchell College endorses a collaborative non exclusionary relationship with families and guardians within the context of the law. As such Mitchell College endorses an inclination toward cooperation with parents and guardians within the context of the law. However, this does not mean that staff and faculty are duty bound to inform families of any or all student progress or action on campus, rather we cooperate with a Mitchell College student and their parents or guardians when information sharing is requested. In all cases, this is done in the best interest of the student, student progress and in some emergency cases the institution of Mitchell College.

NOTE: Employees who are students are protected as much as is possible from the supervisors seeing or reviewing their educational records. Students who are employees should contact the FERPA officer and the Registrar to discuss how and when their record might be reviewed. Review of the educational record is not germane to employee status and as such supervisors and coworkers should not request or attempt access of their staff's educational record.

Mitchell College Training on FERPA:

All Mitchell College staff and faculty who may have need or impact the student's educational record must complete an online training in FERPA and provide evidence of completion to the Human Resources Department. Access to educational record can be restricted until this training is completed. Record of completion is housed in Human Resources and with the campus FERPA officer. Human Resources is responsible for getting the completed list to IT as well as for the updates to that list as new employees pass the course training. <http://ferpa.mitchell.edu/mitchell/ferpacourse/index.html>

Policy Effecting All Students

- Mitchell College reviews and distributes notice of student rights under FERPA on a yearly basis in the following ways via:
 - Distribution and review of the Mitchell College Student Handbook
 - Mitchell College Website
 - Students are offered one on one review of FERPA with a Residence Hall Director or a Learning Specialist. Students wishing extra review of FERPA may contact the FERPA officer through the Department of Student Affairs.
- Student directory information is shared. Students who wish to opt out of directory information should obtain a form, from the Department of Student Affairs or the Registrar and bring it to the appropriate offices to opt out. Please note: opting out

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also removes the student name from records such as ceremonies, yearbooks and other social records.

- Mitchell College can be asked to disclose educational record information to Federal Agencies such as the military or in cases under a lawyer's or judge's subpoena and in other emergency cases as defined by the law.
- Students who are transferring are subject to educational record information sharing of the transcript and discipline history without consent.
- Student questions about FERPA should be directed to the Registrar, the FERPA officer, the Dean of Students, or the Assistant Dean of Students and Judicial Affairs.

PROCEDURE

FERPA officer:

Mitchell College assigns a FERPA officer who along with the Registrar and the Division of Student Affairs oversees FERPA on campus and provides guidance when needed regarding the release of the educational record and related information. All questions about FERPA should be directed to either the Registrar or the FERPA officer, currently located in the Division of Student Affairs.

Disclosure Procedures and FERPA Eligible Students:

- Mitchell College supports all the rights of FERPA eligible students by not releasing any part of the educational record without signed releases from the student in question
- In all cases before any and all educational record disclosure, a Mitchell College employee should determine whether a student is FERPA eligible or not. If the student is FERPA eligible, the appropriate release forms are available on the FERPA site, in the office of the Registrar as well as in the Office of the Dean of Students.
 - If the student is determined to be dependent, responsive information sharing should proceed.
 - If the student is a dependent student, and the student expresses refusal to have information shared, Mitchell College has the right to ask the parent/guardian to produce evidence of students dependent status.
 - Mitchell College strongly encourages the presence of student of whom record information is being released.

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- Mitchell College endorsed the right of faculty and staff disclose information via verbal permission of the student in question as long as that student is present for the disclosure
- Mitchell College endorses the rights of eligible students to revoke permission for disclosure at any time.
- In the cases of medical transport/emergency families or guardians are notified that their student is at the hospital and they are given the emergency room phone number. No further information about the circumstances or incident is revealed at that time, unless the conditions are deemed necessary by the Dean of Students. Note: that further sharing is a violation of the HIPAA laws under which no freedom to share exists unless the party is a threat to self or other.
 - Standard medical and counseling information is not disclosed to families/guardians for any reason
- In the cases of student on student incident where record information is compelled, the release information is restricted to the match between student and parent and guardian. Mitchell College does not release the educational record information of one student to any unrelated external parties. Exceptions to this include information that is compelled under a subpoena.
- For any student under 21, the College may share alcohol or drug violations with parent/guardians as long as the student is under 21 when the violation and the disclosure occurs. In cases of serious intoxication or in the case of a medical emergency, Mitchell College maintains the right to share information with parents and guardians, in these cases of medical transport/emergency families or guardians are notified that their student is at the hospital and they are given the emergency room phone number. It is their responsibility to follow up with the hospital and the College.

Disclosure and Dependent Students:

Dependent students are those who are claimed on parent and guardian tax forms fall into the category of dependent student are not protected by FERPA and information can be shared with credentialed parent or guardians who evidence that their student is still a dependent on their tax forms. In such cases Mitchell College encourages staff and faculty to include the student in question in order to assist with self advocacy, educational and developmental growth, as well as ownership of the student's educational course.

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Student right to review and amend educational records:

- Is requested through the Registrar's or the FERPA officer's office. Cooperation with a review request should take place within 10 business days of that written request. Record review can apply to any part of the educational record as defined above and can take place in the Faculty member's, Registrar's, Dean of the College's or the Dean of Student's office.
- Requests for amendments including a hearing to address disagreement about educational information amendment, must be addressed within 45 business days and is overseen by the Vice President of Academic Affairs/ Dean of the College. The VPAA/DOC oversees the hearing process for the request to amend the record and will give a decision on the hearing within that aforementioned 45 business day time period.
 - Should the decision be not amend the educational record (or finding in favor of the standing record), the student has a right to enter a note of disagreement into his/her record.

Any student (dependent or eligible) has a right to file a complaint with the U.S. Department of Education concerning alleged failures by the College to comply with the requirements of FERPA. The name and address of the Office that administers FERPA is:

*Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue,
SW Washington, DC 20202-5901*

Mitchell Beach Policies and Procedures

PURPOSE

This policy is designed to define the use of Mitchell Beach.

THE POLICY

This policy is designed to ensure that Mitchell Beach is used safely and appropriately at all times. Mitchell College reserves the right to close the beach at any time.

Policy for Mitchell Beach visitors:

- 1) Enter the water at your own risk.
- 2) No lifeguard is on duty.
- 3) No alcoholic beverages are allowed on the beach.

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- 4) No glass is allowed on the beach.
- 5) No animals/pets are allowed on the beach.
- 6) Beach opens at sunrise and closes at sunset.
- 7) All trash must be disposed of in the receptacles provided, or taken with you at the end of your visit.
- 8) No unauthorized fires are allowed on the beach.
- 9) Fireworks are prohibited.
- 10) Motorized boats are not allowed.
- 11) Parking is allowed in the Henry Hall parking lot. Vehicle owners assume all risk when parking on Mitchell College property and no vehicle may be parked overnight.
- 12) Camping is not allowed on any Mitchell College property.
- 13) An outdoor port-o-let is available at the beach for public use.
- 14) On rare occasions seals have come ashore on our beach. If you are aware of a seal on the beach, please do not approach it or disturb it in any way. Instead, please notify Campus Safety immediately.
- 15) Beach passes can only be used at Mitchell Beach next to the Henry Hall parking lot. The pass may not be used at the Mitchell Beach Sailing Dock beach area.

Mitchell College reserves the right to close the beach at any time. Advance notice of beach closing will be provided by posting signs at the entrance as often as possible, although there may be occasions where advance notification is not possible.

Mitchell College's Campus Safety reserves the right to remove guests in violation of any of the policies listed above. If any of the above policies are breached or any suspicious, malicious, or destructive activity is witnessed, Campus Safety should be notified immediately: 860.443.0214 (24 hours daily).

PROCEDURE

To access the Mitchell College beach, you must meet one of the following criteria:

- a). you must be a **current** Mitchell College student; or
- b). you must be an **alum** of Mitchell College; or

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- c). you must be a **current member** of the Mitchell College Faculty or Staff; or
- d). you must be a **Friend** of Mitchell College

Donors who are not students or parents, alumni, or faculty/staff, and who support Mitchell College by making a gift of \$125.00 or more, are recognized formally as Friends of Mitchell College. These gifts make up the Friends of Mitchell Scholarship Fund, directly supporting students in their effort to reach their educational goals.

A beach pass agreement must be signed prior to pass issuance. This agreement will remain on file with the Advancement Office and is renewable on a yearly basis. Additionally, all participants in beach pass program will be required to sign a general release and waiver.

Beach passes are non-transferable. A photo ID will be required in order to gain access to Mitchell Beach.

Residence Life and Housing Policy

PURPOSE

Residential living is an integral part of the academic success. The residence halls are communities where students take responsibility for their actions and their environment, promote understanding and respect, and foster opportunities and activities to make lasting friendships. Faculty and Staff involvement through study groups, lectures and workshops make the residence halls a living/learning environment, which provides an extension of the formal classroom education. The halls are not “dorms;” they are living-learning centers that provide a community based on mutual respect and shared living experiences. Detailed information about residence hall living is listed in the section on residence hall policies.

Mitchell College believes in the importance of on-campus residential living as part of the college experience. As such, all full-time Mitchell students must live in residence halls unless they live in a home year round with a parent, spouse or guardian. The College does consider petitions of older and upper class students to live independently in the local community.

THE POLICY

The success of a residential community depends upon mutual respect between and the shared community responsibility of all residents. Residents need to be concerned for the safety, rights and property of others. All residents are expected to abide by the policies found here, as well as those established by the Residence Life Staff and the Inter-

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Residence Hall Association (IRHA). Failure to abide by these guidelines will subject the individual to disciplinary action and possible loss of Mitchell College housing. These policies may change at the discretion of the College and subsequent notice of such to students.

Alcohol

Connecticut State Law defines 21 years of age as the minimum for possession/ consumption of alcoholic beverages, therefore alcohol is not allowed anywhere on campus regardless of student's age. Whether on or off campus, Mitchell College expects that all underage students not to possess or consume alcohol. Any student in an intoxicated state on campus will be considered to be in violation of the alcohol standards and will be held accountable within the College judicial system. Empty alcoholic beverage containers, even of a decorative nature, are not permitted in student rooms.

Appliances

Each room is equipped with a combination microwave oven and refrigerator, known as a micro-fridge. Residents are expected to use this appliance with care and safety. For students wishing to bring in an additional refrigerator, please note that the maximum size permitted is 3.2 cubic feet. It is the student's responsibility to clean this appliance throughout and at the end of each semester. Secondary to Fire Safety Regulations any appliances with an open burner such as toaster ovens are not allowed in the student bedrooms. All extension cords must be UL listed and used to the manufacturer's recommendations, surge protectors are also recommended for student use. All cords are to be kept free of defects.

Bicycles

Residents with bicycles are responsible for storing the bike in their room or on designated bike racks on campus. Bicycles are not to be stored in stairwells, hallways or lobbies. Mitchell College asks students to keep their bicycle locked when not in use.

Cinder Blocks

To prevent potential injury or damages, cinder blocks are not permitted in the residence halls.

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Common Areas

Residents are responsible for keeping hallways, bathrooms and common areas of residence halls and grounds free of personal trash and belongings. Losses or damages to college property in common areas are assessed against the hall/area, if the individual(s) responsible cannot be determined (see Damages below).

Confiscation

Residence Hall Staff and Campus Safety Officers are authorized to confiscate items which are not permitted in the halls. Items not permitted include (but are not limited to): appliances, alcohol, and drinking paraphernalia, illegal drugs and drug paraphernalia, weapons, martial arts implements, paintball or air soft markers including guns, pellets and other paraphernalia, pets other than fish, incense, candles, explosives. Confiscated items will be turned over to Campus Safety or the Dean of Students and the residents will be notified of the confiscation.

Damages

Damage, theft or acts of vandalism to college property are strictly forbidden. It is the residents' responsibility to take care of their hall/area and hold each other to a high level of civility and respect of each resident and facility. Individual damage charges may be appealed. A damage deposit (\$200) is required of all residents. This deposit is held against the student's account for the duration of the student's residency.

Residents are responsible for the repair costs for all damages (accidental or malicious) they cause in the halls (except normal wear and tear). If the responsible resident(s) cannot be identified in an individual room, the damage charge will be shared by all residents of that room. If the responsible resident(s) cannot be identified for a common area, the damage charge will be shared by all residents of that floor/hall. Common area damages are not able to be appealed as they are a portion of the total damage charges that are assessed to all residents in their area. Residents will be billed for damages at the end of each semester. Residents are expected to report vandalism and if know to report the individuals responsible for it, reports should be made to Campus Safety and/or Residence Life Staff. Students are not permitted to attempt any repairs of any kind (i.e.; painting, furniture repairs), all repairs of damage will be made by college maintenance staff. In addition to the damage charges, students responsible for extensive and/or malicious damage are subject to disciplinary action, including removal from residency.

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Residence Life Decorations

Residents may decorate rooms to their liking provided damage is not done to the walls/furnishings. Items such as tape, tacks & nails, cause damage to walls and should not be used. Removable tape such as a “3M adhesive strip” is acceptable. Decorations that pose fire hazards (fishnets, tapestries, candles, incense, etc.) are not permitted. State owned items or signs from the private sector such as traffic signs, lawn ornaments, traffic barricades, and real estate signs are not permitted in student rooms.

Exterior Door Locking

The exterior doors to the halls are locked at all times. Residents should carry their key/fob/ID card with them to gain entrance. It is unacceptable to “prop open” exterior doors or allow other people into the hall who do not have a key/fob.

Fire Safety

Fire evacuation routes are reviewed by residence hall staff with residents at floor/house meetings. Fire safety equipment is installed in each hall & fire drills are conducted twice per semester. Fire, fireworks and any explosive materials are not permitted in the halls or on Mitchell grounds. Tampering with fire equipment/alarms is a violation of State Law and person(s) involved are subject to 53a-180 of the Penal Code as well as campus judicial system action. Setting off a false alarm or discharging a fire extinguisher is considered one of the most serious violations and students involved with such violations could be fined up to \$500 plus face disciplinary action. Damage to such equipment will also be charged to those responsible. Anyone who sees a fire in a building is expected to pull the fire alarm to notify all residents of such danger.

Whenever a fire alarm sounds, everyone in the building must immediately evacuate the residence hall (Connecticut General Statute 7-313b). No student may remain in a building or be allowed to reenter until permission is given by the New London Fire Department, a Campus Safety Officer, or a Residence Hall Director.

Furniture

The furniture in each room belongs to Mitchell College and is not to be removed from that room or defaced in any way. Missing/damaged furniture will result in charges to those responsible. Common area furniture may not be removed from the common areas. Waterbeds and homemade lofts are not acceptable in student rooms. Room and common area furniture must not block a clear path to

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any exit. Non- Mitchell College furniture must meet fire code be approved by the Residence Hall Director before it is moved into the residence hall room.

Garbage

Residents are responsible for removing garbage and trash from their rooms to the designated collection area on a regular basis. At no time should garbage/trash be left in hallways, common areas, or be thrown from a window. Personal garbage cannot be thrown into bathroom or recycling receptacles.

Guests

Residents have the right to have overnight guests in their residence hall room. The privilege of hosting guests is a negotiable agreement between roommates and the right for a roommate to not feel imposed upon takes priority over the right for a student to host a guest. Any guests under the age of 18 must be approved by the Residence Hall Director or must be in the presence of a parent or legal guardian. All guests are to have a valid picture I.D. such as a current military I.D., driver's license, state I.D., or passport. Guests are to be escorted at all times by their host, and must be signed in to the hall/area while hall staff is on duty. A resident may have no more than two overnight guests stay in their residence hall room at any time, guest are permitted to stay for a duration of two nights at a time. All overnight guests must be registered with the Department of Residence Life with a Guest Permission Form. The responsibility of registering a guest falls solely on the host student and must be done at least 24 hours in advance. Guest permission forms are available in the Residence Life Office. Guest not staying overnight must leave the residence hall by 12:00 am. The host student accepts the responsibility of informing the guest of all Mitchell College policies, such as using the appropriate bathroom designated for his/her gender, compliance with all instructions given by a Mitchell College employee or adherence to the alcohol policy. If a guest has a vehicle, a visitor parking permit must be obtained and displayed on the vehicle while on campus, or it is subject to being towed. All overnight guests must park in the commuter lot on the corner of De Biasi Drive and Montauk Avenue.

Any guests that are not registered or that violate campus policies may be asked to leave campus immediately per the discretion of the Residence Life or Campus Safety staff. The host student is responsible for the behavior of his or her guest. A campus safety officer or professional residence life staff may search any suspicious items brought in by guests. A guest may refuse an item to be searched; however that item must stay locked in his or her vehicle, or be removed from campus at the discretion at the staff.

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Hall Sports

Sports playing and rough housing are not permitted in the residence halls.

Housekeeping

Residents are expected to maintain and clean their room on a regular basis. Monthly inspections will be conducted by the Residence Hall Staff to identify health/safety/maintenance concerns. Residents are obligated to make the necessary corrections as directed. Common areas are attended to daily by the cleaning staff, however it is a responsibility of the student members of the community to maintain appropriate living conditions.

Housing Contract

All residents sign a Housing Contract which lists specific agreements between the student and the College. Residents should know the Housing Contract is binding and violation of its terms may result in disciplinary action.

Laundry

Washers/dryers are installed in all halls for student use, by the Mac Gray Company. These machines are coin operated. The College is not responsible for damage to or loss of personal property associated with the use of laundry facilities. Any problems should be reported to the Residence Hall Director.

Liability

Mitchell College is not responsible for damage to a student's personal property by fire, theft or any other cause. Students are encouraged to remove all valuables from their rooms during periods of absence. Students are further advised to refrain from bringing sentimental objects to college. Students are encouraged to carry homeowner's insurance or renter's insurance.

Lock-Outs

Students are expected to carry keys and ID at all times. Students should contact the Residence Hall staff when locked out. Identification will be required upon unlocking of a door for security purposes. Because lock out are not predictable and staff have ongoing obligations, students should anticipate a wait time to be let in to their room after a lock out. Excessive lockouts (more than 3) may result in a fine, judicial sanction, and/or lock change.

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Pets

With the exception of Service Animals, no pets may be brought into the residence halls by students to visit or live. Fish are allowed in aquariums no larger than 10 gallons and must be non-carnivorous.

Quiet Hours

Quiet hours are in effect Sunday through Thursday 10:00pm to 9:00am and Fridays/Saturdays from 12:00am to 9:00am. During quiet hours no noise audible outside of student rooms. Courtesy hours are in effect 24 hours a day. Repeat violations of quiet hours will result are subject to disciplinary action.

Residence Life Keys/Locks

Each resident is issued a room key and a fob/ID (coded to work as their exterior door key). Residents must carry their key/fob/ID card at all times and may not duplicate keys or lend them to others. Residents must report lost keys to their Residence Hall Director immediately. Lost Keys will result in charges for a lock change plus a replacement fob/ID Card at the student's expense.

Residence Life Room Changes

Mitchell College believes that part of the student development is learning to live with other people through shared experiences and compromises. It is expected that students who choose to live together by request will do so for the entire year. It is also expected that students assigned together will make every effort to be good roommates through mutual respect. All requests for a room change must be presented in writing to the Residence Hall Director. Unauthorized room changes are not permitted.

Restricted Items

The following items are not permitted in the residence halls:

- Air conditioner
- Alcohol
- Alcohol containers (empty)
- Appliances with open burner (hot plates, George Foreman grill)
- Beer balls
- Bombs
- Candles
- Ceiling decorations
- Cinder blocks
- Dangerous materials

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- Dart board/darts
- Drug paraphernalia
- Drum set
- Electric frying pan
- Electric space heater
- Explosives
- Extension cords
- Fire works
- Fishnets
- Gasoline/ kerosene
- Guns (BB gun)
- Halogen lamp
- Hanging on walls (i.e. tape, tacks, nails)
- Homemade lofts
- Horseshoes
- Hot plates
- Illegal drugs
- Incense
- Kegs
- Martial arts implements
- Microwaves
- Musical amplifier
- Paintball or Air Soft markers
- Pets (except fish- tank size: 10 gallon or less)
- Pools
- Refrigerators (larger than 3.2 cubic feet)
- State owned items or signs from private sector (i.e. traffic signs, lawn ornaments, traffic barricades, real estate signs)
- Sun lamps (unless medically necessary)
- Toaster/toaster oven
- Waterbeds
- Weapons
- Wooden furniture (including wicker furniture)

Mitchell College maintains the right to designate items as unsafe or not permitted in the Residence Halls as warranted.

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Room Entry/Search

If a Mitchell College Student Affairs staff member requests to enter a room for a reasonable cause, the resident(s) must permit entry. A failure to do so represents a “failure to comply” violation. Except in specific and defined circumstances staff members will enter a room only after seeking a resident’s consent. If a resident refuses consent, the staff member may still enter (after identifying self and staff role) for reasonable cause. Reasons for which staff may enter a room are: to perform routine safety/maintenance inspections/repairs; to verify room occupancy; to respond to an emergency/crisis situation; and to investigate probable violations of College policy. Mitchell College reserves the right to search a room and/or the belongings of any student upon reasonable belief that violations of federal, state, or local laws or Mitchell College policy are occurring. Such searches occur only with the approval of the Dean of Students or his/her designee after being requested by the Student Life Staff. In the event of a significant emergency, the Director of Campus Safety may authorize a room search.

Room Parties

Social gatherings of ten or more people in any residence hall bedroom are not permitted.

Room Repairs

Residents are responsible for reporting repairs needed to their room or common areas within their living area to their Residence Hall Staff.

Room Selection/Assignments

Upper-class, returning students participate in room & roommate selection each April. To qualify for the process, students must meet certain requirements. Detailed room selection information packets are distributed to residents prior to room selection.

The College reserves the right to assign up to 3 students to a room when the demand for housing exceeds the spaces available. In such cases, the residents of a triple room will be given a rebate on room rate until additional space is available. Students understand that if they choose not to “de-triple”, when it is offered by the College, they will be billed for the regular room rate. If students self select to “triple” in a double room or “double”, a single room when other space is available on campus, they will be billed at the regular room rate.

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In our Residence Halls, very few single rooms are available for students. Designed singles are offered to upper-class, returning students on a priority basis during room selection each April. Students who select a standard single will be billed a surcharge for each semester assigned to the single. When space is available, the College sometimes offers “super single” rooms for students. This option is a room designed for 2 people which is offered to just 1 resident. A surcharge rate will be billed per semester for a Super Single. Billing for single rooms is placed on the student’s account when a student selects such option. Any resident without a roommate (regardless of cause or situation) will be moved to another room with a roommate unless space permits that would allow that resident the option to purchase space as a “super single”. Students do not have a right to refuse a roommate.

Shuttle (Van) Service

For the benefit of residents without cars, Mitchell College provides van shuttle service on an established schedule twice each week. The shuttle loops to the local banks, grocery stores, fast food restaurants, movie theaters and the Crystal Mall. This service is free to all students by displaying their ID card upon entering the van. This service may change throughout the academic year. Students using this service are subject to Mitchell College Code of Conduct and may forfeit the privilege of the service if violations are reported and substantiated.

Solicitation

Students are not permitted to use their rooms or facilities in the residence halls for any commercial purpose. Solicitors, salesmen or agents (student or others) may not contact residents or conduct any promotions in the residence halls for commercial purposes without prior approval from Dean of Students.

Storage

The residence halls are designed with minimal storage space; therefore, residents are expected to store all personal items in their residence hall room. Storage is not available to students over the summer months.

Theft

It is the responsibility of each student to secure all valuables in their rooms and to lock the room door at all times. Mitchell College is not responsible for any theft within the halls. Please see the liability section. Unauthorized possession of property belonging to Mitchell College or other residents is considered theft and students involved in such behavior will face disciplinary action. Identity

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theft (taking or using a person's personal information without their permission) will not be tolerated.

Visitation

Non-student and other Mitchell student guests are permitted in the halls but must be accompanied by a Mitchell College resident at all times. Residents assume all responsibility for the conduct of their guest(s) while on campus or at College sponsored events. If a guest has a vehicle, a visitor parking permit must be obtained and displayed on the vehicle while on campus, or it is subject to being towed.

Weapons

Residents are not permitted to bring ANY type of weapon into the residence halls. This includes, but is not limited to guns, "BB" rifle/gun, air soft or pellet gun paraphernalia, martial arts implements, knives and bombs. Students in possession of a weapon, regardless of intent, will face disciplinary action by the College which may include expulsion.

Windows/Screens

Windows/screens must remain in place at all times. Any removal of screens will result in disciplinary action. Objects cannot be thrown or passed through windows.

Smoking Policy

PURPOSE

To inform the Mitchell community of the smoking policy on campus.

THE POLICY

Effective October 2003 State of Connecticut (Public Act 03-45) prohibits smoking in any college or university residence hall or other buildings. To comply with this State law, all Mitchell College residence halls are completely smoke free. In addition to all interior spaces being smoke-free, all entrance areas and porches of residence halls are considered smoke-free. Smokers may not be within 25 feet of any building while smoking. Smokers are expected to properly dispose of their cigarette butts. There is no smoking on the Main Campus between Pequot and Montauk Avenue. Mitchell Woods is also a non-smoking area, as is anywhere around the Mitchell College Children's Learning Center. Smoking is permitted by the Residence Halls at a distance of 25 feet. Those who

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do not comply will be documented for this violation and students will be subject to disciplinary action. All faculty and staff are responsible to enforce the smoking policy.

PROCEDURE

All faculty and staff are responsible to enforce the smoking policy. Those who do not comply will be documented for this violation and students will be subject to disciplinary action.

Student Health and Immunizations Policy

PURPOSE

This policy is to address immunizations required for College students by CT State regulations Connecticut General Statutes 10a-155. The proscribed immunizations are required to live in community residence settings. College students can submit a religious or medical exemption form if they are not in compliance with this law. The immunization requirements are as follows with recent additions to the law which will go into effect 8/1/2010.

THE POLICY

All students are required to submit proof of immunizations and complete a health form prior to beginning their first semester at Mitchell College. Student athletes must provide an additional medical form yearly that clears them to play NCAA division III athletics. Detailed information about these processes is mailed to all incoming students after they have been accepted to the College.

All students must file a Health Record (at the outset of their enrollment) which must contain the student's immunization history. Students must comply with Connecticut State Law that requires all matriculating students born after December 31, 1956, to present proof of measles/rubella immunization as a condition of enrollment. Students who do not submit a Health Record (on college forms) and complete state mandated immunization requirements will not be permitted to register. All student health information/records are kept confidential and are only divulged by the Health Center Staff to the Dean of Students, the Director of Health and Wellness and emergency medical staff as needed.

In September 2002, the State of Connecticut passed legislation that requires all students residing in campus housing to be immunized against Meningococcal disease, with two exceptions:

1. a physician certifies that such vaccination is medically contraindicated,
2. a student presents a statement that vaccination is contrary to religious beliefs of the student. Medical exemption forms must be done before arriving on campus for the semester. (Refer to Health and Wellness: Student Vaccine Exemption

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Policy.)

[\(See Student Vaccine Exemption Policy\)](#)

Connecticut General Statutes > Title 10a > Chapter 185b > § 10a-155 - Required immunizations for college students

A) Each institution of higher education shall require each full-time or matriculating student born after December 31, 1956, to provide proof of adequate immunization against measles, rubella and on and after August 1, 2010, to provide proof of adequate immunization against mumps and varicella as recommended by the national Advisory Committee for Immunization Practices before permitting such student to enroll in such institution. Any such student who (1) presents a certificate from a physician stating that in the opinion of such physician such immunization is medically contraindicated, (2) provides a statement that such immunization would be contrary to his religious beliefs, (3) presents a certificate from a physician, or from the director of health in the student's present or previous town of residence, stating that the student has had a confirmed case of such disease, (4) is enrolled exclusively in a program for which students do not congregate on campus for classes or to participate in institutional-sponsored events, such as students enrolled in distance learning programs for individualized home study or programs conducted entirely through electronic media in a setting without other students present, or (5) graduated from a public or nonpublic high school in this state in 1999 or later and was not exempt from the measles, rubella and on and after August 1, 2010, the mumps vaccination requirement pursuant to subdivision (2) or (3) of subsection (a) of section 10-204a shall be exempt from the appropriate provisions of this section.

B) Each institution of higher education shall keep uniform records of the immunizations and immunization status of each student, based on the certificate of immunization or other evidence acceptable pursuant to subsection (a) of this section. The record shall be part of the student's permanent record. By November first of each year, the chief administrative officer of each institution of higher education shall cause to be submitted to the Commissioner of Public Health, on a form provided by the commissioner, a summary report of the immunization status of all students enrolling in such institution.

Beginning August 1, 2010, Section 10a-155 of the Connecticut general statutes will require that each full time or matriculating student provide proof of adequate immunization against measles, mumps, rubella (MMR) and varicella as recommended by the Advisory Committee for Immunization Practices (ACIP). Several questions have arisen concerning the interpretation of these requirements. The following information should help clarify which students are affected and what documentation is required for entry into each institution of higher learning.

Full Time/Matriculating Students

The new requirements will affect all full time students as well as all matriculating students. Matriculating students are defined as those enrolled in a degree-seeking

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program. Part time non-matriculating students are not required to have MMR and varicella immunizations although they are recommended to have those vaccines by ACIP.

MMR Vaccine

Beginning August 1, 2010 all incoming freshman will be required to show proof of 2 doses of measles, mumps and rubella vaccine. The doses should be separated by at least 28 days with dose number one given on or after the first birthday. Exemptions to this requirement include:

1. Individuals born before January 1, 1957,
2. Laboratory confirmation of immunity to such disease,
3. Documentation from a physician stating that the student is medically contraindicated from receiving such vaccine,
4. Documentation from the student that such an immunization is contrary to his/her religious beliefs,
5. Documentation from a physician or director of health that the student has had a confirmed case of such disease,
6. Students who graduated from a Connecticut high school in 1999 or later and were not exempt from MMR vaccinations,
7. Enrollment in a distance-learning program conducted entirely through electronic media in a setting without other students present.

Varicella Vaccine

Beginning August 1, 2010 all incoming freshman will be required to show proof of 2 doses of varicella (chickenpox) vaccine. The doses should be separated by at least 28 days with dose number one given on or after the first birthday. Exemptions to this requirement include:

1. Individuals born in the United States before January 1, 1980,
2. Laboratory confirmation of immunity to such disease,
3. Documentation from a physician stating that the student is medically contraindicated from receiving such vaccine,
4. Documentation from the student that such an immunization is contrary to his/her religious beliefs,
5. Documentation from a physician or director of health that the student has had a confirmed case of such disease,
6. Enrollment in a distance-learning program conducted entirely through electronic media in a setting without other students present.

Graduation from a Connecticut high school in 1999 or later does NOT apply to varicella vaccine.

1. Adequate evidence of immunity and the exemptions noted above are consistent with the ACIP varicella recommendations. Parental or self-report of historic varicella disease is no longer considered acceptable evidence of immunity, as naturally occurring infection has declined dramatically and clinical illness has become more difficult to recognize. The full ACIP recommendations for

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prevention of varicella are available at

<http://www.cdc.gov/mmwr/preview/mmwrhtml/rr5604a1.htm>

PROCEDURE

Specific questions about health records or immunization documentation can be addressed by contacting the Center for Health and Wellness at (860)701-5195.

Student Parking Policy

PURPOSE

To outline Mitchell College's expectations in regards to campus parking.

THE POLICY

- There is absolutely no student parking on main campus.
- All vehicles must be registered with Campus Safety.
- Mitchell College is not responsible for theft or damage done to vehicle on campus.
- Insurance must be kept up to date.
- No parking in handicapped accessible spots unless the vehicle has the appropriate measures to do so.
- No parking in any yellow marked areas.
- No parking in any fire lanes.
- Students are not allowed to park in staff parking lots or restricted parking lots that require special marked tags or stickers.
- There is no parking or driving on the grass.
- There is no parking on the road of De Biasi Drive. Vehicles must be in a parking spot.
- No parking in the driveways of the Waterfront houses.
- Parking is allowed on Montauk and Pequot Avenues, Commuter Lot, Henry Hall Lot, Fairhaven Lot. Keep in mind Mitchell College is not responsible for damage or theft done to vehicles left parked on the avenues.
- Anyone found in violation of these regulations can be ticketed 3 times, booted once, and then towed at the owner's expense. Mitchell College will not give a refund for a towed vehicle.
- All vehicles must follow the posted speed limit which is 15 mph anywhere on campus.

PROCEDURE

The provision or removal of parking and driving privileges is primarily the responsibility of the Director of Campus Safety although students can lose these privileges via the

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judicial system. Appeals for suspension or denial of privilege may be made to the Dean of Students.

Student Vaccine Exemption Policy

PURPOSE

This policy is designed to define the policies regarding students with medical exemptions from vaccinations and an explanation of what these students should do in the case of a vaccine-preventable disease outbreak at Mitchell College.

THE POLICY

Students with medical exemptions from vaccination shall be permitted to attend school after the submission of the Mitchell College Health & Wellness Medical Exemption Form. In the case of a vaccine-preventable disease outbreak in the school, all susceptible students will be excluded from school based on public health officials' determination that the school is a primary site for disease exposure, transmission and has the possibility of spreading into the community.

PROCEDURE

Students excluded from school for this reason will not be able to return to school until:

1. the danger of the outbreak has passed as determined by public health officials,
2. the student becomes ill with the disease and completely recovers, or
the student is immunized and cleared to return by a physician

TECHNOLOGY

Adjunct Faculty Network Password Policy

PURPOSE

This policy is designed to define the policy regarding password creation, management, and security.

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THE POLICY

This policy is designed to ensure that data stored on Mitchell College computers and systems are protected through reasonable and appropriate use of password security. Users are responsible for safeguarding passwords and they must not be shared.

Requesting New Mitchell Accounts (Adjunct Faculty)

Network account creation is part of the new associate setup process. When the Support Center receives the list of new adjunct professors from the Office of Academic Affairs. This information is passed on to the appropriate teams for account and security creation. Without this information accounts are not created and will not exist. Default passwords are set at the same time for these accounts and the information is sent to their manager for proper distribution.

Policy for Users When Changing Their Passwords

User must follow the rules below when changing their Mitchell network password:

1. Passwords must be changed every 90 days
2. Passwords must contain characters from three of the following four categories:
 - a. English uppercase characters (A through Z)
 - b. English lowercase characters (A through Z)
 - c. Base 10 digits (0 through 9)
 - d. Non-alphabetic characters (for example, !, \$, #, %)
3. Passwords must be changed while on campus and attached to the network
4. Passwords cannot contain the user's account name or parts of the user's full name that exceeds two consecutive characters
5. It must be at least eight (8) characters in length (Longer is generally better)
6. You cannot use the last 18 previously used passwords
7. It should not be the same as the user ID
8. It should not include the first, middle, or last name of the person issued the user ID
9. It should not be information easily obtainable about you. This includes license plate, social security, telephone numbers, or street address

*Examples: Passw0rd, Passw*rd*

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PROCEDURE

Account Removal/Deactivation

Network accounts are deleted upon request or when a person does not meet the employment eligibility requirements.

Who is removed and when?

- Accounts for Adjunct Faculty are removed immediately upon notification from the Office of Academic Affairs if they are not returning within the next complete school year or
- Accounts for Adjunct Faculty are removed immediately upon notification from the Office of Academic Affairs if they have not returned for two (2) consecutive semesters
- Accounts for Adjunct Faculty are removed immediately if notified by Human Resources that their account should be disabled.
- All electronic files associated with the Adjunct accounts will be moved to an archive area or removed permanently depending on the direction received from the Office of Academic Affairs

Requesting a Network Password Reset (Faculty/Staff)

Adjunct Faculty can request a network password be reset by calling the Support Center. The Support Center will validate two (2) pieces of information before resetting the network account password: The persons last 4 digits of their SSN and birth month/day.

This information is supplied to the Support Center and updated by the Human Resources. If for some reason the Support Center does not have this information the Support Center will contact the Human Resources Department for verification.

Blackbaud Account Security Policy

PURPOSE

This policy is designed to define the policy regarding password creation, management, and security.

THE POLICY

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This policy is designed to ensure that data stored on Mitchell College Blackbaud SIS, FinancialEdge, and RaisersEdge systems are protected through reasonable and appropriate use of password security. Users are responsible for safeguarding passwords for their user identification, and must not be shared.

Policy for Users When Changing Their Passwords

User must follow the rules below when changing their Mitchell network password:

- 1) Passwords must be changed every 90 days
- 2) It should not be the same as the user ID.
- 3) It should not include the first, middle, or last name of the person issued the user ID
- 4) It should not be information easily obtainable about you. This includes license plate, social security, telephone numbers, or street address
- 5) It must be at least eight (8) characters in length (Longer is generally better)
- 6) It must contain one (1) uppercase character
- 7) It must contain one (1) special character
- 8) You cannot use the last five (18) previously used passwords

College Illegal Download Policy

PURPOSE

To meet federal laws, including the Higher Education Reauthorization Act of 2008, and standards for compliance with the U.S. Copyright Law, and specifically to address the implications of the Digital Millennium Copyright Act (DMCA) of 1998.

THE POLICY

As stated in Mitchell College's Appropriate Use Policy for Computer and Information Resources, the College data network may not be used to violate the U.S. Copyright Law. By extension, the Digital Millennium Copyright Act (DMCA) updates existing law in specifying that it is a federal crime to distribute or download copyrighted music, movies, or software on the Internet without permission from the copyright owner.

The College will be actively engaged in identifying infringing activity on the Mitchell College network prior to a notification since infringing activities have an adverse impact

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on network reliability and performance. In doing so we will be able to identify patterns of activity that look the same as the patterns one would see if illegal uploads and downloads of copyrighted music, movies, or software on the Internet were taking place.

Upon identification of unusual network activity:

The College will observe the following procedures when unusual network activity patterns are identified on a PC connected to the Mitchell College network:

- Determine the identity of the student, faculty or staff member from the electronic information or fingerprint supplied by the network scans;
- Disable the network port or block the machine from connecting to the network in order to stop the traffic;
- Forward preliminary information on to the Help Desk and Student Affairs or Human Resources of the action taken on the network to block the traffic;
- Notify the Help Desk that the machine was block from network traffic in order to obtain or validate the owner's identity. The Help Desk will inform the person that they need to contact Student Affairs or Human Resources;
- Once the owner was identified and Student Affairs or Human Resources have met with the owner, OIT will scan the machine to determine if the machine has a virus, worm, or malware creating the same kind of network traffic pattern or if in fact programs were installed to perform illegal download;
- If the machine was determined to have a virus, worm, or malware, OIT will clean the machine before returning it to the owner and allowing it back on the network. This finding will be reported to Student Affairs or Human Resources so that this can be documented;
- If the machine was determined to be downloading files illegally the owner (if a student) will be asked to remove the program and content before it can be returned to the network. This removal must be validated by Student Affairs. If the owner is a member of the faculty or staff the OIT department will remove the software and delete the content;
- Forward preliminary information on to the Help Desk and Student Affairs of the action taken on the network to block the traffic;
- Final notification of all actions taken by OIT will be sent to Student Affairs or Human Resources;
- Keep the identity of the student, faculty or staff member confidential from the complainant.

Under either of the above stated circumstances, the student, faculty or staff member is entitled to deny the allegation(s) if s/he believes that the content downloaded was obtained legally or if s/he feels that the complainant misidentified the content.

Upon receipt of a DMCA (or "cease and desist") notice:

The College will observe the following procedures in response to notifications received by the College's DMCA Agent from the RIAA, or similar external organizations

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representing copyright holders, of alleged use of its network to download and/or distribute digital copyrighted content:

- Determine the identity of the student, faculty or staff member from the electronic information or fingerprint supplied by the complainant;
- Forward the notice to the student, faculty or staff member electronically via campus mail, asking for response within one week in the form of written assurance that, (1) the student, faculty or staff member has removed the illegal content and file sharing software from her/his computer and that, (2) the student, faculty or staff member will not engage in further illegal activity of this nature.
- Forward the notice to Student Life and/or Human Resources and suspend the student, faculty or staff member's account if written assurance from the student, faculty or staff member is not received within one week;
- Keep the identity of the student, faculty or staff member confidential from the complainant;

Upon receipt of a pre-litigation settlement letter:

- Determine the identity of the student, faculty or staff member from the electronic information or fingerprint supplied by the complainant;
- Forward the notice to the student, faculty or staff member electronically via campus email;
- Specify that legal advice to the student, faculty or staff member cannot be provided by the College, and that it is the student, faculty or staff member's responsibility to decide how to respond to the complaint and if personal legal counsel will be retained;
- Keep the identity of the student, faculty or staff member confidential from the complainant unless presented with a subpoena.

Under either of the above stated circumstances, the student, faculty or staff member is entitled to deny the allegation(s) if s/he believes that the content downloaded was obtained legally or if s/he feels that the complainant misidentified the content.

Upon Receipt of a Preservation Notice:

A preservation notice is notice to the College to preserve specific records that could be useful in a subsequent court case by an RIAA member against a person accused of copyright infringement that has used the College/Service Provider's network. Mitchell College will only act in response to Settlement Letters, DMCA notices and subpoenas. The College will not take any action in response to preservation notices.

SANCTIONS FOR VIOLATIONS IDENTIFIED INTERNALLY (STUDENTS)

First Notifications: The CIO must be notified in writing that the infringing content and software have been removed from the computer before Internet access will be

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reinstated. A report concerning the violation of copyright will be sent by OIT to Student Affairs, which will issue a warning letter to the student asking her/him not to repeat the behavior that resulted in the complaint. A copy of that letter will be kept in the student's file.

Second Notifications: Upon the second occurrence of external notification of copyright infringement, Student Affairs will be notified immediately by the OIT, and a judicial hearing will be held to determine appropriate sanctions. Network access, either through a wired port or through the wireless network, may be denied for up to and possibly exceeding four weeks for a second complaint incident. Additional action appropriate to the College's disciplinary process also may be taken. Any attempt by the student, faculty or staff member to connect her/his computer to the network from another open port or through the wireless service may result in further disciplinary action.

Subsequent Notifications: A student's subsequent infringement notifications will result in immediate Judicial Affairs action. Depending upon the severity of the infringement, network access, either through a wired port or through the wireless network, may be denied for up to and possibly exceeding a full semester. Additional sanctions may be applied through the disciplinary process. Any attempt by a student to connect her/his computer to the network from another open port or through the wireless service will result in further disciplinary action.

SANCTIONS FOR DMCA VIOLATION NOTIFICATIONS (STUDENTS)

First Notifications: The DMCA Agent must be notified in writing that the infringing content and software have been removed from the computer before Internet access will be reinstated. A report concerning the violation of copyright will be sent by the DMCA Agent to Student Affairs which will issue a warning letter to the student asking her/him not to repeat the behavior that resulted in the complaint. A copy of that letter will be kept in the student, faculty or staff member's file.

Second Notifications: Upon the second occurrence of external notification of copyright infringement, Student Affairs will be notified immediately by the DMCA Agent, and a judicial hearing will be held to determine appropriate sanctions. Network access, either through a wired port or through the wireless network, may be denied for up to and possibly exceeding four weeks for a second complaint incident. Additional action appropriate to the College's disciplinary process also may be taken. Any attempt by the student to connect her/his computer to the network from another open port or through the wireless service may result in further disciplinary action.

Subsequent Notifications: A student's subsequent external infringement notifications will result in immediate Judicial Affairs action. Depending upon the severity of the infringement, network access, either through a wired port or through the wireless network, may be denied for up to and possibly exceeding a full semester. Additional

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sanctions may be applied through the disciplinary process. Any attempt by a student to connect her/his computer to the network from another open port or through the wireless service will result in further disciplinary action.

SANCTIONS FOR VIOLATIONS IDENTIFIED INTERNALLY (FACULTY/STAFF)

The CIO must be notified in writing that the infringing content and software have been removed from the computer before Internet access will be reinstated. A report concerning the violation of copyright will be sent by OIT to Human Resources. A thorough review of the violation will be conducted and appropriate disciplinary action will be taken. Depending upon the result of the review, a written warning will be given to the employee. However the severity of the violation could necessitate actions up to and including termination.

SANCTIONS FOR DMCA VIOLATION NOTIFICATIONS (FACULTY/STAFF)

The DMCA Agent must be notified in writing that the infringing content and software have been removed from the computer before Internet access will be reinstated. A report concerning the violation of copyright will be sent by the DMCA Agent to Human Resources, . A thorough review of the violation will be conducted and appropriate disciplinary action will be taken. Depending upon the result of the review, a written warning will be given to the employee. However the severity of the violation could necessitate actions up to and including termination.

PROCEDURE

This policy will be reviewed on an annual basis by both the Policy and the Compliance Committees to ascertain the effectiveness of the measures utilized at Mitchell College for combating copyright infringement/illegal downloading. Further, the periodic review will act to ensure that accurate, up-to-date information is provided to the campus community and that the College is in compliance with federal regulations.

The DMCA Agent, Student Affairs, or Human Resources will be responsible for receiving correspondence, centralizing records of violations, delegating investigations, and ensuring the process is followed. These individuals will work closely with OIT to facilitate an efficient and expeditious processing of all reported incidents of copyright infringement/illegal downloading.

Mitchell College students, faculty and staff members will be made aware of the College's policy on illegal downloading through bi-annual electronic notifications at the beginning of the Fall and Spring semesters. Web site links will be provided which will direct the campus community to the "Copyright and Fair Use Resource Center" which also contains information on legal alternatives for downloading and, on otherwise

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acquiring copyrighted material. Further, incoming new first-year students, faculty and staff members will receive information and education on illegal downloading through the First Year College curriculum and/or from Human Resources.

Guest Access to the Mitchell Network

PURPOSE

Define the policy around granting guest access to the Mitchell network.

THE POLICY

The College's wired and wireless networks are for the use of Mitchell College students, faculty, trustees, and staff. However, with special permission and with sponsorship by a college organization or individual, contractors, financial auditors, guest speakers or others who are working for the college may be granted secure access to the Internet via the college network.

- Guest Access permissions will only allow the user of them to access the Internet from a college owned computer and no other Mitchell assets will be accessible.
- Guest Access requiring access to other Mitchell data servers or technology will need the permission of the department VP.
- Guest Access greater than thirty (30) days will require a permanent ID be created.

PROCEDURE

Requests for guest access to the secure network and Internet should be forwarded to the Support Center. Three (3) working days advance notice is required for a secure connection to the Internet. A request for guest accounts must include the guests' full name, along with the department or organization requesting the account, the start and expiration dates for the account, and the employee on campus who will be responsible for supervising the account. Once the guest's access is authorized, the guest will be given a unique network ID and must agree to abide by the Mitchell Colleges Appropriate Use Policy.

Request Instructions

All requests for "Guest Access" should be made by completing the form in the SharePoint Forms Center that is located in the "Computer & Technology"

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section of the site. This form will automatically be sent to the OIT support organization for processing.

A form requesting “Guest Access” requiring access to Mitchell data servers or assets will need VP approval and approval from the Chief Technology Officer before it can be processed.

Automatic Termination

Termination of the account will happen by the end of business day based on the date provided without question unless notice is given to the Support Center of an extension by the employee responsible for the account.

Information Management, Security, and Ownership

PURPOSE

This policy governs the management and accessibility of College Information regardless of the environment that the Information resides in. This includes the Information servers, individual personal computers, and Information residing in any other media (paper printouts, digital storage devices, mobile phones etc.).

College Information is defined as all information created, collected, maintained, recorded or managed by the college, its staff, and agents working on its behalf. It includes information used for planning, managing, operating, controlling, or auditing college functions; especially information used by multiple college departments; and information used for college reporting. For the purposes of this policy, college information also includes research information that contains personally-identifiable subject information, or proprietary college information and trade secrets.

THE POLICY

This policy governs the management and accessibility of College Information regardless of the environment that the Information resides in. This includes the Information servers, individual personal computers, and Information residing in any other media (paper printouts, digital storage devices, mobile phones etc.).

The Information Classification Standard section of this document defines the classification levels assigned to different types of College Information according to confidentiality. Identification and classification of College Information allows the appropriate degree of protection to be applied. Another goal of this document is to apply College security controls consistently for Information of similar sensitivity across various College colleges and departments.

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Idle Workstation Policy

PURPOSE

This policy is designed to define the policy regarding “Unattended Workstations” or workstations that have been idle for an extended period of time. This policy addresses the steps that will be taken to prevent possible data, identify, and security breaches.

THE POLICY

An automatic policy will be set on all machines on campus and will execute when machines are unattended for greater than fifteen (15) minutes. This policy will force all unattended machines into a “Locked” state.

Note for Locked Offices: It is imperative that when people leave their offices for any period of time that they lock their office as an additional measure of information security.

In the locked state, applications will continue to run as they were running before the machine was locked. There are only two (2) ways to unlock a locked machine:

1. The person signed onto the machine must re-enter their password information after hitting CTRL-ALT-DELETE
2. Or A network administrator account can unlock the machine by logging on to the machine

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Information Systems Appropriate Use Policy

PURPOSE

The purpose of this policy is to outline the College users' rights and responsibilities regarding appropriate use of the College Information Systems. This policy is not intended to cover every situation, but instead to provide general guidelines for all users.

THE POLICY

Mitchell College User refers to any College student, faculty, staff, or affiliate using the College Information Systems.

Mitchell College Domain Administrator refers to any individual with express permission and authority from the College to administer and facilitate access to the College Information Systems.

Mitchell College User Account refers to any account assigned by a College Domain Administrator to faculty, student, staff, or affiliate. A user who has been assigned a user account has permission to use the College Information Systems within the parameters determined by the Domain Administrator, this Appropriate Use policy, and other College policies and regulations.

Principal of Least Privilege (PoLP) is a basic security guideline stating that "every program and every user of the system should operate using the least set of privileges necessary to complete the job."

Restrictions

The College reserves the right to protect its Information Systems and to restrict user access to Information System activities that are related to the College. These systems are primarily intended for the academic, educational, and research purposes of the College. The College reserves the right to define what constitutes unauthorized use.

The College and its users must comply with relevant federal and state laws, including but not limited to, appropriate use, copyright and fair use, and privacy laws.

Use of Employee-Owned Computers and Equipment

There are many possible combinations of interaction among the software needed by the remote user and the average mix of programs on most home computers. Troubleshooting software and hardware conflicts can take many

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hours, and a complete reinstall of operating systems and application software is often the only remedy for problems. For these reasons, the College will provide support for College-owned equipment and software only.

The College will bear no responsibility if the installation or use of any College software on employee-owned computers causes system lockups, crashes, or complete or partial data loss on employee-owned equipment.

Computer Usage

Computers, computer files, internet access, and software furnished to employees at Mitchell College are primarily for business purposes and employees are responsible for seeing that these systems are used in an effective, ethical, and lawful manner. Although incidental personal use of these systems is permitted, any personal use of these systems is expected to be on the user's own time and is not to interfere with the person's job responsibilities. Use of these systems may not cause any harm or embarrassment to Mitchell College.

Employees should not use a password, access a confidential file, or retrieve any stored confidential communication without authorization.

The College purchases and licenses the use of various computer software for business purposes and does not own the copyright to this software or its related documentation. Unless authorized by the software developer, the College does not have the right to reproduce such software for use on more than one computer.

Employees may only use software on local area networks or on multiple machines according to the software license agreement. The College prohibits the illegal duplication of software and its related documentation.

Unless permission is granted by the Information Technology Department, employees are not permitted to install or copy software on College equipment. Only software that is licensed to or owned by the College is to be installed on College computers.

Network User Accounts

To utilize the Mitchell College network, the College requires all users to log on with the accounts that have been provided to them by the Office of Information Technology. Users are strictly prohibited from sharing user account information with others or using someone else's user account, with or without their permission. Any users suspecting unauthorized use of their accounts are responsible for changing their passwords and/or contacting the Office of Information Technology through the help desk to have their accounts temporarily or permanently disabled.

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Appropriate Use of Information Systems

- Users are responsible for using the College Information Systems in an efficient, ethical, and lawful manner. Usage that conflicts with this policy is prohibited, and includes, but is not limited to, the following: Supporting commercial interests not related to the work of the College.
- Initiating or propagating electronic chain mail, commercial mailings, or other mass mailings in violation of the CAN-SPAM Act of 2003.
- Intentionally introducing viruses, worms, Trojan horses or other malicious activity.
- Engaging in any activity that interferes with the proper operation of the College Information Systems.
- Installing software on College computers without the authorization of a Domain Administrator.
- Tampering or interfering with the intended use of the College Information Systems.
- Engaging in any unauthorized activities that result in monetary charges to the College.
- Using the College Information Systems to convey fraudulent, defamatory, harassing, obscene, or threatening messages or material and/or any communications prohibited by law.
- Using the College Information Systems to engage in illegal file sharing or any other illegal activities.

Non-commercial, Personal Use

Mitchell College acknowledges that users of the College Information Systems may engage in non-commercial, personal use (e.g. personal email). Such use is permitted within the following guidelines:

- Use does not interfere with the performance of any user's college-related responsibilities.
- Use does not interfere with the performance of the College Information Systems.
- Use is not otherwise prohibited by this policy, by other College policies, or by law.

Electronic Harassment

The College has set forth explicit policies in the student and faculty/staff handbooks regarding harassment. Harassment within the context of the College Information Systems is prohibited and all incidents will be dealt with appropriately.

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Privacy

The College acknowledges its responsibility – pursuant to this policy, the Family Educational Rights & Privacy Act (FERPA), the USA Patriot Act of 2001, U.S. Privacy Act, and the Electronic Communications Privacy Act (ECPA) – to respect the privacy of students’ electronic files and communications within the College Information Systems. However, users of these Information Systems should be aware of the inherent limitations of shared information system resources. The College cannot guarantee the privacy or confidentiality of stored information or electronic communications.

At all times, the College has the right to monitor and access a user’s communications, files, stored information, and activities using the College Information Systems pursuant to state and federal law and College policies.

If the College monitors or accesses a user’s files, communications, or activities using the College Information Systems, it will respect that which is privileged or otherwise protected from disclosure by law.

Sanctions

Violation of these policies may result in the temporary or permanent disabling of the user account, depending on the severity of the offense. Other sanctions, up to and including dismissal and/or termination and prosecution under state and federal law, may apply.

Installation of Personal Wireless Access Points

PURPOSE

To eliminate the installation of personal network attached devices such as wireless access points and routers that have not been approved by Mitchell College’s (Office of Information Technology) OIT department.

THE POLICY

OIT has located wireless access points (WAP) in the all campus buildings and in the residence halls. Mitchell College uses 802.11a/b/g and 802.11 b/g/n wireless access points. Wireless computing will be used to supplement the wired data system for the foreseeable future. Wired networking will remain essential for network speed and security.

OIT is responsible for managing all campus wireless network activities, therefore all Wi-Fi capabilities on the campus will be deployed by Mitchell College’s IT department or with permission from the Mitchell College IT department.

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Personally owned “consumer-style” WAP devices or Wi-Fi routers do not work well in residence halls and interfere with each other causing problems for other users and OIT. WAP’s that are improperly configured pose critical stability and security issues to our network and cannot be managed. Therefore, the installation of personally owned wireless access points is not permitted in any building on the campus.

PROCEDURE

All violations of this policy will be reported to the Office of Student Affairs so they can take the appropriate actions.

Network Account Security Policy

PURPOSE

This policy is designed to define the policy regarding password creation, management, and security.

THE POLICY

This policy is designed to ensure that data stored on Mitchell College computers and systems are protected through reasonable and appropriate use of password security. Users are responsible for safeguarding passwords for their user identification, and must not be shared.

Requesting New Mitchell Accounts (Faculty/Staff)

Network account creation is part of the new associate setup process. When the Support Center receives the “New Associate Setup” form the information is passed the appropriate teams for account and security creation. Without this form accounts are not created and will not exist. Default passwords are set at the same time for these accounts and the information is sent to their manager for proper distribution.

Requesting a New Mitchell Account (Student)

Network account creation is part of the student registration process. Once new students are deemed eligible for registering for classes a notification is sent to the Support Center. The Support Center submits the request to the appropriate departments for proper account creation. Default passwords are set at the same time for these accounts and the information is sent to their manager for proper distribution.

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Policy for Users When Changing Their Passwords

User must follow the rules below when changing their Mitchell network password:

1. Passwords must be changed every 90 days
2. Passwords must contain characters from three of the following four categories:
 - a. English uppercase characters (A through Z)
 - b. English lowercase characters (A through Z)
 - c. Base 10 digits (0 through 9)
 - d. Non-alphabetic characters (for example: !, \$, #, %)
3. Passwords must be changed while on campus and attached to the network
4. Passwords cannot contain the user's account name or parts of the user's full name that exceeds two consecutive characters
5. It must be at least eight (8) characters in length (Longer is generally better)
6. You cannot use the last 18 previously used passwords
7. It should not be the same as the user ID
8. It should not include the first, middle, or last name of the person issued the user ID
9. It should not be information easily obtainable about you. This includes license plate, social security, telephone numbers, or street address.

*Examples: P*ssword PasswOrd*

Account Removal/Deactivation

Network accounts are deleted upon request or when a person does not meet the enrollment or employment eligibility requirements.

Who is deactivated and when?

- Accounts for Staff are deactivated immediately after their last active day
- Accounts for Staff are removed 45 days after their last active day
- Accounts for Faculty are deactivated immediately after their last active day
- Accounts for Faculty are removed after 45 days after their last active day

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- All electronic files associated with deactivated Faculty or Staff accounts will be moved to an archive area or removed permanently depending on their supervisors direction
- Accounts for Students who leave Mitchell College prior to graduation will have their accounts removed immediately upon notification

Requesting a Network Password Reset (Faculty/Staff)

Faculty or Staff can request a network password be reset by calling the Support Center. The Support Center will validate two (2) pieces of information before resetting the network account password: The persons last 4 digits of their SSN and birth month/day.

This information is supplied to the Support Center and updated by the Human Resources. If for some reason the Support Center does not have this information the Support Center will contact the Human Resources Department for verification.

Network Password Reset (Students)

Students can reset their own network account passwords by going to the Mariner SharePoint site and selecting the “Student Password Reset” link and following the instruction or by calling the Support Center. In both instances student account ownership will be validated by requesting two (2) pieces of information: the Student Number and the last 4 digits of your SSN.

Student number is a 6 digits number printed under student's photo on the ID card.

PowerFAIDS Account Security Policy

PURPOSE

This policy is designed to define the policy regarding password creation, management, and security.

THE POLICY

This policy is designed to ensure that data stored on Mitchell College PowerFAIDS systems are protected through reasonable and appropriate use of password security.

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Users are responsible for safeguarding passwords for their user identification, and must not be shared.

Policy for Users When Changing Their Passwords

User must follow the rules below when changing their Mitchell network password:

1. Passwords must be changed every 90 days
2. Passwords must contain at least one (1) numeric character
3. Passwords must contain at least one (1) upper case character
4. Passwords must be changed while on campus and attached to the network
5. It must be at least eight (8) characters in length
(Longer is generally better)
6. You cannot use the last 18 previously used passwords
7. It should not be the same as the user ID
8. It should not include the first, middle, or last name of the person issued the user ID
9. It should not be information easily obtainable about you. This includes license plate, social security, telephone numbers, or street address

Account Removal/Deactivation

PowerFAIDS accounts are deleted upon request or when a person does not meet the employment eligibility requirements.

Who is deactivated and when?

- Accounts for Staff are removed immediately after their last active day

Requesting a Blackbaud Password Reset (Faculty/Staff)

Staff can request a PowerFAIDS password be reset by calling the Support Center. Since only a PowerFAIDS administrator can reset a password or an account the request will be forwarded to the administrator in order for the request to be completed. You will be contacted when the account has been reset or if additional validation information is required.

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Procedure for the Disposal or Relocation of Computer Equipment

PURPOSE

Defines the process that will be followed by OIT, the Business Office, Facilities, and the campus regarding the disposal of computer equipment.

THE POLICY

When it becomes time to dispose of a computer which contains or contained confidential information, or relocate it to another individual or another department, all confidential data must be removed from it. Note that it is the responsibility of OIT to perform the procedures defined in this document; questions may be directed to the Help Desk.

Data Removal and Cleanup

To ensure that all confidential data has been removed from a computer system and cannot be restored using data restoration tools, as well as to ensure that the computer is in compliance with all software licensing issues, all information on the hard drive should not only be deleted but also overwritten (also known as zeroing out the drive). This applies not only to computers being sold, donated, or otherwise disposed of, but also to machines going to another individual at Mitchell College as that individual is unlikely to have the same access rights to confidential information as the original user of the system. Simple instructions to overwrite the drive are available for both the PC and Macintosh.

For computers which will remain in use at Mitchell College, once the hard drive has been cleared, OIT can set it up for the next user.

For computers which will be donated to an off-campus organization or otherwise disposed of, only the operating system software originally received with the computer (on the original media) may accompany the system (to ensure licensing compliance). The installation of said operating system will be the responsibility of the receiving organization and not that of OIT.

The physical moving of any computers or peripheral devices (such as printers) is the responsibility of OIT.

Computer Hardware Resale

Computers which are past their useful life at Mitchell College may still be useful to other organizations that are willing to purchase them. Once a buyer has been identified, a Mitchell College Sales Agreement (on the SharePoint Forms site) must be filled out to accompany the sale. This form spells out the conditions of the sale including that the equipment is sold on an "as is" basis.

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Contact the Purchasing Department if assistance is needed in determining the fair market value of the computer being sold.

Computer Hardware Donations

Computers which are past their useful life at Mitchell College may still be useful to other organizations. If you think this may be the case, prior to the disposal of computers as per below, contact the charitable or non-profit organization of your choice. Note that these organizations also may have standards for minimum configurations of computers they will accept. The following website may be used to determine what organizations are accepting computer donations in our areas: www.useitagainpa.org

Once an organization has been identifying, a Mitchell College Transfer Agreement (on the SharePoint Forms site) must be filled out to accompany the donation. This form spells out the conditions of the donation including that the equipment is sold on an "as is" basis.

Computer Hardware Disposal Procedure

Computers, printers, scanners, and monitors must be discarded responsibly as they contain metals and other materials that can become hazardous to human health and the environment if not properly managed. The largest source of cadmium in municipal waste is rechargeable nickel-cadmium batteries, commonly found in laptop computers. Monitors and televisions contain a cathode ray tube (CRT), which contain leaded glass and are the largest source of lead in municipal waste. While there are regulations in place for organizations which deal in large quantities of these materials, and additional regulations are being proposed, as of now, the EPA has stated that smaller scale disposal of computers and monitors must be dealt with responsibly. This means that there are only two options - either donation or recycling.

PROCEDURE

OIT and Facilities Services have undertaken the task of disposing of obsolete computers for recycling. If a department has a computer to dispose of, the procedure is as follows:

All computers should be zeroed prior to disposal. (See above.)

- Call OIT or send them an electronic request notifying them of the need for computer or computer equipment disposal
- OIT will have someone pick up the computer(s)

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Use of Internet, Email, and Monitoring of Electronic Devices

PURPOSE

The policy outlined herein applies to all Mitchell College ("College") Information Systems users, whether or not they have permission to use the College Information Systems.

THE POLICY

In addition to adhering to this policy, employees are expected to follow information security procedures to safeguard College equipment and information. Failure to do so will result in disciplinary action up to and including termination of employment. Depending on the nature of the violation, action may also include civil or criminal prosecution under federal and/or state law.

Computer Internet Use

Computers, computer files, internet access, and software furnished to employees at Mitchell College are primarily for business purposes and employees are responsible for seeing that these systems are used in an effective, ethical, and lawful manner.

Downloading of any games, MPS files, and non-work related files from the Internet is prohibited. Downloading of any executable files or programs, which change the configuration of your system, by anyone other than the Information Technology Services staff is prohibited. Employees should also be cautious about opening e-mails and/or downloading attachments from unfamiliar senders, as viruses can result in corruption or damage to the files and/or unauthorized entry into Mitchell College's network.

Internet Access

Employees should not consider their use of the Internet to be private. The College may implement software and/or systems that can monitor and record all Internet usage. Security systems are capable of recording (for each and every user) each World Wide Web site visit, each chat, news group or e-mail message, and each file transfer into and out of our internal networks, and we reserve the right to do so at any time. Additionally, the College may utilize independently supplied software and data to identify inappropriate or sexually explicit Internet sites. We may block access from within our networks to all such sites of which we are aware.

We reserve the right to inspect any and all files stored in private areas of our network and/or an employee's College provided computer in order to assure compliance with policy.

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This College's Internet facilities and computing resources must not be used knowingly to violate the laws and regulations of the United States or any other nation, or the laws and regulations of any state, city or province or other local jurisdiction in any material way.

Any software or files downloaded via the Internet into the College network becomes the property of the College. Unless specifically related to processing business transactions, file downloads from the Internet are not permitted unless specifically authorized in writing by the Information Technology Department.

Electronic Mail ("e-mail")

Employees should be aware that e-mail is not private and messages can be retrieved even after they are deleted. Most e-mail systems instantly make back up copies of files, and copies may be easily retrieved by computer experts. The following are guidelines to follow when utilizing e-mail:

1. The e-mail system is not to be used in ways that are disruptive or offensive to others, or in ways that could be harmful to workplace morale.
2. There shall be no display or transmission of sexually explicit images, messages, or cartoons, or any transmission or use of cartoons and/or e-mail communications containing ethnic slurs, racial epithets, or anything that may be construed as harassment or disparagement of others based on their race, national origin, sex, sexual orientation, age, disability, or religious or political beliefs.
3. The information systems at the College are to be used for the business of the College. The e-mail system should not be used to communicate with others regarding commercial, religious, or political causes, etc. which are not work-related.
4. All e-mail messages are records of the College. The College reserves the right to access and disclose all messages sent over its e-mail system for any purpose.
5. Employees should not attempt to gain access to another employee's personal file of e-mail messages without the employee's express permission. However, the College reserves the right to enter an employee's e-mail files whenever there is a need to do so.

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6. Any violation of the College's policy on e-mail use will result in appropriate disciplinary action, up to and including, discharge.

Electronic Monitoring and Confidentiality

At any time, and without prior notice, Mitchell College reserves the right to examine (1) e-mail, (2) personal file directories, (3) all text, audio or images that an employee may place or send over the internet, (4) telephone records, (5) telephone calls, and (5) other information stored on Mitchell College owned electronic equipment. This examination helps to ensure compliance with internal policies, supports the performance of internal investigations, and assists the management of the Information Technology Services Department. Use of the Internet, e-mail, and telephone systems constitutes acceptance of such monitoring.

Mitchell College maintains the right to monitor the job performance and work behavior of its employees. Due to advances in technology, Mitchell College has available to it various forms of electronic monitoring.

Electronic monitoring is defined as collecting information on an employer's premises concerning employee's activities or communications by any means other than direct observation, including the use of computer, telephone, wire, radio, camera, electromagnetic, photo electronic or photo-optical systems. By the inclusion of this policy, Mitchell College is notifying all employees that it does or it may utilize all of the forms of electronic monitoring listed below, as appropriate to individual employees. The specific types of electronic monitoring that do or will occur include, but are not limited to:

- Accessing messages on individual employee voice mail.
- Accessing messages sent via e-mail or otherwise to or from a Mitchell College computer.
- Reviewing telephone bills and/or telephone records to determine telephone numbers called or the number of calls received, from where or whom, and the duration of calls.
- Reviewing employee usage of equipment including, but not limited to, photocopiers, fax machines, printers and computers.
- Review of computer systems to observe:
 - Times employee logged in and/or out from Mitchell College computers.

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- Addresses of internet locations accessed on Mitchell College computers.
 - Files saved or deleted by an employee on any Mitchell College computer.
 - E-mails sent and/or received by an employee using any Mitchell College computer.
 - The presence of any unauthorized hardware or software installation.
-
- Reviewing any data collected by any card key access system on any Mitchell College property.
 - Video surveillance of areas where Mitchell College property and/or supplies are stored, such as tool rooms, workshops, filing rooms and other storage areas.
 - Video surveillance of residence halls and/or other public spaces where the safety of students or visitors to the campus may require such surveillance.

This written notice of Mitchell College's intent to engage in specific forms of routine electronic monitoring, is provided and posted pursuant to Connecticut General Statutes § 31-48d. Pursuant to that statute, Mitchell College retains the right to engage in other forms of electronic monitoring, without specific written notice, when there is reason to believe that an employee or employees are engaged in conduct which violates the law, violates the legal rights of Mitchell College or its employees, or creates a hostile work environment.