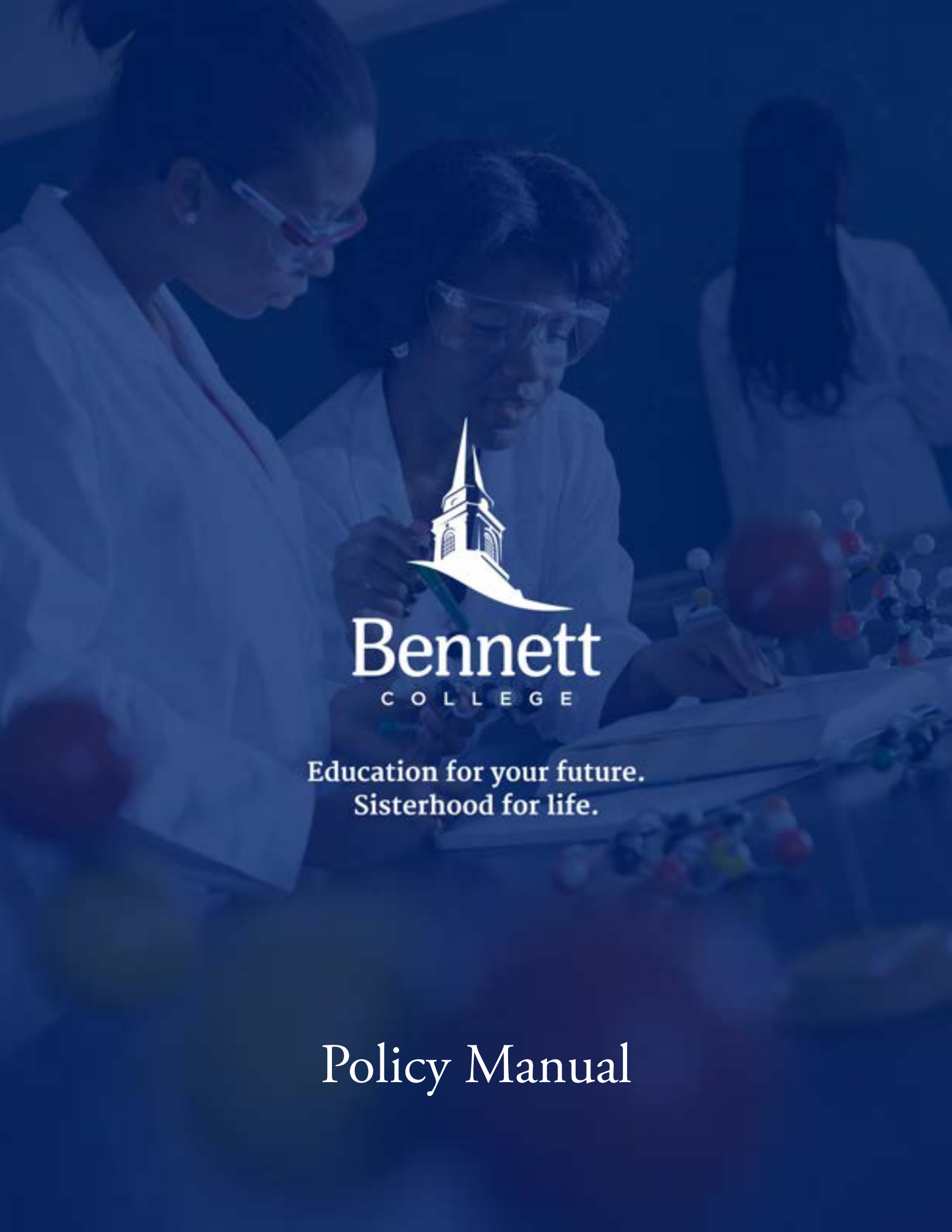

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POLICY DEVELOPMENT PROCESS

1. Rationale or Purpose	The Board of Trustees are responsible for the development, communication, and review of all College wide policies to improve communications, promote administrative consistency and efficiency and to ensure compliance with pertinent state and federal laws as well as accreditation requirements.
2. Policy Statement	The Bennett College Board of Trustees approves, issues, and maintains all college wide policies using a consistent process for the development, review and approval of policies. This college-wide process is intended to provide continuity, ease of access and understanding, and transparent guidance to the College.
3. Procedures	Each policy will consist of general and/or specific procedures required to ensure compliance with the stated policy
3. Scope	This policy on Policies governs the development and oversight of all institutional policies.
4. Roles/Responsibilities	Chair, Board of Trustees and President of the College are responsible for communicating and monitoring this policy. The Chief of Staff is responsible for developing procedures for this policy to ensure compliance.
5. References	Board of Trustees Policy Manual

Bennett College
Institutional Policies and Procedures Review Committee
Proposed Policy Review

Policy _____ Submitted by _____ Date_____

Comments

Recommendation(s)

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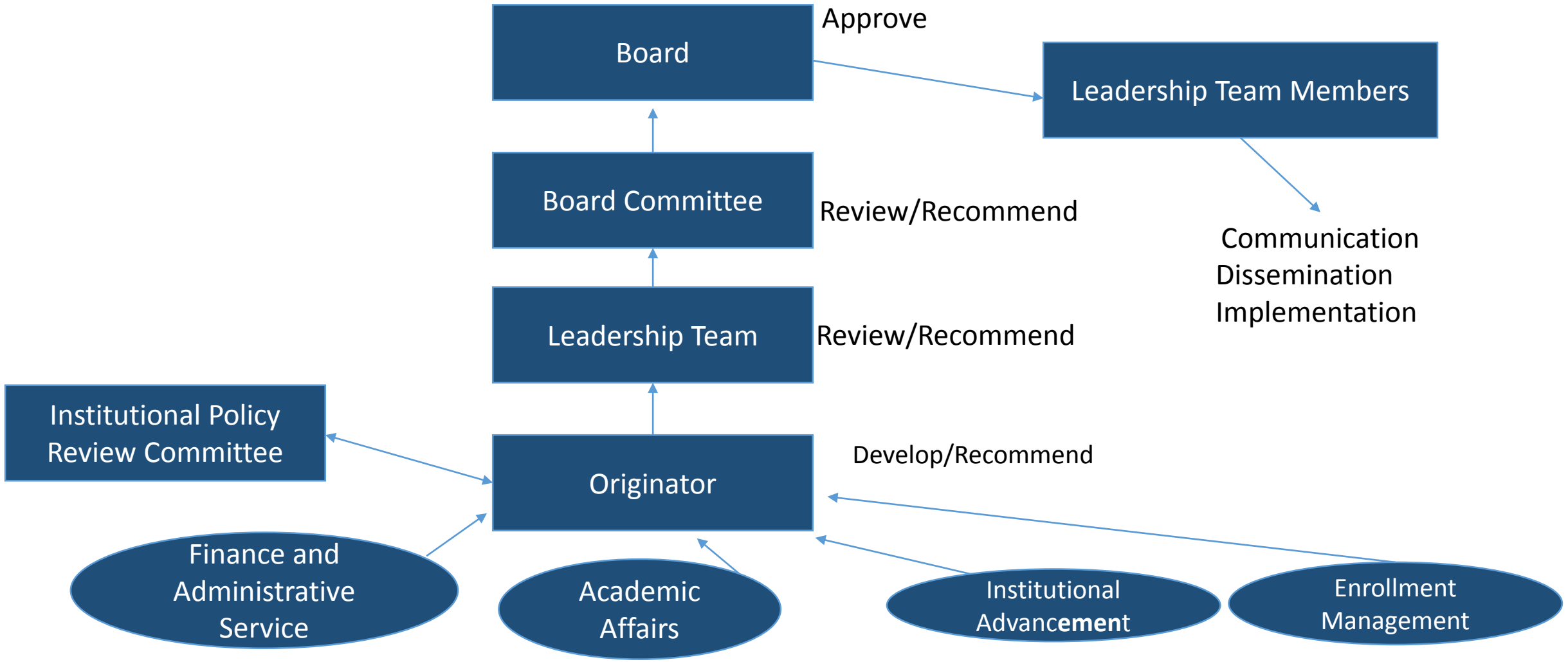
Policy Approval Process



Bennett College

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Board of Trustees Policy Number:	Date of Adoption/Revision:
BTRU 1.03	1/24/2014

SUBJECT	POLICY ON POLICIES
AUTHORITY	Board of Trustees
APPLICABILITY	This policy applies to all constituents of the College responsible for the development and implementation of policies
PURPOSE	The purpose of this policy is to define the steps by which College policies are promulgated. Through a consistent policy process and format, the College can best ensure that institutional policies are consistent with our important academic mission as an institution of higher education; properly developed and regularly updated to remain compliant with the accrediting and regulatory agencies; easy to find, read and understand; and promote: • excellence in our work; • respect and responsiveness to our academic environment; • operational efficiencies and best practices across the College; • compliance with applicable laws; and • compliance with generally accepted accounting and reporting standards.

POLICY	The Bennett College Board of Trustees approves, issues, and maintains all policies using a consistent process for the development, review, and approval of policies. This college-wide process provides continuity, ease of access, and understanding and transparent guidance to the College.
PROCEDURES	The procedures for formulating and reviewing College policies may vary depending on the primary constituency for the policy, institutional traditions and bylaws, as well as relevant external legal constraints. For example, academic policies, in particular those appearing in the Faculty Handbook, normally are reviewed by the Faculty Senate. Each policy should be drafted in the format provided and should identify the Issuing Authority for and Applicability of the policy, the Adoption/Revision Date of the policy, and should include the following sections: a Statement of Policy, Purpose, Procedures for Implementation, Definitions (where applicable), and Related Policies (where applicable). Prior to adoption of a policy, a review must be conducted by the offices directly responsible for implementing any substantive aspect of the policy. After all

	these reviews have been completed, the draft policy is submitted by the member of the Senior Team, who is the Issuing Authority to the Senior Team, for final review prior to referring the policy to the Board of Trustees for review and approval. College policies may be submitted to the Board and/or a duly authorized committee of the Board by the President and/or appropriate Committees of the Board of Trustees or as otherwise provided by the Board of Trustees Bylaws. **Publication and Distribution of Policies** The Responsible Officer for each College Policy is charged with submitting approved policies and procedures to the Institutional Policies and Procedures Committee for publication on the College website and by other means as deemed appropriate. The Institutional Policies and Procedures Committee will provide assistance to the Responsible Officer with respect to the preparing the policy for distribution and publication of the policy. The Institutional Policies and Procedures Committee is responsible for creating and maintaining a central Bennett College Policy webpage with links to all College policies. **Amendments to University Policies** The Responsible Officer for each College Policy also is charged with keeping the policy up to date. Accordingly, the Responsible Officer should ensure appropriate review of the policy periodically, as necessary to assure that the policy reflects obligations imposed by current laws and best practices. The Institutional Policies and Procedures Committee will help assure that the Responsible Officers review and update policies as needed. Each policy will be reviewed on a timely basis in accordance with its date of adoption/revision. Except when the process or authority for making changes to a policy is included in the policy itself, amendments must follow the same process outlined above for initial issuance.

Replaces policy: *Date*

Board of Trustees Policy Number:	Date of Adoption/Revision:
BTRU 1.01	1/24/2014

SUBJECT	CONFLICT OF INTEREST
AUTHORITY	Board of Trustees
APPLICABILITY	This policy applies to the Board of Trustees, Faculty, Staff and other employees of the College
PURPOSE	The purpose of this policy is to ensure that the name, reputation, and integrity of the College is not compromised. The fundamental principle guiding the implementation of this policy is that no Board of Trustees member or employee should have or appear to have, any personal or financial interests, relationships or affiliations that conflict with the best interests of the College.

POLICY	It is the policy of Bennett College that in pursuing its mission, the College must conduct its business free of improper influence resulting from external financial relationships, personal interests, or affiliations that conflict with the best interest of the College. Common situations that might constitute conflicts of interest are: • Holding an interest in or accepting free or discounted goods from any company or organization that does, or is seeking to do, business with the College, by any employee who is in a position to directly or indirectly influence either the College's decision to do business, or the terms upon which business would be done with such company or organization. • Holding an interest in an organization that competes with the College. • Being employed by (including working as a consultant) or serving on the board of any organization that does, or is seeking to do, business with the College or which competes with the College. • Gaining personally, e.g., through commissions, loans, expense or travel reimbursements or other compensation, from any company or organization doing, or seeking to do, business with the College A conflict of interest may also exist when a member of an employee's immediate family is involved in situations described above.
PROCEDURES	• Board of Trustees members are required to disclose promptly all situations that involve actual or apparent conflicts of interests related to the College as situations become known.

	• Annually, the Board will be required to disclose interests known by them which may represent a conflict of interest signing a statement which affirms such person: a. Has received a copy of the conflicts of interest policy; b. Has read and understands the policy, and c. Has agreed to comply with the policy • The College should take affirmative measures annually to inform the Board of Trustees of major institutional relationships and transactions as to maximize awareness of possible conflicts. • It is the responsibility of the employee to report promptly any actual or potential conflict that may exist between the employee (and employee's immediate family) and the College to his/her supervisor. In the absence of disclosure, violations of the principles and standards contained in this policy statement may be subject to discipline, up to and including employee discharge. *Employees with decision-making authority will be required to acknowledge receipt of this policy and when applicable, disclose any existing or potential conflicts.* The President will have the final authority to determine the appropriate penalty for any policy violations.

Replaces policy: *Date*

Board of Trustees Policy Number:	Date of Adoption/Revision:
BTRU 1.02	1/24/2014

SUBJECT	AUTHORIZATION TO OBLIGATE THE COLLEGE
AUTHORITY	The Board of Trustees is responsible for delegating the authority to sign contracts to the President, who may choose to delegate this authority within limits to other College officials. The Office of the President is responsible for the monitoring of contracts and other agreements; developing and communicating procedures for obligating the college to the campus community; and reporting to the Board of Trustees all contracts and agreements enforced.
APPLICABILITY	This policy applies to all contracts where the College or, an area or unit on behalf of the College, is party to a contract (whether referred to as a contract, agreement, memorandum of understanding, or letter of agreement).
PURPOSE	The purpose of this policy is to establish, in writing, which officials of the College are authorized to sign contracts obligating the College, and the fiscal limitations for such contracts. This policy protects the college by defining the authority for signing contracts and other legally binding documents on behalf of the College.

POLICY

A. The College will only be bound by written contracts to which the College is formally a party; which have been reviewed and approved in accordance with this policy; and that have been executed by College officials who have specific contract signature authority. This policy applies to all members of the College community. The Board of Trustees thereby authorizes the President to enter into contracts, deeds, or leases between the College and another party within the limits prescribed below. The President, however, is permitted to delegate this responsibility to appropriate College officials with Board approval as follows:

Contract Signing Authority	Board of Trustees	President	CFO
Contracts >$250,000	X		
Contracts up to $250,000		X	
Contracts up to $50,000			X
Contracts over 5 years	X	X	
Contracts less than 5 years		X	X
Engagement of Auditors		X	
Engagement of Legal Counsel	X	X	
Facility Lease Agreements		X	

Contract Signing Authority	Board of Trustees	President	CFO
Academic Affiliations		X	
Sponsored Research/ Grants/Contracts		X	
Gifts Agreements> $25,000		X	

Authorized signatories must coordinate all special reviews; obtain all internal approvals; and ensure compliance with applicable University policies and state and federal law, directives and guidelines, prior to execution of a proposed contract.

B. Even though unwritten, oral agreements may be held by courts to be legally binding in certain circumstances, this Policy requires that all College contracts
    1. be made in writing,
    2. be reviewed by the College Counsel, and
    3. bear an authorized signature.

    Oral agreements are not permitted and will not be recognized or honored by the College.

C. If an individual signs a contract on behalf of the College, and has not been delegated signatory authority, that individual may be personally liable for the payment and performance of the contract, or for any damage caused to College.

Replaces policy:

Date

Board of Trustees Policy Number: **BTRU 1.04**

Date of Adoption/Revision: April 17, 2014

SUBJECT	**OFFICIAL SPOKESPERSON FOR THE COLLEGE**
AUTHORITY	Chair, Board of Trustees, President of the College
APPLICABILITY	Board of Trustees, Administration, Faculty, Staff and Students
PURPOSE	It is the goal of the Bennett College to maintain effective communications with the public, to convey the College's mission and ensure accurate information is provided to the public which may include college events, achievement, campus incidents, and issues of a controversial and/or sensitive nature.

POLICY	The Board of Trustees authorizes the Chair of the Board of Trustees is the official spokesperson for the Board and the President, or his/her designee, is the official spokesperson for the College and. In this role, he/she shall express the official college position on issues of college-wide significance.
PROCEDURES	1. All request for information pertaining to college events, achievements, campus incidents, and issues of a controversial and/or sensitive nature should be referred to the Office of the President for review and determination of appropriate response. 2. Based on the nature and extent of the request, the President and/or Chair of the Board of Trustees will determine the appropriate response and respondent to the inquiry. 3. Administrators, faculty and staff should consult with the Office of the President if they have questions about releasing information, particularly information of a sensitive or controversial nature. 4. Faculty and staff are encourage to give interviews to the media when asked and provide information on matters within their field of expertise in a timely and courteous manner. The Office of Public Relations/Communications will coordinate all requests for interviews. 5. Copies and other documentation of interviews should be sent to the Office of Public Relations/Communications.

Replaces policy:

Date

Board of Trustees Policy Number:	Date of Adoption/Revision:
BTRU 1.05	April 17, 2014

SUBJECT	EMERITUS STATUS
AUTHORITY	President's Office
APPLICABILITY	Retired Bennett College trustees, administrators, and employees.
PURPOSE	The award of emeritus status is intended as a special honor for College employees and administrators who have served with great distinction. Recognition as emeritus shall not be awarded as a matter of due course, and is granted only to those whose service has been most exemplary.
POLICY	**Part 1.** Emeritus status shall be granted to any employee or administrator who: 1. Separated, or will be separating within six (6) months of conferment, from the position with Bennett College; 2. Served a minimum of 10 years of full-time service at Bennett College; 3. Established a record of distinguished performance while employed in or holding a position at Bennett College; 4. Completed employment in the position in good standing; and 5. Is nominated by member(s) of his/her department/or unit. *(For persons who do not fall within the departmental structure, the nomination shall be initiated by the individual's immediate supervisor.)* **Part 2. Trustee.** The Board may elect a retiring Trustee for the honorary status of Trustee Emeritus who meets the requirements set forth in Part 1. Trustees Emeriti shall be entitled to receive notice of all meetings of the Board and attend and participate in designated meetings, but shall not have the right to vote. Trustees Emeriti may be invited by the Chair of the Board to sit as a member of any committee other than the Executive Committee. **Part 3. President.** The Board may confer by appropriate resolution the honorary office of President Emeritus upon a president or former president who meets the requirements set forth in Part 1. The Board of Trustees may grant (or deny) Emeritus Status on an exception basis. All persons designated as having Emeritus Status shall be accorded the

	following privileges: 1. Presentation of a certificate or resolution appropriate for framing. 2. Use of the title. 3. An identification card denoting Emeritus Status. 4. Listing in the college catalog and other appropriate directories. 5. Receipt of select campus publications upon request. 6. Eligibility to purchase a faculty/staff parking decal. 7. Faculty/staff admission to campus activities and events. 8. Inclusion in select ceremonies and events. **Responsibility of Recipients of Emeritus Status** Emeriti employees or administrators are expected to assist and support the College in their areas of competence, particularly in an advisory capacity, when requested to do so.
PROCEDURES	For administrators each nomination for emerita/emeritus status with an administrative title shall be accompanied by a succinct statement to the President providing evidence of distinguished performance in the form of a recommendation from the appropriate vice president, president or trustee. For vice presidents, the President will make the determination. For the President, the title of President Emeritus is bestowed by the Bennett College Board of Trustees. For Trustees, the title of Trustee Emeritus is bestowed by the Bennett College Board of Trustees. Emerita/emeritus status may be bestowed posthumously. The awarding of emerita/emeritus status is made once yearly, at commencement. The President will notify the individual in writing of the conferral of the title(s) to be awarded.

Replaces policy: *Date*

Board of Trustees Policy Number: **BTRU 1.06**

Date of Adoption/Revision: June 3, 2016

SUBJECT	Investment Policy
AUTHORITY	Board of Trustees
APPLICABILITY	All Bennett College managed investments
PURPOSE	The purpose of this policy is threefold: a)to protect the principal of gifts to assure continuation of the College's mission; b) to obtain a stable investment return that provides cash flows to meet the scholarship, educational support and other needs of the College; and c) to obtain growth of investments to mitigate the effects of inflation on the assets.

POLICY	The Bennett College Board of Trustees has overall fiduciary responsibility to ensure that all investable assets are invested prudently and in conformance with the North Carolina Uniform Prudent Management of Institutional Funds Act and with the requirements, if any, of the donor. The Board of Trustees delegates the authority to oversee the implementation of all investments to the Board appointed Investment Committee.
PROCEDURES	• The primary investment objective is to use a total return approach while exercising the degree of prudence and fiduciary care required for endowment funds of this type. • The Investment Committee will review the asset allocation policy as the needs of The Fund change. The target asset allocation will be based on The Fund's anticipated cash flow needs for the next year and the anticipated additions to and withdrawals from The Fund for the current year. • The target-spending rate will be five (5.0%) percent of the previous three (3) fiscal year-end average investment fund balances. The Board of Trustees will review and approve these withdrawals at least annually. • New monies designated for The Fund shall be invested following the strategy described in the guidelines. All gifts of liquid securities will be liquidated immediately upon

	receipt and invested according to the asset allocation in place at that time. If suitable, gifts may be immediately used for cash flow needs as the wishes of the donor may dictate and as determined by the College. • Specific guidelines for the criteria for management and reporting of all investment activities are provided in Appendix A of this policy.

Replaces policy: *Date*

APPENDIX A

BENNETT COLLEGE
INVESTMENT GUIDELINES

Investment Guidelines were established to assist with the management of the Investment portfolio, hereafter referred to as (The Fund) of Bennett College. These policies and guidelines apply to unrestricted and restricted funds of the College. The ultimate responsibility for managing The Fund shall rest with the Bennett College Board of Trustees (Board).

GENERAL INFORMATION AND DISTRIBUTION POLICY AND GUIDELINES

- The Fund is a tax-exempt fund established to provide income for the support of the mission of the College.

The guidelines address the need for future growth, inflation adjustment and spending requirements of The Fund's assets.

- The primary investment objective is to use a total return approach while exercising the degree of prudence and fiduciary care required for endowment funds of this type.

- The Investment Committee will review the asset allocation policy as the needs of The Fund change. The target asset allocation will be based on The Fund's anticipated cash flow needs for the next year and the anticipated additions to and withdrawals from The Fund for the current year.

- The target-spending rate will be five (5.0%) percent of the previous three (3) fiscal year-end average investment fund balances. The Board of Trustees will review and approve these withdrawals at least annually.
- New monies designated for The Fund shall be invested following the strategy described in the guidelines. All gifts of liquid securities will be liquidated immediately upon receipt and invested according to the asset allocation in place at that time. If suitable, gifts may be immediately used for cash flow needs as the wishes of the donor may dictate and as determined by the College.
-

DELEGATION OF AUTHORITY AND RESPONSIBILITY:

The ultimate responsibility for managing The Fund shall rest with the Bennett College Board of Trustees (Board). The Board has the fiduciary responsibility to invest The Funds prudently for the benefit of the College, as defined in the North Carolina Uniform Prudent Management of Institutional Funds Act (UPMIFA). The Board has delegated responsibility for the College's investments to its Investment Committee. The primary function of the Committee is to develop and recommend to the Board investment related policies as it deems appropriate for the benefit of the College.

Members of the Investment Committee shall not have or appear to have a conflict of interest that impairs or appears to impair the member's ability to exercise independent and unbiased judgment in the good faith discharge of his or her duties.

Duties of the Investment Committee:

- Will make regularly scheduled reports to the Board of Trustees by the committee chair.

- Will review the investment policies and make appropriate changes as necessary to meet the needs of the College.

- Will review the asset allocation policy and determine appropriate asset allocation ranges for the approved asset classes.

- Will set relative performance objectives for The Fund and review The Fund performance against the established objectives as well as set the risk level deemed suitable for The Fund.

- Establish and propose to the Board the spending policy for The Fund.

- Will retain highly qualified investment advisor(s) who will report to the Committee on their work under these policies as part of fulfilling the College's fiduciary responsibilities. The advisor(s) will assist with investment strategies, asset allocations, market trends, investment manager(s) and custodian selection, manager and custodian evaluation criteria, investment performance evaluations, and any other appropriate matters.

- Will review the work of the investment advisors as it relates to the stipulations of these guidelines.

- Will select and change investment managers, fund custodians and the investment advisors for The Fund as the Committee believes best fulfills these guidelines.

- May delegate authority to the investment advisor to make manager changes and or asset allocation shifts in the portfolio, within the bounds of this investment policy statement. Any such changes made by the investment advisor will be promptly communicated to the Committee.

RESPONSIBILITIES OF INVESTMENT MANAGERS

In general, the primary responsibility of each Investment Manager is to act as a "prudent expert" by investing in assets in accordance with the investment policies described in this document and in accordance with its own judgments concerning relative investment values. Each Investment Manager is responsible for making investment decisions in a discretionary manner, within the asset allocation guidelines established by the Board of Trustees through the Investment Committee.

The specific duties and responsibilities of each Investment Manager include:

- Managing the assets of The Fund within Investment Policies and Guidelines.

- Exercising investment discretion in regard to buying, managing and selling assets held in the portfolio, subject to any restrictions contained in this investment policy.

- Maintaining all state and federal registrations necessary to manage the assets of The Fund.

- Notifying The Fund of any legal action taken against the manager(s), any arbitration involving the manager(s), or any judgments against the manager(s) or any of its employees.

- Keeping records of all proxy votes if the voting of such is their direct responsibility.

- Providing quarterly performance reports that are within the industry standards and in a format that is acceptable to the Investment Committee.

INVESTMENT ADVISOR RESPONSIBILITIES:

The primary role of the Investment Committee's Investment Advisor is to provide objective, third party advice and guidance.

The specific duties and responsibilities of the Investment Advisor are:

- Assisting the Investment Committee in making well informed and educated decisions regarding the investment of Bennett College assets.

- Assisting the Investment Committee in the development of investment policy guidelines that reflect the Committee's tolerance for risk and rate- of-return objectives.

- Assisting the Investment Committee in the development of an Investment Manager structure that provides adequate diversification with respect to the appropriate number and types of Investment Managers.

- Assisting the Investment Committee with identifying the appropriate benchmarks and manager style groups for manager comparisons.

- Maintaining proper due diligence on a database of qualified Investment Managers for use within the fund.

- Assisting the Investment Committee in monitoring each Investment Manager and the total fund on an ongoing basis.

- The Investment Committee may grant discretion to the Investment Advisor for responsibilities such as manager selection, asset allocation and/or portfolio rebalancing within the guidelines of this document. Any such discretion will be clearly documented and agreed upon by the Investment Committee and the Investment Advisor.

INVESTMENT CRITERIA:

The objectives of Bennett College Endowment Funds are to maximize return within reasonable and prudent levels of risk. Bennett College seeks appreciation of assets, inflation adjustments and spending requirements under these policies. In accordance with this policy, The

Fund will seek to diversify across appropriate asset classes and styles in order to achieve a diversified portfolio.

As a general guide, the implementation of the asset allocation will follow the Consulting Group's (or successor) Global Investment Committee tactical recommendations for moderately conservative to moderately aggressive portfolios. Specific choices will be based on guidance about the market outlook contained in the monthly Research Report of the Consulting Group, Global Investment Committee.

ASSET ALLOCATION:

The strategic asset allocation policy may use any of the following broad asset classes:

- Domestic Equities
- Foreign equities from developed and emerging economies
- Fixed Income (Domestic and Foreign)
- Cash Equivalents

In addition, the following investments may be considered for The Fund:

- High Yield Bonds
- Alternative Investments
- Real Estate Investment Trusts

EQUITIES

The equity allocations may include the following styles. Additional styles may be approved as the Committee decides.

DOMESTIC LARGE CAPITALIZATION EQUITIES GROWTH ACCOUNT:

This asset class seeks to provide capital growth by investing primarily in common stocks and securities convertible into common stocks. The manager should invest in equities with long-term growth potential. Growth may be considered either appreciation of the security itself or growth of the company's earnings or gross sales. Any income will be entirely incidental to the objective of capital growth. Securities considered for this portfolio will normally have price-to-earnings ratios that are higher than the market average and dividend yields that are less. The appropriate benchmark for this portfolio is the Russell 1000 Growth Index.

DOMESTIC LARGE CAPITALIZATION EQUITIES VALUE ACCOUNT:

This investment type seeks to provide appreciation of the asset base by investing primarily in common stocks of companies that are under-valued by the market. Value may be considered either on a relative low price-to-earnings multiple, out-of-favor industries with future appreciation potential, special situations in which companies are temporarily out of favor in the market, but are still quality firms, or firms whose value has not yet been recognized by the market. Typically, value investing generates a portfolio with a higher dividend yield than the market and a corresponding lower price-to-earnings ratio. The appropriate benchmark for this portfolio is the Russell 1000 Value Index.

SMALL AND MID CAP GROWTH DOMESTIC EQUITIES ACCOUNT:

This portfolio is intended to be invested in smaller rapidly growing companies. Excessive volatility is acceptable given the potential for long-term returns. The appropriate benchmark for this portfolio is the Russell 2000 Growth Index.

SMALL AND MID CAP VALUE DOMESTIC EQUITIES PORTFOLIO:

The purpose of this portfolio is to provide exposure to smaller established corporations for return and diversification. Value may be determined by low P/E multiples, low price-to-book multiples, or any other common means of valuation deemed prudent. The appropriate benchmark for this portfolio is the Russell 2000 Value Index.

SMALL CAP CORE EQUITIES

Given the relatively small allocation to small cap equities, either growth or value, the Investment Committee may decide to combine the approaches with a single small cap core manager. The appropriate benchmark for this portfolio is Russell 2500 or 2000.

FOREIGN/INTERNATIONAL EQUITY ACCOUNT:

The objective for these securities is the same as for domestic equities, appreciation and income from either growth or value strategies. Generally, the allocation to equities from developed countries will predominate over equities from emerging markets, reflecting the greater volatility of emerging market equities. The additional risk factors of foreign stocks (currency risks, political risks, liquidity risks) should be weighed against the increasing importance of foreign economies and the relatively high, long term growth rates of emerging markets. The

appropriate benchmark for developed countries equities is Morgan Stanley Capital International All Country World Excluding US (MSCI AC WD xUS) Index and emerging markets Morgan Stanley Capital International Emerging Markets (MSCI EM) Index.

FIXED INCOME:
Security types may include:

- U. S. Government Securities
- U. S. Agency Securities
- Corporate Securities
- Mortgage-Backed Securities
- Certificates of Deposit
- Preferred Securities
- International securities, from developed and emerging countries
- High Yield Securities

The fixed income securities of The Fund should be well diversified, provide a dependable source of income, and reduce the volatility of The Fund. Taken as a whole, the rating of the securities should be at least an "A". The average maturity should be less than ten (10) years. High yield securities and international securities, taken together, should make up no more than ten (10%) percent of The Fund. Performance should be measured against the Barclays Aggregate Bond Index.

INVESTMENT GRADE FIXED INCOME ACCOUNT:

The purpose of this account is to provide diversification and a highly predictable, dependable source of income. Fixed instruments should reduce the overall volatility of the account's assets and provide a deflation hedge. 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. The funds within this portfolio are not necessary for the immediate operation of Bennett College. Prudent total return consisting of both capital appreciation and interest income is expected from the manager(s). Liquidity will be managed through the use of readily marketable securities and adherence to the fixed income specifications outlined in the Investment Polices and Guidelines.

HIGH YIELD FIXED INCOME ACCOUNT:

The funds within this portfolio are designed to complement the other allocation to fixed income and shall be limited to five (5%) percent of the total Fund. The investment advisor will diversify high yield fixed income

securities shall be diversified appropriately among issues and sectors to avoid unnecessary risk from any single issuer or industry.

ALTERNATIVE INVESTMENTS PORTFOLIO:

Alternative investments represent an approach that seeks to provide diversification through innovative and flexible strategies such as the ability to short, add leverage and hedge. Investments in such vehicles are expected to provide diversification. They may reduce volatility or seek greater appreciation.

Diversification standards within each investment vehicle shall be according to the prospectus or trust document. Investments in these vehicles carry special risks. The Fund may utilize speculative investment strategies, trade in volatile securities, and use leverage in an attempt to generate superior investment returns. The Fund may invest in illiquid securities for which there is no ready market, and place restrictions on investors as to when funds may be withdrawn. There is no single benchmark for alternative investments.

REAL ESTATE SECURITIES PORTFOLIO:

To achieve diversification, the Fund may invest in a portfolio of real estate holdings through Real Estate Investment Trusts (REIT). Real estate holdings shall be diversified by property type, geographic area and management structure Investments in Refits should not exceed 10% of the Fund. The appropriate benchmark for this portfolio is the National Association of Real Estate Investment Trusts (NAREIT).

REBALANCING PROCEDURES:

One essential component of a strategic asset allocation policy is the development and use of rebalancing ranges for the target allocation. Each asset class shall fall within a range of value as designated below. This range shall be examined regularly, but not less often than quarterly, for allocations within tolerance levels. The Fund should be rebalanced whenever an investment style's actual allocation deviates significantly from its tactical target allocation.

Asset Allocation Ranges

	Min	Target	Max
Broad Allocation Targets			
Total Equities	50%	65%	80%

Total Fixed Income & Cash Equiv.	20%	35%	50%
Allowable Asset Class Ranges			
Large-Cap US Equities	15%	25%	35%
Mid- and Small-Cap US Equities	5%	10%	15%
Developed International Equities	10%	20%	30%
Emerging Markets Equities	5%	10%	15%
Cash and Equivalents	0%	2%	15%
Investment Grade Fixed Income	15%	30%	45%
High-Yield Fixed Income	0%	3%	5%
Alternative Investments	0%	0%	15%

Alternative Investments and REITS may be added to The Fund by the Committee. Target allocations for other asset classes will be reduced.

PERFORMANCE STANDARD:

Benchmarks for various asset classes are as follows:

Large Cap Growth Domestic Equities	Russell 1000 Growth
Large Cap Value Domestic Equities	Russell 1000 Value
Small Cap Core Domestic Equities	Russell 2000
Foreign Equities	MSCI-AC WD X US
Emerging Markets	MSCI EM
Intermediate Fixed Income	Barclays Credit
Alternative Investments	None
High Yield Fixed Income	Barclays High Yield
Bond	
Real Estate Investment Trusts	(REIT) NAREIT

The primary purpose of The Fund is to achieve a rate of return that is above the combined rate of inflation and spending rate of the College. This measure of effectiveness shall be calculated over a full market cycle or a rolling five-year period.

The Committee will measure all accounts against the appropriate benchmark(s). Performance is expected to be in the upper third of comparable managers over a five-year period. The manager should, over the same rolling five-year period as above, achieve risk-adjusted returns that demonstrate value in excess of those obtained by the passively managed indexes mentioned above. (Example: A manager who takes equal risk, as measured by their standard deviation, to the index but

under-performs on a total return basis will be deemed as not having added value.) Risk measurements will be obtained by observing long-term statistics including alpha, beta, standard deviation, and a Sharpe ratio.

COMMUNICATIONS:

Each investment manager is required to provide The Fund and its investment advisor with periodic investment information as follows:

Quarterly:

- Time weighted rates of return for the quarter, YTD and since inception.
- Performance commentary that describes elements of quarterly performance to the sources of return.
- Strategy statement that describes current portfolio strategies.

As Develops:

- Any organizational developments that address changes to manager's organization, investment philosophy, decision-making process, financial condition, ownership or professional staff.

Pooled Funds:

The Fund recognizes that mutual funds/commingled funds guidelines are established by their trust documents/prospectus and that the Investment Guidelines have no bearing on fund policies. However, the Investment Committee expects that the Investment Advisor/Consultant will inform the Investment Committee if the trust document/prospectus or any such fund conflicts with the investment policy and guidelines.

EQUITY REQUIREMENTS:

Individual issues may not exceed five (5%) percent of the portfolio at cost per issuer unless the Investment Committee approves an exception.

No more than twenty (20%) percent of the portfolio may be invested in a single industry.

FIXED INCOME REQUIREMENTS:

Cash requirements will be set by the Office of Business and Finance during the fiscal year.

The Fixed Income Portfolio should be "A" rated or better.

GENERAL REQUIREMENTS:

Discretion will be given to the manager to buy and sell securities as a fiduciary on the behalf of The Fund.

Quarterly performance reports must be sent to The Fund and to the advisor within thirty (30) days following the quarter end.

ASSET ALLOCATION AND RE-BALANCING PROCEDURES

The Investment Committee will review the strategic allocation in each class, as well as the allocation to various approaches of managers within these classes, at least annually.

Cash flows into and out of the portfolio (i.e., new gifts and spending) shall be allocated to the investment managers each month in a manner that will rebalance the portfolio consistent with asset allocation policies. Rebalancing the fund will follow the strategic guidance of the Committee. Asset allocation reports will be provided to the Committee on a quarterly basis.

PERFORMANCE MEASUREMENT, MONITORING AND EVALUATION

Performances will be calculated on a quarterly basis by the Advisor.

In addition to reporting time-weighted total returns for each manager, a comparison is made with relevant market benchmarks as well as the composite returns for other money managers with similar philosophies. Managers should add value above these benchmarks over the long term. Reports will include historical data in order to evaluate short-term results against longer-term strategies.

GUIDELINES FOR CORRECTIVE ACTION

Corrective action should be taken as a result of an ongoing Investment Manager's review process. The following are instances where corrective action or termination may be in order:

- Major organizational changes in a firm, including any changes in portfolio managers, may require a new contract and interview process. Failure on the part of the Investment Consultant/Advisor to notify the Investment Committee of such changes is grounds for

termination. At all times, communication with the managers should be open and informative. Investment Consultant/Advisor should be willing and able to meet at least annually with the Committee.

- As part of the overall asset allocation strategy, the Committee will choose managers with certain styles and approaches to provide portfolio diversification. Therefore, it is critical that managers adhere to the original intent of the Committee at the time they are engaged. Any significant changes in investment approach may be grounds for termination.

- The Committee will not, as a rule, terminate a manager on the basis of short-term performance. If the organization is sound and the firm is adhering to the style and approach, the Committee will allow a sufficient interval of time over which to evaluate the performance. The Committee's consultant/advisor will provide insight regarding the appropriate length of time. The manager's performance will be viewed in light of the firm's particular style and approach, keeping in mind at all times The Fund's diversification strategy and other organizational and relationship issues.

- Investment Managers may be replaced at any time as part of the overall restructuring of The Fund.

- Other events or circumstances that are deemed to be in the best interest of the College.

ENDOWMENT SPENDING GUIDELINES

Generally, the College will allocate five (5%) percent of the three (3) year value of the Fund for spending. The Investment Committee may make exceptions.

GIFT ACCEPTANCE POLICY (Bennett College Policy 8.01)

It is anticipated that from time to time the College will receive gifts in the form of marketable securities. In such event, the Investment Advisor in consultation with the Office of Business and Finance and the President will liquidate the securities as soon as possible. In the event that the securities are restricted from sale for a designated period of time due to regulatory reasons, the College will hold said securities until the restricted period has elapsed and then liquidate the securities as soon as possible thereafter. The College will make no attempt to add value to The Fund by holding gifted securities.

CUSTODIAN AND DEPOSITORY ACTIVITIES

The custodian and depository activities for The Fund, including agreements with any banks for the temporary, short-term investment of cash and equivalents, will be subject to annual review by the Investment Committee to assure that the College is receiving competitive rates and services.

This Investment Policies and Guidelines have been formally adopted by the Board of Trustees of Bennett College effective as of the date shown below. This policy statement will replace any and all existing investment policies for the College.

This policy and guidelines were approved by the Bennett College Board of Trustees on June 3, 2016.

Board of Trustees Policy Number:	Date of Adoption/Revision:
BTRU 1.07	January 28, 2017

SUBJECT	**Awarding of Honorary Degrees**
AUTHORITY	Board of Trustees
APPLICABILITY	All potential candidates for the awarding of Honorary Degrees
PURPOSE	To ensure a systematic and equitable process for awarding honorary degree.

POLICY	Bennett College will award honorary degrees on a selective basis to distinguished individuals who merit special recognition for genuine achievement and distinction in a field or activity consonant with the mission of the College. Recipients of Bennett College honorary degrees should reflect the College's high ideals and values, should enhance the reputation of the College, and should exemplify the concepts of excellence, service, and integrity. Honorary degree recipients are encouraged to assist the College in whatever way they consider most appropriate. The Board of Trustees may authorize the award of an honorary degree which are: Doctor of Arts (D.A.) – Design, visual, or performing arts; Doctor of Humane Letters (L.H.D.) – Service to society (humanitarianism) and scholarship in the humanities, journalism, or social sciences; Doctor of Laws (LL.D.) – Law, public policy, and public service; Doctor of Science (Sc.D.) – Science, medicine, engineering, and related fields.
PROCEDURES	1. The chair of the Honorary Degree Selection Committee of the Faculty Senate solicits nominations of persons to be considered for the award of an honorary degree in September of each year. Nominations may come from a variety of sources including Board of Trustees, Faculty, Staff, Students, and Alumnae, and must be submitted through the office of a dean or the President. Letters of nomination should outline the nominee's qualifications and the reasons why Bennett College should consider awarding an honorary degree to the nominee. 2. The Honorary Degree Selection Committee assesses the nomination letters, requests additional supporting materials if appropriate, and forwards a list to the Faculty Senate. The full Faculty votes on each nomination, and forwards recommendations to the Office of the Provost. 3. The Provost presents candidates for honorary degrees to the Academic Affairs Committee of the Board of Trustees. The Committee reviews the nominees and formulates recommendations to the full board. 4. Nominations and discussions of nominees will be confidential throughout the process. No publicity shall be issued regarding nominees until final approval by the Board of Trustees.

	5. The full board will evaluate nominees, and approve them, if there is consent by 2/3 of all trustees present and voting. This process must take place three (3) months in advance of the May Commencement. 6. The board may decide to make an exception to this process if there is consent from 2/3 of trustees. 7. The President contacts honorary degree nominees and makes arrangements for the honorary degree to be conferred at the May commencement. 8. While the number of nominations is not limited, except under unusual circumstances when the Board of Trustees determines otherwise, no more than two honorary degrees will be awarded per commencement. 9. The College may award an honorary degree to an approved candidate at any time within two years of the Board's granting of that approval. After that time, the Board must re-approve the candidate in order to award the honorary degree 10. Except under unusual circumstances when the Board of Trustees determines otherwise, an honorary degree recipient shall not receive a speaker's fee or honorarium for accepting an honorary degree or delivering a commencement address or the equivalent. 11. No honorary degree shall be conferred unless the recipient is present.

Replaces policy: *Date*

Board of Trustees Policy Number:	**Date of Adoption/Revision:**
BTRU 1.08	January 28, 2017

SUBJECT	Confidentiality Policy
AUTHORITY	Bennett College Board of Trustees
APPLICABILITY	Bennett College Board Trustees and Senior Leadership Team
PURPOSE	The purpose of this Policy is to ensure that confidential matters brought before the the Board of Trustees or any Committees of the Board are not disclosed until disclosure is properly authorized.
POLICY	All Bennett College Board of Trustees and Senior Leadership Team members will agree to: (i) use the Confidential Information solely for the purpose of exercising his or her obligations to the College in his or her capacity as a member of the College's Board of Trustees and Senior Leadership team and for no other purpose, (ii) the Confidential Information will be kept confidential, and (iii) Trustee and Senior Leadership Team member will not disclose any of the Confidential Information in any manner whatsoever, provided, however, that Trustee and/or Senior Leadership Team member may make any disclosure of the Confidential Information to which the College gives its prior written consent. Trustee and Senior Leadership Team member agree to use no less than a reasonable standard of care, to safeguard and protect the confidentiality of the Confidential Information. Trustee and/or Senior Leadership Team member will promptly notify the Chair of the Board of Trustees of any unauthorized use or disclosure of Confidential Information in violation of this Agreement.
PROCEDURES	1. *Confidential Information* means all information provided by the College to Trustee and Senior Leadership Team concerning the College's business, financial condition, operations, assets and liabilities, in whatever form, that is not generally known by or available to the public. Confidential Information includes, but is not limited to, the following: (i) information regarding individuals as to their suitability for membership on the College's Board of Trustees or a committee thereof and/or their potential ability as a financial contributor to the School; (ii) information concerning personnel matters of all types; (iii) building plans; (iv) budgets, financial, and fundraising plans; (v) information regarding grants or contributions (or potential grants and contributions) to the College; and (vi) mailing lists and

Board of Trustees Policy Number: **BTRU 1.09**

Date of Adoption/Revision: March 19, 2018

SUBJECT	**PRESIDENTIAL TEMPORARY ABSENCE**
AUTHORITY	The Board of Trustees (BOTs) shall be responsible for implementing this policy and its related procedures.
APPLICABILITY	This policy applies to the position of President
PURPOSE	The purpose of this policy is to be prepared for temporary absence of the President of the College – either planned or unplanned – to insure the stability and accountability of the College until such time as the President returns. The purpose of this policy is also to implement a plan to address the need to have interim leadership in case of temporary incapacity of the President.
POLICY	To insure the College's operations are not interrupted in case of temporary prolonged absence of the President due to illness, vacation, extended travel or other unforeseeable circumstances. If the temporary situation becomes permanent the Board of Trustees will refer to its succession policy. The Acting President shall ensure that the College continues to operate without disruption and that all commitments previously made are adequately executed.
PROCEDURES	Definitions: Acting President: The term traditionally used when a position is filled on a short-term basis by an internal appointee. The expected length of the acting appointment should not exceed 30 days. Any situations requiring the Acting President to continue beyond this period shall require the Board of Trustees to operate under its Succession Policy.

Procedures for Appointment:

In the event the President of Bennett College is absent from the College for extended periods due to illness, extended vacation or extensive travel or the like, the executive committee of the

BOTs shall do the following:

1. Within 5 business days appoint an interim President according to the following line of succession:
    a. Provost
    b. VP for Fiscal Affairs
2. The Provost will make decisions about day to day operations of the College.
3. Any decisions regarding financial, contractual, legal or binding commitments/documents shall be referred to the Chair of the Board, who will collaborate with the appropriate Committee Chair (i.e., Finance, Investments, Audit, etc.) and/or College Attorney to determine the appropriate course of action.
4. Any such decisions will require a signature of the Board Chair along with the Interim President; and must be documented and transmitted to the President's files and the Board of Trustees File.

College Fiscal/Contractual/Signatory/Communications Responsibilities:

5. Fiscal and contractual responsibilities will be discussed with the VP for Finance and the Finance Committee Chair, who will transmit items to the Board Chair for approval. No contracts will be signed by staff, in the absence of the President, unless approved in writing by the Board Chair.
6. All contracts, memoranda, etc. that obligate the College must be reviewed and signed by the Board Chair (with appropriate legal or fiscal consultation)

Communications/Public Relations:

1. The Provost shall consult with the Board Chair regarding issues that require a formal statement of position or communications to the Public, Funders, Contractors, etc.
2. The Board Chair must be available to assist the Provost with public engagements, etc. as requested or required to represent the College.

	a. Communicate with key stakeholders regarding actions taken by the board in naming an interim successor, appointing a transition committee, and implementing the succession policy. The College shall maintain a current list of key stakeholders who must be contacted. The Chair of the Board shall be the spokesperson for the College in this situation. b. Consider the need for consulting assistance (i.e., transition management or executive search consultant) based on the circumstances of the transition. c. Review the organization's business plan and conduct a brief assessment of organizational strengths, weaknesses, opportunities and threats to identify priority issues that may need to be addressed during the transition process and to identify attributes and characteristics that are important to consider in the selection of the next permanent leader. d. Establish a time frame and plan for the recruitment and selection process.

Date March 19, 2018 approved by Quorum of Board at its Special Call meeting

Board of Trustees Policy Number: **BTRU 1.10**

Date of Adoption/Revision: November 23, 2019

SUBJECT	Board of Trustees Self-Assessment Policy
AUTHORITY	Chair, Board of Trustees
APPLICABILITY	Bennett College Board of Trustees
PURPOSE	Effective board governance and accountability are achieved when trustees focus on a constructive board-president relationship, shared governance, strategic long-term issues, business models to ensure the College's long-term sustainability, and both internal and public interests in the value proposition of the College's mission in a very competitive higher education environment. The aim of this policy is to guide the Bennett Board of Trustees through an effective, well-developed self-assessment that objectively measures progress according to the benchmarks and highlights areas for board learning and improvement. The Board will use the evaluation results and board members' understanding, expectations and directions for progress to implement a focused leadership improvement action plan.
POLICY	The Board of Trustees (the Board) has established this policy on self-assessment to ensure a continuous quality improvement in providing effective governance and strategic leadership for one of the country's historic HBCU leaders in the education women of color. Qualitative and quantitative evaluations will be used to measure the Board's satisfaction with its services, processes, capacities and outcomes; to pinpoint improvement opportunities; and to establish an actionable plan that translates better fiduciary policies and practices into effective Board conduct.
PROCEDURES	C**omprehensive Process Evaluation** Every three years the Board will engage in a focused comprehensive evaluation of its operations, policies and practices considering the vision, expectations, goals and objectives it has established to move the College forward. • The Governance Committee is responsible for ensuring that the Board holds itself accountable for quality and improvement in governance performance and will accordingly outline the process, including

	scheduled dates, for board self-assessment in consultation with the Board Chair and President. • An outside consultant will recommend the appropriate assessment instruments, conduct the process, analyze the results, and report its findings to the Board of Trustees. • The Board and consultant will develop a continuous quality improvement plan based on the evaluation assessment results and board discussion. The plan will guide the work of the Board and its committees for the next three years. **Annual Board Evaluation** • At a time when dramatic changes and shifting policy issues on the higher education landscape are impacting the College's structure, finances and educational processes, the Board will annually measure the board's capacity to carry out annual board priorities and tasks. • The Governance Committee will be responsible for outlining the process, including scheduled dates, for board self-assessment in consultation with the Board Chair and President. • As necessary, the Board will modify its three-year continuous quality improvement plan based on discussion of its assessment of progress in meeting goals and expectations in a volatile, uncertain, complex and ambiguous higher education environment.

Replaces policy: *Date*

	contributor lists. Confidential Information does not include information that: (i) becomes generally available to the public other than as a result of an unpermitted disclosure by another board member; (ii) was available on a non-confidential basis to Trustee prior to the College's disclosure of such information to Trustee; (iii) becomes available to Trustee from a source other than the College provided such source is not bound by a confidentiality agreement with the College; (iv) is authorized in writing by the College to be released from the confidentiality obligations contained in this Agreement; or (v) is required by legal process 2. In the event that Trustee and/or Senior Leadership Team member is requested or required (by oral questions, interrogatories, requests for information or documents in legal proceedings, subpoena, civil investigative demand or other similar process) to disclose any of the Confidential Information, he/she agrees to provide the College with prompt written notice of any such request or requirement so that the College may consult with Trustee with respect to taking steps to resist or narrow the scope of such request or legal process, seek a protective order or other appropriate remedy and/or waive compliance in whole or in part with the provisions of this Agreement. 3. All matters that are before a Board Committee are confidential unless they have been determined not to be confidential by the Chair of the relevant Committee following consultation with the Board Chair and the President. All matters that are presented to the Board in confidence remain confidential unless they have been determined not to be by the Board Chair. 4. When Trustee's term of service or Senior Leadership Team member employment stops, he/she shall, subject to applicable law and at its own expense, either promptly return to the College all originals and existing copies of any Confidential Information or by written notice, executed by Trustee, certify that such copies have been destroyed. 5. All Trustees and Senior Leadership Team members are required to sign the Bennett College Confidentiality Agreement immediately upon service or employment. (Attachments A – Board of Trustees and Attachment B – Senior Leadership Team)

Replaces policy: *Date*

Attachment A

BENNETT COLLEGE

Board of Trustees

Confidentiality Agreement

In the course of my service as member of the Board of Trustees, I may have access to confidential information concerning the College and their donors, alumni, employees, board members and information pertaining to the financial, administrative, and legal and governance aspects of the College.

I recognize that as a Trustee, I have a duty to protect Confidential Information from improper disclosure and agree that ensuring the privacy of the Confidential Information is of paramount importance and utmost concern. Any information or knowledge gleaned from my service as a Trustee for Bennett College will not be used for my professional or personal benefit. I further agree to take all steps necessary to ensure the maintenance of confidentiality of the Confidential Information.

To ensure confidentiality, I will:

- Exercise the highest degree of care in safeguarding Confidential Information against loss, theft, or other inadvertent disclosure.
- Not disclose Confidential Information, directly or indirectly, under any circumstances or by any means, to any third person without the express written consent of the Chair of the Board of Trustees or designee.
- Not copy, transmit, reproduce, lend, summarize, quote, or make any use of the Confidential Information.
- Return to the Chair of the Board of Trustees or designee all Confidential Information in my possession upon departure from the Board of Trustees. I will take all steps necessary to completely delete any Confidential Information I received in electronic form from any electronic storage device in my possession (including email accounts).

_____ _____

Signature Date

_____

Print Name

Attachment B

BENNETT COLLEGE
Senior Leadership Team

Confidentiality Agreement

In the course of my service as member of the Senior Leadership Team, I may have access to confidential information concerning the College and their donors, alumni, employees, board members and information pertaining to the financial, administrative, and legal and governance aspects of the College.

I recognize that as a Senior Leadership Team Member, I have a duty to protect Confidential Information from improper disclosure and agree that ensuring the privacy of the Confidential Information is of paramount importance and utmost concern. Any information or knowledge gleaned from my service as a Senior Leadership Team Member for Bennett College will not be used for my professional or personal benefit. I further agree to take all steps necessary to ensure the maintenance of confidentiality of the Confidential Information.

To ensure confidentiality, I will:

- Exercise the highest degree of care in safeguarding Confidential Information against loss, theft, or other inadvertent disclosure.
- Not disclose Confidential Information, directly or indirectly, under any circumstances or by any means, to any third person without the express written consent of the Chair of the Board of Trustees or designee.
- Not copy, transmit, reproduce, lend, summarize, quote, or make any use of the Confidential Information.
- Return to the Chair of the Board of Trustees or designee all Confidential Information in my possession upon departure from the College. I will take all steps necessary to completely delete any Confidential Information I received in electronic form from any electronic storage device in my possession (including email accounts).

_____ _____

Signature Date

_____

Print Name

Board of Trustees Policy Number:	Date of Adoption/Revision:
CADM 2.01	January 28, 2017

SUBJECT	Records Retention
AUTHORITY	College Administration
APPLICABILITY	All College Departments
PURPOSE	To develop a system for storage and disposal of College records that will ensure efficient retrieval, retention and destruction of records and comply with regulatory and funding agencies requirements

POLICY	Bennett College will adhere to the requirements accrediting, governmental and funding agencies and other applicable policies and procedures for the storage, retrieval and destruction of College documents by instituting the following: • Providing adequate storage for College records, • Establishing record retention and disposal schedules, • Supervising the collection and destruction of College records and • Developing procedures for the maintenance and retrieval of College records.
PROCEDURES	1. To develop a continuing program for the economical and efficient management of its records, including the establishment and/or revision of records retention schedules in order to ensure proper and orderly disposal of not required by the operations of the College 2. The College will adhere to the following records retention schedule to ensure the appropriate storage, retrieval and destruction of records: See APPENDIX A

Replaces policy:

Date:

Board of Trustees Policy Number: **CADM 2.02**

Date of Adoption/Revision: November 23, 2019

SUBJECT	Dissemination of Public Information
AUTHORITY	College Administration
APPLICABILITY	Bennett College Community
PURPOSE	Bennett College, its faculty, and administrative components actively pursue opportunities to inform the public about all aspects of the College's programs and services outside of the areas protected by state and federal privacy laws, and other areas exempted by the Freedom of Information Act (FOIA) or the Family Education Rights and Privacy Acts (FERPA). Providing information about the College is vital to our internal and external audiences and the College's ability to carry out its mission. This policy establishes the official guidelines for the dissemination of information for publication, broadcast through the mass media, or other public forums. The policy also provides specific guidelines to aid individuals speaking on behalf of the College. These guidelines are not intended to hinder open communication between College constituents and the public or news media. These guidelines are, however, intended to ensure a more accurate, consistent and reliable flow of information about College activities.

POLICY	Bennett College has a responsibility and a commitment to disseminate information about its programs and activities the public in a manner that ensures that the positions and statements of the College are represented accurately and consistently. Bennett College makes the following information available to students and the public through the institution's Catalog(s), website and/or other methods: academic calendar, grading policies, refund policies, admission policies, program requirements, and information regarding tuition and fees.
PROCEDURES	1. Faculty, staff, College-supported student organizations and/or individual College employees who release information to the public through mass produced publications, brochures, news reporters or other mass communication channels must provide this information to the Office of Strategic Communications in advance of distribution, if practical, or as soon after the release of information as possible. 2. In the case of releasing information via news releases or other channels regarding a gift, donation or donor, the Vice President for Institutional Advancement or designee in the Institutional Advancement Department is responsible for ensuring that all information is correct. It is the responsibility

	of the Director for Strategic Communications to prepare a news release regarding the gift, donation or donor for dissemination to media outlets, after said news release has been reviewed by the Vice President or designee. After the Vice President for Institutional Advancement or designee has approved the final news release, Strategic Communications will disseminate the information to the mass media. 3. Each division and/or department head assumes primary responsibility for any official public statements, announcements or advertisements issued through their areas of responsibility or their personnel. This responsibility may be delegated according to the needs and resources of each division and/or department. However, each division and/or department head must be informed about the release of public statements issued by division or department staff. Individual employees who disseminate information to a mass audience (via such means as advertisements, interviews with news reporters, etc.) must notify the division, and/or department head and the Office of Strategic Communications prior to such dissemination or, if that is not possible, immediately thereafter. 4. College employees should never give personal opinions as official College positions on particular issues. If asked by a news reporter to give an opinion about particular issues, services or programs, College employees should explain that giving personal opinions on behalf of the College is not appropriate or not a part of their responsibility. It is, therefore, advisable to decline comment and offer to direct the news reporter to the Provost/Vice President for Academic Affairs, division and/or department director or the Office of Strategic Communications. 5. It is appropriate for College employees involved in a newsworthy event to respond to news reporters about facts surrounding an event, such as a professional conference (sponsored by the College), commencement exercises, or scholarship fundraising events, etc. However, the information provided to reporters should be released in coordination with the staff person in charge of the event and the Office of Strategic Communications. 6. Information should be limited to the facts pertaining to the particular event or the safety and welfare of College students, faculty and administration. Information that may be sensitive or have implications relating to litigation or personal privacy should not be discussed. In addition, information or speculation that deals with broader issues or policies of the College should be deferred to the President's office, the department/division head and the Office of Strategic Communications. 7. All uses of the Bennett College logo and seal, tagline, wordmark, brand colors and any collateral (print, online or merchandise) promoting Bennett College such as advertisements, brochures, fliers, invitations, annual reports, promotional items, web design, videos, social media, etc., should be in compliance with the College's Public Relations and Communications Guideline and Procedures and must be approved by the Office of Strategic Communications.

Replaces policy: *Date*

Board of Trustees Policy Number: **CADM 2.03**

Date of Adoption/Revision: **November 23, 2019**

SUBJECT	Fraud and Abuse
AUTHORITY	College Administration
APPLICABILITY	All Bennett College property, resources or assets ("assets" encompasses property of all kinds, real and personal, tangible and intangible; including computer data, programs, software, and services).
PURPOSE	Employees, students or individuals representing the institution shall not engage in fraud and abuse, as outlined in state and federal law and regulation, or in practices or procedures that are designed or have the tendency to create a falsification or deceive students.

POLICY	Bennett College is committed to a strict policy regarding fraud and abuse. It will not engage in fraud or abuse and practices or procedures that are designed to deceive students or falsify information to students; nor will it tolerate any form of abuse and/or fraud in regards to college property, resources or assets. College Senior Leadership is accountable for setting the appropriate tone of intolerance for fraudulent acts by displaying the proper attitude toward complying with laws, rules, regulations, and policies. Senior Leadership should be aware of the risks and exposures inherent in their area of responsibility, be familiar with the types of improprieties that might occur, and be alert for any indication of irregularity.
PROCEDURES	• The Office of the President shall administer and oversee all investigations relating to fraudulent activities. • At a minimum, coordination and collaboration is expected with the college's Department of Campus Safety, College Counsel, Director of Human Resources, Chief Operating Officer, and other designated college officials

	• College employees and students are required to report suspected irregularities or possible fraudulent transactions to the Office of the President. • The Office of the President shall ensure that the proper authorities within the College have been notified as required by state and federal law and regulations. • Individuals reporting fraud are expected to be truthful, provide all the information they have knowledge of, and cooperate fully with those performing the investigation. • A sufficient initial investigation will be performed to determine whether a fraudulent transaction/s has occurred. • If a confirmed case of fraud is confirmed, the respective College Senior Leadership must submit a corrective action plan to the Office of the President within 30 days of receiving investigation recommendations to prevent future fraud of a similar nature. • Persons who are found in violation of this policy shall be disciplined up to and inclusive of termination.

Replaces policy: n/a

Date:

BENNETT COLLEGE APPENDIX A
RECORDS RETENTION SCHEDULE

Division/Area	Description	Retention	
Office of the President	Board of Trustees Policy Manual	Permanent	
	College Policies and Procedures	Permanent	
	Office of the President Policies and Procedures	Permanent	
	Minutes: Board of Trustees BOT Committees President's Staff College Council	 Permanent Permanent 7-10 years 7–10 years	
	College Committees: Compliance (Accreditation) Committee minutes Policy and Procedures Committee minutes Standing Committee minutes	 Permanent electronically Permanent electronically Permanent electronically	
	Communication /Correspondence	3 – 5 years	
	Report/Surveys/Analysis Accreditation Acquisitions Agreements	7 – 10 years Permanent Permanent Permanent	
	Legal Documents	Permanent	
Academic Affairs	All memos, letters, and emails from the academic Departments from department chairpersons.	7 years	
	Forms File (These forms are contained in binders.) Retain these forms are copies. The originals are submitted to offices The binders may contain some of the following documents: Timesheets, Purchase requisitions, Expense Reports, Search Authorizations/Position Descriptions/Vacancy Announcements, Budget Transfers, adjunct faculty contracts, faculty schedule cards, Office and Classroom Space assignments, Request for equipment, Overtime Authorization, Key Request, Facilities Request, Duplicating Services, Storeroom Requisitions, Postage Request, etc.	Retain for two years then destroy.	

	Student Grievances and Complaints	Retain for 5 years and destroy or until grievance is settled	
	Student Files Binder contains letters to and from students and copies of course substitutions and independent study forms.		
	Articulation Agreements - Articulation agreements with Local Education Agencies - Articulation agreements with 2 year and 4-year colleges and universities.	Permanent Permanent	
Human Resources	Personnel Records	Retain while active and for 7 years thereafter	
	I'9's	Retain while active and for 7 years thereafter	
	Faculty and Staff evaluations	Retain for 5 years in HR department and assigned department	
	Leave records and supporting documents	Retain while active and for 7 years thereafter	
	Worker's Compensation Records	Retain while active and for 7 years thereafter	
	Professional Development Records	Retain for 3 years	
	General Correspondence	Retain while active and for 7 years thereafter	
Information Technology	Administration (Faculty & Staff) Records: Files on User's Home Directory Files on Network Directories Email Messages Applications Files	 6 months 6 months 6 months 6 months	
	Student Records: Admission Forms Grades Transcripts Financial Aid Advising (GAP) Student Accounts Course Schedule Instructor Information Degree Audit	Permanent Permanent Permanent Permanent Permanent Permanent Permanent Permanent Permanent	
Finance	Financial Records: abandoned property records, account transactions, accounts receivable material, bad check records, bank books an statements, bank debit /credit card memoranda, cancelled check, cash income reports, cash register reports, cashier settlement sheets/certificates of deposits, billing transactions, charges to other units for services, check copies, contract items/transactions, credit card sales/receipts, deposits, vouchers, financial management system access forms, inventory data, journal vouchers, payroll	For College accounts, retain for 3 years and until audit requirements are met, then destroy. For federal and other sponsored accounts, retain for 5 years after close of contract or for 10 years after the date of record creation (whichever is less), then destroy. Retain accounts receivable material for 23 years after payment is received and until audit requirements are met, then	

	transfers, periodic financial reports, Perkins assignment, scholarship account records, special payments, student accounts material, student loan material, travel logs and supporting receipts, 1099 change forms and other financial material.	destroy	
	Approved Travel Requests and Expense Statements – documents evidencing appropriate approval to undertake travel on behalf of Bennett College on official business, and documents summarizing expenses for which personal funds have been advanced by the traveler on behalf of the College	For College accounts, retain for 3 years after the date of approval of travel request/expense statement and until audit requirements are met, then destroy. For federal and other sponsored accounts, retain for 5 years after the close of the contract or for 10 years after the date of approval of travel request/expense statement (whichever is less), then destroy.	
	Procurement Contracts – contracts proposal, master c o ntracts, construction and non-construction project contracts, freight rate contracts, moving contracts, and related documents.	Retain for 5 years after the close of the contract and until all audit requirements have been met, and then destroy	
	Procurement and Supply Vendor List – includes goods and services offered by responding vendors and indicates vendor identification of small business and minority business eligibility.	Retain until superseded, and then destroy.	
	Purchasing Records – purchase orders, requisitions, invoices, purchasing card transaction logs, Bennett College purchasing cardholder agreements, advertising and bid requests, bids and quotes, bid tabulation records, requests for proposal and vendor responses, notices of award of contract, and purchasing register.	For College accounts, retain for 5 years and until audit requirements are met, then destroy. For federal and other sponsored accounts, retain for 5 years after the close of the contract or for 10 years after the date of record creation (whichever is less), then destroy.	
	Property Files – material relating to the lease/purchase of property by the college.	Screen upon completion of lease or purchase and destroy that material for which no further reference is required. Remaining material with non-historical value to be retained for 15 years, and then destroyed. Remaining material with historical value to be document image permanent retention in the College's archives	
	External Audits	4 years or until findings are cleared	
	Budget Materials Annual working budgets, annual budget requests, budget amendments, budget histories, tuition revenue projections, indirect cost projections and other budget planning and management information	Retain for 3 years and until audit requirements are met	

	Inventory Material – records of capital and sensitive equipment including loan and disposal forms	Retain equipment loan and disposal forms for 3 years and until audit requirements are met, then destroy	
Payroll	Payroll Records- journals, statements of payroll charges, and other internal adjustment forms	For College accounts, retain for 3 years and until audit requirements are met, then destroy. For federal and other sponsored accounts, retain for 5 years after the close of the contract or for 10 years after the date of record creation (whichever is less)	
	Payroll deduction authorization forms	Retain for 3 years after the termination of deduction or employment whichever is first then destroy.	
	Pay reports W-2, labor distribution, check register by account and deductions taken.	Archive for permanent retention	
Sponsored Programs	Contract and Grant Files Records that document contracts and grants received from any source, including applications, proposals, agreements, research reports, publicity notices, acknowledgments and transfer of funds records, controlling rules and regulations, copy of periodic reports, correspondence, and memoranda.	Retain contract and grant files for 3 years after the close of the contract and after audit is concluded, then destroy. For federal and other sponsored contract and grant files, retain for 7 years after the close of the contract and after the audit is concluded, then destroy.	
	Sponsored Project Equipment Records – material used to prepare equipment reports for federal sponsors annually and when the account is being closed. Includes budget, purchase requisitions, purchase orders, inventory documents, and reports made to sponsoring agencies.	Retain in the Grant contract office for 6 years, then for 4 additional years in storage and until audit requirements are met, and then destroy.	
	Federal, state and local grants and contracts material Grant Applications Contract Bid Applications Letters of Intent Approval Letters or notices Executed Contracts Grant and Contracts Narrative Reports	Federal, state and local contracts and grant materials should be held for five years or the length of the grant or contract term.	
Publications, Statistical Data Documents and Institutional Reports	Crime Statistics Institutional Information (cost of attendance, withdrawal procedures, accreditations Catalogs Degree statistics Enrollment statistics Grade statistics Race/ethnicity statistics Commencement programs	3 years 3 years Permanent Permanent Permanent Permanent Permanent Permanent	

Facilities	Campus Maps – building names and numbers, topological surveys, steam lines, water lines, gas lines, electric service lines, telephone/video lines, sanitary sewer lines, storm sewer lines and central control and monitoring service	Retain permanently in Facilities Management Department.	
	As Built Drawings- as built drawings for all buildings	Retain permanently in paper form in Facilities Management Department. Convert to CDs when possible.	
	Campus and Project Photography – photographic documentation of general College campus (aerial, districts, landscapes, buildings, architectural features and projects including new, renovations and additions	Retain permanently in Facilities Management Department	
	Work orders and requests for Facilities Management Services	Retain for three years	
	Construction Documents – contract information, bid proposals, pre-bid documents, minutes, building permits, change orders/proposals, schedules, minutes, pay applications with supporting documentation, final punch lists insurance documentation and project close out documents	Retain permanently for historical value and audit purposes.	
	Hazardous Material and Environmental Safety Files – reports and other pertinent material related to asbestos, lab safety, lead, biohazards, incidence reports, permits hazardous waste removal and other pertinent materials and reports	Retain permanently in secure, fireproof location.	
Admissions	Admissions Data/Documents for Applicants **Who Do Not Enroll –** Acceptance letters, Advanced placement records Applications for admission Correspondence, Entrance examination reports/test scores (e.g., ACT, SAT) Letters of recommendation Medical Records Military documents Placement test scores and reports Readmission forms Other test scores Transcripts from high school and other college(s).	1 year after application term	
	Admissions Data/Documents for Applicants **Who Do Enroll** Acceptance letter Advanced placement record Application for admission Entrance examination reports/test scores Letter of recommendation Medical records Military Records Residency classification forms	Retain for 5 years after graduation or date of last attendance	
Registration/Attendance	Academic action authorizations Academic records	5 years after graduation or date of last attendance Permanent	

	Advanced placement and other placement test scored	5 years after graduation or date of last attendance	
	Applications for graduation	1 year after graduation or date of last attendance	
	Change in grades	Permanent	
	Student class schedules	1 year after graduation of date of last attendance	
	Degree audits	5 years after graduation or date of last attendance	
	Disciplinary action documents	5 years after graduation or date of last attendance	
	FERPA documents	5 years after graduation or date of last attendance	
	Financial Aid documents	5 years after graduation or date of last attendance	
	International/Foreign Students forms (I-20, passport number, etc)	3 years after graduation or date of last attendance	
	Grade reports	Permanent	
	Medical Records	5 years after graduation of date of last attendance	
	Personal Data Forms	1 year after graduation or date of last attendance	
	Withdrawal authorization	5 years after graduation or date of last attendance	

POLICIES *and* PROCEDURES

Board of Trustees Policy Number:	Date of Adoption/Revision:
ACAF 3.03	April 20, 2016

SUBJECT	**Student Identify Verification in Distance and Correspondence Education**
AUTHORITY	Vice President of Academic Affairs and Information Technology
APPLICABILITY	Distance Learning Courses/Programs
PURPOSE	An institution offering Distance Education as stated in Federal definitions must have a process in place to verify that the students who register in a distance or correspondence education course are the same students who participate in and complete the course, and receive the academic credit.

POLICY	Bennett College will ensure that the students who register in a distance education course are the same students who participate in the course, complete the course, and receive academic credit.
PROCEDURES	This procedure includes, primarily, a secure logon and password, acceptable use compliance, and faculty assurance. 1. Secure Logon: Before initially using their user IDs, students are required to login to the Bellnet Self-Service portal (https://bellenet.bennett.edu/ics) to set up their accounts and create individual passwords. Students use this secure user ID and password to access the university's learning management system. Students may change their passwords at any time; they are required to change their passwords every 90 days. Bennett College's Office of Information Technology is the office responsible for issuing secure usernames and passwords and for identity verification procedures. Students are not charged any additional fees for identity verification. 2. Acceptable Use Compliance: Individuals using Bennett's information technology resources must signify their agreement to comply with the Bennett College Acceptable Use of Information Technology Policy http://www.bennett.edu/board/ BOT_Acceptable_Use_of_Information_Technology_Policy. pdf) This policy forbids a user to share or use another user's ID and/or password. Individual user accounts are created for the sole use of one person, and each user of the learning management system is required to maintain the security of his or her user ID and password. 3. Faculty Assurance: Because technology and personal accountability are not absolute in determining a student's identity, faculty members are encouraged to design courses that use assignments and evaluations that support academic integrity. Changes in student behavior such as sudden shifts in academic performance or changes in writing style or language used in discussion groups or email may indicate academic integrity problems. Instructors are encouraged to use a variety of assessment instruments. As best practices suggest, faculty should routinely ask

	students to share in appropriate ways important ideas learned from texts and references, require research projects and paper assignments to be submitted in steps.
Note	**TRACS Requirement** 17.6 Verification of Student Identity: An institution offering Distance Education as stated in Federal definitions must have a process to verify that the student who registers for a Distance Education program or course is the same student who participates in, completes, and receives credit. Methods to verify the student include but are not limited to: 1. A secure login or passcode, 2. Proctored examinations, or new or other technologies and practices that are effective in verifying the identity of the student. Institutions must notify the student at the time of registration of any additional charges associated with the verification of student identity. (IER) - §602.17(g)1

Replaces policy:

Date

Board of Trustees Policy Number:	Date of Adoption/Revision:
ACAF 3.04	April 20, 2016

SUBJECT	CREDIT FOR PRIOR LEARNING (CPL) POLICY
AUTHORITY	Office of Academic Affairs/Enrollment Management
APPLICABILITY	All Bennett College students, especially non-traditional students
PURPOSE	Bennett College recognizes that learning is a lifelong process and recognizes knowledge is acquired in many different ways. In addition to the traditional classroom setting, mastery of college-level knowledge and skills may occur as a result of nontraditional learning experiences such as employment, military training and experience, non-collegiate training programs, advanced high school courses, and self-development. Bennett College awards applicable credits earned for nontraditional prior learning. This pathway saves the student time and money, shortening and/or easing the path to degree completion. **Definitions**: *Credit for Prior Learning* (CPL) is the knowledge and skills gained through work and life experience; through military training and experience; and through formal and informal education and training from in-state and out-of-state institutions including foreign institutions. For purposes of this policy, does not include regular credit-bearing courses from regionally accredited institutions of higher education, normally accepted for transfer credit or International Baccalaureate (IB) or Advanced Placement (AP) credits earned while in high school. Each department's major should have an approved rubric or *CPL Checklist.*

POLICY	Bennett College awards applicable credits earned for nontraditional students prior learning according to measurable college-level learning, which includes knowledge, skills and competencies obtained.

PROCEDURES	College credit may be granted on a case-by-case basis for prior learning only when it can be documented and falls within Bennett College's regular credit course offerings. Application for credit for prior learning must be approved prior to course enrollment regardless of method or type of prior learning. All mandatory institutional requirements for degree programs must be met and individuals are only eligible for prior learning credit once officially accepted as a Bennett College student. Each department's major should have an approved rubric or *CPL Checklist.* A maximum of 15 hours may be earned and applied for measurable college-level work experience. The total of all credit by examination and non-traditional education cannot exceed 24 hours earned and applied toward a degree. Please note that there may be financial aid implications as it relates to credit for prior learning. Please visit with the Financial Aid Office for further details. Transferability of prior learning credit is at the discretion of the receiving institution and is not guaranteed to transfer to other institutions. **Non-collegiate Programs** Credit may be granted for training programs that have been successfully completed at non-collegiate organizations such as government agencies, and corporations and businesses, when applicable to students' declared programs of study at Bennett College and approved by the Bennett College instructional department and dean. Non-collegiate courses will be evaluated in accordance with the American Council on Education (ACE) recommendations. Non-collegiate programs must be approved prior to Bennett College course enrollment when students believe they have mastery of course skills and objectives. Successful performance and payment of fees results in course credits and appears on transcripts as proficiency credit. Credit for non-collegiate programs cannot be retaken and cannot be taken by students previously unsuccessful in courses for which they are seeking credit. Students must be admitted to the college prior to receiving credit. A fee is associated with the application. Each department's major should have an approved rubric or *CPL Checklist.* **Military Education and Training** Credit may be granted for military education and training, based on recommendations made by the American Council on Education. Credit will be awarded in disciplines substantially similar to courses and programs offered by Bennett College. Official military transcripts, including Community College of the Air Force (CCAF), AARTS, SMART, or other military transcripts, must be submitted to the Office of the Registrar. **Portfolio Assessment** Credit for prior learning acquired through employment, self-study, volunteer, civic, or other activities may be awarded through the portfolio assessment option. Students must demonstrate that prior learning and experience have resulted in the acquisition of college-level competencies and skills directly related to courses

	in their learning programs. Credit through portfolio assessments must be requested prior to course enrollment when students believe they have mastery of course skills and objectives. Successful portfolio performance results in course credits and appears on transcripts as proficiency credit. Portfolio assessments can be attempted only once per course and cannot be taken by students previously unsuccessful in courses for which they are seeking credit. Students must be admitted to the college prior to attempting portfolio assessment. Application for portfolio assessment must be submitted two weeks prior to the start of the term in which the student plans to enroll. A fee is associated with the application. Each department's major should have an approved rubric or *CPL Checklist.*

Replaces policy:

Date

References:

Best Practices: Credit for Prior Learning. (2016). American Council on Education. Retrieved from http://www.acenet.edu/news-room/Pages/Best-Practices-Credit-for-Prior-Learning.aspx

Credit for Prior Learning Practices (2014). AACRAO. Retrieved from http://www.aacrao.org/docs/default-source/PDF-Files/aacrao_dec_2014_60_second_survey_credit_for_prior_learning_practices.pdf?sfvrsn=4

Prior Learning Assessment Services. (2015). The Council for Adult & Experiential Learning. Retrieved from http://www.cael.org/pla.htm

Benchmarks:

University of Maryland University College http://www.umuc.edu/undergrad/creditoptions/priorlearning/index.cfm

University of Southern Maine http://usm.maine.edu/pla

North Central Missouri University http://www.ncmissouri.edu/admissions/Documents/credit-for-prior-learning.pdf

Liberty University (Online) https://www.liberty.edu/online/credit-for-prior-learning/

Clark College http://www.clark.edu/enroll/credential-evaluation/nontraditional_programs.php

Fayetteville Technical Community College http://www.faytechcc.edu/campus-life/academic-resources/credit-for-prior-learning/

Wilberforce University http://www.wilberforce.edu/academics/c-l-i-m-b/credit-for-prior-learning/

Board of Trustees Policy Number:	Date of Adoption/Revision:
ACAF 3.05	April 20, 2016

SUBJECT	SEMESTER/MINIMESTER FORMAT AND DEFINITION OF CREDIT HOUR POLICIES
AUTHORITY	Vice President of Academic Affairs/Registrar
APPLICABILITY	Semester term management
PURPOSE	To provide options for course offering to increase student enrollment and to ensure compliance with TRACS standards. Most U.S. higher education institutions operate on an academic year divided into two equal semesters of 15-17 weeks' duration, a winter session and summer sessions. Bennett College recognizes the academic year as divided into semesters of relatively equal periods (Fall and Spring) with each semester containing 16 weeks. The minimester terms (of one 2-week session and two consecutive 7-week sessions) within each semester are unique and innovative method of course offering lengths at Bennett College. Students who are working professionals often find it easier to balance their study time with other outside demands by enrolling in terms. The Minimester structure allows greater flexibility in course scheduling.

POLICY	**Federal Definition of the Credit Hour** For purposes of the application of this policy and in accord with federal regulations, a credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates 1. Not less than one hour of classroom or direct faculty instruction and a minimum of two hours out of class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time, or 2. At least an equivalent amount of work as required outlined in item 1 above for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

	Semester Credit Hour Definition One semester credit hour will be awarded for a minimum of 750 minutes of formalized instruction that typically requires students to work at out-of-class assignments an average of twice the amount of time as the amount of formalized instruction (1,500 minutes). It is acknowledged that formalized instruction may take place in a variety of modes. Bennett College courses may be offered in the standard 16-week full semester format scheduled to allow for the credit hour formula noted above. In addition, Bennett College offers courses in a 2-week Minimester 1, a 7-week Minimester 2 and a 7-week Minimester 3 all within the Fall Semester. Class times and offering days are adjusted to meet the formula stated above. While awarding semester credit hours typically occurs for instruction delivered in accordance with an institution's standard semester calendar, it may also occur for instruction that may not follow the typical pattern of an institution's standard semester calendar as long as the criteria for awarding such credit is met.
PROCEDURES	These procedures are for all students who are registered within courses at Bennett College. Courses offered for credit by Bennett College may be taught in formats shorter than semester length, with proper safeguards of quality. If recommended by the departmental area to offer the course, and approved through the administrative channels, the shortened course procedure is as follows: a)The semester hour system is based upon one contact hour per week (50 minutes of instruction) or its equivalent for a semester of 16 instructional weeks. Instructional hours for the shortened format courses generally maintain this standard, and any deviation must be approved through regular channels. Thus, a three-credit-hour course must have 45 contact hours. b) Any regular credit course may be taught in the summer term, utilizing the extended class periods applicable to summer. c) Courses to be offered in shortened format must have prior approval at departmental or area and College levels. d) Department chairpersons and area coordinators must formally advise their respective deans of courses to be taught in shortened format each semester.

	e) It is recognized that not all courses are appropriate for shortened format. Before developing such shortened courses, the department or area proposing short courses should take into consideration such factors as amount of reading and analysis required, maturity of students, need for concentrated immersion in subject, and, in general, the nature of the learning required. f) Admission to short courses follows standards for all regular credit courses.
Notes	The policy is in compliance with the TRACS standards/requirements as outlined in it's Accreditation Manual 2021 Edition Section 17.1 "Credit Hours: The institution's award of credit hours and length must meet national norms and federal requirements and Section 17.2 "Program Length and Cost: The institution's programs must be appropriate to the institution's mission and objectives and must demonstrate that program lengths are comparable to accredited institutions of higher education."

Replaces policy: *Date*

Board of Trustees Policy Number:	Date of Adoption/Revision:
ACAF 3.06	June 15, 2024

SUBJECT	**Credit by Examination and Extra-Institutional Credit**
AUTHORITY	Registrar
APPLICABILITY	All Bennett College Students
PURPOSE	To award credit through alternative credit sources outside accredited institutions.

POLICY

Bennett College welcomes students to use credit by examination and extra-institutional credit to help advance their academic career. Students are responsible for registration and completion of Credit by Examination and Extra-institutional Credit. All scores and transcripts must be sent to the Office of the Registrar. Minimum scores and grades for credit will be determined by the respective organization. Earned credit will be marked on the student's transcript with a grade of 'TR.' Credit by examination and extra-institutional credit will not impact a student's GPA. Students can complete a total of 24 hours between credit by examination and extra-institutional credit.

Credit by Examination –

- *Advanced Placement Program (AP):* Through the College Entrance Examination Board, high school students can earn college credit through exam scores following the completion of college-level courses through their high school. Students must earn scores of 3 or higher. Earned credit is assessed in conjunction with Advanced Placement Program standards.
- *College Level Examination Program (CLEP)*: CLEP allows current and incoming students to demonstrate prior knowledge in provided subject areas. The awarding of credit is determined by the American Council on Education's (ACE) recommendation for the subject area.
- *International Baccalaureate (IB)*: Through the International Baccalaureate Organization's Diploma Program, high school students complete a two-year program culminating in examinations. Students receiving grades of 5 or 6 are eligible for college credit.

Extra-institutional Credit –

Extra-institutional Credit represents collegiate level work offered by non-accredited and non-degree awarding organizations. Examples include Sophia Learning and StraighterLine. The organizations must be evaluated by the American Council on Education to offer college level credit. Credit is offered not by examination but through classes and coursework. Students are responsible for enrolling, completing, and submitting transcripts to the Office

	of the Registrar for all Extra-institutional Credit. Students must earn the equivalent of a C grade through the extra-institutional organization to receive credit on the transcript. Students can receive up to 15 hours of credit from extra-institutional organizations.
PROCEDURES	Students are responsible for sending all scores or transcripts to the Office of the Registrar. The Office of the Registrar will transfer passing coursework to the student's transcript. The application of coursework to General Education or the Major will be assessed through either an equivalency transfer rubric for Credit by Examination or a Transfer Form for Extra-institutional credit. Course equivalency will be recorded in the Student Information System's Degree Audit.

Replaces policy: *Date*

Board of Trustees Policy Number:	Date of Adoption/Revision:
ACAF 3.07	July 22, 2016

SUBJECT	**COURSE LEVEL AND NUMBERING DESIGNATION**
AUTHORITY	College Registrar
APPLICABILITY	This policy applies to all Bennett College courses.
PURPOSE	This policy provides the framework for the identification of courses by developing a numbering scheme (assigned level and numbering) to allow consistency and clear indications of course level, sequence, and logic within the curriculum

POLICY	Beginning with the 2016-2017 academic year, all approved courses offered by Bennett College will be identified using a protocol for course numbering system consisting of two separate units: (1) the subject or departmental designation [two-four digits] and (2) the course number [three digits].
PROCEDURES	The specific course designation and number will appear in the College Catalog and registration schedule directly in front of the course title *(see Appendix A Department Course Subject or Departmental Designation).* A three-digit number identifies the course number. The first digit reflects the level at which the course is taught. The level designations are as follows: **000-099 Noncredit courses (remedial)** Remedial courses or prerequisite courses needed to meet certain conditions of admission and do not apply toward any degree requirement. **100-299 Lower-division courses** Introductory lower-division undergraduate courses, usually taken by first-year students and generally do not include prerequisites. **200-299 Primarily for sophomores** Courses designed to present a large body of information without expecting a mastery of detail (e.g., survey courses in history or literature) or to present general theoretical or methodological approaches (e.g., foundation courses in the social, natural and physical sciences) or to teach skills or techniques at an introductory level (e.g., general physical education) are lower division. Lower-division courses (usually taken by second-year students) may be expected to include elementary and may include intermediate levels of subject matter competency but not advanced levels. **300-399 Upper-division courses** Upper-division undergraduate courses usually taken by third- or fourth-year students and are normally courses in the major, those at the highest levels of the College and those that often include significant prerequisite preparation.

	400-499 primarily for seniors Advanced upper-division undergraduate courses that require a high degree of disciplinary sophistication or specificity in content; these courses assume considerable prerequisite knowledge and experience and include courses such as independent study, independent research, capstone courses, internships or those undergraduate courses that are cross-listed with graduate or professional courses..

Replaces policy: *Date:*

The department offering a course is identified by two-four letters (Appendix A):

Appendix A for Department Course Subject or Departmental Designation

AC	**Accounting**
ACES	Aces
AN	Anthropology
AB	Arabic
AR	Arts Management-Visual Arts
BI	Biology
BA	Business Administration
CH	Chemistry
CS	Computer Science
EC	Economics
ED	Education
EN	English
EI	Entrepreneurship Studies
FI	Finance
FR	French
GS	Global Studies
HE	Health & Physical Education
HI	History
IS	Interdisciplinary Studies
JM	Journalism & Media Studies
LW	Literature/Writing
MA	Mathematics
MU	Music
OR	Orientation
PH	Philosophy
PE	Physical Education & Health
SC	Physical Science
PY	Physics
PO	Political Science
PS	Psychology
RL	Religion
RS	Research Methods
RU	Russian
SW	Social Work
SO	Sociology
SP	Spanish

SE	Special Education
SH	Speech
KI	Swahili
TH	Theatre
TK	Turkish
WBP	Willa B. Player
WS	Women's Study

BENCHMARK

10 colleges/universities; HBCU; top public colleges' top colleges in NC; top liberal arts colleges; top HBCU

College/University	Course Numbering System	Reasoning
Spelman College Atlanta GA	3 letter subject 3 digit number	100 – 499 progressive study number designation
Greensboro College Greensboro NC	3 letter subject 4 digit number	1000 – 4999 progressive study number designation
North Carolina State University Raleigh NC	2-3 letter subject/department 3 digit number	100 – 499 progressive study number designation (undergrad)
Howard University Washington DC	4 letter subject 3 digit number	001 (remedial) – 499 progressive study number designation (undergrad)
Appalachian State University Boone NC	3 letter subject 4 digit number	1000 – 4999 progressive study number designation (undergrad)
Elon University Elon NC	3 letter subject 3 digit number	100 – 499 progressive study number designation
College of William & Mary Williamsburg VA	3 letter subject 3 digit number	100 – 499 progressive study number designation
University of North Carolina at Chapel Hill	4 letter subject 3 digit number	Course abbreviation represents administrative home; In general, the system of course numbering works as follows: 50–99 First-year seminars and other courses reserved for special Purposes; 100–199 Introductory undergraduate courses; 200–399 Undergraduate courses considered to be above the introductory level; 400–699 Courses open to undergraduate and graduate students
Brown University Providence Rhode Island	4 letter subject 1-4 digit number	Courses open only to undergraduates are numbered from 1 to 999. Courses open to undergraduate and graduate students are numbered 1000 to 1999. Courses open to graduate students and, by special arrangement, to undergraduates are numbered 2000 to 2999. Courses open only to students enrolled in the Medical School are numbered 3000 and above.
Dartmouth College Hanover New Hampshire	4 letter subject 1-2 digit number	The numbering of each course indicates the level of the course. Numbers 1-9 are used primarily to designate courses on an introductory level; numbers 10-79 are used for the general course offerings of the

		department or program. The significance of the various levels depends on the needs of the department or program, but the higher numbers generally indicate courses of more advanced and specialized nature. Numbers 80-89 are used for certain special types of courses, such as seminars, thesis courses, independent study, and honors courses. The numbers 90-99 are used for certain advanced undergraduate major courses.

Board of Trustees Policy Number:	Date of Adoption/Revision:
ACAF 3.08	July 22, 2016

SUBJECT	**POST-TENURE REVIEW REVISED POLICY**
AUTHORITY	Office of the Vice President for Academic Affairs
APPLICABILITY	All faculty members who have been tenured for five (5) or more years.
PURPOSE	Bennett College is committed to academic excellence. Post-Tenure Review is intended to assure that all faculty members maintain a satisfactory level of performance, and provide that faculty whose performance is rated unsatisfactory an opportunity to improve. Further, the purpose is to provide an opportunity for periodic review after the granting of tenure, with the objectives of affirming continued acceptable performance or providing faculty members with constructive feedback to assist them with their professional development.
POLICY	***Definition*** *Post-Tenure Review is a comprehensive, periodic evaluation of cumulative faculty performance, the prime purpose of which is to ensure faculty development and to promote faculty vitality.* All tenured faculty members will participate in a post tenure review once every five years. The process will be less formal than tenure and promotion processes. Review of the tenured faculty will be carried on through normal academic channels, starting with the Dean (or the Vice President of Academic Affairs in the case of the Dean). The review can be tailored to the discipline of the faculty member but should include elements of personal and professional growth, following the main criteria for tenure. Annual faculty performance evaluations by the supervisor are a part of the post-tenure review process. Effective Teaching, Scholarly Work and Service to the Community must be documented, although as noted less formally, as on-going through the post tenure period. Tenured faculty who are participating in a leave of absence of one year or more, sabbatical leave, or a development/improvement process during the five year post-tenure review period are provided an additional year for each year away from half-time or greater teaching position for evaluation. A tenured faculty member's review for promotion may constitute a post-tenure review. Post-tenure review may be waived for any tenured faculty member who communicates in writing the plan for retirement within three years of the next scheduled review, and who will be issued a terminal 3-year contract.
PROCEDURES	The first post-tenure review is to occur five years after the faculty member is granted tenure. The Office of the Vice President for Academic Affairs is responsible for ensuring that the review of candidates for tenure and promotion is conducted according to the procedures described in the Tenure and Promotion Policy. The Vice President for Academic Affairs is the sole administrator who notifies candidates officially that they are eligible for post-tenure review and that

dossiers must be submitted to the candidate's supervisor initially to begin the review process.

In cases where the faculty member intends to retire within the next three years or is eligible to apply for promotion, the candidate may forgo the post-tenure review process if they submit a letter to the Vice President of Academic Affairs, indicating their intent to retire within the next three years or to participate in a review for promotion within the next year. The letter declaring their intent to retire or to undergo promotion review in lieu of post-tenure review would be due no later than the deadline for submitting the dossier for post-tenure review as outlined below. Faculty members declaring to retire within the next three years will be issued a terminal 3-year contract.

The Office of the Vice President of Academic Affairs is responsible for ensuring that post-tenure review of eligible candidates is conducted according to the procedures described below.

Steps for Submitting the Dossier:

1. By **March 31** of the fifth year after the most recent review for tenure and/or promotion or post-tenure review (or, for **the initial cohort participating in post-tenure review, by March 31, 2014**), the Vice President of Academic Affairs will **notify candidates for tenure in writing that they are eligible to participate in post-tenure review**. This letter should be hand delivered to each eligible candidate. The Vice President of Academic Affairs will also inform the Chairperson of the candidate's Department and Division that the candidate is eligible to participate in post-tenure review by copying them on this letter. Candidates should notify the Vice President of Academic Affairs in writing that they have received notice of their eligibility to participate in post-tenure review. If the Vice President of Academic Affairs does not receive a reply from the candidate within two weeks of the time that the notice on eligibility was sent to the candidate, the candidate should be contacted directly by the Vice President of Academic Affairs .

2. The candidates should be informed by the Office of the Vice President of Academic Affairs that they must submit her/his dossier for post-tenure review to his/her supervisor by **August 31** (five months later).

3. After the dossier has been received by the supervisor, she/he will determine whether all necessary sections of the dossier are present. The supervisor will complete a checklist to indicate that all necessary sections of the dossier are present. Missing documents will be requested from the candidate by the supervisor. Candidates will have five (5) business days to submit the requested documents to the supervisor. If the dossier is complete as originally submitted, the review may proceed. After the five (5) business days, the review will proceed whether or not the candidate submits the missing elements of the dossier.

4. Dossiers must be kept in the Provost Vice President of Academic Affairs in a locked confidential file. The review will take place during the semester in which the dossier is submitted and the Post- Tenure Review Rubric will be used to determine whether the candidate continues to demonstrate acceptable teaching, scholarship and service.

The Review Process

1. By **September 1**, the dean shall compile a list of faculty members in his

	or her department who are eligible for review. 2. The Dean shall notify each faculty member eligible for post-tenure review by **September 15** that the review is to take place. At that time, the faculty member shall be provided with a copy of the post-tenure review procedure and the date of the review. The date of the review shall not be sooner than 45 days following the notice. 3. Once notified that he or she is eligible for post-tenure review, the faculty member will create a post-tenure review file for submission to the dean or chair by **November 1**. The file should demonstrate performance in three (3) areas: teaching, research and/or creative activity, and service. The overall contents of the file are up to the individual, but each file must contain the following elements: most current curriculum vitae; peer and student teaching evaluations; annual peer performance evaluations; evidence of scholarly and/or creative activity as well as service; and the outline of a five-year plan setting forth the faculty member's goals for teaching, scholarship and service and any other information (e.g., description of work in progress, activities scheduled for the year, etc.) that the faculty member would like to bring to the chair's attention. By **December 1st**, the supervisor will send the results of the review to the Vice President of Academic Affairs and the Chairperson of the Tenure and Promotion Committee for their information but not for review or further action. A copy of the review results will also be sent to Human Resources, the candidate, and the Dean. **Outcomes of the Post-Tenure Review:** 1. If the review shows that the faculty member did demonstrate acceptable performance in all three areas, the post-tenure review process for that candidate is completed until the next 5-year cycle passes. 2. If the review shows that the faculty member did not demonstrate acceptable performance in all three areas (teaching, scholarship, service), then the reviewers will work with the faculty member to develop a professional development plan (PDP) as detailed in the policy, within 30 days of the review. If the PDP is not developed within 30 days, the faculty member is referred to the supervisor. **The Professional Development Plan Process:** 1. The faculty member and Dean shall review the faculty member's current and planned scholarship, teaching, and service interests and accomplishments, and examine their relationship to current departmental needs. When the interests and academic activities of the faculty member correspond with needs of the department, no changes are necessary. When a gap between division needs and individual faculty member interest is identified, the Dean and faculty member shall explore possible changes, so that the faculty member's strengths and interests can better serve the needs of the department and college. The Dean must create a professional development plan. 2. The Dean must provide a formal assessment of the performance of the faculty member and, where appropriate or necessary, recommendations for improvement that will maximize the faculty member's contributions to the division and the College. The report shall include: (1) an assessment of the strengths and

	weaknesses of the faculty member's performance; and (2) if applicable, a professional development plan indicating the faculty member's expected long-range contributions to the college in specific terms. 3. Where deficiencies or areas for possible improvement are noted, the professional development plan should address any concerns, measures of expected outcomes, and a timetable for accomplishing these outcomes. The professional development plan, including the expected outcomes, if appropriate, will be detailed in a signed agreement among the faculty member, chair, and dean within 30 days (or **March 1)** of the review. The full text of this agreement is submitted to the Vice President for Academic Affairs. The Vice president for academic affairs may approve, modify or reject the strategic development plan. The implementation of the professional development plan is expected to take place the following fall semester. 4. If the Dean is unable to solicit the cooperation of the faculty member in the development of the professional development plan, the dean will prepare a plan to which the faculty member will be expected to agree by **March 10.** In the event that the individuals involved (dean, faculty member) are unable to reach an agreement on a professional development plan by March 10, the dean will report to the Vice President of Academic Affairs that an agreement has not been reached. In such an instance, if the dean and Vice President of Academic Affairs concur, disciplinary action may be taken against the faculty member at this time. 5. If the faculty member refuses to agree or sign the professional development plan and instead to grieve the post-tenure process, the faculty member must file a formal grievance by **March 24** and follow the grievance policy outlined in the most recently approved Faculty Handbook. 6. If the faculty member receives an outstanding performance review, he/she will be rewarded by means of special, non-monetary, recognition, such as: (1) nomination for awards; and/or (2) revision of workload. 7. Faculty members who participated in post-tenure review and who are required to develop a professional development plan (PDP) will have progress on this plan assessed a year later by their supervisor in the performance evaluation of the faculty member. 8. Annual evaluations in succeeding years will specifically address progress toward meeting the goals outlined in the agreement on the professional development plan. A faculty member who fails to achieve the outcomes identified in the in-depth evaluation within the agreed-upon timetable may be subject to disciplinary actions. 9. If the faculty member has an unsuccessful PDP reviews, the T&P Committee will send a letter to the faculty supervisor and the Vice President of Academic Affairs to inform them of the situation. Consequences for not meeting the objectives of the PDP will be determined by the supervisor and Vice President of Academic Affairs, and **may include but are not limited to reassignment within the college, separation from the college, or other alternatives.** **Appeals Process for Post-tenure Review** Upon receipt of the results of an unsuccessful Post-tenure review of a candidate, the

	candidate can appeal the decision by the following process: 1. Notify the Vice President of Academic Affairs of the intent to appeal the post-tenure review results within THIRTY days of the receipt of the post-tenure review results. 2. Provost will then notify the College Tenure and Promotion Committee of the appeal. 3. Candidate will then submit a letter to the Provost describing the reason for challenging the post-tenure review. 4. The Vice President of Academic Affairs will then submit the letter appealing the post-tenure review result to the Chair of the Grievance Committee of the Faculty Senate. The Grievance Committee will appoint an ad hoc committee to review the appeal of the post-tenure review as specified in the Faculty By-Laws of the College. 5. The members of the ad hoc committee must be tenured senior faculty with the rank of Associate Professor or Professor. 6. The ad hoc committee will only review the part(s) of the post-tenure review dossier of the candidate that did not contain sufficient evidence. The committee will not review the entire dossier. 7. The ad hoc committee must adhere to the criteria for post-tenure review of the Tenure and Promotion Policy in reviewing the appeal of the post-tenure review. 8. The ad hoc committee will send a recommendation to the Chair of the Tenure & Promotion Committee, with a copy to the Vice President of Academic Affairs, concerning the appeal of the post-tenure review, within thirty days (30 days) of the receipt from the Provost of the letter from the candidate appealing the post-tenure review decision. 9. The President will review the recommendation from the ad hoc committee and either concur with or reject the recommendation. The decision of the President concerning the appeal of the post-tenure review is final. 10. The President will inform the candidate of the decision concerning the appeal of the post-tenure review in a letter. The Post-Tenure Review Rubrics, a PDP template, and PDP review report template are contained in the Promotion & Tenure section of the Faculty Handbook.

Replaces policy: 2014 Policy

Date: April 2006 (page 20 of the Tenure & Promotion Manual,2005-2006)
(Revised and approved by the faculty on January 4, 2007 and May 11, 2007, and approved by the Bennett College Board of Trustees on February 16, 2008)

This revised policy was approved 8/21/2015 by T&P Committee, 8/25/2015 by Faculty Senate, and 9/1/2015 by the Faculty (43-1-1 vote)

Board of Trustees Policy Number: ACAF 3.09

Date of Adoption/Revision: July 22, 2016

SUBJECT	**Policy on Pregnant Students**
AUTHORITY	Vice President of Academic Affairs
APPLICABILITY	All Bennett College students
PURPOSE	Provide a comprehensive policy regarding pregnant students on campus.

GENERAL POLICY	Under the Department of Education's (DOE) regulations implementing Title IX of the Education Amendments of 1972, a college or university "shall not discriminate against any student, or exclude any student from its education program or activity, including any class or extracurricular activity, on the basis of such student's pregnancy, childbirth, false pregnancy, and termination of pregnancy or recovery therefrom." According to these materials, not discriminating against a pregnant student means granting her leave "for so long a period of time as is deemed medically necessary by the student's physician," and then effectively reinstating the student "to the status which she held when the leave began." Pregnant students are entitled to accommodations under Title IX and/or the American with Disabilities Act (ADA) and should be given an opportunity to make up missed work wherever possible. Extended deadlines, makeup assignments, and incomplete grades that can be completed at a later date (agreed between instructor and student), should all be utilized. The college has to provide the student with the appropriate assignments and information to make up the work she would have been required to complete while she was out, if this is possible in a given course. In situations where the temporal particularities of the task do not allow for a "break," such as large performances, and some lab or group work, the institution should work with the student to devise an alternative academic course work plan for completion within the policies for academic progress of the college as defined by the college catalog (page 62). The college requires a doctor's note for continued participation in the college activities for all students who have a medical condition that requires routine treatment by a doctor. This also applies to pregnant students. Colleges cannot terminate or reduce athletic, merit, or need-based scholarships based on pregnancy as long as the student continues to be enrolled in the college

	and otherwise adheres to the eligibility requirements of the scholarships. While the college may offer to provide more leave than that under Title IX, the college cannot have a rule that prohibits students from returning to classes for a set period of time after childbirth. Pregnant students working as peer-tutors or work-study students are protected under Title IX in their capacity as part-time employees.
LABORATORY ACTIVITIES	Bennett College laboratories in the Department of STEM are in compliance with the requirements of the Occupational Safety and Health (OSHA) Act. However, it is the responsibility of the student to inform the instructor in the laboratory courses as soon as the student knows she is pregnant. The student must obtain written permission from her prenatal care doctor to participate in the course laboratory. If the student does not properly inform the instructor of the pregnancy, does not provide a doctor's permission note, or is unaware of her pregnancy, the responsibility for any risks or consequences associate with the completion of the laboratory work remains with the student. Bennett College cannot ensure that a pregnant student will not be exposed to chemicals that might be unhealthy for her or her fetus since the effects of all chemicals in fetal development are not completely known. In addition, is impossible to precisely anticipate the level of exposure, the length of exposure, and the number of encounters that might occur with any chemical during a semester. Therefore, it is the college's professional advice that pregnant students should be advised NOT to take a lab course unless she is willing to understand and assume all the risks. She should certainly seek and follow proper medical advice from her physician. Pregnant students will be advised that if they choose to enroll in a science laboratory class at Bennett College, they must participate as fully as any other student or their grades will be impacted. They may not take the course in a virtual mode or by watching others, and labs will not be revised under any circumstances to accommodate a pregnant student.

Title IX Statement: The following has to be included in the college's handbook and website:
"Bennett College does not discriminate against any student on the basis of pregnancy or related conditions. Absences due to medical conditions relating to pregnancy will be excused as long as deemed medically necessary by a student's doctor and students will be given the opportunity to make up missed work if this is possible in a given course. Students needing assistance can seek accommodation from the Title IX Coordinator at (336) 517-1502."
Bennett College will conduct training on the college's obligations related to the student pregnancy and related conditions to all Title IX coordinators and directors of Student's Affairs at Bennett College. This information will be disseminated. Professors and administrators should not require students to drop out of their classes or programs or change their education plans due to their pregnancies or related conditions. And Bennett College cannot terminate or reduce athletic, merit or need-based scholarships based on pregnancy. These rules

supersede any college-or instructor- based attendance or other policies regarding allowable numbers of absences or ability to make up missed work.

9/16/2015 Pregnancy Policy Committee, by Faculty Senate, and by the Faculty (vote)

Board of Trustees Policy Number:	**Date of Adoption/Revision:**
ACAF 3.10	September 29, 2016

SUBJECT	**INTELLECTUAL PROPERTY**
AUTHORITY	Office of the Vice President of Academic Affairs and the Office of Sponsored Programs
APPLICABILITY	This policy applies to all constituents of the College.
PURPOSE	The purpose of this policy is to protect Bennett College and the daily work of its members (students, faculty, and staff) and their work under a sponsored research program or activity on or off-campus.
POLICY	Bennett College recognizes and supports the role of academic institutions in fostering an atmosphere of intellectual and creative endeavor. As such, Bennett College recognizes that faculty and staff of the college own the products of their intellectual and creative activity in all circumstances where Federal law, work-for-hire rules, or the college's contribution of extra-ordinary resources, does not mandate Bennett College ownership. The college recognizes that it receives indirect benefits from faculty and staff's intellectual and creative pursuits, and that such pursuits directly enhance the ability of faculty and staff to fulfill their primary function at the college. As such, the college encourages the unfettered production of creative and scholarly work by its community and only seeks, through this policy, to clarify under what circumstances Bennett College may have ownership rights.

DEFINITIONS	The following categories are considered Intellectual Property and shall be treated the same under all provisions of this policy: 1. Patents This Policy shall apply to patent(s) resulting from Bennett College's related activities of individuals subject to this Policy as students, faculty, and staff members. For purposes of this Policy, the term "patent" or "patents" shall apply to those inventions, innovations or discoveries that are or may be protected under Title 35 of the United States Code. 2. Inventions The term "invention(s)" used in this Policy describes innovations or discoveries that come within the definition of "patents" that a patent application has been filed, or a patent has been issued. Such an invention must be a product or a process that provides a new way of doing something or that offers a new technical solution to a problem. Patent-protection means that someone else cannot commercially make, use, distribute, or sell the invention without owner's permission for a limited

period of 20 years.

3. Copyrights
   This Policy applies to those copyrightable works developed or authored by persons covered by this Policy as students, faculty, and staff members. The term “copyrightable works” or “copyrights” applies to work of authorship considered protectable under Title 17 U.S.C. “Copyrights” include but are not limited to grant proposals, copyrightable books, manuscripts, poems, plays, choreography, photography, videos, audio recordings of choir, work of art, research publications, pedagogical work such as course materials, syllabi, and lecture notes.

   - "work-for-hire": is a statutory exception to the general ownership provisions of the copyright law. It is a way of allocating whether an employee or an employer is the author, and thus copyright holder, of work performed in the course of employment. The work-for-hire provision entitles an employer to assert ownership over materials prepared by its employees acting within the "scope of their employment":

   - The AAUP notes "In traditional academic works 'the faculty member rather than the institution determines the subject matter, the intellectual approach and direction, and the conclusions.' Thus it follows that the faculty member rather than the institution would have ownership" *(4, Ibid)*. As to syllabi/courses and general teaching materials, it is fair for the college to retain a right of free use where that material was created by the faculty member, however, it important to acknowledged that the faculty member still "owns" that material.

   - "extra-ordinary:” resources notes normal use of offices, computers, nominal office supplies, library facilities, etc. and does not count as "extra-ordinary" resource contribution by the college.

   - Administration ownership of faculty scholarly works, lecture notes and teaching materials are not included in this policy.

4. Trademarks and Service Marks
   Trademarks and Service Marks as described under this Policy shall be interpreted in accordance with Title 15 U.S.C. and also in accordance with validly existing laws of the State of North Carolina covering trademarks. The existence of a trademark or service mark does not change the definition or treatment of patent(s) or invention(s) associated with such a trademark.
   Bennett College owns all rights in trademarks related to its seal, logo,

magazine, words and slogans used in advertising and events.

5. Tangible Research Property
   "Tangible Research Property" as used in this Policy means tangible products of research that include, but are not limited to: compositions, biological and chemical materials (including but not limited to cell lines, plasmids, dna, rna, and transgenic animals), diagrams, analytical methods, prototypes, devices, equipment, psychological research, articles of research data. Tangible research materials created by faculty, staff, or students in the course of employment at Bennett College, or work directly related to professional or employment responsibilities, or work carried out on Bennett College's time, at Bennett College's expense, or with substantial use of Bennett College's resources under grants is the property of Bennett College. Use of resources is considered substantial when the additional support received is beyond the normal support level made available by the College through the annual unrestricted budget for a department.

   Data obtained from the use of tangible research materials in research labs legally belongs to Bennett College, not to the individuals who produced the data. Tangible research materials made by students or non-employees working with a faculty or staff member under the above conditions are also the property of Bennett College. Commercial licensing of tangible research products is permitted when all restrictions are removed by the sponsored agency on publication or dissemination of research results and materials.

Intellectual Property developed by Covered Persons in the course of such individual's participation in an on-campus program, project or other relationship between Bennett College and a third party is assigned to the Bennett College and considered "Bennett College Owned." Intellectual Property developed by faculty and staff within the scope of their employment is owned by Bennett College to the extent permitted by law. All scholarly and artistic works developed by students during their employment at Bennett College under an external agreement are Bennett College-Owned.

Office of Sponsored Programs is responsible to submit a copy of the Intellectual Property Policy to the third party. Following the disclosure of an invention pursuant to this Policy, the Office of Sponsored Programs will be responsible for reporting the invention as required under the terms of external funding agreements, if any.

Under the new Uniform Guidance developed by Office of Management and Budget, there is only one (1) federal regulation for intellectual property developed under sponsored projects:

	When intellectual property is developed under federal grants, the federal government typically retains rights to the use of that property. Under general principles, the government has the right to use the intellectual property on its own behalf and to authorize others to use the intellectual property when doing something for the government. The award agreement will provide details and restrictions. The Office of Management and Budget (OMB) published final guidance on grants management reforms in the December 26, 2013, Federal Register. Section 200.59 of the uniform guidance defines intangible property as "property having no physical existence, such as trademarks, copyrights, patents and patent applications and property…." Section 200.315 sets forth the government rights in intangible (intellectual) property developed under federal grants as well as the grantee's rights and requirements, which are largely in keeping with the principles embodied in Circular A-110 for colleges and universities. When intellectual property is developed under federal grants, the federal government typically retains rights to the use of that property. Under this general principle, the government has the right to use the intellectual property on its own behalf and to authorize others to use the intellectual property when doing something for the government. According to 2 CFR §200.315(a), title to intangible property "acquired under a Federal award vests upon acquisition in the non-Federal entity. The non-Federal entity must use that property for the originally-authorized purpose, and must not encumber the property without approval of the Federal awarding agency." When no longer needed for the originally authorized purpose, disposition of the intangible property must be disposed of in keeping with the requirements surrounding use of equipment (2 CFR §200.313(e). As international collaboration increases, the evolution of international standards for the enforcement of copyright and related rights has been dramatic in recent years, diverse from country to country, and this evolution has been driven principally by two factors. The first is the advance of technological means for the creation and use (both authorized and unauthorized) of protected material, including, most recently, the advent of digital technology, which makes it possible to transmit and make perfect copies of any information existing in digital form, including works and productions protected by copyright and related rights. The second factor is the increasing economic importance of goods and services protected by intellectual property rights in the realm of international trade; simply put, trade in products embodying protected intellectual property rights is now a booming, worldwide business. Please consult the Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS), which forms part

	of the overall Agreement establishing the World Trade Organization (WTO), requires the members of the WTO to ensure that effective enforcement procedures are available. The TRIPS Agreement also includes provisions requiring action by customs authorities against suspected counterfeit or pirated goods.
PROCEDURES	1. Intellectual Property Assignment Agreement All Bennett College faculty and staff, and students who engage in activities that will or may result in Bennett College ownership of Intellectual Property in accordance with this Policy must, prior to participating in any such activity, execute the Intellectual Property Agreement ("IPA"), attached to the Intellectual Property Manual as Appendix A. If the IPA is not executed as required, such individual is still subject to this Policy as a condition of his or her participation. 2. Obligation to Disclose All individuals participating in Bennett College activities as faculty and staff, visitors and/or students must disclose to the Office of Sponsored Programs, Office of Provost, and to the Office of the President in a timely manner any and all Intellectual Property invented or created by them so that Bennett College can determine whether it has an ownership interest according to this Policy. Disclosure does not itself constitute a surrender or determination of ownership. Disclosure shall be made by completion of the appropriate Intellectual Property Disclosure Form, appended to this Policy as Appendix B, and by submitting it to the appropriate administrative offices as directed on the form. Failure on the part of any Covered Person to complete the Disclosure Form(s) as required shall not in any manner impair or diminish the rights (including ownership rights) and obligations of either Bennett College or the individual as described in this Policy. Covered Persons uncertain whether Intellectual Property developed by them during the period of their employment with Bennett College must be disclosed should consult with the Department and Division Deans. 3. Determination of Ownership Following receipt of a properly completed and signed Disclosure Form, the Office of Sponsored Programs, the Office of the Provost and the Office of the President will determine whether, consistent with this Policy, Bennett College is entitled to ownership of the Intellectual Property disclosed, and it shall promptly notify the inventor(s) or creators(s) in writing of its decision. Bennett College's decision as to ownership and disposition of Intellectual Property will be made in accordance with the institutional mission and goals and the requirements of applicable external agreements and obligations. Bennett College's

decision may, in some instances, include exercising ownership and thereafter placing the Intellectual Property in the public domain.

4. Timeliness
   Bennett College acknowledges the interests of inventors and creators in pursuing timely protection and/or publication of innovations and discoveries, and/or theses or dissertations. Once disclosure is made, Bennett College will act within 75 days with respect to ownership determinations. If Bennett College concludes that this time period is or will be inadequate, Bennett College will inform the affected parties in writing of the circumstances of the delay and the expected date of determination.

If the College decides not to pursue commercialization of any invention disclosed by a Bennett College inventor, the inventor may petition the Board of Trustees, in writing, to release the rights of the invention to the inventor. If there are no obligations to any other third party, including but not limited to sponsors or government agencies, Bennett College, at the sole discretion of the Bennett College BOT, may release the invention to the inventor, provided, however, that, as a condition of such release of rights, Bennett College shall be entitled to ten percent (10%) of all future revenues or other monetary or financial considerations resulting from the invention.

Process for Seeking Intellectual Property Protection

Invention Reporting and Determinations of Patentability
Following the disclosure of an invention pursuant to this Policy, the Office of Sponsored Programs will be responsible for reporting the invention as required under the terms of external funding agreements, if any.
Further, in good faith consultation with the inventor or inventors, President will undertake a patentability review based upon the potential commercial value of the invention, with the assistance of an attorney if necessary. Where the filing of a patent application is considered appropriate, it shall be Bennett College's responsibility to undertake such filing at its own expense and in its own name.

All inventors of Bennett College-Owned inventions shall reasonably cooperate with Bennett College's designees in securing patent rights for inventions and shall diligently execute all documents as may be required. All patenting activities shall be at the expense of Bennett College.

Commercialization of Intellectual Property

1. Reporting to Research Sponsors and Collaborators
   The Office of Sponsored Programs has primary responsibility for notifying the external research sponsors and collaborating parties of Intellectual Property developed under agreements with them. Recognizing that such reporting cannot be undertaken until Intellectual

	Property reports have been received from covered persons, the Office of Sponsored Programs is also responsible for developing, managing and retaining Intellectual Property Assignment Agreements and initiate the disclosure process. Office of Sponsored Programs must obtain clearance form sponsor agency before publication or dissemination of research results. 2. Licensing for Commercialization Bennett College will license its Intellectual Property in a manner that conforms to its mission and goals and consistent with its policies. Commercialization of Bennett College-Owned Intellectual Property shall be assumed and accomplished by the Office of the President, with support from other units within the College and with the support of a licensing consultant as considered necessary or desirable. Only the President shall have the authority to engage a third-party as a licensing agent to act on behalf of Bennett College. Authority to sign licenses or other agreements concerning Bennett College-Owned Intellectual Property shall rest with the President. In no case shall inventors or creators have authority to enter into agreements regarding the Intellectual Property. Any such attempted agreements are voided. In situations where Bennett College is negotiating the licensing of Intellectual Property with a company, it is a prohibited conflict of interest for any faculty or staff member who supervises an inventor or creator of that Intellectual Property to influence or attempt to influence the licensing negotiations. In addition, it is conflict of interest for such personnel to co-found in a Bennett College-licensed start-up company with inventors or creators under their supervision. 3. Distribution of Licensing Revenues “Royalty Income” shall mean all revenues received by Bennett College through the licensing for commercialization of Intellectual Property. For the purpose of this definition, revenues shall include, but are not limited to, fees, payments and percentages of gross or net sales of licensed products. “Net Royalty Income” shall mean all Royalty Income, less: • Bennett College' out-of-pocket costs for securing and maintaining legal protection, such as patenting; • Bennett College’s out-of-pocket costs associated with the utilization of an attorney, licensing agent or consultant if applicable; • Bennett College’s internal costs of production if the invention was not part of sponsored research.

	Net Royalty Income shall be distributed as follows: 50% to the creator(s), 50% to Bennett College. For Intellectual Property owned by joint creators or inventors, the royalty share for the inventor/creator shall be shared equally, unless all inventors or creators agree otherwise. "Any scholarly or creative work developed by a faculty member should remain the property of that faculty member." Bennett College may accept a minority equity interest in a business entity in partial consideration for the licensing and commercialization of the Invention. Net Royalty Income in the form of equity interest in a company shall be distributed immediately according to revenue sharing formula stated above (Royalty Income less out-of –pocket costs, deducting such costs from the number of shares at the current market value). When Bennett College accepts equity in a business entity, the inventor(s) shall receive 50% share of that Net Royalty Income in the form of equity and Bennett College shall receive 50% of the Net Royalty Income in the form of equity. The inventor's 50% share of equity interests shall be issued by the company in the name of the inventor and distributed directly to the inventor at the time of the issuance of shares. Inventor will be wholly responsible for any tax burden, benefit, and business judgment regarding the management of the shares as distributed. Bennett College shall have no financial responsibility to the inventor for shares of equity interests. If Bennett College transacts a licensing arrangement with a company that includes the payment of royalties in cash as well as equity, all inventors and creators will be entitled to their established share of cash Net Royalty Income, regardless of whether they have also received an equity share. To avoid any conflict of interest or conflict of commitment, Bennett College's employees engaged in negotiating commercialization will assure that information is kept confidential and they will not personally invest in non-public companies holding licenses to the intellectual property or will not engage in Bennett College licensing negotiations with any company in which that fund is invested. The Intellectual Property Manual, Intellectual Property Agreement (IPA), Appendix A and the Intellectual Property Disclosure Form, Appendix B are available on Bennett College's intranet, BelleNet, under Sponsored Programs tab.

Replaces policy: *Date*

Board of Trustees Policy Number:	Date of Adoption/Revision:
ACAF 3.11	March 25, 2017

SUBJECT	**General Education Block Transfer Credit Policy**
AUTHORITY	Office of the Vice President of Academic Affairs and College Registrar
APPLICABILITY	Community College graduates applying for admissions and requesting the acceptance of general education credits
PURPOSE	To facilitate the transfer of general education course credits from community colleges to baccalaureate colleges and universities

POLICY	Bennett College will award transfer credit for general education courses successfully completed from regionally accredited institutions and institutions participating in statewide general education agreements. This policy applies to community college graduates with an Associate of Arts (A.A.), Associate of Science (A.S.) degree, Associate in Arts for Transfer (AA-T) or Associate in Science for Transfer (AS-T).
PROCEDURES	1. Upon receipt of the official transcript, the Office of the Registrar will review and approve transfer credits for all general education courses required in the students program of study 2. The Office of the Registrar will then evaluate additional courses for transferability towards programmatic major courses. 3. Transfer of Credit Limitations: a) The total transfer credit accepted will **not** exceed 75% of the total hours required for an undergraduate degree; and b) no more than 50% of the major programmatic course requirements can be earned through transfer credit. 4. The College Registrar will be responsible for documenting and monitoring all statewide general education agreements, including agreements outside the regional accreditation scope, to ensure appropriateness and consistency in the implementation of this process.
NOTES	References: TRACS Standard 8.4 Undergraduate academic degree programs offered include an appropriate general education core. General education courses are not narrowly focused nor are they directed toward a specific occupation or profession. Undergraduate bachelor degree programs include a minimum of 30 semester hours in general education, with at least 3 semester hours, in each of the humanities/fine arts, behavioral/ social sciences, and natural science/math. Associate degree programs include a minimum of 15 semester hours in general education. (IER)

Replaces policy:

Date

Board of Trustees Policy Number:	**Date of Adoption/Revision:**
ACAF 3.12	June 15, 2024

SUBJECT	Graduation Credit Hour Requirements
AUTHORITY	Office of the Vice President of Academic Affairs
APPLICABILITY	All Bennett College Students
PURPOSE	To ensure being able to complete the degree in a timely manner and reduce financial aid cost

POLICY	All candidates for Bachelor of Art, Bachelor of Science, Bachelor of Social Work, and Bachelor of Arts and Sciences in Interdisciplinary Studies must complete a minimum of 120 credit hours, earn at least a 2.0 grade point average at this college and must take a minimum of 30 hours in residence with Bennett College. Study abroad and coursework completed via consortial agreements will count toward the residence requirement.
PROCEDURES	A degree audit in the Student Information System will be reviewed by both the faculty advisor and the Registrar's office to ensure the student is in compliance with academic program requirements.

Replaces policy:

Date

Board of Trustees Policy Number:	Date of Adoption/Revision:
ACAF 3.13	September 16, 2017

SUBJECT	**Artwork Procurement Policy**
AUTHORITY	Office of the Vice President of Academic Affairs
APPLICABILITY	All activities relating to the acquisition and accessioning of works of art to the Bennett College Collection
PURPOSE	This policy was developed to ensure that appropriate processes are in place for the acquisition, maintenance and de-accessioning of Bennett College artwork.

POLICY	Bennett College is committed to acquiring and maintaining high-quality works of art that support the College's mission, vision and values. The College will acquire works of art by a variety of methods and is committed to ensuring that all acquisitions are negotiated and managed on terms that are ethical, honorable, and responsible.

PROCEDURES	1. The approved methods of artwork acquisition are:
	    1. gifts
	    2. bequests
	    3. purchases
	    4. extended loans
	
	2. All works of art must be reviewed for acquisition by Wilbur Steele Hall Gallery Manager and Advisory Committee. The Gallery Manager and Advisory Committee will present recommendations of acceptance or rejection of works of art for the permanent collections, providing a statement explaining rationale for rejection or describing the provenance, quality, and desirability for accepting the gift or making a purchase to the Provost.
	
	3. The Gallery Manager and Advisory Committee shall conduct an analysis to determine compatibility of the object with collection categories, its value, and its storage and display requirements. The committee shall also analyze requirements stipulated by the donor and other potential issues before making their decision.

	4. Bennett College will provide the donor of acquisitioned works of art with a deed of gift which is signed by the Provost and may be used by the donor for tax purposes. 5. Upon acceptance of a work of art to the permanent collection, the Gallery Manager will issue the object a permanent accession number and photograph the artwork for purposes or record and identification. 6. All records pertaining to acquisitioned works of art will be kept by Office of Business and Finance and maintained by the Gallery Manager. Donated artwork will be acknowledged by the Office of Institutional Advancement. 7. For accepted bequests, a copy of the will, codicils and any other related documentation must be presented and will be maintained by the Office of Institutional Advancement and the Gallery. 8. The Gallery Manager and Advisory Committee will ensure that all acquisitions are negotiated and managed on terms that are ethical, honorable, responsible and visible to public scrutiny and will maintain the Gallery's standing and reputation for collection excellent and quality works of art.

Replaces policy: *Date*

Board of Trustees Policy Number: **ACAF 3.14**	**Date of Adoption/Revision: June 6, 2006** **Approved by Faculty: April 11, 2005** **Revised: November 2005; March 2006**

SUBJECT	Tenure and Promotion Policy
AUTHORITY	Office of the Vice President for Academic Affairs
APPLICABILITY	All Bennett College faculty members
PURPOSE	Bennett College seeks to create and maintain an instructional faculty that endorses the nature and purpose of a liberal arts college for women, and whose teaching ability, scholarship, skills, and values are consistent with and supportive of the mission of the College. In the achievement of this goal, the tenure program at Bennett College is designed to reward faculty performance at Bennett College, distinguished by sustained excellence, with reasonable professional security. Tenure assures a faculty member that he/she will be reemployed for succeeding contract terms until retirement, resignation, death, or termination for one of the causes specified in this Tenure and Promotion Policy subject to the terms and conditions of employment as they may be changed from time to time by the College. Tenure grants the right of a faculty member to continued employment subject to the letter of tenure and is granted by action of the Board of Trustees on the recommendation of the President of the College following a formal tenure review process.

POLICY	Tenure grants the right of a faculty member to continued employment subject to the letter of tenure and is granted by action of the Board of Trustees on the recommendation of the President of the College following a formal tenure review process. The granting of tenure is not an automatic process and such decisions are made with careful and serious deliberation. While it is expected that tenure-track positions will result in tenured faculty, at no time will the number of tenured faculty exceed sixty percent of full-time faculty. Tenured positions will be equitably distributed among the two Divisions in general proportion to the total number of faculty positions in each Division, consistent with the Mission of the College.

PROCEDURES	**DELINEATION OF ROLES AND RANKS IN THE COLLEGE** **Definitions** The faculty of Bennett College shall consist of those persons as identified in their contracts who carry titles as professors, associate professors, assistant professors, instructors, lecturers, emeritus, faculty- in-residence, and visiting. Persons identified as adjunct and part time faculty are also defined as members of the faculty for the purpose of being guided by the provisions of this Handbook, but they are not considered members of the faculty for other administrative purposes. The administration of the college are those persons so designated by the Board of Trustees and shall consist of the President, Vice Presidents for Academic Affairs, Institutional Advancement, and Finance and Administration, and such other administrative officers as the Board may designate from time to time. The staff of the college consists of all personnel who support the work of the faculty and administration. Those administrators and staff with faculty rank are accorded such status by recommendation of the Vice President for Academic Affairs to the President of the college. Administrators and staff may be accorded faculty rank when they function in an instructional capacity, either in or outside the classroom. They are subject to all the responsibilities and standards of performance that apply to full time members of the faculty and receive the same academic freedom as other faculty members. Regarding the non-instructional aspects of their duties, they are governed by the provisions of the general college employee handbook. Such status affords the opportunity to attend and speak at meetings of the faculty, participate on faculty committees, and process in academic convocations. Such status does not carry the right to vote or to be considered for tenure. **Types of Faculty Appointments** • **Non-Tenure Track Appointments** A Non-Tenure track appointment shall be for a specified period of time and shall be extended to persons having full-time teaching and/or research responsibilities to the College. Individuals appointed in these positions may apply for promotion but are ineligible for tenure.

	• **Tenure Track Appointments** A tenure track appointment carries a probationary status which may lead toward the granting of tenure or the termination of service. The period of probationary status on a Tenure track appointment is seven (7) years. Time spent away from the College for professional improvement is counted as part of the probationary period. Appointees to the College Faculty who bring with them a record of service at other colleges and/or universities may be granted as much as three (3) years credit toward the seven years of probationary period. • **Adjunct Faculty Appointments** An adjunct faculty appointment is limited to faculty who normally are practitioners in a profession or whose main base is another academic institution. This is a temporary appointment. • **Visiting Faculty Appointments** A visiting faculty appointment shall be for faculty who are normally based at another institution of higher education or who are normally employed with another agency but temporarily transfer from the home base to the College. The visiting title may be used with any of the professorial ranks. • **Emeriti Appointments** An emeriti appointment shall be for faculty who retire at the legal retirement age and have served the College for at least ten years, or the faculty member retires after twenty-five years or more of service. The same rank will be maintained in the emeritus title as the one held while a member of the College. Persons with the emeritus title are extended privileges which are commensurate with full-time faculty members. Emeriti appointments must be approved by the Board of Trustees. (Board of Trustees approved Policy - BTRU 1.05, 4/17/2014) **Professorial Ranks** The terms and conditions of each initial appointment and of each reappointment to the faculty shall be set forth in writing in a faculty contract. Any special terms and conditions shall be clearly stated in the faculty contract. Special terms and conditions should be stated in the initial appointment, or in revisions approved by the College and faculty member. For each academic rank the minimum qualifications shall be as follows:

	• **Instructor** To qualify for the rank of instructor, one must hold an earned master's degree in the academic specialty from an accredited institution and show definite promise of teaching ability. An instructor should have completed at least 18 graduate semester hours in the subject or field in which he or she is hired to teach. Appointments to this rank are for a stated term of service. Teaching experience is preferred although not required. Upon promotion to a higher rank, Tenure track or non-Tenure track status is confirmed by the college through the faculty contract. • **Assistant Professor** To qualify for the rank of assistant professor one should have an earned doctoral degree or other terminal degree from an accredited institution or a master's degree with at least 30 graduate semester hours beyond the Master's degree in the area of specialization from an accredited institution. Additionally, at least two years successful teaching and/or research or related experience in the area of specialization at the college or university level is required. An assistant professor must have completed 18 graduate semester hours in the subject field in which he/she is hired to teach. Advanced study above the master's degree may be substituted for a portion of the required experience. • **Associate Professor** To qualify for the rank of associate professor, one must hold an earned doctorate or appropriate terminal degree in the area of specialization from an accredited institution; must have evidenced the ability to produce scholarly research and/or publications in the field, teaching and/or artistic activities or creative works; must hold active membership in at least one professional society in their discipline; and must have five (5) years of successful teaching experience or the equivalent at the college ·Or university level. An associate professor must have completed 18 graduate semester hours in the subject field in which he/she is hired to teach. • **Professor** To qualify for the rank of professor, one must hold an earned doctorate in the area of specialization from an accredited institution; must have acquired widely recognized eminence in a specific academic discipline or profession or have demonstrated superior scholarship, artistic activities, and/or creative works, professional ability and/or teaching competence; must have active membership in at least one national society in the field; must show evidence

of the ability to produce scholarly research and publication(s) in the field; and must have ten (10) years of successful experience at the college or university level or equivalent experience.

CRITERIA FOR TENURE

The criteria are aligned with the annual Faculty Performance Evaluation and are consistent with current best pedagogical practices for college teaching.

Two Tracks for Tenure

a. The first track to achieve tenure will place a greater emphasis on teaching effectiveness and contributions to the enhancement of the undergraduate curriculum.
b. The second track will require that a faculty member have satisfactory teaching effectiveness but will place a greater emphasis on scholarly productivity and/or research in the field of expertise of the faculty member. For both tracks the following three criteria for tenure will be reviewed in the tenure review process:
    1. Teaching Effectiveness
    2. Scholarly Productivity and/or Research
    3. Service to the College and the Community

1. Track One for Tenure – Emphasis on Teaching

The candidate will teach a full teaching load of typically twelve credit hours. Significant contributions to creative enhancements of teaching methods and the curriculum would be expected from a candidate in this track. The candidate will also perform scholarly work and/or research in her/his area of expertise and specific discipline such as sociology, chemistry, and philosophy. However, the candidate would be expected to devote at least 60% of her/his time to teaching and innovations in teaching and the curriculum. Scholarly productivity or research in the area of expertise would constitute approximately 25% to 30% of the professional work of the candidate. The time devoted to service to the college and the community would be flexible. In the review of the candidate for tenure, more emphasis will be placed on teaching effectiveness than on scholarly productivity/research.

The percent weight allocated to each of the three major criteria is indicated in parentheses next to the titles of the major criteria. Documentation which can be reviewed under the three criteria listed above.

Teaching Effectiveness (50%)

Documentation is required for the categories listed under a, b, and e:

	a. Faculty performance evaluation for the three years prior to submission of the dossier. These documents must be signed by the immediate supervisor of the candidate and must be complete with accurate dates. b. Student evaluations of courses taught by the candidate for at least the three years prior to submission of the dossier including student comments and the summary of scores received. c. Supervisor's in-class evaluation of the candidate for the three years prior to the submission of the dossier. Additional examples of documentation which can be submitted to support these criteria include: d. Documentation of innovations in teaching methods developed by the candidate including textbooks, DVD's and other instructional materials. e. Documentation of contributions to enhancements and innovations in the curriculum in the major degree area of the teaching field, including submission of revised syllabi, portfolios, global aspects etc. Many aspects of the 21st Century curriculum could be used for evidence. f. Letters of support from external reviewers indicating the caliber of the innovations and enhancements in teaching methods or curriculum development g. Exposing students to scholarly activities outside the classroom such as accompanying students to scholarly conferences, locally and nationally h. Pedagogical research that contributes to the curriculum. ***Scholarly Productivity and/or Research (20%)*** Specific documentation will be presented to support: a. Caliber of scholarly productions and/or research projects as judged by the national standards of the professional area in which the candidate has expertise b. Quantity of scholarly productions (i.e., art works, theatrical productions, presentations at conferences) and/ or research projects. The publishing of a few abstracts of research with no peer reviewed, full research articles produced, would not be sufficient to obtain tenure. c. Mentoring of students as participants in scholarly work or research of the candidate, for example, did the candidate sponsor a research project for a senior thesis d. Quality of publications resulting from scholarly work or research,

	including: 1. Is the journal or publication in which an article is published peer reviewed? 2. Is the journal or publication in which an article is published nationally recognized by the discipline? e. Contributions of the scholarly work or research in enhancing the curriculum for students in the area of expertise. This can include curriculum development in the major field and contributions in the General Education core areas f. Number of submissions of grant proposals to support research or scholarly productivity g. Number of grants or other funding awards obtained by the candidate to support her/his work h. Contribution of scholarly work/ research to the Mission of the candidate's Department and the academic program ***Service to the College and the Community (20%)*** Specific documentation will be presented to support: a. Type of College committees on which the candidate served as a member and number of years served b. Number of College committees on which the candidate served c. Support of College fund raising activities d. Volunteering in activities of community organizations such as church organizations and other non-profit organizations e. Participation in formal College ceremonies such as Commencement and Convocatum Est: f. Advising or major support of student organizations and contributions to college extracurricular activities ***Letters of Recommendations (10%)*** Additional recommended documentation: a. Special task forces in which the candidate has participated b. Special assignments for the College at all levels c. Membership on boards or committees of community organizations d. Service as an officer of the Faculty Senate e. Financial support of community organizations f. Service to the college as an academic advisor **2. Track Two for Tenure – Emphasis on Scholarly Productivity and/or Research**

	In this track, a much greater emphasis is placed on scholarly productivity and/or research accomplishments. The candidate in this track will have a smaller teaching load, teaching no more than six credit hours per semester. At least 60% of the professional work of the candidate will be devoted to scholarly productivity and/or research. No more than 25% to 30% of the candidate's professional work will be devoted to teaching. Time devoted to service to the college and the community is flexible. The candidate must have satisfactory teaching effectiveness evaluations. The criteria for review of the candidate in this track for tenure will be the same as discussed under the criteria for Track One. However, in the review of this candidate a much greater weight will be placed on the accomplishments of the candidate under the category, Scholarly Productivity and/or Research. For example, the candidate will be expected to produce significantly more scholarly work within her/his discipline, and through interdisciplinary collaboration including scholarly peer reviewed papers, recognized and critiqued works of art, and performance and/or compositions. The percent weight allocated to each of the three major criteria is indicated in parentheses next to the titles of the major criteria. Documentation which can be reviewed under the three criteria listed above includes: ***Scholarly Productivity and/or Research (50%)*** Specific documentation will be presented to support: a. Caliber of scholarly productions and/or research projects as judged by the national standards of the professional area in which the candidate has expertise b. Quantity of scholarly productions (i.e., art works, theatrical productions, presentations at conferences) and/ or research projects. The publishing of a few abstracts of research with no peer reviewed, full research articles produced, would not be sufficient to obtain tenure c. Mentoring of students as participants in scholarly work or research of the candidate: for example, did the candidate sponsor a research project for a senior thesis? d. Quality of publications resulting from scholarly work or research, including 1. Is the journal or publication in which an article is published peer reviewed? 2. Is the journal or publication in which an article is published nationally recognized by the discipline? e. Contributions of the scholarly work or research in enhancing the curriculum for students in the area of expertise. This can include curriculum development in the major field and contributions in the General Education core areas. f. Number of submissions of grant proposals to support research or

	scholarly productivity g. Number of grants or other funding awards obtained by the candidate to support their work h. Contribution of scholarly work/ research to the Mission of the candidate's Department and the academic program. ***Teaching Effectiveness (20%)*** Documentation is required for the categories listed under a, b, and e: a. Faculty performance evaluation for the three years prior to submission of the dossier. These documents must be signed by the immediate supervisor of the candidate and must be complete with accurate dates b. Student evaluations of courses taught by the candidate for at least the three years prior to submission of the dossier including student comments and the summary of scores received c. Supervisor's in-class evaluation of the candidate for the three years prior to the submission of the dossier Additional examples of documentation which can be submitted to support these criteria include: d. Documentation of innovations in teaching methods developed by the candidate including textbooks, DVD's and other instructional materials e. Documentation of contributions to enhancements and innovations in the curriculum in the major degree area of the teaching field, including submission of revised syllabi, portfolios, global aspects etc. Many aspects of the 21st Century curriculum could be used for evidence f. Letters of support from external reviewers indicating the caliber of the innovations and enhancements in teaching methods or curriculum development g. Exposing students to scholarly activities outside the classroom such as accompanying students to scholarly conferences, locally and nationally h. Pedagogical research that contributes to the curriculum ***Service to the College and the Community (20%)*** Specific documentation will be presented to support: a. Type of College committees on which the candidate served as a member and number of years served b. Number of College committees on which the candidate served c. Support of College fund raising activities d. Volunteering in activities of community organizations such as church organizations and other non-profit organizations e. Participation in formal College ceremonies such as Commencement and Convocatum Est f. Advising or major support of student organizations and contributions

to college extracurricular activities

Letters of Recommendation (10%)

Additional recommended documentation:

a. Special task forces in which the candidate has participated
b. Special assignments for the College at all levels
c. Membership on boards or committees of community organizations
d. Service as an officer of the Faculty Senate
e. Financial support of community organizations
f. Service to the college as an academic advisor

PROCESS FOR APPLYING FOR TENURE

The Office of the Vice President for Academic Affairs is responsible for ensuring that the review of candidates for tenure and promotion is conducted according to the procedures described in the Tenure and Promotion Policy. The Vice President for Academic Affairs is the sole administrator who notifies candidates officially that they are eligible to apply for tenure, and all tenure and promotion dossiers must be submitted to the Vice President for Academic Affairs initially to begin the review process. The detailed description of the role of the Vice President for Academic Affairs in the process for review of candidates for tenure and promotion is described in this section of the Tenure and Promotion Policy, Process for Applying for Tenure.

A candidate is reviewed for both tenure and promotion at the same time by the same criteria specified in the College Tenure and Promotion Policy. There is no separate review for promotion if the candidate is applying for tenure.

1. By March 31 of the sixth year of the probationary period, the Vice President for Academic Affairs will notify candidates for tenure in writing that they are eligible to apply for tenure. This letter should be hand delivered to each eligible candidate. The Vice President for Academic Affairs will also inform the Chairperson of the candidate's Department and the Division Dean that the candidate is eligible to apply for tenure by copying them on this letter. Candidates should notify the Vice President for Academic Affairs in writing that they have received notice of their eligibility to apply for tenure. If the Vice President for Academic Affairs does not receive a reply from the candidate within two weeks of the time that the notice on eligibility was sent to the candidate, the candidate should be contacted directly by the Office of the Vice President for Academic Affairs.

	2. The candidates should be informed by the Office of the Vice President for Academic Affairs that they must submit her/his dossier for tenure to the Vice President for Academic Affairs at the beginning of the seventh year of the probationary period by August 31. If a candidate does not submit his/her dossier by the date of August 31, the College will assume that the candidate does not want to apply for tenure, and the candidate will be given a terminal faculty contract for one year beyond the termination date of the current faculty contract. 3. After the dossier has been received by the Vice President for Academic Affairs, she/he will determine whether all necessary sections of the dossier including letters of support from supervisors, colleagues and students in the College, are present. The Vice President for Academic Affairs will complete a checklist to indicate that all necessary sections of the dossier are present. Missing documents will be requested from the candidate by the Vice President for Academic Affairs. Candidates will have five (5) business days to submit the requested documents to the Vice President for Academic Affairs. If the candidate fails to submit requested documents by the deadline, this indicates to the College that the candidate does not wish to be considered for tenure and promotion, and the candidate will be given a one year terminal contract at this time for the next academic year. 4. If the dossier is complete, the Vice President for Academic Affairs will send the dossier to the Dean. The Dean must complete a document indicating the date of receipt of the dossier. Dossiers must be kept in the Division Office in a locked confidential file. The Dean does not review the dossier but in conjunction with the Chairperson of the Division Tenure and Promotion Committee convenes this committee for review of the dossier. The Division Tenure and Promotion Committee will review the dossier within thirty days of being notified that the dossier is available for review. The committee will send its recommendation concerning the tenure application of the candidate to the Vice President for Academic Affairs through the Dean of the candidate within this thirty day deadline. 5. The Vice President for Academic Affairs will notify the Chairperson of the College Tenure and Promotion Committee that the dossier is ready to be reviewed by the College Tenure and Promotion Committee. In conjunction with the Chairperson of the College Tenure and Promotion Committee, the Vice President for Academic Affairs then convenes the committee for the review of the dossier. Dossiers will be reviewed by the College Tenure and Promotion Committee in a meeting room which can satisfactorily maintain the

	confidentiality of the deliberations of the committee. The committee will review the dossier and make their recommendation concerning the application for tenure to the Vice President for Academic Affairs within sixty days of the date that the Chairperson is notified that the dossier is available for review. As a part of their review, the College Tenure and Promotion Committee is required to consider the recommendation of the Division Tenure and Promotion Committee concerning the application for tenure of all candidates. 6. Upon receipt of the recommendation concerning the application for tenure of a candidate from the College Tenure and Promotion Committee, the Vice President for Academic Affairs will review the dossier. The Vice President for Academic Affairs should complete her/his review within thirty days of the receipt of the recommendation concerning tenure from the College Tenure and Promotion Committee. The recommendation of the Vice President for Academic Affairs should be submitted to the College President who will then review the dossier. The President must sign a document indicating the date of receipt of the dossier. 7. The College President must complete her/his review of the dossier within sixty days of the receipt of the dossier. She/he will send the recommendation concerning the application for tenure to the Board of Trustees. The Board of Trustees will then decide whether or not to award tenure to the candidate. The decision should be made no later than the June meeting of the Board in the academic year in which the dossier was submitted. 8. The candidate must be informed in a certified letter from the College President of the decision of the Board of Trustees concerning his/her application for tenure within thirty days of the date the decision is made by the Board. The candidate should acknowledge through a certified letter that they have received the official notice of the decision of the Board. 9. If the application for tenure of a candidate is rejected, the candidate can appeal this decision through the process described in the section of the College Tenure and Promotion Policy concerning appeals of rejection for tenure, within sixty days of the receipt of the notice of the decision of the Board.

PRE-TENURE MENTORING AND REVIEW

1. During their first year of appointment faculty should receive information from their Dean regarding Tenure and Promotion upon hire and will be assigned a mentor. Tenure track faculty will be considered for promotion at the same time as their consideration for tenure. Tenure track faculty members begin dossier development in the first two years and have preliminary evaluations with feedback from Division Tenure and Promotion committees during the third and fifth year. Reviews at these times are based on the Criteria for Tenure and Promotion described in that section of the document.

2. New faculty in most cases will be mentored by Faculty Lead. Mentors will serve as advocates for the candidate during the divisional tenure and promotion review process.

Mentoring of New Faculty
A process of mentoring will be established so that each new faculty member has a designated support person who can provide information, guidance and encouragement. That person will act as an advocate for the candidate, and present their case for tenure and promotion to the initial recommending bodies. In most cases, it is presumed that this mentor will be the Faculty Lead. Exceptions can be made where circumstances warrant, such as (1) a faculty member has an interdepartmental appointment, (2) the faculty member prefers another senior member of the department who has a closer professional relationship to the candidate, or (3) the number of such candidates requires another senior faculty in the department to act as a mentor. While a wide variety of styles can and would be anticipated, it should be understood that the mentor would provide explicit guidance and monitoring of the candidate throughout the process of attaining promotion and eventually tenure and promotion.

Pre-Tenure Review Process
Candidates for tenure will receive a pre-tenure review, with an initial review occurring in the third year of a candidate's appointment, and a more formal review during the fifth year. These reviews will be conducted by the Division Tenure and Promotion Committee with recommendations sent to the VPAA. The dossier will be formally reviewed during the fifth year of pre-tenure review. Responses to candidates from each Division Tenure and Promotion Committee will each year be passed to the Vice President for Academic Affairs, so that each candidate's progress will be monitored at two levels: divisional and administrative.

In some extraordinary cases, final application for tenure and promotion may be considered at a time earlier than the seventh year. The dossier must be complete and all other requirements must be fulfilled by any candidate making early

application for tenure and promotion. A minimum of three years of service must be completed before an early application for tenure. All persons in tenure track positions will be evaluated for tenure and promotion no later than the seventh year of the probationary period.

CHRONOLOGY OF TENURE/PROMOTION DOSSIER DEVELOPMENT

1. Upon hiring--faculty member is provided with the College Tenure and Promotion Policy. A mentor of associate professor rank or higher is identified by the Dean.

2. During the first three years-- a faculty member develops a preliminary dossier which is monitored by their mentor, and presented to the Division Tenure and Promotion Committee at the start of the third year. Division Tenure and Promotion Committee recommendations are presented to the Dean. Recommendations should incorporate all elements of the Tenure and Promotion Criteria. The dossier is returned to the faculty member.

3. During the fourth year--faculty member continues dossier development with attention to the recommendations on the preliminary dossier. The mentor works with the faculty member to develop strengths in needed areas and assist in gathering documentation (e.g., student survey data and other institutional materials).

4. At the fifth year--candidate presents a more complete and formal dossier to the Division Tenure and Promotion Committee. More formal recommendations are provided to the candidate with copies sent to the faculty mentor and the Department and Dean. Any significant weaknesses are clearly identified and remedial or supplementary courses of action are suggested. The dossier is returned to the faculty member.

5. At the seventh year--The Vice President for Academic Affairs formally notifies the candidate that she/he is eligible to apply for tenure and promotion. A deadline is set for the presentation of the final dossier to the Division Tenure and Promotion Committee as described under Process for Applying for Tenure. The College Tenure and Promotion Committee has a deadline for making final recommendations on promotion and tenure to the Vice President for Academic Affairs. At completion of all deliberations, including possible appeals, the dossier is returned to the candidate by the office of the VPAA.

PROCESS OF APPEAL FOR DENIAL OF TENURE

Upon receipt of a certified letter from the College President by a candidate for tenure, that their application for tenure has been denied by the Board of Trustees,

the candidate can appeal the decision by the following process:

1. Notify the Vice President for Academic Affairs (VPAA) of the intent to appeal the denial of tenure within sixty days of the receipt of the letter informing the candidate of the denial.

2. Vice President for Academic Affairs will then notify the College Tenure and Promotion Committee of the appeal.

3. Candidate will then submit a formal certified letter to the VPAA describing the reason for challenging the denial of tenure.

4. The VPAA will then submit the letter appealing the denial of tenure to the Chair of the Grievance Committee of the Faculty Senate. The Grievance Committee will appoint an ad hoc committee to review the appeal of the denial of tenure as specified in the Faculty Bylaws of the College.

5. The members of the ad hoc committee must be tenured senior faculty with the rank of Associate Professor or Professor.

6. The ad hoc committee will only review the part of the tenure dossier of the candidate upon which the denial of tenure was based. The committee will not review the entire tenure dossier.

7. The ad hoc committee must adhere to the criteria for tenure and promotion of the Tenure and Promotion Policy in reviewing the appeal of the denial of tenure.

8. The ad hoc committee will send a recommendation to the President, with a copy to the VPAA, concerning the appeal of the denial of tenure, within thirty days (30 days) of the receipt from the VPAA of the letter from the candidate appealing the denial of tenure.

9. The President will review the recommendation from the ad hoc committee and either concur with or reject the recommendation. The decision of the President concerning the appeal of the denial of tenure is final.

10. The President will inform the candidate of the decision concerning the appeal of the denial of tenure in a certified letter.

PROCEDURES FOR PROMOTION OF NON-TENURE TRACK FACULTY

Those faculty members who have a non-tenure track appointment may apply for promotion after serving in their initial faculty appointment for three years. **The faculty member will have an appointment in one of the following two track**s:

1. Track One - Emphasis on Teaching Effectiveness
2. Track Two - Emphasis on Scholarly Productivity and/or Research
3.

The track of the faculty member will be determined by negotiation with the College administration concerning the first contract for the faculty appointment.

A non-tenure track candidate is reviewed for promotion by the same criteria specified in the College Tenure and Promotion Policy and listed below under Criteria for Evaluation of the Application for Promotion.

Process for Applying for Promotion for Non-Tenure Track Faculty

1. By March 31 of the third year of appointment of the faculty member, the Vice President for Academic Affairs will notify candidates for promotion that they are eligible to apply for promotion. The Vice President will also inform the Dean that the candidate is eligible to apply for promotion. Candidates should notify the Vice President in writing that they have received notice of their eligibility to apply for promotion. If the Vice President does not receive a reply from the candidate within two weeks of the time that the notice on eligibility was sent to the candidate, the candidate should be contacted directly by the Office of Academic Affairs. Candidates who are non-tenure track are not required to apply for promotion by the third year of appointment.

2. The candidates should be informed that they must submit their dossier for promotion to the Vice President for Academic Affairs at the beginning of the year in which they are to apply for promotion by August 31.

3. After the dossier has been received by the Vice President for Academic Affairs, she/he will determine whether all necessary sections of the dossier including letters of support from supervisors, colleagues and students in the College, are present. The Vice President for Academic Affairs will complete a checklist to indicate that all necessary sections of the dossier are present. Missing documents will be requested from the candidate by the Vice President for Academic Affairs. Candidates will have five (5) business days to submit the requested documents to the Vice President for Academic Affairs.

	4. If the dossier is complete, the Vice President for Academic Affairs will send the dossier to the Dean. The Division Dean must complete a document indicating the date of receipt of the dossier. Dossiers must be kept in the Division Office in a locked confidential file. The Dean does not review the dossier, but in conjunction with the Chairperson of the Division Tenure and Promotion Committee convenes this committee for review of the dossier. The Division Tenure and Promotion Committee will review the dossier within thirty days of being notified that the dossier is available for review. The committee will send its recommendation concerning the promotion application of the candidate to the Vice President for Academic Affairs through the Division Dean of the candidate within this thirty day deadline. 5. The Vice President for Academic Affairs will notify the Chairperson of the College Tenure and Promotion Committee that the dossier is ready to be reviewed by the College Tenure and Promotion Committee. In conjunction with the Chairperson of the College Tenure and Promotion Committee, the Vice President for Academic Affairs then convenes the committee for the review of the dossier. Dossiers will be reviewed by the College Tenure and Promotion Committee in a meeting room which can satisfactorily maintain the confidentiality of the deliberations of the committee. The committee will review the dossier and make their recommendation concerning the application for promotion to the Vice President for Academic Affairs within sixty days of the date that the Chairperson is notified that the dossier is available for review. As a part of their review, the College Tenure and Promotion Committee is required to consider the recommendation of the Division Tenure and Promotion Committee concerning the application for promotion of all candidates. Upon receipt of the recommendation concerning the application for promotion of a candidate from the College Tenure and Promotion Committee, the Vice President for Academic Affairs will review the dossier. The Vice President for Academic Affairs should complete his/her review within thirty days of the receipt of the recommendation concerning promotion from the College Tenure and Promotion Committee. The recommendation of the Vice President should be submitted to the College President who will then review the dossier. The President must sign a document indicating the date of receipt of the dossier. The College President must complete her/his review of the dossier within sixty days of the receipt of the dossier. She/he will send the recommendation concerning the application for promotion to the Board of Trustees. The Board of Trustees will then decide whether promotion will or will not be awarded to the candidate. The decision

should be made no later than the June meeting of the Board in the academic year in which the dossier was submitted.

The candidate must be informed in a certified letter from the College President of the decision of the Board of Trustees concerning his/her application for promotion within thirty days of the date the decision is made by the Board. The candidate should acknowledge through a letter that they have received the official notice of the decision of the Board.

6. If the application for promotion of a candidate is rejected, the candidate can appeal this decision through the process described in the section of the College Tenure and Promotion Policy concerning appeals of rejection for promotion, within sixty days of the receipt of the notice of the decision of the Board.

Criteria for Evaluation of the Application for Promotion

The criteria for evaluating an application for promotion in a non-tenure track appointment will be the same criteria listed on pages six through twelve in the section Criteria for Tenure and Promotion of the Tenure and Promotion Policy, with the three main criteria being:

1. Teaching Effectiveness
2. Scholarly Productivity and/or Research
3. Service to the College and the Community

The non-tenure track candidate for promotion should prepare a dossier providing evidence of accomplishments under these criteria for promotion. The dossier will be reviewed by the Division Tenure and Promotion Committee and the College Tenure and Promotion Committee according to the process and timetable described above.

Two Tracks for Promotion

The first track to achieve promotion will place a greater emphasis on teaching effectiveness and contributions to the enhancement of the undergraduate curriculum. The second track will require that a faculty member have satisfactory teaching effectiveness but will place a greater emphasis on scholarly productivity and/or research in the field of expertise of the faculty member. For both tracks the following three criteria for promotion will be reviewed in the promotion review process:

1. Teaching Effectiveness
2. Scholarly Productivity and/or Research
3. Service to the College and the Community

1. **Track One for Tenure – Emphasis on Teaching**
   The candidate will teach a full teaching load of typically twelve credit hours. Significant contributions to creative enhancements of teaching methods and the curriculum would be expected from a candidate in this track. The candidate will also perform scholarly work and/or research in their area of expertise and specific discipline such as sociology, chemistry, philosophy. However, the candidate would be expected to devote at least 60% of their time to teaching and innovations in teaching and the curriculum. Scholarly productivity or research in the area of expertise would constitute approximately 25% to 30% of the professional work of the candidate. The time devoted to service to the college and the community would be flexible. In the review of the candidate for promotion, more emphasis will be placed on teaching effectiveness than on scholarly productivity/research.

   The percent weight allocated to each of the three major criteria is indicated in parentheses next to the titles of the major criteria. Documentation which can be reviewed under the three criteria listed above includes:

   Teaching Effectiveness (60%)
   Documentation is required for the categories listed under a, b, and c:
   a. Faculty performance evaluation for the three years prior to submission of the dossier. These documents must be signed by the immediate supervisor of the candidate and must be complete with accurate dates.
   b. Student evaluations of courses taught by the candidate for at least the three years prior to submission of the dossier including student comments and the summary of scores received.
   c. Supervisor's in-class evaluation of the candidate for the three years prior to the submission of the dossier.

   Additional examples of documentation which can be submitted to support these criteria include:

   Documentation of innovations in teaching methods developed by the candidate including textbooks, DVD's and other instructional materials
   d. Documentation of contributions to enhancements and innovations in the curriculum in the major degree area of the teaching field, including submission of revised syllabi, portfolios, and inclusion of global aspects. Many aspects of the 21st Century curriculum could be used for evidence.
   e. Letters of support from external reviewers indicating the caliber of the innovations and enhancements in teaching methods or curriculum development
   f. Exposing students to scholarly activities outside the classroom such as accompanying students to scholarly conferences, locally and nationally g. Pedagogical research that contributes to the curriculum

	Scholarly Productivity and/or Research (20%) Specific documentation may be presented to support: a. Caliber of scholarly productions and/or research projects as judged by the national standards of the professional area in which the candidate has expertise b. Quantity of scholarly productions (i.e., art works, theatrical productions, presentations at conferences) and/ or research projects. The publishing of a few abstracts of research with no peer reviewed, full research articles produced, would not be sufficient to obtain promotion. c. Mentoring of students as participants in scholarly work or research of the candidate, for example, did the candidate sponsor a research project for a senior thesis d. Quality of publications resulting from scholarly work or research, including: 1. Is the journal or publication in which an article is published, peer reviewed? 2. Is the journal or publication in which an article is published, nationally recognized by the discipline? e. Contributions of the scholarly work or research in enhancing the curriculum for students in the area of expertise f. Number of submissions of grant proposals to support research or scholarly productivity g. Number of grants or other funding awards obtained by the candidate to support their work h. Contribution of scholarly work/ research to the Mission of the candidate's Department ***Service to the College and the Community (20%)*** Specific documentation will be presented to support: a. College committees on which the candidate served as a member and number of years served b. Number of College committees on which the candidate served c. Support of College fund raising activities d. Volunteering in activities of community organizations such as church organizations and other non-profit organizations e. Participation in formal College ceremonies such as Commencement and Convocatum Est f. Advising or major support of student organizations and contributions to college extracurricular activities Additional recommended documentation: g. Special task forces in which the candidate has participated h. Special assignments for the College at all levels i. Membership on boards or committees of community organizations j. Service as an officer of the Faculty Senate

k. Financial support of community organizations l. Service to the College as academic advisor

2. Track Two for Promotion-Emphasis on Scholarly Productivity and/or Research

In this track, a much greater emphasis is placed on scholarly productivity and/or research accomplishments. The candidate in this track will have a smaller teaching load, teaching no more than six credit hours per semester. At least 60% of the professional work of the candidate will be devoted to scholarly productivity and/or research. No more than 25% to 30% of the candidate's professional work will be devoted to teaching. Time devoted to service to the college and the community is flexible. The candidate must have a satisfactory teaching effectiveness evaluation. The criteria for review of the candidate in this track for promotion will be the same as discussed under the criteria for Track One. However, in the review of this candidate a much greater weight will be placed on the accomplishments of the candidate under the category, Scholarly Productivity and/or Research. For example, the candidate will be expected to produce significantly more scholarly work within her/his discipline and through interdisciplinary collaboration, including scholarly peer reviewed papers, recognized and critiqued works of art and performance and/or compositions.

The percent weight allocated to each of the three major criteria is indicated in parentheses next to the titles of the major criteria. Documentation which can be reviewed under the three criteria listed above includes:

Scholarly Productivity and/or Research (60%)

Documentation will be provided for:

a. Caliber of scholarly productions and/or research projects as judged by the national standards of the professional area in which the candidate has expertise
b. Quantity of scholarly productions (i.e., art works, theatrical productions, presentations at conferences) and/or research projects. The publishing of a few abstracts of research with no peer reviewed, full research articles produced, would not be sufficient to obtain promotion.
c. Mentoring of students as participants in scholarly work or research of the candidate, for example, did the candidate sponsor a research project for a senior thesis?
d. Quality of publications resulting from scholarly work or research, including:
    1. Is the journal or publication in which an article is published, peer reviewed?
    2. Is the journal or publication in which an article is published, nationally recognized by the discipline?
e. Contributions of the scholarly work or research in enhancing the

curriculum for students in the area of expertise. This can include curriculum development in the major field and contributions in the General Education core areas.

f. Number of submissions of grant proposals to support research or scholarly productivity
g. Number of grants or other funding awards obtained by the candidate to support their work
h. Contribution of scholarly work/ research to the Mission of the candidate's Department

Teaching Effectiveness (20%)

Documentation is required for the categories listed under a, b, and c:

a. Faculty performance evaluation for the three years prior to submission of the dossier. These documents must be signed by the immediate supervisor of the candidate and must be complete with accurate dates.
b. Student evaluations of courses taught by the candidate for at least the three years prior to submission of the dossier including student comments and the summary of scores received.
c. Supervisors' in-class evaluation of the candidate for the three years prior to the submission of the dossier. Additional examples of documentation which can be submitted to support these criteria include:
d. Documentation of innovations in teaching methods developed by the candidate including textbooks, DVD's and other instructional materials
e. Documentation of contributions to enhancements and innovations in the curriculum in the major degree area of the teaching field, including submission of revised syllabi.
f. Letters of support from external reviewers indicating the caliber of the innovations and enhancements in teaching methods or curriculum development
g. Exposing students to scholarly activities outside the classroom such as accompanying students to scholarly conferences, locally and nationally
h. Pedagogical research contributing to the curriculum

Service to the College and the Community (20%)

Specific documentation will be presented to support:

a. College committees on which the candidate served as a member and number of years served
b. Number of College committees on which the candidate served c. Support of College fund raising activities
c. Volunteering in activities of community organizations such as church organizations and other non-profit organizations
d. Participation in formal College ceremonies such as Commencement

and Convocatum Est

e. Advising or major support of student organizations and contributions to college extracurricular activities
f. Additional recommended documentation:
g. Special task forces in which the candidate has participated h. Special assignments for the College at all levels
h. Membership on boards or committees of community organizations
i. Service as an officer of the Faculty Senate k. Financial support of community organizations
j. Service to the College as an academic advisor

PROCESS OF APPEAL FOR DENIAL OF PROMOTION
(Non-Tenure Track)

Upon receipt of a certified letter from the College President by a candidate for promotion, indicating that their application for promotion has been denied by the Board of Trustees, the candidate can appeal the decision by the following process:

1. Notify the Vice President for Academic Affairs (VPAA) of the intent to appeal the denial of promotion within sixty days of the receipt of the letter informing the candidate of the denial.

2. Vice President for Academic Affairs will then notify the College Tenure and Promotion Committee of the appeal.

3. Candidate will then submit a formal certified letter to the VPAA describing the reason for challenging the denial of promotion.

4. The VPAA will then submit the letter appealing the denial of promotion to the Chair of the Grievance Committee of the Faculty Senate. The Grievance Committee will appoint an ad hoc committee to review the appeal of the denial of promotion as specified in the Faculty By-Laws of the College.

5. The members of the ad hoc committee must be tenured senior faculty with the rank of Associate Professor or Professor.

6. The ad hoc committee will only review the part of the promotion dossier of the candidate upon which the denial of promotion was based. The committee will not review the entire promotion dossier.

7. The ad hoc committee must adhere to the criteria for promotion of the Tenure and Promotion Policy in reviewing the appeal of the denial of promotion.

8. The ad hoc committee will send a recommendation to the President, with a copy to the VPAA, concerning the appeal of the denial of

	promotion, within thirty days (30 days) of the receipt from the VPAA of the letter from the candidate appealing the denial of promotion. 9. The President will review the recommendation from the ad hoc committee and either concur with or reject the recommendation. The decision of the President concerning the appeal of the denial of promotion is final. 10. The President will inform the candidate of the decision concerning the appeal of the denial of promotion in a certified letter.

Replaces policy: June 16,2006

Date: 11/06/2019 0020

Board of Trustees Policy Number: **ACAF 3.15**

Date of Adoption/Revision: November 23, 2019

SUBJECT	**Student Privacy Policy**
AUTHORITY	Registrar and Office of Vice President of Academic Affairs
APPLICABILITY	All published recruitment materials
PURPOSE	The Office of the Registrar complies with the provisions of the Family Educational Rights and Privacy Act (FERPA) of 1974. The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. This Policy notifies students of their rights under the federal Family Educational Rights and Privacy Act.
POLICY	Under the Family Educational Rights and Privacy Act (FERPA), a student have the right to: • Inspect and review her education records; • Request an amendment to her education records if you believe they are inaccurate or misleading; • Request a hearing if her request for an amendment is not resolved to your satisfaction; • Consent to disclosure of personally identifiable information from her education records, except to the extent that FERPA authorizes disclosure without her consent; • File a complaint with the U.S. Department of Education Family Policy Compliance Office if they believe her rights under FERPA have been violated.
PROCEDURES	• Simplified, FERPA gives a student the rights to: • Control the disclosure of her “education records” to others • Inspect and review her own “education records” • Challenge the content of her “education records”

FERPA rights belong to the student, and not to the student's parents or legal guardians. The term "education records" includes almost all information Bennett College maintain about our students including course schedules, grade reports, bursar's bill, student financial aid, academic information and disciplinary records.

Medical information is also protected by federal and state law and cannot be obtained without the student's express written consent.

1. **Inspect and Review:**
   Any student may inspect and review her educational record upon completion of the appropriate form in the Office of the Registrar. The request will be honored as soon as possible; under the law this must be done within 45 days of receipt of the request. The Office of the Registrar will notify the student regarding when and where the record will be available for inspection. Any student has the right to review and inspect all of the documents in her folder except for the following:
   - Confidential evaluations and letters of recommendation filed before January 1, 1975.
   - Evaluations and recommendations after that date if the student has waived her right to see them.
   - Financial records and statements of her parents.
   - Those documents classified by law as non-educational.

   If, after inspecting and reviewing her records, the student has any questions about them, she may request an oral or written explanation and interpretation of them.

   The student may also secure a copy of every document in her folder open to inspection. These copies will be made by the College under the same terms and conditions for a student copy of a transcript. Copies will not be supplied if the student has an overdue debt to the College or has outstanding overdue books or fines with the Library. If an original or source document exists elsewhere (e.g., records of other schools, test scores), copies will not be issued to the student.

2. **Amendment of Educational Records**
   A student has the right to request that a school correct records which she believes to be inaccurate or misleading. To do so,
   - The student must send a written, signed request for amendment to the Office of the Registrar, Bennett College, 900 East Washington Street, Greensboro 27401.
   - The request **must** specify the record she wishes amended and the reason for the amendment. The College will reply to student's requests no later

than 45 days after receiving the requests. If the College does not agree to amend the record, students have a right to a hearing on the issue.

3. Request a Hearing

- If the College decides not to amend the record, students then have the right to a formal hearing. The student must request a hearing, in writing, with the **Office of the Registrar.** After the hearing, if the College still decides not to amend the record, the student has the right to place a statement with the record setting forth her view about the contested information.

4. Control Disclosure of Records

Generally, the College must have written permission from the student in order to release any information from a student's education record. However, FERPA allows the College to disclose those records, without consent, to the following parties or under the following conditions (34 CFR § 99.31):

- School officials with legitimate educational interest;
- Other schools to which a student is transferring;
- Specified officials for audit or evaluation purposes;
- Appropriate parties in connection with financial aid to a student;
- Organizations conducting certain studies for or on behalf of the school;
- Accrediting organizations;
- To comply with a judicial order or lawfully issued subpoena;
- Appropriate officials in cases of health and safety emergencies; and
- State and local authorities, within a juvenile justice system, pursuant to specific State law.

FERPA Exemptions to Privacy: Directory Information

- Provisions of FERPA allow the institution to define directory information, that is, information which is public. Bennett College determined that the following student information is directory information:
- Name
- Address (local and permanent)
- College email address
- Telephone number (local and permanent)
- Major
- Dates of attendance
- Admission or enrollment status
- Currently enrolled (Y/N)
- Campus, school, College, or division
- Class standing
- Degrees and awards
- Activities
- Sports/athletic information and

- Previous educational institutions attended.
- Request Non-Disclosure

Students May Request Nondisclosure of Directory Information

Enrolled students may withhold disclosure of directory information under FERPA. This is called "directory exemption". Upon designating this status on their academic records, no information can be released to the general public, including phone requests from financial lenders, employers or insurance companies for verification of terms of enrollment, verification of their presence on campus, nor any address or telephone information. Directory exemption will prevent the release of directory information.

NOTE: Under the Solomon Amendment of 1997, military recruiters are guaranteed access to directory information for all students except those with privacy designated on their records.

EXCEPTIONS to Student Consent for Release of Educational Records

FERPA allows the institution the right to disclose student records or identifiable information without the student's consent under the following circumstances:

- To authorize representatives for audit of Federal or State supported programs.
- To College employees who are in the process of carrying out their specifically assigned educational or administrative responsibilities acting in the student's educational interest.
- Veteran's Administration officials
- Officials of other institutions in which a student seeks or intends to enroll on the condition that the issuing institution makes a reasonable attempt to inform the student of the disclosure unless the student initiates the transfer.
- Persons or organizations providing financial aid to students.
- Organizations conducting studies for, or on behalf of, educational agencies or institutions to develop, validate, and administer predictive tests, to administer student aid programs or to improve instruction, provided that individual identity of students is not made.
- Accrediting organizations carrying out their accrediting functions.
- Parents of a student who have established that student's status as a dependent according to Internal Revenue Code of 1954, Section 152.
- Persons in compliance with a judicial order or a lawfully issued subpoena, provided that the institution makes a reasonable attempt to notify the student in advance of compliance. NOTE: The institution is not required to notify the student if a federal grand jury subpoena, or any other subpoena issued for a law enforcement purpose, orders the institution not to disclose the existence or contents of the subpoena.
- Persons in an emergency, if the knowledge of information, in fact, is necessary to protect the health or safety of students or other persons.

- An alleged victim of any crime of violence of the results of any institutional disciplinary proceeding against the alleged perpetrator. The information may only be given in respect to the crime committed.

Bennett College may disclose personally identifiable information from education records to an outside contractor or volunteer without prior written student consent if the outside contractor or volunteer is a "party acting for" the institution and is performing a service which the institution would otherwise have to perform for itself (as in the case of the National Student Loan Clearinghouse for loan verification or Credentials, Inc.).

How to Request Non-Disclosure of Directory Information

A student may request that her information is not listed in the College Directory by completing the Non-Disclosure/Confidentiality form Once elected the College cannot acknowledge the existence of, or release information about, the record of any student who has elected confidentiality. No information or services will be available to the student via telephone if she has elected the confidentiality option. The student's only options for conducting business transactions with the College would be in person, after presenting a valid photo ID, or through secure login on BelleNet systems.

5. File a Complaint

If a student believes believe the College has not complied with FERPA regulations, she may file a complaint with the:

Family Policy Compliance Office
Department of Education
400 Maryland Avenue, S.W.
Washington, DC 20202-4605

Replaces policy: n/a

Date:

Board of Trustees Policy Number: **ACAF 3.17**

Date of Adoption/Revision: **November 23, 2019**

SUBJECT	**Distance Education or Correspondence Education Policy**
AUTHORITY	**Office of Academic Affairs**
APPLICABILITY	**Dean, Faculty Leads, Academic Coordinators and Faculty**
PURPOSE	Bennett College has adopted this policy based on principles of good practice to ensure that the College's distance education or online course offerings: a) provide the same quality, integrity, and effectiveness as the traditional modes of instruction (face-to-face); b) meets the needs of students enrolled in the courses; and c) meets the state and federalregulations for distance education.

POLICY

All distance education or online courses at Bennett College are considered comparable to traditional face-to-face courses and adhere to the same course standards, prerequisites, and requirements as traditional sections of identical courses.

A. Data Security and Integrity

Confidentiality:

- Academic programs offering online courses must adhere to the Registrar's Office protocols and applicable laws (e.g., FERPA) for protecting student privacy when generating and handling students' educational records.
- Bennett College expects students enrolled in online courses to 1) maintain the confidentiality of the course materials; 2) uphold the privacy of other students enrolled in the course and will not share information shared with anyone outside the classroom setting.
- Students will be provided links to the College's the privacy policy or the policy will be available for students to read and use to safeguard their accounts.

Identity Verification:

- Bennett College has established practices that ensure that the student who registers in the online course is the same student who participates in and completes the course and receives the credit, by verifying the identity of a student who participates in the class or coursework http://www.bennett.edu/wp-content/uploads/2016/12/ACAF_3.03_Student_Identity_Verification_Distance.pdf.
- All enrolled students are issued a unique username and to be used in all College activities, including access to the College email system and BelleNet.
- Students' identities are verified by utilizing a secure login and password code; unique registration student personal identification numbers (PINs) acceptable use compliance, and faculty assurance.

Secure Location

- Unless otherwise required, all online courses mu be secured and housed with the College's intranet, secure Educational IT Systems or the Moodle School LMS.

B. Oversight
Course Compliance

- All online courses will comply with the quality assurance and standards of excellence adopted by Bennett College and the academic program.
- Online course offerings will be determined by the Departmental Faculty, in conjunctionwith the Dean and Vice President of Academic Affairs and will be dependent upon, (a) student needs, (c) department/college goals concerning online versus face-to-face instruction and degree programs, and (d) resource availability. The departmental faculty and Dean has primary responsibility for overseeing the scheduling of courses offered through the department each semester and summer, and that includes the scheduling of the course delivery format.

Online Course Approval

- All individual degree related courses offered online will undergo the same approval process established for all Bennett College courses.

Enrollment Data

- The Office of Institutional Effectiveness working with the Registrar's Office will maintain official data on headcount enrollment for students in distance education programs. Accurate headcount enrollment data will be reported annually, as required, to all outside agencies (, IPEDS, etc.). Attendance should not be determined by the last date the student logged into thecourse. Attendance should be based on active participation that can be accurately track.

Quality Control
Access to Bennett College Resources

- Students enrolled in online courses must have access to and can effectively use appropriate library resources. Access is provided to laboratories, facilities, and equipment appropriate to the courses or programs offered.
- Bennett College will provide access to students enrolled in online courses to the range of services appropriate to support the College's online course offerings.
- Students enrolled in distance education courses are able to use the technology employed, have the equipment necessary to succeed, and are provided assistance in using the technology employed.

Student Attendance Policy

- All Bennett College students are expected to attend and participate in their enrolled classes on a regular basis in order to successfully achieve course learning outcomes and meet federal financial aid requirements. Class attendance in online courses is defined as active participation in academically related course activities. Active participation may consist of course interactions with the content, classmates, and/or the instructor. Examples of academically-related course activities include, but are not limited to:

- Completing and submitting assignments, quizzes, exams, and other activities within the College's LMS (Canvas) or through Moodle School (third- party products).
- Participating in course-related synchronous online chats, discussions, or meeting platforms such as Moodle School in which participation is tracked.

Course Credit

- All courses, including those using a distance education delivery method, must adhere to Bennett College Credit Hour Policy listed in the College Catalog.

Course Evaluation

- Online courses are expected to adhere to approved course descriptions and have similar expected student learning outcomes as face-to-face courses. Student satisfaction and evaluation of the course with the course will be assessed through the online course evaluation administered to all students regardless of the delivery format of the class. The results of the students' course evaluations are shared with the course professor and department chair for each online course.

Frequency of Evaluation

- Online courses and teaching faculty will be reviewed annually to ensure and monitor compliance with the established Distance Education practices and procedures.

Fees

- The Registrar's Office and/or Business Office will ensure that, students enrolled in online courses are notified, at the time of registration or enrollment, of any additional costs associated with verification of student identity and academic integrity. Bennett College faculty must distinguish clearly in the syllabus between required and optional course materials as well as assessments that require additional costs.

D. Faculty Requirements

Professional Development

- Faculty teaching online courses or engaged in distance education have the same faculty development opportunities evaluation processes as all Bennett College faculty. In addition, because teaching online require a different skillset or additional technological skills, all faculty members will undergo faculty orientation and online teaching training before teaching the first distance course and must be certified for meeting quality standards. Certification documents must be provided to the Office of the Vice President of Academic Affairs and approved by the Director of Distance Learning. Adjunct faculty members wishing to teach an online course must provide documentation that they have completed training on the College's LMS or similar system prior to class assignment.

Faculty Availability and Communication

- Distance education faculty members will adhere to the Bennett College's Office Hours policies. Full-time faculty teaching online courses may maintain virtual office hours while simultaneously maintaining on-campus office hours. Part-time faculty teaching solely online will hold all office hours online and may hold on-campus hours. Office hours will be published in the online course, under the Faculty Information section, and on the course syllabus. The course syllabus and Faculty Information section must notify students of the approximate time and method they can expect to

	receive an answer to all communications (e.g., email, phone, course messages). Excluding holidays, the response should be provided within 48 hours. **Course Load, Compensation** ▪ Faculty teaching online will be compensated at the same rate as faculty teaching traditional face-to-face courses. Typically online courses will be part of a faculty member's regular teaching load. However, online courses may also be taught as an overload, when needed, at the same rate of compensation as traditional courses taught as an overload. Any exceptions (e.g., reassigned time for developing courses using new distance technologies) are reviewed on a case- by-case basis, and as per current procedure, must be approved by the departmental chairperson, the dean, and the provost. **Ownership of Materials, and Copyright** ▪ Bennett College recognizes that faculty and staff of the college own the products of their intellectual and creative activity in all circumstances where Federal law, work for-hire rules, or the college's contribution of extra-ordinary resources, does not mandate Bennett College ownership. The college recognizes that it receives indirect benefits from faculty and staff's intellectual and creative pursuits, and that such pursuits directly enhance the ability of faculty and staff to fulfill their primary function at the college. See the College Intellectual Property Policy. http://www.bennett.edu/wp-content/uploads/2017/02/Intellectual_Property_Policy.pdf **E. Use of Distance-Learning in Non-Distance Learning Classes** • **Online components of non-distance learning classes** In classes that do not fulfill the definition of Distance Education as described in this Policy, online components including, but not limited to, SKYPE, prerecorded videos or audio files, are not governed by this policy. • **Use of online teaching modalities during emergency situations in face-to face course offerings** Bennett College is aware that situations may occur (due to weather or absence of the faculty, etc.) which will have an effect on faculty's ability to deliver its face-to face curriculum in its normal course. In these instances, distance learning may be used in ways that are not governed by this policy.
DEFINITIONS	• **U.S. Department of Education** defines distance education as "education that uses one or more of the technologies listed below to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously. The technologies may include-- (1) The internet; (2) One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices; (3) Audio conferencing; or (4) Video cassettes, DVDs, and CD-ROMs, if the cassettes, DVDs, or CD-ROMs are used in a course in conjunction with any of the technologies listed above. • **Online courses** are those in which all or the vast majority (typically 75% or more) of the instruction and interaction occurs via electronic communication or equivalent mechanism with the faculty and students physically separated from each other. All online courses are identified on the course schedule. ▪ **Asynchronous mode of delivery**: Online: Courses offered via the internet using a Learning Management System (LMS)

	▪ **Synchronous mode of delivery**: Compressed Video: Occurs in real time and allows the instructor to communicate with remote site sections of the class via two-way audio/video. Instructors and students hear and see each other live from each site. These courses blend face-to-face and online pedagogies.
PROCEDURES	1. The following procedure's electronically verify student's identity and prevent others from accessing a students' data: a. Secure login – Students access the LMS via a unique sign in and pin. b. Password – All students are provided passwords constructed based on rules of the LMS or Bennett College Office Institutional Technology. 2. College faculty teaching online courses must use their unique username and password to access the LMS. All students' records are required to be place on the College's LMS system Canvas). 3. Faculty teaching online must meet with Library staff as needed to ensure that the tools and resources are appropriate for those students taking online courses. 4. Through the student course and faculty evaluations students' access to library resources and student services for the online course is accessed. 5. Faculty teaching online must have appropriate documentation of completion of online training. 6. Bennett College will periodically provide training for faculty and provide online resources and access to assistance during the course implementation as required.

Replaces policy: n/a

Date: 11/01/2019

Board of Trustees Policy Number: **ACAF 3.18**

Date of Adoption/Revision: **April 24, 2021**

SUBJECT	Attendance Policy at Bennett College
AUTHORITY	Office of Vice President of Academic Affairs
APPLICABILITY	All Bennett College Students
PURPOSE	This policy sets forth Bennett College's support for faculty course attendance policies. The College gives full discretion to faculty to determine a course and laboratory attendance and nonattendance policy that best supports the mode of instruction, teaching effectiveness, student learning, and learning outcomes. Bennett College recognizes that regular attendance is an important contributor to student success whether the course meets in person, hybrid/blended courses, or in online synchronous class meetings. Therefore, the College strongly encourages students to attend regularly and promptly classes, laboratories, lectures, films, guest speakers, class discussions, and group activities.
POLICY	The College requires student attendance (online or on-ground) during the first 14 days of classes per Department of Education policies in the distribution of financial aid. Bennett College verifies student enrollment following the add/drop period in accordance with this regulation. Accordingly, during this 14 days of classes, student attendance must be taken by all faculty, including adjuncts. The College acknowledges that certain academic areas (such as the Education Program and the Department of Social Work) requiring accreditation from organizations/agencies in addition to SACS and TRACS may have stricter attendance policies and accordingly the College will comply with the standards demanded by those agencies. Following the first 14 days of required class attendance, any form of attendance used by an individual professor as a criterion for evaluation

	must be clearly identified in the course syllabus and presented to students during the first week of classes so that students can calculate the impact of missing class or a laboratory on her grade. It is up to the instructor to excuse or penalize absences in a course as well as to penalize missed exams and other assignments. By the act of enrollment, the student is responsible for knowing and adhering to the individual professor's attendance policy in a particular course and laboratory and the individual professor's policy on late or missing work. *A student's failure to comply with* the first 14 days of classes per Department of Education policies in the distribution of financial aid *and the individual professor's attendance policy may result in dismissal from a course.*

Replaces policy: *Date*

Board of Trustees Policy Number:	Date of Adoption/Revision:
ACAF 3.19	June 15, 2024

SUBJECT	Academic Renewal Policy/Grade Forgiveness
AUTHORITY	Office of Vice President of Academic Affairs and Office of the Registrar
APPLICABILITY	All Bennett College Students
PURPOSE	The Academic Renewal Policy affords readmitted students with legacy coursework the opportunity to improve their academic standing through limited grade forgiveness. Without academic renewal, readmitted students struggle to regain good academic standing and often persist on academic probation through dismissal.

POLICY

Academic Renewal

The Bennett College Academic Renewal Policy provides previously enrolled students who have been absent from the College for at least three years to have the opportunity to pursue a single "fresh start" by removing all grades lower than a C in their grade point average. All grades remain as part of the student permanent record and are not removed. This policy is designed to facilitate the retention of previous students with an unsuccessful start by renewing their academic progress and encouraging them to complete their degree requirements at their home campus rather than seeking other options such as transferring to another institution. Formerly enrolled students who have less than a 2.0 cumulative GPA and who have not been enrolled at Bennett College three years prior to applying for readmission are eligible to petition to the Office of Academic Affairs for academic renewal under the following conditions:

Students not enrolled at any higher educational institution three years prior to readmission:
The readmitted student must successfully complete two consecutive semester terms earning at least 24 credit hours, maintain a minimum grade point average of 2.0 for both consecutive semester terms, and maintain a satisfactory grade in ACES for both consecutive semester terms.

Students who have enrolled at other nationally and or regionally accredited institutions during the three-year absence from Bennett College:
The readmitted student must have successfully completed a minimum of 24 hours of transferable coursework following their last enrollment date at Bennett College with a minimum overall grade point average of 2.50.

Grade Forgiveness

After completing the appropriate forms and approvals and meeting the conditions for the Academic Renewal Policy, identified courses in which grades below a C were

	earned will be marked as forgiven. The forgiven grades of these courses will be shown on the transcript but will not be used in the calculation of the GPA and the hours will not be counted toward degree requirements. The Academic Renewal Policy allowing grade forgiveness may be used only once up to 18 credit hours of a semester during a student's matriculation through Bennett College. In addition to the single usage of the policy, a student forfeits their eligibility to be recognized for academic honors (excluding Dean's list) during matriculation and graduation. TRANSCRIPT EXPLANATION: Courses with an indicator of "*" in front of the course number on the transcript will be excluded from the career total and cumulative GPAs.
PROCEDURES	The Offices of Admission and the Registrar identify readmitted students eligible for the renewal policy and distribute appropriate paperwork. The Academic Renewal Committee will review the student's appeal upon completion of the conditions. If approved, the Office of the Registrar records the grade forgiveness in the Student Information System.

Replaces policy: *Date*

Board of Trustees Policy Number:	**Date of Adoption/Revision:**
ACAF 3.20	June 15, 2024

SUBJECT	Repeating Courses
AUTHORITY	Office of Vice President of Academic Affairs and Office of the Registrar
APPLICABILITY	All Bennett College Students
PURPOSE	To provide the framework for students repeating courses for degree requirements and grade improvement.

POLICY	In this policy, "repeat" means to enroll in a course for which a grade has already been assigned. Students may enroll in courses in which they earned grades below a C. Upon completion of the course, Bennett College will apply the highest earned grade to the calculation of the GPA and the earned hours. The lowest grade(s) in these attempts will populate on the transcript but will not be used in the calculation of the GPA and the hours will not be counted toward degree requirements. The recomputed GPA will be calculated from the courses in which grades of C or higher were earned. The maximum number of times that a student can repeat a course is three times. *Students cannot repeat a course for which they received an "I," until the "I" is converted to a grade. If a course holds a grade of C or higher, students should consult with their advisor to discuss the usefulness of repeating the course. Students who received a grade of C or higher may only repeat a course with permission of the Dean of Faculty in consultation with program faculty to meet GPA requirements for program entry or graduation.* TRANSCRIPT EXPLANATION: Courses with an indicator of "R" in the Rpt column of the transcript will be excluded from the career total and cumulative GPAs but retained in the term totals.
PROCEDURES	The Student Information System governs the repeat process through scripted programming.

Replaces policy: *Date*

Board of Trustees Policy Number:	**Date of Adoption/Revision:**
ACAF 3.21	June 15, 2024

SUBJECT	**Course Reuse**
AUTHORITY	Office of Vice President of Academic Affairs and Office of the Registrar
APPLICABILITY	All Bennett College Students
PURPOSE	To increase the efficiency of a student's academic career by outlining how course requirements interact across the major, minor, and general education.

POLICY	Courses can satisfy more than one requirement in a student's academic program under specific conditions. Students may reuse a course between: (1) their major and their minor; (2) a minor and general education requirements; (3) two separate majors. Major and general education course reuse is limited to specific instances in the major and are indicated in the major's course requirements in the Academic Catalog. NOTE: A course's credit hours are earned and counted only once, regardless of reuse.
PROCEDURES	The degree audit in the Student Information System will capture the reuse of courses across the specified conditions.

Replaces policy: *Date*

POLICIES *and* PROCEDURES

Board of Trustees Policy Number: **BUFIN 4.01**

Date of Adoption/Revision: April 17, 2014

SUBJECT	ACCOUNTS RECEIVABLE MANAGEMENT
AUTHORITY	The Office of Business and Finance
APPLICABILITY	This policy applies to students, faculty and staff.
PURPOSE	The purpose of this policy is to establish standards for the accounting and collection of accounts receivable. As a significant asset for the College, accounts receivable must be carefully managed to ensure efficient and effective collection of all debts owed to the College. Accounts receivables are the result of various types of financial transactions, including, but not limited to student tuition, fees, room, board, and miscellaneous charges posted to the account.

POLICY	The College will charge the appropriate costs and collecting funds for services provided to constituents as a result of various types of financial transactions, including, but not limited to student tuition, fees, room, board, and miscellaneous (parking fines, library fines and return check fee) charges posted to the account.
PROCEDURES	**Establish the receivable**. The accounts receivable is created through a variety of processes that bill the student, faculty, or staff for a service, violation, or other necessary expense. The majority of accounts receivable stems from the student class registration process which results in an amount owed to the College. The student has access to review their account online. The debt is acknowledged by the student at the time of account/statement review. The College establishes the terms and conditions for payment by directing the student to the Tuition Payment Plan or Financial Services Center website through the College's Home Page or main website. **Billing.** The College requires students to view their account online, which shall constitute an electronic invoice. Business Office sends an e-mail blast to students with an outstanding balance on the 1st and 15th of each month encouraging them to view their account online and make payments by the designated due dates. **Current accounts collection activities**. The College uses third party software to manage its undergraduate tuition payment plans. Students have the option of establishing a maximum 10 month payment plan for the academic year. Payments are drafted from the payee's bank account or charged to a valid credit/debit card on the 5th and/or 20th of each month. Reminder notices as well as delinquent notices are sent to enrollees in all plans via email.

	Business hold. The Business Office places a business hold on all unpaid student accounts with balances of $50 or more before the beginning date of the next term registration. All balances of less than $50 are carried forward without generating a hold. The hold prevents the student from registering, viewing grades and academic transcripts online, or receiving their official academic transcript and College degree. **Delinquent accounts collection activities** 1. At the end of each semester, the Controller's Office generates a list of students who left the College owing a balance. 2. Using Jenzabar software, the Student Accounts Coordinator prints and mails an itemized billing statement to each student on the list. The mailing will include a letter notifying the student that the account will be placed with a collection agency if not resolved within 60 days. Payments can be made in the form of a credit card, money order or cashier's check. If no payment or communication is made within the 60-day time period, the accounts are turned over to the Office of Default Management. 3. The Loan Default Manager places the account in the internal collection process which is managed by the College's payment plan provider, AES. The list of delinquent accounts is sent to AES for system upload and the scheduled communications begin. Students pay a sign-up fee for this payment plan. AES processes all payments for these accounts and sends the funds to the College by ACH. 4. If an account is not set up in the internal collection plan within one year, the account is returned to the Office of Default Management and then placed with a collection agency. The student will make payments directly to the agency. 5. By the 10th of each month, agencies send checks made payable to Bennett College for the amount collected to the Office of Default Management, which are then transmitted to the Cashier's Office. Some agencies make electronic deposits of these collections. 6. The Office of Default Management will notify Student Accounts when an account is paid in full. The Assistant Controller will make the appropriate journal entry to show that the account is paid in full and notify the student that her obligation to the college has been satisfied. 7. After all efforts have been exhausted by an agency or a year has passed with no progress, accounts are rotated out to another collection agency for one year. After all collection efforts have been exhausted by collection agencies, accounts are returned to the College and recommended for write-off. **Writing off uncollectible accounts.** The Vice President for Business and Finance/CFO or a designee must periodically, but no less than annually, review all past-due accounts receivable. The College must make every reasonable effort to collect an account before write-off. An account is deemed uncollectible after two semesters or one year as it relates to internal collection efforts and two years by external collection agencies. When an account is determined to be uncollectible, the debt must be written off from the financial accounting records and is no longer recognized as an account receivable for financial reporting purposes. The Vice President for Business and

	Finance must approve all write-offs of uncollectible accounts receivable. When an account is written off, a business hold as described in the preceding paragraph is placed on the student account. Determining that the account is uncollectible does not cancel the legal obligation of the debtor to pay the debt. **Restoring the previously written-off receivable.** Payment against a written-off accounts receivable will be accepted by the College. The receivable must be reestablished in the system to record the payment and deposit funds to the appropriate account. The CFO or a designee must approve the reinstatement of all previously written-off accounts receivable.

Replaces policy: *Date*

Board of Trustees Policy Number: **BUFIN 4.02**

Date of Adoption/Revision: **April 17, 2014**

SUBJECT	**STUDENT ORGANIZATIONS CASH MANAGEMENT**
AUTHORITY	The Office of Business and Finance and Office of Student Affairs
APPLICABILITY	This policy applies to student organizations officially recognized by the College responsible for collecting cash receipts from fundraising events.
PURPOSE	The purpose of this policy is to establish standards and best practices for the collection and disbursement of funds by student organizations.

POLICY	All student organizations officially recognized by the College are required to deposit all cash receipts from fundraising events or other activities that generate cash receipts with the Business Office. The College will properly account for, report, and manage cash receipts in a manner supporting strong internal controls. This will minimize the potential for mishandling funds and create an audit trail to conduct a review of cash related transactions.
PROCEDURES	**Fundraising Event/Activity Designated Project Form** 1. Complete the form for each event/activity **Cash Receipts** 1. Direct all vendors required to pay the vendor/set-up fee to participate in a college event to the Business Office between the hours 8:00 a.m. and 4:00 p.m. Monday – Friday. Vendor fee must be paid at least one week in advance of the event. **The vendor fee is $75 per day for food vendors and $45 per day for non-food vendors.** 2. The Business Office will issue a cash receipt book (**issue a receipt when items/merchandise are being sold**) and event ticket roll to the advisor of the student organization responsible for collecting funds from fundraising events/activities. These funds will supplement the organization's institutional budget and would include organization such as Student Government Association (SGA), Pre-Alumni Council and College Choir. 3. Issue a ticket to the patriot at the time the payment is received or collected at the door for events that requires an admission fee. 4. Prepare the Event Settlement Sheet at the end of the event and submit it to the Business Office along with all cash proceeds and completed Fundraising Event/Activity Designated Project Form the next business day by 4:00 pm.

	5. If students are required to pay a fee in advance (**Morehouse College trip**) prior to participating in the event/activity, the students must be directed to the Business Office to pay the fee at least three (3) days prior to the event/activity. The Business Office will generate a report that contains all paying students and distribute to the advisor. **Note: do not use any of the cash proceeds to pay financial obligations on site.** **Disbursement of Funds** **1.** Prepare a purchase requisition or check request, attach supporting documentation, obtain advisor and other appropriate parties' signatures and forward the completed paperwork to the Controller's Office within **five (5) business days prior to the event or activity for processing.** **2.** In the case of contest or prize winners, obtain the winner's name, social security number and mailing address using a W-9 form; prepare a check request, attach supporting documentation, obtain advisor and other appropriate parties' signatures and forward the completed paperwork to the Controller's Office **within five (5) business days prior to the event or activity for processing.** 3. The Associate Vice President/Controller or Assistant Controller will conduct a review periodically of cash receipts books, event ticket rolls and other documents related to fundraising events/activities of student organizations.

Replaces policy: *Date*

Board of Trustees Policy Number:	Date of Adoption/Revision:
BUFIN 4.03	April 1, 2016

SUBJECT	**Davis-Bacon Act Compliance Policy**
AUTHORITY	Office of Sponsored Programs
APPLICABILITY	The Davis-Bacon Act (DBA) codified as 40 U.S.C. 3141-3148 applies to contractors and subcontractors performing on federally funded contracts in excess of $2,000 for construction, alterations, repairs (including painting and decorating) and also, including craft positions such as plumber, carpenter, cement mason/concrete finisher, electrician, insulator, laborer, lather, painter, power equipment operator, roofer, sheet metal worker, truck driver, and welder. DBA contractors and subcontractors must pay their laborers and mechanics employed under the federal funded contract no less than the locally prevailing wages and fringe benefits for corresponding work on similar projects in the area.
PURPOSE	Compliance with the Federal regulation Davis-Bacon Act (DBA) codified as 40 U.S.C. 3141-3148

POLICY	*Local Prevailing Wage Rates and Benefits* - Service employees paid under the federal funded contract must receive salary rates and benefits which conform to the U.S. Department of Labor's determination of local prevailing wages and benefits for the same employee class. *Minimum Wages* - In the absence of a wage determination for certain classes of employees, those employees may not be paid less than the minimum wage established under the Fair Labor Standards Act. *Wage Offset for Benefits* - Employees who are ineligible for health insurance must be furnished with equivalent benefits or cash equivalent. Average health and welfare benefits must equal the U.S. Department of Labor's determination of fringe benefit costs. Information on such prevailing wage and

	benefit rates must be supplied to employees. *Premium Overtime* - Service employees under the contract are required to be paid premium overtime at 1.5 times salary after 40 hours of work per week. *Pay Period* - Service employees under the contract must be paid at least on a semi-monthly basis. *Health and Safety* - Working conditions must meet health and safety standards under 29 CFR Part 1925. *Recordkeeping* - Records must be kept for three years and are subject to investigation by the U.S. Department of Labor. Please do **NOT** submit copies of the certified payrolls to Bennett College. *Enforcement* - The U.S. Department of Labor has enforcement powers, including debarment, to correct contractor violations. Please view the Department of Labor's websites **http://www.dol.gov/whd/contracts/dbra.htm and http://www.wdol.gov/faqs.aspx** for all pertinent information related to compliance with labor standards.
PROCEDURES	An executed certificate, Davis-Bacon Act Certification Form, must be submitted for approval to Business & Finance/Purchasing prior to performing on-campus renovations/repairs that exceed $ 2,000 per year for each federal funded construction contract. The form is available on BelleNet, Sponsored Programs tab, under Forms. Contractor must certify that has read and understood this Federal regulation and that the Company is paying the appropriate wage rate for compliance with the DAVIS BACON ACT, 40 U.S.C. §§3141 as amended and in conformance with the U.S. Department of

	Labor regulations at 29 CFR Part 5, (Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction) and 29 CFR Part 3 (Contractors and Subcontractors on Work Financed in Whole or in Part by Grants from the United States).

LOCATION	**WEBSITE/HARDCOPY**
www.bennett.edu Business & Finance Office Sponsored Programs	Website Location:
Business & Finance Sponsored Programs	Hardcopy Location:

Board of Trustees Policy Number:	Date of Adoption/Revision:
BUFIN 4.04	April 1, 2016

SUBJECT	**Travel Policy**
AUTHORITY	Office of Business and Finance
APPLICABILITY	This policy applies to all employees, officers and guests traveling on the behalf of Bennett College.
PURPOSE	This policy provides information to individuals traveling on College business. The policy assists with determining appropriate expenses, approvals and how individuals should be reimbursed for expenses incurred while on travel for the College.

POLICY	All official travel should be prudently planned so that the best interests of the College are served at the most reasonable cost. Anyone traveling on College business is expected to exercise the same economy that a practical person would exercise when traveling on personal business. Justifiable and reasonable costs will be reimbursed by the College. This policy includes travel within the United States as well as travel to Canada, Mexico and Puerto Rico.
PROCEDURES	Most countries will now require a passport for entry and the United States will require a passport for re-entry to this country. It is up to the employee to make certain that all requirements for entry into any other country outside the United States have been thoroughly researched and put into place. It is not the responsibility of Bennett College to determine passport and visa requirements for any country, even if the Office of Business and Finance considers the country to be "domestic" for federal travel purposes. Business travel will be arranged through the College's official travel agency. Employees seeking to travel or arranging travel for visitors on official college business should begin planning as far in advance as possible. Every effort must be made to expedite the travel authorization approvals in order to avoid price increases when airline travel is involved. Fund availability will be verified and the Controller will review and confirm travel arrangements with the travel agency and forward to Accounts Payable for processing of registration fees and travel advance checks as needed. Any changes to travel arrangements required by the traveler should be requested via e-mail or memorandum to the Controller. If prices have changed when the travel authorization is processed, the traveler will be notified immediately by the Controller to obtain authorization for the adjusted cost.

Travel Agency

All employees are required to book travel arrangements through the official travel agency. The travel agency will attempt to book the lowest available fare within the designated travel period. If the trip is canceled after the airline ticket has been issued, the traveler or the person arranging the travel should contact the Controller at 336-517-2115 as soon as possible who will determine if the ticket can be used for future travel.

Request for Authorization of Travel (BF/AS/4001)

Prior to traveling, all travelers must complete the Request for Authorization of Travel. The request contains information related to the trip and details the costs associated with traveling on the behalf of the College. It also contains the budget code that will be charged for the trip. Proper supporting documentation must be attached to the request. The signatures required for the Request for Authorization to Travel will be the Requestor, the Activity/Program Director (if applicable), the area Vice President or her/his designee, the Office of Sponsored Programs (if applicable), the Contracts/Grants Accountant (if applicable), the Controller, and the Vice President for Business and Finance or her/his designee (for fiscal budgetary review). The President must sign the Request for Authorization of Travel for members of the senior leadership team prior to leaving the campus.

American Express Card

When possible, all travel expenses, excluding registration, will be charged to the College's cardholder American Express (AMEX) card credit. An AMEX card has been issued to the president, senior staff members and other designated employees of the College to defray business related travel and entertainment expenses and in the case of the president to purchase items to provide comfort to college quests at the President's Residence. Only business related expenses such as lodging, meals, car rental, gasoline, parking, entertainment and other related travel expenses should be charged to the credit card. The cardholder must complete an expense report, attach the approved Request for Authorization of Travel, all original receipts and supporting documentation and forward the report to the Controller's Office within five (5) days upon return from the trip. In addition, copies of the preceding documentation must be submitted with the monthly AMEX statement to the Controller's Office.

Airline Travel

Airline travel within the United States and to/from Canada, Mexico and Puerto Rico shall be booked at economy coach class. Any upgrade accommodations will be at the personal expense of the traveler. Airline reservations are the responsibility of the employee. Reimbursement will be made at the lowest logical standard or discounted rate for the period of business travel. Your travel itinerary, a copy of your credit card statement, and any other documentation provided by the airline are required for reimbursement of airfare. Trips that include additional personal stops are not authorized for reimbursement for the personal

portion of the trip.

Reimbursement for first-class airfare will be made only when a supporting statement is provided by the airline stating that no lower rate was available.

Car Rental

Vehicles may be rented when driving is more cost effective than public transportation or common carriers. Vehicles may be reserved through the travel agency. Vehicles may also be rented at the travel destination when use of a rental car is more cost effective than using public transportation or there is little public transportation available at the destination site. Supporting documentation must be attached to the Request for Authorization of Travel.

Only the rental cost and actual gasoline purchases will be reimbursed. Gasoline receipts must be submitted for reimbursement. Mileage reimbursement will not be made on rental vehicles. Actual tolls and parking fees will also be reimbursed. Parking receipts must be attached for reimbursement to occur for these expenses.

Anyone renting a vehicle for College business within the United States, Canada or Puerto Rico **SHOULD NOT** take out insurance through vehicle rental agencies. Your personal automobile liability insurance is your primary coverage for rental and personal vehicles. If your liability limits become exhausted following an accident, Bennett College's policy provides a second layer of coverage, provided the vehicle was used for approved College business. If your insurance does not cover business use of a rental vehicle, the College policy becomes primary coverage, unless other insurance is in place. Accidents occurring in a rental car must be reported immediately to the rental agency, local police, Bennett College Campus Safety Office and the traveler's immediate supervisor.

Minibus/Van

The department head or responsible person must complete the Vehicle Request Form and submit to the Office of Administrative Services at least 28 days in advance of the trip. The use of the minibus or van must be approved by the Associate Vice President for Administrative Services. A certified driver must be available to operate the minibus. If the Vehicle Request is approved, the request is forwarded to the Office of Campus Safety and the requestor is notified via e-mail by the Associate Vice President for Administrative Services. If the requestor if not approved, the requestor is notified of the decision via e-mail.

The requestor is required to complete the Request for Authorization to Travel and attach all supporting documentation including the approved Vehicle Request Form. The travel authorization request should be submitted to the Controller's Office for processing at least 21 days prior to trip. The Executive Assistant for the Division/Office of Business and Finance will e-mail the approve Request for Authorization to Travel to the requestor and Director, Campus Safety.

	The Director of Campus Safety must complete all columns listed on the Travel Log. The director must also attach the approved Request for Authorization to Travel to the copy of Travel Log and forward to the Controller's Office by the first business day following of the close of the month. The Assistant Controller will prepare a journal entry to charge the appropriate department for use of the vehicle(s). **Personal Car** The use of personal vehicles may be approved for all or part of an official business trip. This would include driving a personal vehicle to the Raleigh/Durham (RDU) or Charlotte (CLT) airports to fly from those airports. Personal vehicle mileage reimbursement will be provided at 90% of the posted federal rate. This information can be found at: h**ttp://www.gsa.gov/Portal/gsa/ep/contentView.do?contentId=9646&contentType=GSA BASIC** Mileage should be estimated based on the shortest distance, using Mapquest.com, AAA.com or similar routing and mileage information and the expense included on the Request for Authorization of Travel form. Actual mileage reimbursement will be based on the final submission of the same information. In no case, will mileage reimbursement be more than the cost of using the least expensive common carrier (such as air transportation) for the requested trip. Tolls and parking fees will be reimbursed at their actual rates. Parking receipts must be attached for reimbursement to occur for these expenses. **Lodging** Hotel reservations may be made through the College's official travel agency unless the travel is for a convention or conference at a designated hotel and special arrangements have already been made for a group. Hotel rooms will be reserved for late arrival. The traveler must present a credit card to pay for lodging or a credit card authorization. The agency can assist with convention travel arrangements as well. Every attempt will made by the agency to negotiate favorable rates and to establish relationships with selected properties. Special rates will be used whenever practical and cost effective. In no case is an employee expected to book lodging at a hotel which would be rated lower than AAA 3 diamonds, or at a location which poses a hardship for the traveler. The traveler must obtain a final hotel bill/invoice at the time of check-out. Receipts must be attached to the traveler's expense report. **Ground Transportation** Employees should share ground transportation (airport shuttles, courtesy cars and other public transportation) whenever possible. A receipt must be obtained for this type of

expense. Bennett College does not provide transportation to and from the airport, train stations or bus terminals.

Meals

Per Diem of 90% of the federal rate per day is provided for meals and incidental expenses when overnight travel is involved. This rate varies depending upon the location of travel.

This information may be found at:
http://www.gsa.gov/Portal/gsa/ep/contentView.do?contentId=17943&contentType=GSA_BASIC

Actual meal expense may be reimbursed in lieu of per diem if itemized receipts are provided.

Meal per diem will be provided for overnight travel departure and return days as indicated below:

Departure:	Before 7:00 am	Breakfast, Lunch, and Dinner
	7:00 am – 12:00 Noon	Lunch and Dinner
	12:00 Noon – 6:00 pm	Dinner
Arrival:	4:00 am – 11:00 am	Breakfast
	11:00 am – 5:00 pm	Breakfast and Lunch
	After 5:00 pm	Breakfast, Lunch, and Dinner

Per Diem rates will be reduced for full meals included in meeting/conference registrations. If the traveler has opted for the actual expense method for meals and incidental expenses, rather than the per diem method, and does not include all of the receipts, the traveler will be reimbursed at the per diem rate.

When traveling, the traveler must choose either the per diem or direct reimbursement method for each day of the trip. Combining the two methods within a single day is not allowed.

Group/Student Travel

A list including the names and ID numbers of students, faculty and staff travelers must be attached to the Request for Authorization of Travel Form when requesting travel for a group. Advisors and coaches are expected to make travel arrangement for students who will be traveling to represent the college. The coach or advisor will establish student and coach meal per diem rates up to the standard per diem of 90% of the federal rate per day. The established rate must be recorded on the Request for Authorization of Travel Form.

Telephone Calls

Telephone calls clearly documented as official business calls are reimbursable. Supporting

documentation must include the name of the person called and the general nature of the call. Care must be taken to avoid excessive hotel fees for telephone use. Supporting documentation must be attached to the traveler expense report.

Alcoholic Beverages

The College will not reimburse travelers for any purchase of alcoholic beverages.

Registrations

Approved registration fees are authorized travel expenses. If the registration fees are to be paid by check, attach the completed original registration form to the Request for Authorization of Travel. The original registration form will be mailed with payment to the party indicated on the registration form. Please indicate on the Request for Authorization of Travel, the method of payment for the registration fees.

If paying by personal funds, include a signed receipt from a conference official and a copy of the program with your expense report. If a receipt is not available you may use a copy of your cancelled check (front and back) or a copy of your credit card statement to document your expenditures for registration fees that are paid in advance.

Family Travel

The College will not reimburse the traveler for any additional expenses incurred for any non-employee and/or family member accompanying the employee on official College business.

Temporary Dependent Care Travel

The College will reimburse the traveler temporary dependent care cost equal to the difference between the traveler's destination point and home city provide that:

- The costs are a direct result of the individual's travel for federal award;
- The costs are consistent with the non-federal entity's documented travel for all entity travel; and
- The travel is temporary during travel period.

Traveler must provide adequate supporting documentation (cost comparison, receipts, etc.) to receive reimbursement for costs.

This information may be found at:
http://www.gsa.gov/Portal/gsa/ep/contentView.do?contentId=17943&contentType=GSA_BASIC

Cash/Travel Advances

The College will provide advances for travel when requests are made prior to the twenty-one (21) day period required by the policy. The applicable section of the Request for Authorization of Travel must be completed in order to request a travel advance. Travel advances are available to employees to cover meals and other expenses not paid by check or college credit card in advance. Travel advance checks are issued from the Bursar's Office and will not be released more than five (5) days before the travel begin. Travel advances for coaches and advisors travelling with students will be done in the name of the advisor or head coach. Employees who do not receive advances will be reimbursed within seven (7) business days of submitting his or her expense report with out-of-pocket expense receipts attached.

Expense Report (BF/AS/4002)

As soon as the traveler returns from the trip, she/he must complete and submit the expense report to the Controller's Office within five (5) business days. The report is the final accounting and reconciliation of the trip and should be turned in, with all receipts attached. All expenses must be itemized on the expense report. Receipts must be attached for airline tickets, hotel expenses, vehicle rentals and any other allowable expenses incurred for which reimbursement is claimed or college credit card is used. Traveler must not claim expenses for movies, alcoholic beverages, recreation and clothing or personal items purchased while traveling. Entertainment expenses will be reimbursed if documented as a legitimate business requirement. If an employee uses his/her personal funds or credit card to pay for travel expenses the employee must record the charges on the expense report and attach supporting original itemized receipts.

The expense report will be processed within seven (7) business days. If there is a problem with the accounting on the report, the traveler will be immediately informed by the Controller's Office, so the problem can be resolved and expense report processed within the required seven (7) business days. The only signature required on the expense report will be the traveler and Controller or Assistant Controller.

If funds were advanced for students or groups of travelers, written documentation indicating each individual's signature to acknowledge receipt of the funds must be attached to the expense report. If funds advanced to the traveler were not spent for authorized travel expenses the traveler must remit payment to the Bennett College Bursar Office for all unspent travel advance funds. Failure to do so will result in the unspent amount being deducted from your payroll check. Failure to submit timely expense reports may result in payroll deduction for the cost of the trip, loss of travel privilege or further disciplinary action. Funds due to the traveler will be issued from the Bursar's Office.

	WEBSITE/HARDCOPY LOCATION Website Location: www.bennett.edu Business & Finance Office Sponsored Programs Hardcopy Location: Business & Finance Sponsored Programs

Revised Policy Approved by the Board of Trustees

Date -4-1-2016

Forms

BF/AS/4001 Request for Authorization of Travel

BF/AS/4002 Expense Report

Board of Trustees Policy Number:	Date of Adoption/Revision:
BUFIN 4.05	April 20, 2016

SUBJECT	Purchasing Policy
AUTHORITY	The Office of Business and Finance
APPLICABILITY	This policy applies to all employees of College departments including administrative officers and students, who approve, sign or authorize requests and/or purchases of goods and services from College funds, regardless of the source.
PURPOSE	The purpose of this policy is to ensure the Purchasing Department is receiving the best value on all goods and services purchased by the College.

POLICY	All departments/units must adhere to the purchasing policy and procedures of the College. Individuals who fail to do so may be held liable for payment of invoices.
PROCEDURES	The President and Vice President for Business and Finance are the only employees authorized to obligate College funds. After a purchase requisition or check request has been approved through the proper channels, the Purchasing Agent will secure goods and services on the behalf of the College. If an unauthorized person commits College funds, the College may consider the acquisition null and void, and decline to pay any invoices presented as a result of the unauthorized purchase. The individual responsible for the unauthorized purchase may be liable for payment or reimbursement to the vendor or supplier. The College recognizes that certain departmental personnel may possess specialized product knowledge that can be valuable to the procurement process. The Purchasing Department encourages the sharing of this knowledge. If comparable items can be obtained from different vendors, competition should be sought; however, State contracts may be used in lieu of competition. The Purchasing Agent will request at least three (3) written quotes for purchases above $3,000. A minimum of three (3) formal bids must be obtained by the requestor with the assistance of the Purchasing Agent for purchases exceeding $5,000. Contracts in excess of $150,000 will require the requestor to submit a minimum of three (3) sealed bids. When the department is aware that fewer than three sources are available or acceptable, documentation and/or justification should be attached to the purchase requisition (brand names alone are not sufficient justification.) Professional services (legal, audits, architectural, sole source providers) may not be

	subject to the bidding requirements. A sole source provider is one who is the only practical option for a good or service to be used by the College. Examples of legitimate sole source vendors include: a. Only a particular brand or "make" is compatible with existing equipment or inventory. b. Only one supplier is capable of providing the required goods or service. c. An emergency condition exist which makes soliciting three bids impractical. It is the responsibility of the department/unit heads to ensure sufficient funds are available in the appropriate budget line prior to submitting the requisition. Purchase action may not be initiated in the anticipation of funding that may be provided at some future date. All grant related purchases must be reviewed by the Office of Sponsored Programs (OSP) for compliance with the terms of the grant and then forwarded through the Controller's Office. All purchases of computer technology for campus use must be coordinated through the Information Technology Services Department. This policy applies to all computing- and network-related resources, telecommunications devices, audio/visual equipment and media services, and technology consulting, including grant-based items. A department or individual in need of technology equipment or software must l contact the Director of Information Technology Services or a designated person in the IT Department to discuss their technology needs before initiating an order. The use of departmental funds for purchases of gifts is prohibited. Using the college's purchasing system to purchase materials, supplies, or equipment for personal use is strictly prohibited. Shall a personal purchase occur, the individual is required to reimburse the college within 15 days of the charge. If reimbursement is not made within 15 days, the individual will be subject to disciplinary action. The authorized buyer has the responsibility to confirm that goods/services received conform to specified order requirements and are detailed on the receiving documentation. Goods should be inspected and signed for upon delivery. Verify the quantity and quality of the order when received. If the order is incorrect, or if there is a need to return any items, immediately inform the Purchasing Agent. Doing so prevents over-paying and over-charging the department's budget. In order to continue to ensure sound fiscal management, all purchase requisitions and check requests must be signed by the Vice President for Business and Finance. The record retention of purchasing documents is the responsibility of Business and Finance, Office of the Controller, and the Purchasing Agent for three (3) years after the date of purchasing.

	By consolidating office supply purchases with few primary companies, "preferred vendors", the Purchasing Department can significantly save time in searching for office supply products, provide savings through discounted prices, while providing next business day delivery. Please contact the Purchasing Department for a list of preferred vendors, links and access to view the discounted prices. As a further control over budgetary expenditures, and in order to continue to ensure sound fiscal management at all levels, any purchase requisitions and/or purchase orders over $5,000 must contain the signature of the President or designee.

Replaces policy: *Date: 9/24/2008*

Board of Trustees Policy Number:	Date of Adoption/Revision:
BUFIN 4.06	January 19, 2018

SUBJECT	**Award Close-Out Policy for Sponsored Programs**
AUTHORITY	Office of Sponsored Programs and Business and Finance
APPLICABILITY	Principal Investigators, Activity Directors and fiscal employees
PURPOSE	The purpose of this policy is to provide guidance on the Federal and other sponsor requirements for award closeout to comply with the requirements of the Office of Management and Budget (OMB) Uniform Guidance 2 CFR Part 200, *Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and other Non-profit Organizations* for the financial management of sponsored projects including the timely and accurate closeout for awards.

POLICY	Bennett College will ensure the proper and efficient close-out of all sponsored programs. This responsibility is assigned to Office of Sponsored Programs, and Business & Finance. For a sponsored project to be properly closed-out, the Office of Sponsored Programs (OSP), Principal Investigator/Activity Director and fiscal employees must ensure that the following requirements are met: • All technical and financial reports required by the sponsor have been submitted no later than the due date specified in the award document; • All purchased items have been delivered and are in good condition; • All outsourced services have been finalized; • All vendors have been paid; • Proper termination procedures have been followed for the personnel hired only for the duration of the award. • Provided there are no other outstanding encumbrances, unmet cost share, or open invoices, the budget is ready for the closing process. The award is "In Balance" (balance zero): all expenditures are recorded and equal award amount. Federal awards, final financial reports, final narrative reports, and final invoices must be submitted within 90 days after the award end date. Non-government sponsor deadlines may vary, but in the absence of any sponsor imposed deadlines, OSP requires the 90-day rule for internal closeout purposes.

	For subaward/subcontracts where Bennett College is the subrecipient, the final invoice should generally be submitted to the prime grantee within 60 days after the award end date. Equally, Bennett College must receive the final invoice from sub-recipients within 60 days of the award end date to allow for proper review and timely submission of the final report and/or final reimbursement invoice to the sponsor.
PROCEDURES	<u>60 Days Prior to Award End Date</u> Office of Sponsored Programs and Business & Finance must identify awards with end dates within the next 60 days and notify the PI of the award's pending closeout. The notification e-mail lists the necessary steps the PI must take to properly close the award. The PI will collaborate with OSP to: • Determine if a no-cost extension is required for the award. If so, the PI will submit a request for an extension to the funding agency; • Review anticipated payroll distributions to ensure that charges will cease to post once the end date has been reached; • Review any open encumbrances and purchase orders and contact the Purchasing Coordinator to close them; • Review for unallowable costs per The Allowable Cost Policy for Federal Grants. Confirm all payroll charges, office supplies, and certain types of telephone or postages expenses are appropriate. Remove any unallowable costs, review to see that subcontracts have been fully paid for invoices submitted, including the final invoice; • Submit any pending cost transfer requests so that they can be received and processed by the award end date. Business & Finance must post all G/L entries to the project. The only pending item allowed at the time of closeout is outstanding payments. Such costs must be posted to the project prior to financial reporting deadline prescribed by the sponsor. <u>90 Days after the Award End Date</u> Each month, Business & Finance will run an infomaker report to identify awards with end dates within the past 90 days. This internal control ensures: • That no additional charges have been recorded by mistake beyond the award end date. Any additional expenses recorded after the award has been closed, must be reclassed to operational budget; • That all revenue has been recorded especially for reimbursable awards.

	The funding agency usually pays the last award amount owed to Bennett College after receiving the Final Financial Report along with the Final Narrative Report.

Replaces policy: *Date*

Board of Trustees Policy Number:	Date of Adoption/Revision:
BUFIN 4.07	January 19, 2018

SUBJECT	**Cost Transfers on Sponsored Projects Policy**
AUTHORITY	Office of Sponsored Programs and Business & Finance
APPLICABILITY	Principal Investigators, Activity Directors and fiscal employees
PURPOSE	Compliance with the Office of Management and Budgets (OMB) Uniform Guidance 2 CFR Part 200 "Cost Principles for Educational Institutions" (formerly OMB Circular A-21)

POLICY	Bennett College will comply with Office of Management and Budget regulations to ensure the proper administration and reporting of all sponsored programs activities. The Uniform Guidance 200.405 indicates "any costs allocable to a particular sponsored agreement under the standards provided may not be shifted to other sponsored agreements in order to meet deficiencies caused by overruns or other fund considerations, to avoid restrictions imposed by law or by terms of the sponsored agreement, or for other reasons of convenience." Cost transfers from one sponsored project to another are not allowed. Only in cases where multiple sponsors are funding the same project/deliverables in an overlapping project period will the transfer of cost-overruns to other sponsored projects be considered for approval. In this case, all expenditure (cost) transfers to or from a sponsored project must be recorded in the receiving fund within ninety (90) days after the initial charge was recorded or prior to the submission of the final expenditure report to the sponsor, or the final request for reimbursement from the sponsor, whichever occurs first. In unusual circumstances, a transfer may be appropriate even though the ninety (90) day deadline is not met and the quarterly financial report has not yet been submitted to the federal agency or if employee's time and effort has already been certified for the sponsored project. Under such circumstances, cost transfers TO a sponsored project will be considered with additional justification, well documented. Errors in the allocation of costs to sponsored projects must be identified, corrected, and documented in a timely and consistent manner. No time limit exists for REMOVING expenditures from a sponsored project. If inappropriate expenditures or cost overruns are discovered, they must be

	removed without regard to time limits and if outside of the time limits or acceptable circumstances outlined above, transferred to a non-sponsored fund.
PROCEDURES	Principal Investigators/Activity Directors are responsible to review award expenditures regularly (best practice = monthly) to ensure that expenditures are correct and appropriate. Please consult Grants and Contracts Procedures Manual, Post-Award Management. To correct mistakes or budget overruns, please submit a Cost Transfer Request Form to Office of Sponsored Programs with attached justification. The form is available on BelleNet, Sponsored Programs tab, under Forms.

Replaces policy: *Date*

Board of Trustees Policy Number:	Date of Adoption/Revision:
BUFIN 4.08	January 19, 2018

SUBJECT	**Fiscal Responsibilities on Sponsored Projects Policy**
AUTHORITY	Office of Sponsored Programs and Business & Finance
APPLICABILITY	Principal Investigators, Activity Directors and fiscal employees
PURPOSE	Compliance with all federal regulations for post-award management incorporated in Office of Management and Budget (OMB) Uniform Guidance 2 CFR Part 200.

POLICY	Acceptance of a grant or contract by Bennett College signifies the institution's willingness to assume responsibility for the administration of the funds in accordance with the terms specified by the awarding agency. Grants and contracts are awarded to the institution; not to individual investigators or departments and the responsibility is shared within the institution by the investigator, directors, division deans, and the fiscal employees in the Office of Sponsored Programs and Business and Finance. All help to see that the terms of the award are respected and that expenditures during a given period are not in excess of funds awarded.
PROCEDURES	Neither faculty nor staff has the authority to accept an award or sign any type of agreement on behalf of Bennett College. Only the President of the College is the authorized signatory for accepting the grant or award. Funds must be used only for the purpose and at the level designated in the final approved proposal. <u>PI's Responsibilities</u> The PI should: • Review the award terms and conditions to confirm project activities and reports as well as any restrictions on expenditures or project changes. • Identify significant dates and activities, such as report due dates, timeline for completion of activities, and requirements for award renewal. • Oversee conduct of the project, including work of collaborators and sub-recipients. • Ensure that project staff has training and certification required by Federal or by the sponsor. • Maintain program-related records.

- Submit all required program reports.
- Prepare and submit results for publication if research was involved.
- Determine that any expenditure charged to an award, whether for personnel, supplies, equipment, travel, or other types of expenses, is allocable to the project as well as allowable and reasonable.
- Certify and submit monthly Time & Effort Forms to Office of Sponsored Programs for Federal Awards.
- Review award expenditures regularly (best practice = monthly) to ensure that expenditures are correct and appropriate. The reports are e-mailed approximately on the 10th of every month by Grants & Contracts Accounting Office.
- Review and/or request project changes, some of which may require sponsor approval (such as a change to the scope of work, or significant change in a PI's effort on the project).
- The Principal Investigator is responsible for implementing the program in accordance with the proposal and is ultimately responsible for the overall success of the project.

<u>Title III Activity Director's Responsibilities</u>

The Activity Director is primarily responsible for carrying out the approved activity's plan, achieving of objectives, outcome measures, progress reports, and fiscal year budget parameters. Each Activity Director reports to the appropriate administrator within the existing administrative structure of the Bennett College.

Specifically, the Activity Director is responsible for:

- Preparing and submitting to Office of Sponsored Programs complete and accurate quarterly reports of activity progress toward objectives by the 10th of every month following the end of the quarter; the Quarterly Performance Report form are provided by Office of Sponsored Programs & Title III by e-mail.
- Preparing and submitting to OSP annual performance reports for the period starting October 1st, previous year through September 30th, current year within 60 days from the end of performance period.
- Certify and submit Monthly Time and Effort Reports for each employee compensated with Title III funds. The form is available on BelleNet, Sponsored Programs.
- Monitoring and reporting timely completion of activity objectives.

- Requesting Title III funds and other restricted funds via purchase requisitions, check requests, and/or travel requests in accordance with

	approved activity budgets and college's procurement policies. After-the-fact requests will not be approved. • Review award expenditures regularly (best practice = monthly) to ensure that expenditures are correct and appropriate. The reports are e-mailed approximately on the 10th of every month by Grants & Contracts Accounting Office. <u>Sponsored Programs & Title III Director's Responsibilities</u> When the award document is received and formally accepted by Bennett College, Sponsored Programs will start the Create Account process through Business & Finance. This process of assigning an account number and setting up the account in Jenzabar, our financial reporting system, could take up to three days. The Principal Investigator is notified once the account number is assigned and implementing the project can begin. Sponsored Programs Office monitors the account through the terms of the award, approves requisitions for expenditures in accordance with the award objectives, prepares periodic account status reports, and works with Principal Investigator to obtain proper authorization for re-budgeting or transfer funds across budget line items if necessary. The principal responsibility for administering and managing all Title III activities rests with the Director of Title III who serves as a liaison among constituents of the College and the U.S. Department of Education. The Director is responsible for monitoring the completion of objectives and outcome measures for all activities according to the approved Annual Grant Performance Report. Additionally, the Director manages and approves expenditures for all federal funds not only within the two Title III programs but for all awards and restricted funds. Compliance with the Federal regulations and guidelines is a necessary condition for funding the Title III programs and maintain a clean record with the auditors. Specifically, the Title III Director is responsible for: • Keeping the President informed of the status of all Title III activities by working in close cooperation with relevant personnel. • Providing overall leadership to the programmatic financial aspects of Title III. • Submitting Annual Grant Performance Reports to U.S. Department of Education and budget revisions when required. • Ensuring that the implementation process of Title III activities is consistent with the U.S. Department of Education guidelines and recommendations, as well as Bennett College's policies and procedures.

	- Approving all expenditures of the grant and monitoring daily Title III expenditures. - Developing the Title III HBCU Part B and SAFRA Part F comprehensive proposals and assisting faculty and staff in submitting reports, and other documents related to the administration of awards and restricted programs. - Cooperating with Business & Finance to ensure that an efficient and effective system for fiscal control of Title III and all other restricted funds is maintained. <u>Office of Business & Finance Responsibilities:</u> Business & Finance staffs monitor the internal controls, prepare account reconciliations, oversee the maintenance of fiscal records related to restricted budgets, provide assistance with external reviews, maintain an accurate schedule of all transactions/recordings, and administer the College's procurement program. They are also responsible for: - Reconciling American Express credit card business charges made against any restricted budget with pre-approved requests. American Express charges without pre-approval cannot be recorded against the grants. If an item has to be purchased immediately and charged on American Express card, the pre-approval request is still necessary prior to spending any funds. - Completeness and accuracy of the required information on the request forms. - Create budget line items in Jenzabar system for every new award as soon as the Create Account Form with appropriate award documents is received from Office of Sponsored Programs. - Ensure allocation of expenses to the appropriate account(s) and/or project. - Submit budget reports by the 10th of every month to PIs and Activity Directors. - Invoice monthly agencies, foundations, and other institutions for reimbursement agreements. - Submit financial reports to Office of Sponsored Programs when requested. The quarterly activity reports must be submitted by the Office of Sponsored Programs to federal agencies by the 28th of the month following the end of the quarter so Business & Finance must maintain an accurate schedule of all transactions/recordings**.** No additional transaction can be recorded during any quarter after the 28th of the month following the end of the quarter. - Respect the fiscal federal regulations and requirements. After an award has been closed, Business & Finance will continue to run reports

	to identify awards with end dates within the past 90 days. This internal control ensures: • That no additional charges have been recorded by mistake beyond the award end date. Any additional expenses recorded after the award has been closed, must be reclassed to operational budget. • That all revenue has been recorded especially for reimbursable awards. The funding agency usually pays the last award amount owed to Bennett College after we submit the Final Financial Report along with the Final Narrative Report. --- Grants and Contracts Procedures Manual is a resource for faculty and staff providing information on post-award management of grant activities, compliance with the Federal regulations and College's policies for all sponsored programs activities. The Manual is available on Bellenet, Sponsored Programs tab, under Post-Award. Questions relating to accounting matters should be directed to Business & Finance.

Replaces policy: *Date*

Board of Trustees Policy Number:	Date of Adoption/Revision:
BUFIN 4.09	June 15, 2024

SUBJECT	**Fraud Response Policy**
AUTHORITY	**Office of Business and Finance**
APPLICABILITY	This policy applies to all College Faculty, Staff, Officers, Students, and members of the public.
PURPOSE	This policy sets out the College's position and methods of managing and addressing instances where an alleged fraud may have taken place.

DEFINITIONS	**Fraud** – any action deliberately designed to cause loss to the College, or to obtain any unauthorized benefit, whether or not this is received personally, or by others. More specifically, this includes, but is not limited to: • Forgery of or alteration to checks, wire transfer, ACH, securities or similar documents. • Any misappropriation of funds, securities, supplies or any other College asset. • Any irregularity in the handling or reporting of financial transactions. • Misappropriation of furniture, fixtures or equipment. • Seeking or accepting anything of material value (more than $100) from vendors, consultants or contractors doing business with the College without the authorization of the Chief Financial Officer (CFO) or College President. • Unauthorized use or misuse of property, equipment, materials or records (including academic records). • Disclosing confidential or proprietary information, including intellectual property, to outside partners. • Any computer-related activity involving the alteration, destruction, forgery or manipulation of data for fraudulent purposes, or misappropriation of software. • Any claim for reimbursement or expenses that is not made for the exclusive benefit of the College.

	• Dishonest use of a college purchasing card. • The failure to disclose any conflict of interest to the College. **Member/s of the Public** – those that are neither staff nor students. **Faculty & Staff** – for the purposes of this policy, the definition of "faculty & staff" extends to cover all persons working at, for, or on behalf of, the College (whether paid or unpaid), including but not limited to, contractors, subcontractors and their employees, adjunct appointees, consultants, guest lecturers, interns and volunteers. **Student** – a person who is currently enrolled as a student at the College, either directly or through official arrangements with another organization. SEE POLICY BELOW

Replaces policy: New Policy as of March 11, 2023 *Date*

FRAUD RESPONSE POLICY

Policy Statement

The College has zero tolerance to fraud.

The College will implement controls for the prevention and detection of fraud. The College will also take steps to ensure that faculty & staff (including those providing services to the College), students and alumni, know of their obligations in relation to fraud, including identification and reporting of suspected fraud.

As well as seeking to reduce both the opportunity and scope for fraud, the College is committed to taking prompt action to fully investigate and address any suspected cases, whether carried out by staff, students, suppliers or other partners. The procedures outlined below define the authority levels, responsibilities for action and reporting lines in the event of a suspected fraud or irregularity.

The use the following procedures should enable the College to

- Prevent further loss;
- Establish if there is a case for criminal or disciplinary action;
- Retain any relevant evidence;
- Minimize and recover losses;
- Review the reasons for the incident, the measures taken to prevent a recurrence, and any action needed to strengthen future responses to fraud;
- Keep all personnel with a need to know suitably informed about the incident and the institution's response;
- Assign responsibility for investigating the incident;
- Establish circumstances in which external specialists should be involved;
- Where appropriate, notify the police and establish lines of communication with them;
- Deal with requests for references for employees disciplined or prosecuted for fraud.

Procedures

1. Initiating Action

Suspicion of fraud or irregularity may be captured through several means, including

- The requirement of this policy for all members of faculty & staff to report fraud or irregularity to their immediate supervisor, or one level above if necessary;
- Planned audit work;
- Internal controls;
- Normal operating procedures.

All actual or suspected incidents should be reported without delay to the Chief Financial Officer (CFO) or through the Fraud Hotline (336-517-1542), who should, within 24 hours, hold a meeting of a Fraud Response Group (FRG) to decide on the initial response. This group consists of the:

- President
- CFO
- Controller
- Director, Human Resources

If the actual or suspected incident concerns or implicates the Controller, it should be reported without delay to the CFO who will initiate the procedures for investigation set out in this document.

Upon launching an initial investigation, the Board of Trustees will be notified by the President or CFO. An update of the progress of the investigation will be provided within 30 days of the launch of the investigation.

a) Role of the FRG

The FRG will decide on the action to be taken in most instances. This will normally be a review led by the Controller. It may be necessary to involve the Executive Director of Campus Safety and Security the time action is to be initiated.

If the size or seriousness of the incident/s warrants, a special review will be led by an auditor contracted by the College. The auditor will make recommendations to the FRG about further action. This would include any recommendation/s about police action. Some special investigations may require the use of technical expertise, which the contracted auditor may not possess. In these circumstances, external specialists may be appointed to lead, or contribute to, the investigation. If the FRG decides that a special investigation is not required, the outcome shall be reported to the complainant and other appropriate persons at the time.

Where an investigation is to take place and the matter implicates any of the persons referred to in the preceding paragraph above, another person with senior management responsibility shall be appointed by the FRG.

The FRG will also decide what information should be conveyed to the College Executive

Committee, the Police and the College's insurance brokers/insurers.

b) Confidentiality of Information

All information received will be treated confidentially. It must be appreciated, however, that the investigation process may reveal the source of the information, or a statement by the individual may be required as part of the evidence. Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct, and to protect the College from potential civil liability.

Members of the FRG:

- Will have free and unrestricted access to all College records and premises, whether owned or rented;
- Will have the authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who may use or have custody of any such items or facilities, when it is within the scope of their investigation; and
- Are required to keep discussions and information confidential.

A major fraud event would require the development of a Fraud Response Plan specific to that event (refer to *Appendix 2*).

2. Prevention of Further Loss

- Where initial investigation provides reasonable grounds for suspecting a member or members of staff of fraud, the FRG will decide how to prevent further loss. This may require the suspension, with or without pay, of the suspect/s. It may be necessary to plan the timing of suspension to prevent the suspect/s from destroying or removing evidence that may be needed to support disciplinary or criminal action.
- In these circumstances, the suspect/s should be approached unannounced. They should be supervised at all times before leaving the College's premises. They should be allowed to collect personal property under supervision but should not be able to remove any property belonging to the College. Any security passes and keys to premises, offices and furniture should be returned.
- The Executive Director, Campus Safety and Security should advise on the best means of preventing future access to the College, including while suspects are suspended. The Director, IT should be instructed to withdraw access permissions to the College's computer systems.

  The CFO should consider whether or not it is necessary to investigate systems other than that which has given rise to suspicion, through which the suspect/s may have had opportunities to misappropriate the College's assets.

3. Recovery of Losses

- The College will follow disciplinary procedures against any member of staff who has committed fraud and will also normally pursue the prosecution of any such individual.

- Recovering losses is a major objective of any fraud investigation and the amount of any loss will be quantified insofar as this is possible. Repayment of losses should be sought in all cases.
- Where the loss is substantial, legal advice will be obtained about the need to freeze the suspect's assets through the court, pending conclusion of the investigation. Legal advice should also be obtained about the prospects for recovering losses through the court, where the perpetrator refuses repayment. The College would normally expect to recover costs in addition to losses.

4. Reporting to Senior Management

Where a suspected fraud is being investigated, the Controller will provide a confidential report to the CFO at least monthly, unless the report recipient requests a lesser frequency. The scope of the report shall include,

- quantification of losses,
- progress with recovery action,
- progress with disciplinary action,
- progress with criminal action,
- estimate of resources required to conclude the investigation, and
- actions taken to prevent and detect similar incidents.

5. Reporting to the Executive Committee of the Board of Trustees

On completion of the investigation, a written report shall be submitted to the Executive Committee containing

- a description of the incident, including the value of any loss, the people involved, and the means of perpetrating the fraud,
- the measures taken to prevent a recurrence, and
- any action needed to strengthen future responses to fraud.

6. References for Staff Disciplined or Prosecuted for Fraud

Full details of the investigation/s will be attached to the personnel file/s of the staff involved.

Any request for a reference for a member of staff who has been disciplined, or prosecuted for fraud, shall be referred to the Director, Human Resources who shall prepare any reply having regard to employment and other relevant law. It is a requirement that a specific reference will be made to the fraud episode/s.

7. Whistle-Blower Protection

No employer or person acting on behalf of an employer shall:

- Dismiss or threaten to dismiss an employee;
- Discipline or suspend, or threaten to discipline or suspend, an employee; and/or
- Intimidate or coerce an employee because the employee has acted in accordance with the requirements of this policy. The violation of this section will result in discipline up to and including dismissal.

8. Media Issues

Any staff or elected member contacted by the media with respect to an audit investigation shall refer the media to the Chief Global Communications & Experience Officer. The alleged fraud or audit investigation shall not be discussed with the media by any person other than through the Chief Global Communications & Experience Officer or College President.

If the College's external auditors are contacted by the media regarding an alleged fraud or audit investigation, then they will consult with the CFO and the Chief Global Communications & Experience Officer before responding to a media request for information or interview.

APPENDIX 1

Guidance for the Prevention of Fraud in Areas of Risk

1. Cash

Cash operations include petty cash, cash registers, cash donations, and vending machines. Management of cash should include the following:

- Segregation of duties. Systems should prevent one person from receiving and recording and also banking cash. The system should incorporate additional supervisory management and spot checks. Segregation of duties should continue during periods of leave or sickness absence.
- Reconciliation procedures. An independent record of cash received and banked must be kept, and staff documents used in reconciliation processes.
- Receipts must be issued for all cash received, to provide an audit trail.
- Physical security measures are also necessary, including keypad controlled safes. Losses normally occur because cash is left unsecured, often despite ready availability of safes. Keys and access codes should also be kept secure.
- Frequent banking, preferably daily.
- The use of alternatives to cash, including purchasing cards, checks, direct debits and direct credits.

2. Checks

It is possible for checks to be completed in ways which facilitate opportunistic fraud. Sometimes such checks can be intercepted by people who falsify payee and value details using sophisticated techniques. Debtors may also be told to make checks payable to a private account, possibly using an account name which is similar to the College's. Preventative measures include:

- Physical security. Unused, completed and cancelled checks must be held in secure facilities. If checks are destroyed, more than one staff member should be present, and a record of the serial numbers should be maintained.
- Frequent bank reconciliations. Accounts must be reconciled promptly, preferably daily.
- Segregation of duties. Receipting and reconciliation activities must be kept separate.
- Clear instructions to debtors about correct payee details and the address to which checks should be sent. The address should normally be the Business Office, not the department which has provided the goods or services.
- Central opening of all mail delivered to the Business Office.

- Rotation of staff responsibilities.
- Training in secure completion of checks.
- The use of electronic funds transfer (EFT/ACH/Wire) as an alternative to checks.

3. Purchasing ledger

Preventative measures include:

- Minimizing little used or unusual account codes.
- Ensuring that all account codes are effectively monitored by line management.
- Segregation of duties.
- Secure management of the creditors' master file, including segregating the originating and approval of new or amended data.
- Requiring purchase orders for the procurement of all goods and services except where services are not usually ordered (e.g., electricity), variable (e.g., travel supply) or the use of a purchasing card is not appropriate (e.g., design consultancy work).
- Suppliers should be vetted to establish that they are genuine and reputable companies before being added to lists of authorized suppliers.

APPENDIX 2

Key Components of a Fraud Response Plan in Relation to a Specific Major Fraud Event

1. The plan should be in writing and as part of its development involve an appropriate level of professional consultation. The Chief Financial Officer (CFO) will approve the plan.

2. The plan should consider any internal arrangements necessary to assist in any external criminal investigation conducted by the Police.

3. The plan should set out who will control an internal fraud investigation in the event that investigation referrals to the Police are declined. If this occurs it will be necessary to develop and have approved a separate internally controlled fraud investigation process.

4. The plan should set out who will be involved and what their role will be throughout the fraud response process. Communication with parties outside of this process should be on a strict need to know basis.

5. A communication strategy should be developed by the Chief Global Communications & Experience Officer as part of the plan. This strategy should cover:

   - who will make external statements to the media and liaise with parties specifically involved during the course of any Police or internal fraud investigation;
   - the handling of internal communications where an employee is suspected to be implicated and the Police have agreed to carry out a criminal investigation;
   - liaison arrangements for Police or external investigators or legal advisors; and
   - the nature and type of internal advice or communications once any investigation process has been completed or the event concluded.

6. The plan should consider options for the counselling of affected employees and handling of local morale issues that could arise during and after any Police or internal fraud investigation.

7. The plan should require a post-event analysis of outcomes. This process should involve identification of the lessons to be learnt, consideration of improvements to existing internal controls and procedures, and final report back to the CFO.

Board of Trustees Policy Number: ADM 5.01

Date of Adoption/Revision: November 15, 2013

SUBJECT	**CONCEALED OR OTHER WEAPONS POLICY**
AUTHORITY	Administrative Services
APPLICABILITY	Bennett College Faculty, Staff, Students and Visitors
PURPOSE	New legislation amending the State's firearms laws on private and public college and university campuses (N.C. Sess. Law 2013-369, HB 937) took effect October 1, 2013. While the general ban against weapons on campus remains under N.C.G.S. 14-269.2, additional caveats and exceptions are included in the amended statute. N.C.G.S. 14-415.11(c)(8) requires a private college or university, as a private property owner, to post a "conspicuous notice or statement" prohibiting concealed weapons on campus if it wishes to prohibit any individual with a concealed carry permit from bringing a concealed handgun on campus. In addition, new N.C.G.S. 14-269.2(i) requires a private college or university to opt out of the specific provision pertaining to employees' ability to have handguns in their dwellings on campus.

POLICY	It is the policy of Bennett College that possession of any weapon (concealed or openly visible) is prohibited on Bennett College property. This policy shall govern each employee while on any property owned by or under control of the College including private dwellings such as residence hall rooms and college owned apartments. In addition, this policy shall apply at any time during which an individual acts in the course and scope of their employment with the College.
PROCEDURES	Each employee will be notified and receive documentation of the policy at the time of employment This policy shall apply at any time during which an individual acts in the course and scope of their employment with the College. It is a condition of employment with the College that each individual shall comply with the College's Concealed or Other Weapons Policy Statement. Violation of this Policy Statement shall subject an individual to disciplinary action by the College up to and including termination.

Replaces policy:

Date

Board of Trustees Policy Number:	Date of Adoption/Revision:
BUFIN 4.09	March 11, 2023

SUBJECT	**Fraud Response Policy**
AUTHORITY	**Office of Business and Finance**
APPLICABILITY	This policy applies to all College Faculty, Staff, Officers, Students, and members of the public.
PURPOSE	This policy sets out the College's position and methods of managing and addressing instances where an alleged fraud may have taken place.

DEFINITIONS	**Fraud** – any action deliberately designed to cause loss to the College, or to obtain any unauthorized benefit, whether or not this is received personally, or by others. More specifically, this includes, but is not limited to: • Forgery of or alteration to checks, wire transfer, ACH, securities or similar documents. • Any misappropriation of funds, securities, supplies or any other College asset. • Any irregularity in the handling or reporting of financial transactions. • Misappropriation of furniture, fixtures or equipment. • Seeking or accepting anything of material value (more than $100) from vendors, consultants or contractors doing business with the College without the authorization of the Chief Financial Officer (CFO) or College President. • Unauthorized use or misuse of property, equipment, materials or records (including academic records). • Disclosing confidential or proprietary information, including intellectual property, to outside partners. • Any computer-related activity involving the alteration, destruction, forgery or manipulation of data for fraudulent purposes, or misappropriation of software. • Any claim for reimbursement or expenses that is not made for the exclusive benefit of the College.

	• Dishonest use of a college purchasing card. • The failure to disclose any conflict of interest to the College. **Member/s of the Public** – those that are neither staff nor students. **Faculty & Staff** – for the purposes of this policy, the definition of "faculty & staff" extends to cover all persons working at, for, or on behalf of, the College (whether paid or unpaid), including but not limited to, contractors, subcontractors and their employees, adjunct appointees, consultants, guest lecturers, interns and volunteers. **Student** – a person who is currently enrolled as a student at the College, either directly or through official arrangements with another organization. SEE POLICY BELOW

Replaces policy: New Policy as of March 11, 2023 *Date*

FRAUD RESPONSE POLICY

Policy Statement

The College has zero tolerance to fraud.

The College will implement controls for the prevention and detection of fraud. The College will also take steps to ensure that faculty & staff (including those providing services to the College), students and alumni, know of their obligations in relation to fraud, including identification and reporting of suspected fraud.

As well as seeking to reduce both the opportunity and scope for fraud, the College is committed to taking prompt action to fully investigate and address any suspected cases, whether carried out by staff, students, suppliers or other partners. The procedures outlined below define the authority levels, responsibilities for action and reporting lines in the event of a suspected fraud or irregularity.

The use the following procedures should enable the College to

- Prevent further loss;
- Establish if there is a case for criminal or disciplinary action;
- Retain any relevant evidence;
- Minimize and recover losses;
- Review the reasons for the incident, the measures taken to prevent a recurrence, and any action needed to strengthen future responses to fraud;
- Keep all personnel with a need to know suitably informed about the incident and the institution's response;
- Assign responsibility for investigating the incident;
- Establish circumstances in which external specialists should be involved;
- Where appropriate, notify the police and establish lines of communication with them;
- Deal with requests for references for employees disciplined or prosecuted for fraud.

Procedures

1. Initiating Action

Suspicion of fraud or irregularity may be captured through several means, including

- The requirement of this policy for all members of faculty & staff to report fraud or irregularity to their immediate supervisor, or one level above if necessary;
- Planned audit work;
- Internal controls;
- Normal operating procedures.

All actual or suspected incidents should be reported without delay to the Chief Financial Officer (CFO) or through the Fraud Hotline (336-517-1542), who should, within 24 hours, hold a meeting of a Fraud Response Group (FRG) to decide on the initial response. This group consists of the:

- President
- CFO
- Controller
- Director, Human Resources

If the actual or suspected incident concerns or implicates the Controller, it should be reported without delay to the CFO who will initiate the procedures for investigation set out in this document.

Upon launching an initial investigation, the Board of Trustees will be notified by the President or CFO. An update of the progress of the investigation will be provided within 30 days of the launch of the investigation.

a) Role of the FRG

The FRG will decide on the action to be taken in most instances. This will normally be a review led by the Controller. It may be necessary to involve the Executive Director of Campus Safety and Security the time action is to be initiated.

If the size or seriousness of the incident/s warrants, a special review will be led by an auditor contracted by the College. The auditor will make recommendations to the FRG about further action. This would include any recommendation/s about police action. Some special investigations may require the use of technical expertise, which the contracted auditor may not possess. In these circumstances, external specialists may be appointed to lead, or contribute to, the investigation. If the FRG decides that a special investigation is not required, the outcome shall be reported to the complainant and other appropriate persons at the time.

Where an investigation is to take place and the matter implicates any of the persons referred to in the preceding paragraph above, another person with senior management responsibility shall be appointed by the FRG.

The FRG will also decide what information should be conveyed to the College Executive

Committee, the Police and the College's insurance brokers/insurers.

b) Confidentiality of Information

All information received will be treated confidentially. It must be appreciated, however, that the investigation process may reveal the source of the information, or a statement by the individual may be required as part of the evidence. Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct, and to protect the College from potential civil liability.

Members of the FRG:

- Will have free and unrestricted access to all College records and premises, whether owned or rented;
- Will have the authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who may use or have custody of any such items or facilities, when it is within the scope of their investigation; and
- Are required to keep discussions and information confidential.

A major fraud event would require the development of a Fraud Response Plan specific to that event (refer to *Appendix 2*).

2. Prevention of Further Loss

- Where initial investigation provides reasonable grounds for suspecting a member or members of staff of fraud, the FRG will decide how to prevent further loss. This may require the suspension, with or without pay, of the suspect/s. It may be necessary to plan the timing of suspension to prevent the suspect/s from destroying or removing evidence that may be needed to support disciplinary or criminal action.
- In these circumstances, the suspect/s should be approached unannounced. They should be supervised at all times before leaving the College's premises. They should be allowed to collect personal property under supervision but should not be able to remove any property belonging to the College. Any security passes and keys to premises, offices and furniture should be returned.
- The Executive Director, Campus Safety and Security should advise on the best means of preventing future access to the College, including while suspects are suspended. The Director, IT should be instructed to withdraw access permissions to the College's computer systems.

  The CFO should consider whether or not it is necessary to investigate systems other than that which has given rise to suspicion, through which the suspect/s may have had opportunities to misappropriate the College's assets.

3. Recovery of Losses

- The College will follow disciplinary procedures against any member of staff who has committed fraud and will also normally pursue the prosecution of any such individual.

- Recovering losses is a major objective of any fraud investigation and the amount of any loss will be quantified insofar as this is possible. Repayment of losses should be sought in all cases.
- Where the loss is substantial, legal advice will be obtained about the need to freeze the suspect's assets through the court, pending conclusion of the investigation. Legal advice should also be obtained about the prospects for recovering losses through the court, where the perpetrator refuses repayment. The College would normally expect to recover costs in addition to losses.

4. Reporting to Senior Management

Where a suspected fraud is being investigated, the Controller will provide a confidential report to the CFO at least monthly, unless the report recipient requests a lesser frequency. The scope of the report shall include,

- quantification of losses,
- progress with recovery action,
- progress with disciplinary action,
- progress with criminal action,
- estimate of resources required to conclude the investigation, and
- actions taken to prevent and detect similar incidents.

5. Reporting to the Executive Committee of the Board of Trustees

On completion of the investigation, a written report shall be submitted to the Executive Committee containing

- a description of the incident, including the value of any loss, the people involved, and the means of perpetrating the fraud,
- the measures taken to prevent a recurrence, and
- any action needed to strengthen future responses to fraud.

6. References for Staff Disciplined or Prosecuted for Fraud

Full details of the investigation/s will be attached to the personnel file/s of the staff involved.

Any request for a reference for a member of staff who has been disciplined, or prosecuted for fraud, shall be referred to the Director, Human Resources who shall prepare any reply having regard to employment and other relevant law. It is a requirement that a specific reference will be made to the fraud episode/s.

7. Whistle-Blower Protection

No employer or person acting on behalf of an employer shall:

- Dismiss or threaten to dismiss an employee;
- Discipline or suspend, or threaten to discipline or suspend, an employee; and/or
- Intimidate or coerce an employee because the employee has acted in accordance with the requirements of this policy. The violation of this section will result in discipline up to and including dismissal.

8. Media Issues

Any staff or elected member contacted by the media with respect to an audit investigation shall refer the media to the Chief Global Communications & Experience Officer. The alleged fraud or audit investigation shall not be discussed with the media by any person other than through the Chief Global Communications & Experience Officer or College President.

If the College's external auditors are contacted by the media regarding an alleged fraud or audit investigation, then they will consult with the CFO and the Chief Global Communications & Experience Officer before responding to a media request for information or interview.

APPENDIX 1

Guidance for the Prevention of Fraud in Areas of Risk

1. Cash

Cash operations include petty cash, cash registers, cash donations, and vending machines. Management of cash should include the following:

- Segregation of duties. Systems should prevent one person from receiving and recording and also banking cash. The system should incorporate additional supervisory management and spot checks. Segregation of duties should continue during periods of leave or sickness absence.
- Reconciliation procedures. An independent record of cash received and banked must be kept, and staff documents used in reconciliation processes.
- Receipts must be issued for all cash received, to provide an audit trail.
- Physical security measures are also necessary, including keypad controlled safes. Losses normally occur because cash is left unsecured, often despite ready availability of safes. Keys and access codes should also be kept secure.
- Frequent banking, preferably daily.
- The use of alternatives to cash, including purchasing cards, checks, direct debits and direct credits.

2. Checks

It is possible for checks to be completed in ways which facilitate opportunistic fraud. Sometimes such checks can be intercepted by people who falsify payee and value details using sophisticated techniques. Debtors may also be told to make checks payable to a private account, possibly using an account name which is similar to the College's. Preventative measures include:

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- Central opening of all mail delivered to the Business Office.

- Rotation of staff responsibilities.
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- Requiring purchase orders for the procurement of all goods and services except where services are not usually ordered (e.g., electricity), variable (e.g., travel supply) or the use of a purchasing card is not appropriate (e.g., design consultancy work).
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   - liaison arrangements for Police or external investigators or legal advisors; and
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6. The plan should consider options for the counselling of affected employees and handling of local morale issues that could arise during and after any Police or internal fraud investigation.

7. The plan should require a post-event analysis of outcomes. This process should involve identification of the lessons to be learnt, consideration of improvements to existing internal controls and procedures, and final report back to the CFO.

Board of Trustees Policy Number: EMS 7.01

Date of Adoption/Revision:
March 2, 2016 / April 17, 2020

SUBJECT	Commencement Participation
AUTHORITY	College Registrar
APPLICABILITY	This policy applies to all Bennett College Students
PURPOSE	The following policy defines the requirements that must be met for students to participate in commencement exercises and/or receive diplomas during commencement exercises. Students completing all degree requirements by the end of the fall or spring semester are encouraged to participate in the May commencement exercises that follow the completion of all degree requirements.

POLICY	Only students who have completed all required credit hours towards their degree will be allowed to participate in the commencement ceremony.
PROCEDURES	Determinations of eligibility occur at the end of the drop/add period in the spring semester of the Commencement Ceremony. At that time, the Registrar will calculate each student's expected credit total, which is the number of credits earned plus the amount for which a student is registered. If a student fails to obtain the required passing grade in expected course credit, they will not be able to participate in the Commencement Ceremony. The student must have met all financial obligations to the College. The student must have met all institutional requirements of the College as outlined under the Graduate Clearance tab in Bellenet. The student must apply for graduation before the published deadline. Students must pay the graduation fee. The student must meet with their Academic Advisor to obtain a senior audit review. The Academic or Faculty Advisor and the student must complete and sign the Course Requirement for Degree Completion form (CRDC) The CRDC form must include the currently enrolled expected course credits for the student.

	The remaining expected course credit taken off-campus will also require completing the Transient Student/Transfer Credit form. (Both forms, if applicable, are submitted together.) Submit the completed and signed CRDC form to the Registrar Office for review and the student's permanent file. No diploma will be awarded until the student has been approved by their major department(s) as having completed all academic and institutional requirements and certified by the Bursar as having met all financial obligations to the College. The student who does not apply for graduation before the published deadline for any semester must apply for graduation during the next semester. Students who have applied for graduation but fail to meet the requirements must reapply for graduation by the published deadline for the semester in which they will fulfill the requirements.

Replaces policy: EMS 7.01, March 16, 2015, March 2, 2016

Approval Date: April 17, 2020

Board of Trustees Policy Number:	Date of Adoption/Revision:
EMS 7.02	January 28, 2017

SUBJECT	**Transgender Admissions Policy**
AUTHORITY	Office of Admissions
APPLICABILITY	All applicants applying for admissions to Bennett College
PURPOSE	

POLICY	Bennett College admits self-identified women and people assigned female at birth who do not fit into the gender binary. Within these parameters, Bennett College does not discriminate on the basis of gender identity and expression in its admission policy, scholarship and loan programs or in the educational program, co-curricular activities and residential facilities. Bennett College does not accept applications men. Those assigned female at birth who identify as men are not eligible for admission. The College will continue to use female pronouns and the language of sisterhood, both of which powerfully convey important components of our mission and identity.
PROCEDURES	Definition - *Transgender describes those individuals whose gender identity is different from the sex they were assigned at birth. A transgender male is someone who identifies as male but was assigned the sex of female at birth; a transgender female is someone who identifies as female but was assigned the sex of male at birth.* 1. All applicants for acceptance to Bennett College must meet the requirements for admission; 2. Applicants assigned a female sex at birth who have undergone a legal change in gender to male prior to the point of the application are not eligible for admission; 3. Where there is a conflict between the student's self-identified gender and the gender that appears on legal documentation such as an academic transcript or documents provided as part of the financial aid process, the student is strongly encouraged to contact the Office of Admissions for a discussion around the desire to attend a women's college and how they self-identify in terms of gender; 4. Once admitted, the student must continue to self-identify as a

	woman throughout their matriculation at Bennett College. 5. If a student decides to self-identify as a male, the student will no longer be eligible to receive a degree from the College. 6. If, during a student's time at Bennett College, the student decides that, as a women's college it no longer offers the appropriate educational environment or self-identifies as a male, the College will offer guidance and resources to assist in making choices that are best for that student.

Replaces policy: *Date*

Board of Trustees Policy Number:	**Date of Adoption/Revision:**
EMS 7.03	September 2, 2016

SUBJECT	Admissions Policy
AUTHORITY	Office of Admission
APPLICABILITY	All women applying for acceptance to Bennett College
PURPOSE	To ensure the fair and equitable evaluation of all applicants for admission to Bennett College

POLICY	Bennett College welcomes applications from women who seek to receive an excellent liberal art education. Each applicant is required t provide the following documentation for consideration of their applications: Official Bennett College Application Official high school transcript or GED Official transcript from other college or university attended (transfer applicants only) Official standardized test scores Teacher/Counselor recommendation Personal Essay Bennett College adheres to a rolling admissions process, accepting applications for Fall and Spring semesters until the first day of class. Bennett College does not discriminate on the basis of race, age, color, disability, religion, sexual orientation and ethnic origin.
PROCEDURES	• The Office of Admissions is responsible for the collection, evaluation and recommendation for acceptance for all applicants • Bennett College will accept applications for the following categories of students **First time applicants** are applicants applying for admission to college and never enrolled in an accredited college or university. **Transfer Students** are those applicants seeking admissions that have completed at least a semester of college work at an accredited four year college/university or community college. **International Students** are those applicants who are seeking admissions that have evidence of completing high school or college work outside of the United States.

Re-Admit Students are those students who attended Bennett for one or more semesters and are requesting re-admission

- The Office of Admissions communicates with all applicants the status of applications on a timely basis and reports to the Associate Vice President for Enrollment Management on a weekly basis the status of all applicants
- Applications will be reviewed and evaluated in accordance with approved requirements for admission to the College
- Periodic assessments of the application review process and the requirements for acceptance to the College will be conducted by the Admissions Committee to ensure the appropriateness and adequacy of the Office of Admissions procedures

ADMISSIONS REQUIREMENTS

First Time Applicants

- Official Bennett College Application
- Official High School Transcript with High School Weighted GPA of a 2.5 or better or GED

(***If student attended more than one high school both transcripts are needed***)

- Official Standardized Test Scores (SAT/ACT)
- Teacher/Counselor Recommendation
- Optional Personal Essay
-

First Time Applicants must also have the following high school course requirements.

- English, four (4) courses units emphasizing grammar, composition and literature;
- Mathematics, four (4) course units including algebra I, algebra II, geometry and fourth math higher than algebra II or algebra I
- Science three (3) course units, including at least one lab science
- Foreign Language two (2) course units (of the same language)
- Social Studies two (2) course units one must include US History
- Academic Electives three (3) Physical Education, Health Education, Music, Computer Science, etc.
- Applicants who have taken the IB (International Baccalaureate) Exam must have a score of 5, 6, or 7 to receive credit.
- Applicants who take the AP (Advance Placement) exam and score a 3 or better may receive advance placement credit in the following subject areas: Art, Biology, Computer Science, Economics, French and Government and Politics. To receive credit in chemistry, history or music a student needs to score a 4. The College Registrar will determine how much credit you are eligible to receive based on your score.

	First time applicants with a grade point average not meeting or exceeding minimum requirements will be considered for admissions using a holistic review process. Therefore, all applications are welcomed and are subjected to gaining admissions through the Emerging Scholars Program. Applicants who are over the age of 24 and have not attempted to earn any college credits after high school must meet the following: • Official Bennett College Application • Official high school transcript or GED • Standardized test score (SAT/ACT) recommended, not required **Transfer Applicants** • Official Bennett College Application for Admissions • Official final High School Transcript • Official Transcripts from all colleges or universities attended. • Applicant must have earned a cumulative GPA of 2.5 from all post-secondary institutions. **International Students** • Official Bennett College Application • Official Transcript of all academic work (Translated in English) with transcript guide of secondary courses and validation of post-secondary A-1 level courses. Transcripts must be submitted to the World Education Services (WES) for verification and evaluation purposes. • TOEFL or TOEFL iBT scores (TOEFL minimum 507 and TOEFL iBT minimum 64) • Statement of Financial Readiness An I-20 will not be issued until the student has been accepted and the Statement of Financial Readiness is provided to the college. **Re-Admit Students** • Official Bennett College Re-Admit Application • Students seeking readmission to Bennett College are required to be in good academic standing with a grade point average of 2.0 or better will be considered for readmissions. The student is required to receive clearance to re-enroll from the following areas before a decision can be made: Academic Affairs, Student Affairs, Health Center and Business Office • If any college coursework was attempted since last being enrolled at Bennett College, official transcripts from those post-secondary institutions must be submitted. The transcript(s) must indicate a grade point average of 2.5 or higher.

Replaces policy:
Date

POLICIES *and* PROCEDURES

Board of Trustees Policy Number:	Date of Adoption/Revision:
EMS 7.04	September 29, 2016

SUBJECT	**SUMMER SCHOOL CREDIT HOURS**
AUTHORITY	College Registrar
APPLICABILITY	This policy applies to all matriculating Bennett College students.
PURPOSE	The policy defines the maximum credit hours accepted for students who participate in summer courses at Bennett College or other campuses.

POLICY	A total of 12 credit hours may be earned in any one summer at Bennett College. A total of no more than 7 credit hours may be earned in any one summer at an accredited institution other than Bennett College.
PROCEDURES	Bennett College awards full credit in terms of semester hours and quality points for all courses that are satisfactorily completed during the academic year or summer sessions at approved institutions. 1. Before taking a course at another institution, a student must receive the signatures of the program chair and the department director. 2. The approval form must be completed and approved by the Provost and must be filed with the Office of the Registrar. 3. A transcript of work completed must be filed with the Office of the Registrar when work is completed not later than 30 days following the beginning of the fall semester. 4. Permission for a student to enroll in a course for transfer credit may be denied if the course is being offered at the home institution, and/or a home institution course can be substituted for the transfer course.

Replaces policy:

Date

Board of Trustees Policy Number: **EMS 7.05**

Date of Adoption/Revision: November 23, 2019

SUBJECT	Student Recruitment Materials
AUTHORITY	Office of Enrollment Management
APPLICABILITY	All published recruitment materials
PURPOSE	Federal requirements stipulate that recruitment materials and presentations accurately represent the institution's practices and policies. It is particularly important that materials designed for prospective students be factual and clear regarding important issues such as admissions policies, curricular offerings, degree requirements, tuition and fees, and other expenses.

POLICY	All Enrollment Management (Office of Admissions and Office of Financial Aid) student recruitment materials are reviewed for accuracy and consistency with college policies before release, including posting to the college website. This includes information contained in brochures, flyers, compact disks, videos, web pages, or any other print or electronic medium.
PROCEDURES	• General recruitment materials such as those developed by the Office of Admissions and/or the Office of Financial Aid are reviewed annually (at the end of the academic year; prior to the start of the new academic year). • This review is done by the Vice President of Enrollment Management and Student Experience in consultation with the Director of Admissions, the Director of Financial Aid, and the Director of Marketing and Communications (or designee). • The review is done in conjunction with the review of the academic catalog and website and/or as necessary. • A file of approved materials and a check sheet indicating approval date is maintained in the Office of Enrollment Management for a period of three years.

	NOTE: Printed collateral materials are printed in bulk; therefore, any changes made to the recruitment materials are captured in the next print cycle and a review date is added to each piece of collateral material.

Replaces policy: n/a **Date:**

Board of Trustees Policy Number: EMS 7.06

Date of Adoption/Revision: November 23, 2019

SUBJECT	Financial Aid Policy
AUTHORITY	Office of Financial Aid
APPLICABILITY	All Degree Seeking Students at Bennett College
PURPOSE	The Office of Financial Aid is a provider of accessible and affordable education experiences to students by offering a variety of financial opportunities. The purpose of the Bennett College Office of Financial Aid is to assist students and their families with locating the resources necessary for financing their education.

POLICY	The Office of Financial Aid administers need-based and non-need- based funds in the form of grants, scholarships, loans, and work-study. These funds originate from federal, state, private, institutional, and other sources. The Office of Financial Aid operates under the *Bennett College Financial Aid Process Manual* that is written in accordance with Federal and State regulations, institutional guidelines, and guidelines established by private grants and scholarships.
PROCEDURES	The Free Application for Federal Student Aid (FAFSA) is the needs analysis system used by Bennett College. It is used to determine eligibility for Federal Pell Grants, Federal Supplemental Educational Opportunity Grants, Federal Direct Student Loans and Federal Work Study. Applicants seeking financial aid must submit the Free Application for Federal Student Aid (FAFSA). The Free Application for Federal Student Aid opens annually on October 1. The priority deadline is March 15th of each year. The application can be completed online at www.fafsa.gov. **Bennett College's Title IV school code is 002911**

Financial Aid is determined by a standard needs analysis system using confidential data submitted by the parents and/or the student. The needs analysis establishes the financial need by deducing the computed family and/or student contribution form the total cost of attending Bennett College.

TYPES OF FINANCIAL AID

Grants are forms of financial assistance that do not have to be repaid. Grants are often based upon funding availability, financial need, merit, and academic progress. Federal and state grants are the two types of grant opportunities (Federal Pell Grant, Federal SEOG, Federal Teach Grant).

Work Study is a form of financial assistance awarded through on or off campus student employment opportunities. Interested students should complete the FAFSA as early as possible. Work Study is awarded based on eligibility and availability of funds.

Student Loans are forms of self-help financial assistance that must be re-paid. Student loans are optional and are often used to aid in meeting the cost to attend college. Federal loans are available regardless of income level or credit history. Students and parents should always exhaust federal loan options first before considering a private loan (Direct Subsidized Loan, Direct Unsubsidized Loan, Direct PLUS Loan).

Scholarships are forms of financial assistance that do not have to be re-paid. Institutional scholarships are awarded to students based on the criteria set forth by the scholarship donor. Students can also receive outside scholarships and are also awarded to the student based on the scholarship criteria.

SATISFACTORY ACADEMIC PROGRESS

Students receiving Federal Assistance are required to meet the College's standards of academic progress that are guided by Federal requirements.

In regulation Section 668.32, the U.S. Department of Education defines the requirements for Colleges & Universities to administer Satisfactory Academic Progress (SAP) standards for students receiving Title IV Federal Financial Aid.

As required, the Bennett College SAP policy for Title IV students is the same as or stricter than the school's standards for students enrolled in the same educational program who are not receiving Title IV aid. Aid recipients must maintain sufficient progress to assure successful completion of their educational objectives as measured by quantitative and qualitative standards.

The Office of Financial Aid is responsible for ensuring that all students who receive federal financial aid are meeting these standards. The College Satisfactory Academic Progress Committee is responsible for conducting annual reviews of its SAP Policy to ensure federal compliance and dissemination to students.

These requirements apply to the following programs: The Federal Pell Grant, the Federal Supplemental Educational Opportunity Grant, the Federal TEACH Grant,

Federal Work Study, Direct Loans, Federal Parent PLUS Loans, and all Institutional Aid. Bennett College also uses this standard to renew need-based aid.

Recipients of DC, PHEAA, Rhode Island and NC Grant aid must also follow certain academic progress guidelines. Bennett College's SAP policy meets the requirements of both federal and state agencies.

Students failing to meet the standards will be placed on Financial Aid WARNING for one semester. At the end of that semester, if the student has not met the minimum requirements, the student will be INELIGIBLE to receive student aid.

Reinstatement will be contingent upon attainment of satisfactory progress standards or an appeal and acceptance of an Academic Plan through the Academic Advising unit at Bennett College. Students will be notified in writing when they are in either Financial Aid WARNING or INELIGIBILITY status.

RETURN OF TITLE IV FUNDS, REFUNDS, AND WITHDRAWAL POLICY

All schools that administer Title IV funds must adhere to the various rules and regulations concerning the Return of Title IV Funds (R2T4).

If a recipient of Title IV aid withdraws during a payment period (or a period of enrollment), the college calculates the amount of Title IV aid the student did and did not earn. Unearned Title IV funds are returned to the Title IV programs as soon as possible, but no later than 45 days after the date of determination of withdrawal.

Upon receipt of an official withdrawal form a calculation is completed based on the official withdrawal date and the unearned funds are returned to Title IV programs.

The Controller's office calculates how much the student earned in Title IV aid, completes the calculation for the amounts that were disbursed and communicates this to the financial aid office. The financial aid office returns the funds to Title IV programs, and proceeds with the removal of the funds from the students account.

The Office of Financial Aid will send written notification to the student reflecting the amount of aid that has been returned and a print out of the calculation is kept in the financial aid file of the student.

Title IV funds are returned to the programs from which the student received aid during the payment period or period of enrollment as in the following order, up to the net amount disbursed from each source:

- Unsubsidized Direct Loans (other than Direct PLUS Loans)
- Subsidized Direct Loans
- Direct PLUS Loans
- Federal Pell Grants for which a return of Title IV funds is required

	• FSEOG for which a return of Title IV funds is required • TEACH Grants for which a return of Title IV funds is required • Iraq and Afghanistan Service Grant, for which a return of Title IV funds is required. **RESOURCES AND PUBLICATIONS USED TO GUIDE THE OFFICE OF FINANCIAL AID IN ADMINISTERING FINANCIAL AID** The Federal Financial Aid Handbook – can be located at www.ifap.ed.gov The Verification Guide - located on the Department of Education website at www.ifap.ed.gov Federal Registers, Action Letters, Dear Partner (Colleague) Letters, Electronic Announcements, Audit Guide, Regulation Compilations and the Federal Student Financial Aid Handbook can be found at the Department of Education website at www.ifap.ed.gov Information from the National Association of Student Financial Aid Administrators can be found at https://www.nasfaa.org Information on North Carolina programs can be found at www.cfnc.org Information on the North Carolina of Association of Student Financial Aid Administrators can be found at www.ncasfaa.com Bennett College Financial Aid Process Manual 2019-2020 (located on the Bennett College Financial Aid shared drive)

Replaces policy: n/a *Date*

Board of Trustees Policy Number: **IA 8.01**

Date of Adoption/Revision: April 17, 2014

SUBJECT	**GENERAL GIFT ACCEPTANCE**
AUTHORITY	The Office of Institutional Advancement is responsible for the administration of this policy and the divisional procedures.
APPLICABILITY	Board of Trustees, Administration, and Donors
PURPOSE	This policy governs the acceptance of and processes by which gifts will be accepted by Bennett College.

POLICY	Bennett College accepts gifts of monetary value, physical property, artwork and other tangible items deemed of value to support and further the mission of BENNETT COLLEGE.
PROCEDURES	1) Bennett College will accept all unrestricted gifts, unless there is a question as to whether the donor has sufficient title to the asset given or is mentally competent to transfer the asset to Bennett College legally. 2) All checks must be made payable to "Bennett College" and will not be made payable to an employee, volunteer or any other agent for the credit of Bennett College. 3) Bennett College will accept restricted gifts *(i.e., named scholarships)* only as those gifts are consistent with our purpose and our non-profit status. Without exception, all restricted gifts accepted will be used per the requested designation. 4) **Gifts received through direct mail appeal letters and telefund campaigns:** All gifts received with a reply device are restricted. All gifts received for expressed appeal amounts are restricted. 5) **Gifts received through comprehensive campaigns and special projects:** All restricted capital campaign gifts accepted will be noted on devices of commitment and applied to campaign use. All restricted special project gifts accepted will be used per the requested designation. 6) Bennett College accepts major gifts consistent with our purpose and our non-profit status. A "Major Gift" is defined as a gift having value *equal to or greater than* **$10,000.00**, and includes: • One time cash gifts *(from individuals, corporate, and foundation sources),* • Bequests,

	• Art Work, • Terminated trusts, • Real estate with fair market value *(FMV),* • Stocks, bonds and mutual funds with FMV, • Marketable tangible assets, • Life insurance policies, Unless restricted *(in part or in whole)* to the operating budget, a special program, or a special project, these gifts will be invested into the Bennett College endowment consistent with the Bennett College Investment Policy. The Office of Business and Finance oversees the endowment funds. 7) Major non-cash, deferred gifts will be received within a structure designed to maximize the benefits both to the donor and to Bennett College. In every case, Bennett College will first look to the donor's intent. Bennett College will not look to encumber itself with gifts, which may prove to generate more cost than benefits. 8) Bennett College willingly accepts all appropriate in-kind contributions of skilled services and tangible assets consistent with our purpose and our non-profit status, in accordance with our established acceptance policies and procedures. 9) In situations where advisors retained by Bennett College prepare documents or render advice in any form to Bennett College and/or a donor to Bennett College, it shall be disclosed: a. that the professional involved is in the employ of Bennett College and is not acting on behalf of the donor, and b. that any documents or other advice rendered in the course of the relationship between Bennett College and the donor should be reviewed by the Office of Institutional Advancement for the donor prior to the completion of the gift. 10) All gifts will have a gift agreement executed to complete the gift. **Unacceptable Gifts:** The College reserves the right to refuse any gift that is not consistent with its mission. In addition to and without limiting the generality of the foregoing, gifts will not be accepted by the College: 1) That violate any federal, state or local law, stature or ordinance; 2) That provide for scholarships, fellowships, professorships or lecture series with restrictive clauses that could cause embarrassment to the College, or that reserve to the donor or his/her representative the right to designate the recipient; 3) That as a condition thereof, require any action on the part of the College which is unacceptable to the Board of Trustees; 4) That commit the College to name a faculty, program, or endowment fund that is revocable in any way; 5) That require/stipulate to the College and its Board of Trustees the future

	employment of any specified person; 6) That contain unreasonable conditions (i.e. a lien or other encumbrance) on gifts of partial interest and property; 7) That are financially unsound, fail to provide a positive net present financial value, or which, in the College's sole judgment, could reasonably expose the College to unacceptable liability (including gifts of real estate which may expose the College to environmental liability.)

Replaces policy: *Date*

Board of Trustees Policy Number:	Date of Adoption/Revision:
HR 9.01	1/24/2014

SUBJECT	BACKGROUND CHECKS
AUTHORITY	Administrative Services and the Department of Human Resources are responsible for communicating and managing this process.
APPLICABILITY	This policy applies to all prospective Bennett College employees
PURPOSE	Bennett College is committed to ensuring that its mission and goals are supported by qualified faculty and staff members, and that its community is as safe as possible. Bennett College is also committed to taking meaningful actions to protect its finances, property, and other assets. This policy is a guideline to assist in the consistent application of Bennett College Policies and Procedures for employees. This policy does not create a contract, express or implied, with any employee.

POLICY	The Board of Trustees authorizes the College to require Background checks for prospective employees (faculty, staff, and administrators) and any other positions deemed appropriate as a requirement for employment at Bennett College.
PROCEDURES	**A. Notification of Background Process** Finalist will be informed during the pre-employment process that an offer is subject to completion of background checks with results acceptable to Bennett College as appropriate to each position and as stated in the position description. Prior to conducting the background check, a signed, written consent will be obtained from the finalist. Refusal by the finalist to authorize the background check will make him/her ineligible for employment. Information obtained through background checks is confidential and will be shared only with individuals with an essential business need to know. Records of the background check will be maintained in the Office of Human Resources in file separate from the personnel file. **B. Screening of Finalists** An offer of employment is contingent upon the successful completion of a background check process. Generally, employment in the position should not begin until Bennett College has received and reviewed the results of the background checks. Exceptions may be made at the hiring

department's request with the approval of the President and/or his/her designee.

The finalist for all staff and faculty positions at Bennett College are subject to local, county, state and national criminal records search, motor vehicle driving records, national sexual offender database search and analyzed social security number search. Additional background searches may be requested by the President and/or his/her designee.

C. Background Checks for Current Faculty and Staff

Background checks will be required of current Bennett College faculty and staff who are finalists for a position if they have not undergone the background check process. A current employee who has already undergone a background check in the two (2) years preceding his/her application for transfer or promotion, will not be required to undergo a new background check unless he/she is applying for a position with substantially different responsibilities and the position requires additional background checks such as a credit check. A background check will not be required for changes in shift or other interdepartmental lateral transfers.

D. Evaluation of Background Check Results

Once the background checks are completed, Bennett will make a hiring decision based upon the information gathered. If negative information is obtained through the background check process, Bennett will determine whether the information is job-related and if the decision not to hire is consistent with business necessity. In making the determination, Bennett will consider, among all other relevant information, the following:

1. For all criminal convictions or pleas, the nature and seriousness of the offense(s), the number and type of offense(s), the amount of time that has elapsed since the offense(s), whether such offense(s) are related to the responsibilities of the position, and the accuracy and completeness of the information provided by the finalist during the application process.
2. For all other negative information, the nature and seriousness of the activities or date obtained; the amount of time that has elapsed since the activities or data; whether the information is related to the responsibilities of the position; and the accuracy and completeness of the information provided by the finalist during the application process.

E. Adverse Action Taken Due to Background Check Results

If adverse action is probable, based in whole or in part, on the results of a background check, the finalist will receive a copy of the background check report, a Pre-Adverse Action Notice (Attachment 1) and a document summarizing his/her rights under Fair Credit Reporting Act

	(FCRA) Finalist will be permitted to provide responsive information regarding their criminal history, including evidence that they did not commit the offense (in the case of misidentification), evidence of rehabilitation of character, the length of time since the last criminal conviction, and other extenuating circumstances. The finalist will be given five (5) business days to provide this information so as not to halt the recruitment process for the position. If adverse action is taken against the finalist in whole or in part based upon the results of a background check, the finalist will receive an Adverse Action Notice (Attachment 2), indicating that no further action will be taken and the offer will be rescinded. The finalist will also receive a document summarizing his/her rights under the FCRA. **F. Adverse Action Taken Due to Background Check Results *(Exceptions to the Background Check Policy)*** Exceptions to this policy may be made at the discretion of the President or his/her designee. Categories of workers that are excluded from this policy include student workers, unpaid interns, and volunteers unless a background check is required by state or federal law, or by accrediting body.

Replaces policy: *Date*

Board of Trustees Policy Number: **HR 9.02**

Date of Adoption/Revision: April 17, 2014

SUBJECT	**DRUG FREE WORKPLACE**
AUTHORITY	Human Resources
APPLICABILITY	Faculty, Staff and Student Employees
PURPOSE	To ensure compliance with the Drug Free Workplace Act of 1988 and the Drug Free Schools and Communities Act Amendments of 1989.

POLICY	Bennett College prohibits the unlawful manufacture, distribution, dispensation, possession or use of illegal drugs and alcohol on its property or as a part of any activity by faculty, staff and student employees.
PROCEDURES	A copy of this policy will be made available to each employee of Bennett College at the time of their orientation and annually to all employees Bennett College recognizes drug and/or alcohol dependence as a treatable illness. Employees are encouraged to seek assistance for drug and/or alcohol problems before there is an incident which would cause the College to impose sanctions. Assistance may be sought through the College's Employee Assistance Program (EAP) or other programs and/or licensed treatment facilities. Referrals to such programs may be self-referrals or supervisory referrals. If a supervisory referral is made which includes satisfactory participation in a rehabilitation program as a condition of continued employment, the referral must be made through the Office Human Resources. Referrals and records of referrals will be handled with the same degree of confidentiality as for medical records. Bennett College works with local medical providers and insurers to provide a drug-free awareness program to inform employees about the dangers of alcohol and/or drug abuse in the workplace, available drug counseling, rehabilitation and

	employee assistance information and the penalties that may be imposed for alcohol and/or drug abuse violations

Replaces policy: *Date*

Board of Trustees Policy Number: **HR 9.03**

Date of Adoption/Revision: April 17, 2014

SUBJECT	**NEPOTISM**
AUTHORITY	Human Resources
APPLICABILITY	Faculty, Staff and Student Employees
PURPOSE	Bennett College promotes equal opportunity in employment. Job openings are filled by recruiting and hiring qualified applicants without regard to gender, race, national origin, age, or disability. To ensure fairness and equity, the hiring of relatives or near relatives must be carefully administered.

POLICY	No employee of the College, full time and part time, may cause the employment, appointment, promotion, transfer or advancement of a family member to position within the College which the faculty or staff member supervises or manages or participates in an action related to the discipline of the employee's family member.
PROCEDURES	1. **All Personnel** - No employee of Bennett College may approve, recommend, or otherwise act with regard to the appointment, reappointment, promotion, or salary of any person related to such employee as outlined in this policy. 2. **Supervision -** If the appointment, or promotion of a person places him or her under an administrative supervisor related within the specified degree, all subsequent actions with regard to the evaluation, reappointment, promotion, or salary shall be the responsibility of the next highest supervisor. 3. **Promotion -** If the appointment, reappointment, or promotion of a person places him or her in an administrative or supervisory position with responsibility to approve, recommend, or otherwise act with regard to reappointment, promotion, or salary of a person who is related to them within the above degree specified, all subsequent actions regarding the evaluation, reappointment, promotion, or salary of such person shall be made by the next highest supervisor. 4. **Marriage** - This policy shall apply to situations where two employees marry and one spouse is the supervisor of the other.

	5. **Private Contractor –** This policy also applies to individuals hired as private contractors. 6. Requests for approval of the appointment of relatives must include a justification for the appointment containing a statement that a reasonable recruiting effort was made to fill the position and such effort provided the candidate affected by the nepotism rule as the person best qualified to perform the job. The qualifications of the person to be recommended for appointment must be provided to establish his or her ability to perform the work required by the position. The request to appoint, together with supporting information, must be submitted through the appropriate management chain and to the President for approval before any offer of employment is made. 7. Any Bennett College employee whose work is supervised by a relative must have his or her work reviewed and evaluated by the next highest supervisor not related by affinity or consanguinity. Definitions For the purposes of this policy, family member refers to an individual who is: • The spouse, parent, brother, sister, child, mother-in-law, father-in-law, son-in-law, daughter-in-law, grandparent or grandchild. • A member of the individual's immediate family. Immediate family is defined as follows: a. A child residing in the employee's household b. A spouse of an employee c. An individual claimed by the employee as a dependent for income tax purposes.

Replaces policy:

Date

Board of Trustees Policy Number: HR 9.04 **Date of Adoption/Revision: 10-10-14**

SUBJECT	**TOBACCO FREE CAMPUS**
AUTHORITY	Administrative Services
APPLICABILITY	This policy applies to all employees, students, visitors, contractors and externally affiliated individuals or companies renting university-owned space on university-owned and operated property and campus grounds.
PURPOSE	To provide an environment that promotes the health, well-being, and safety of students, faculty, staff, and visitors at Bennett College by minimizing the negative effects of secondhand smoke; to improve fire safety; and to encourage a more sustainable environment.

POLICY	In recognition of the health, safety and comfort benefits of smoke-free air and the responsibility to provide and maintain an optimally healthy and safe working and living environment for faculty, students, staff and visitors, Bennett College is designated a tobacco free campus. No smoking is permitted on any college, in any college-owned buildings or in college-leased buildings or vehicles. Tobacco," as used in this policy, means smoking any substance, including but not limited to, tobacco, cloves, or marijuana. "Smoking Products" include, but are not limited to, all cigarette products (cigarettes, bidis, kreteks, e-cigarettes, etc.) and all tobacco-producing products (cigars, pipes, hookahs, etc.).
PROCEDURES	1. Organizers of public events, such as conferences, meetings, public lectures, social events and cultural events using campus facilities must advise participants in such events of this policy and require compliance. 2. Violators may be provided education, offered a referral for smoking cessation and, if a student or employee of Bennett College, may be subject to disciplinary action as indicated below. 3. Persons engaging in smoking and/or the use of Smoking Products in violation of this policy may be subject to the following: a. Students will be referred to the appropriate student conduct office. Violation of this policy is a violation of the Student Code of Conduct. b. Employees will be referred to their supervisor and/or appointing authority for appropriate action. c. Contractors will be referred to their respective employers for appropriate action. d. Visitors will be required to leave the campus if they fail to

	conform to the policy when advised. 4. No person who makes a complaint of a violation of this policy or who furnishes information concerning a violation of this policy shall be retaliated against in any manner. Questions regarding this policy or request for assistance should be referred to the Human Resources Department.

Replaces policy: *Date*

Board of Trustees Policy Number: HR 9.05 **Date of Adoption/Revision: 10-10-14**

SUBJECT	**RECRUITMENT AND EMPLOYMENT POLICY**
AUTHORITY	Human Resources
APPLICABILITY	Faculty, Staff and Student Employees
PURPOSE	To ensure compliance with: Title VII of the Civil Rights Act of 1964 (Title VII), which prohibits employment discrimination based on race, color, religion, sex, or national origin; The Equal Pay Act of 1963 (EPA), which protects men and women who perform substantially equal work in the same establishment from sex-based wage discrimination; The Age Discrimination in Employment Act of 1967 (ADEA), which protects individuals who are 40 years of age or older; Title I and Title V of the Americans with Disabilities Act of 1990, as amended (ADA), which prohibit employment discrimination against qualified individuals with disabilities in the private sector, and in state and local governments; Sections 501 and 505 of the Rehabilitation Act of 1973, which prohibit discrimination against qualified individuals with disabilities who work in the federal government; Title II of the Genetic Information Nondiscrimination Act of 2008 (GINA), which prohibits employment discrimination based on genetic information about an applicant, employee, or former employee; and The Civil Rights Act of 1991, which, among other things, provides monetary damages in cases of intentional employment discrimination.

POLICY	This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training. Bennett College seeks the most qualified and suitable employees, based upon a competitive search preceding each appointment. All positions will be announced, posted, advertised, and filled as indicated in this policy. A position may be dependent on continuation of funding from a specific source and may terminate when the funding is no longer available. EXCEPTION: The President is authorized to make appointments as appropriate.

PROCEDURES	**Approval to Fill a Position** Before any positions, including faculty positions, will be filled or before any application will be accepted, the Human Resources Department must receive a completed Hire Request Form that bears the signature of the Hiring Manager, Vice President, Controller, and Human Resources Director. This approval process is intended to establish agreement among the department, area, and the business office concerning the responsibilities, classification, and salary range of the position. **Essential Job Functions** The essential functions of a position must be determined before it is opened for recruitment. They are the core/required duties of a job as opposed to the marginal responsibilities. An updated copy of the Job Description must be submitted along with the Hire Request Form. **Job Announcements/Advertising** Job announcements are available in the Human Resources Department and on the College's website. When the College desires to announce positions to wider audiences, advertisements may be placed in other media (e.g., large metropolitan daily newspapers, the *Chronicle of Higher Education*, professional journals, and other recruitment websites such as Indeed, Monster and Simply Hired). The hiring unit is responsible for the cost of advertising. **Application Procedure** <u>*Internal Candidates*</u> To apply for a vacant position, internal candidates should complete an internal application form along with submission of his or her resume. The Human Resources Department will review the employee's work experience and performance record at the College and may conduct a preliminary interview to determine his/her interests and qualifications. If the employee meets the qualifications for the vacant position, an interview will be scheduled with the hiring supervisor. The employee's immediate supervisor will be notified of his/her interest in exploring other opportunities at the College. If a decision is made to transfer an employee into another position, the Human Resources Department will work with the two supervisors involved to negotiate an effective transfer date that causes the least disruption in both offices. A fourteen-day transition period is standard. Any employee's interest in or pursuit of another opening at the College shall not affect his/her current position. Any employee who changes jobs more than three months after his/her last performance evaluation will have a performance assessment completed in collaboration with the sending and receiving supervisor for the next appraisal period. In either case, the receiving

supervisor is responsible for preparing and conducting the appraisal discussion.

External Candidates
External candidates should be directed to the Human Resources Department. The Human Resources Department screens and refers suitable applications for review to the relevant supervisor in the department where the vacancy exists. The supervisor selects the applicants to be interviewed and makes the necessary arrangements for the interviews to be conducted.

Application Deadlines
All open positions must specify an application deadline date. The application deadline will always be noted as follows: "must be received by 5:00 p.m. in the Human Resources Department" or "must be postmarked by [insert deadline date]."

Applicants who knowingly submit false information at any point during the employment process will be disqualified or, if hired, subsequently dismissed.

Interviewing
Interviews may not be conducted before the application deadline. However, this requirement is not applicable to emergency hires, "named in grant/contract" positions, or waivers.

Interview questions and screening criteria must be based on the required and desired qualifications for the position. All questions must be job-related and must be consistent for each interviewee. The Human Resources Department will work directly with the Hiring Department to create appropriate interview questions.

The Human Resources Department will create an Interview Packet for the Hiring Department. This Interview Packet will consist of interview process instructions, interview questions, and a list of all candidates that meet the minimum qualifications.

The Human Resources Department must notify applicants who are not recommended for hire after being interviewed. Specific job-related reasons for a non-hiring decision must be provided to human resources by the decision maker.

All Interview Packets must be returned to Human Resources within 5 business days after candidate selection occurs.

Reference/Background Checks
The Human Resources Department conducts reference checks on all selected

	applicants. Background checks are required for all new hires and internal applicants selected for specific positions. **Offering Employment** After consultation with the hiring manager, the Human Resources Department may make a verbal offer of employment. The offer must comply with the rate-of-pay and benefits guidelines of the Human Resources Department. The offer may be expressed as conditional if the candidate has not authorized the hiring official to contact his/her current supervisor. For administrative and service professional positions, an offer letter, prepared by the Human Resources Department should be sent to the candidate. It should request the candidate's written acceptance or rejection of the offer. For faculty positions, an appointment letter, prepared by the Office of the Provost should be sent to the candidate. It should request the candidate's written acceptance or rejection of the offer. **Retention of Records** The Human Resources Department must retain all records associated with employment for each position. Such records must provide documentation of a legitimate, nondiscriminatory basis for the hiring decision. The Human Resources Department will retain résumés and applications of candidates for all positions for a minimum of three years.

Replaces policy: *Date*

Board of Trustees Policy Number:	Date of Adoption/Revision:
HR 9.06	April 10, 2015

SUBJECT	**REDUCTION IN FORCE POLICY**
AUTHORITY	Human Resources
APPLICABILITY	Faculty, Staff and Student Employees
PURPOSE	To ensure compliance with: Title VII of the Civil Rights Act of 1964 (Title VII), which prohibits employment discrimination based on race, color, religion, sex, or national origin; The Equal Pay Act of 1963 (EPA), which protects men and women who perform substantially equal work in the same establishment from sex-based wage discrimination; The Age Discrimination in Employment Act of 1967 (ADEA), which protects individuals who are 40 years of age or older; Title I and Title V of the Americans with Disabilities Act of 1990, as amended (ADA), which prohibit employment discrimination against qualified individuals with disabilities in the private sector, and in state and local governments; Sections 501 and 505 of the Rehabilitation Act of 1973, which prohibit discrimination against qualified individuals with disabilities who work in the federal government; Title II of the Genetic Information Nondiscrimination Act of 2008 (GINA), which prohibits employment discrimination based on genetic information about an applicant, employee, or former employee; and The Civil Rights Act of 1991, which, among other things, provides monetary damages in cases of intentional employment discrimination.

POLICY	A reduction in force may occur due to budget constraints, funding reductions, reorganizations or other operational reasons. Employees will receive at least a two weeks advance notice of the layoff.

Board of Trustees Policy Number: **HR 9.07**

Date of Adoption/Revision: November 23, 2019

SUBJECT	**PERFORMANCE EVALUATIONS POLICY**
AUTHORITY	Human Resources
APPLICABILITY	Non-academic Staff
PURPOSE	Performance evaluations are conducted to provide both supervisors and employees the opportunity to discuss essential job functions, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals.

POLICY	Upon completion of the 90-day introductory period, the immediate supervisor evaluates the performance of the employee and the employee completes a self-performance evaluation. Annual performance evaluations are completed by the immediate supervisor and the employee completes a self-performance evaluation, which are both due by June 30. Performance Evaluation Forms Staff Performance Evaluation (.pdf, 68K) Staff Performance Self Evaluation (.pdf, 69K) Supervisory Staff Performance Evaluation (.pdf, 105K) Supervisory Staff Self Performance Evaluation (.pdf, 106K) Bennett College believes in the principle that employees should be given the opportunity to demonstrate their abilities and continually improve their job performance. Where performance problems exist, employees should be told about these deficiencies in writing and in some instances, given an opportunity to improve. When it is determined that an employee requires improvement, the College will attempt to help the employee meet the expectations as defined in the job description.

PROCEDURES	Annual Performance Evaluation Workshops are held for all supervisors. Schedule the Performance Evaluation (PE) at least one (1) week in advance. This will allow ample time for the employee to complete the self-evaluation. ● Advise the employee that PE Forms are located on ***Bellenet***…click on the ***Employee Info*** tab…scroll down to the header "***Evaluations***" ● There are four (4) evaluation forms listed – **Staff Performance Evaluation)** – **Staff Performance Self Evaluation** – **Supervisory Staff Performance Evaluation** – **Supervisory Staff Self Performance Evaluation** ● Advise the employee to complete either the ***Staff Performance Self Evaluation*** or the ***Supervisory Staff Self Performance Evaluation*** (manages other employees). – It is at the manger's discretion to either request the self-evaluation prior to the scheduled meeting or advise the employee to bring it with them. ● Discuss each essential job functions with the employee and make appropriate revisions if any. If there are revisions, email the updated job description to the Director of Human Resources. ● The overall evaluation rating should not be a surprise to the employee ● If an employee is rated below 2.5, there should be documentation in the employee's personnel file to justify a *less than satisfactory* rating ● Give the employee a copy of the evaluation; the manager should keep a copy; and the original is forwarded to HR. ● If the employee refuses to sign the evaluation, ask the employee to write on the evaluation, "I refuse to sign". **Ten Tips for Conducting Employee Performance Reviews** **1.** Supervisor should be fully prepared *before* sitting down with the employee **2.** Lead with the positive **3.** Do not be confrontational **4.** Keep it real **5.** Be consistent **6.** Make it a two-way conversation **7.** Address what is important to the employee **8.** Discuss work/life balance **9.** Be a good listener **10.** Review regularly
Date: 11/23/2019	

Board of Trustees Policy Number: **HR 9.10**

Date of Adoption/Revision: November 23, 2019

SUBJECT	**FAMILY MEDICAL LEAVE ACT (FMLA)**
AUTHORITY	Human Resources
APPLICABILITY	Bennett College Employees
PURPOSE	To explain the circumstances under which and procedures whereby an employee may take leave under the provisions of the Family and Medical Leave Act (FMLA) of 1993

POLICY

Overview

In accordance with the Family and Medical Leave Act of 1993 (FMLA), the College provides up to twelve weeks of unpaid leave in a 12-month period to eligible employees who need to take time off from work: (1) for the care of a child after birth or adoption, or placement with the employee of a foster child; (2) for the care of the employee's child, spouse, or parent with a serious health condition; or (3) in the event of an employee's own serious health condition (as defined below). In addition, the FMLA allows eligible employees to take leave to care for covered service members and for certain qualifying exigencies arising out of the foreign deployment of an employee's spouse, child, parent, or next of kin.

Eligibility

Pursuant to the FMLA, employees who have worked for the College for at least 12 months and at least 1,250 hours during the prior 12 months and work at a location in the United States or in any territory or possession of the United States (where at least 50 employees are employed by the College within 75 miles) may take up to 12 weeks of unpaid leave per each rolling 12-month period measured forward from the date of the employee's first FMLA leave usage for the following circumstances:

- Birth and/or care of a newborn child of the employee;
- Placement of a child into the employee's family by adoption or by a foster care arrangement;
- Care of the employee's spouse, child (means a biological, adopted, or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis, who is either under age 18, or age 18 or older and "incapable of self-care because of a mental or physical disability"), or parent who has a serious health condition (as defined by the FMLA); or
- Because of the employee's own serious health condition.

- Military Caregiver Leave**,** where an eligible employee who is the spouse, son, daughter, parent, or next of kin of a "covered servicemember" is entitled to take up to 26 weeks of leave during a single 12-month period to care for the servicemember. A "covered servicemember" includes a current member of the Armed Forces, including the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy, is in an outpatient status, or on a temporary disability retired list, for a serious injury or illness incurred in the line of duty while on active duty. This leave expands the number of weeks of FMLA from 12 to 26 for qualifying families and also expands the protection to additional family members, *i.e.*, next of kin.

- Qualifying Exigency Leave**,** where an eligible employee who is the spouse, son, daughter, or parent of a member of the National Guard and the Reserves is entitled to up to 12 weeks of FMLA-protected leave to use for "any qualifying exigency" arising out of the fact that a covered military member is on active duty or is called to active duty. The Department of Labor regulations list the following types of circumstances that will qualify as a "qualifying exigency,":
  (1) Short-notice deployment; (2) financial and legal arrangements;
  (3) counseling; (4) military events and related activities; (5) rest and recuperation; (6) childcare and school activities; (7) post-deployment activities; (8) certain parental care activities for the military member's parent who is incapable of self-care; and (9) additional activities not encompassed in the other categories.

Nature of FMLA Leave
FMLA leave is an unpaid leave. The College, however, requires employees to exhaust all paid leave (accrued sick leave, personal leave, and annual leave, if applicable) before requesting unpaid FMLA leave. FMLA leave will run concurrently with all paid leave, short-term disability, long-term disability, and workers' compensation leave taken by the employee.

Notification of Intent to Take FMLA Leave
When the necessity of leave is foreseeable, the employee must provide their supervisor and the Office of Human Resources with at least 30 days' notice or as soon as practical of the employee's intention to take leave. Employees must make a reasonable effort to schedule foreseeable treatment so as not to unduly disrupt the College's operations, subject to the approval of the employee's health care provider. ***After the employee has met with the Office of Human Resources, the Office of Human Resources will notify the supervisor of the employee's intent to take an FMLA leave of absence, not the specific condition(s) of the leave.***

Spouses employed by the College are jointly entitled to a combined total of 12 workweeks of family leave for the birth and care of a newborn child, for placement of a child for adoption or foster care, and to care for a parent who has a serious health condition.

Leave for birth and care, or placement for adoption or foster care must conclude within 12 months of the birth or placement.

Employees shall use all accrued sick leave, accrued annual and personal leave to cover some or all of any FMLA leave. Any such paid leave available to the employee shall

	count toward the total leave entitlement under the FMLA. ***Employees that fail to submit the appropriate FMLA documents are not eligible to use paid sick leave days. Annual leave, personal leave, and/or leave without pay must be used instead.*** **Intermittent Leave** Under some circumstances, employees may take FMLA leave intermittently—which means taking leave in blocks of time, or by reducing their normal weekly or daily work schedule. If FMLA leave is for birth and care or placement for adoption or foster care, use of intermittent leave is subject to the College's approval. FMLA leave may be taken intermittently if medically necessary to care for a seriously ill family member, or because the employee is seriously ill and unable to work. **Definitions** "**Serious health condition"** is defined as an illness, injury, impairment, or physical or mental condition that involves either: (a) Any period of incapacity or treatment connected with inpatient care (i.e., an overnight stay) in a hospital, hospice, or residential medical-care facility, and any period of incapacity or subsequent treatment in connection with such inpatient care; or (b) Continuing treatment by a **health care provider** (see definition below) which includes any period of incapacity (i.e., inability to work, attend school or perform other regular daily activities) due to: (1) A health condition (including treatment therefore or recovery there from) lasting more than three consecutive days, and any subsequent treatment or period of incapacity relating to the same condition that also includes: treatment two or more times by or under the supervision of a health care provider; or one treatment by a health care provider with a continuing regimen of treatment; or (2) Pregnancy or prenatal care. A visit to the health care provider is not necessary for each absence; or (3) A chronic serious health condition which continues over an extended period of time, requires periodic visits to a health care provider, and may involve occasional episodes of incapacity (e.g., asthma, diabetes). A visit to a health care provider is not necessary for each absence; or (4) A permanent or long-term condition for which treatment may not be effective (e.g., Alzheimer's, a severe stroke, terminal cancer). Only supervision by a health care provider is required, rather than active treatment; or (5) Any absences to receive multiple treatments for restorative surgery or for a condition which would likely result in a period of incapacity of more than three days if not treated (e.g., chemotherapy or radiation treatments for cancer). "**Health care provider**" means**:** doctors of medicine or osteopathy authorized to practice medicine or surgery by the state in which the doctors practice; or Podiatrists, dentists, clinical psychologists, optometrists and chiropractors (with limitations) authorized to practice in the state and performing within the scope of his or her practice; or nurse practitioners, nurse-midwives, clinical social workers, or physician assists

	authorized to practice, and performing within the scope of their practice, as defined under state law; or any health care provider recognized by the College or its group health plan.
PROCEDURES	**How to Request Leave** A health care provider must certify a leave of more than 3 consecutive days for a serious health condition. Employees who request a leave because of their own or a family member's serious health condition (including pregnancy and military caregiver leave) must submit written medical certification from a health care provider to support the leave request, along with any other requested documentation to the Office of Human Resources. A completed certification form should be provided before leave begins or, if leave has already commenced, within 15 days. Failure to submit the required certification may result in the delay or denial of FMLA leave. For an employee's serious health condition, the College may require a second medical opinion. In cases of conflicting opinions, an agreed-upon health care provider will render a third opinion, which will be binding and final. Employees must provide subsequent recertification when the duration of the need for leave specified in the initial certification expires and every 30 days thereafter. If the circumstances described in previous certifications change significantly, the College may ask for recertification prior to every 30 days. Employees on leave also must furnish to the Office of Human Resources periodic reports on his/her status and intent to return to work. The employee's doctor must fax or mail a "release to return to work" note stating restrictions, if any, to the Office of Human Resources prior to the employee's return to work after an employee takes FMLA leave. **Maintenance of Health Benefits/Retirement Contributions** The College is required to maintain group health insurance coverage for an employee on FMLA leave whenever such insurance was provided before the leave was taken and on the same terms as if the employee had continued to work. If applicable, arrangements will need to be made for employees to pay their share of health insurance premiums while on leave. The employer may recover premiums it paid to maintain health coverage for an employee who fails to return to work from FMLA leave. An employee will not have any retirement contributions paid by the College during leave without pay. **Limitations on an Employee's Right to Return to Work** Upon return from FMLA leave, an employee will be restored to the employee's original job, or to an equivalent job with equivalent pay, benefits, and other terms and conditions of employment. An employee's job is not protected from actions that would have affected the employee if the employee were not on FMLA leave. For example, a layoff, reduction in force, decrease in overtime, etc.

	In addition, an employee's use of FMLA leave cannot result in the loss of any employment benefit that the employee earned or was entitled to before using FMLA leave, nor be counted against the employee under a "no fault" attendance policy. Under specified and limited circumstances where restoration to employment will cause substantial and grievous economic injury to its operations, the College may refuse to reinstate certain highly-paid "key" employees after using FMLA leave during which health coverage was maintained. In order to do so, the College must: • notify the employee of his/her status as a "key" employee in response to the employee's notice of intent to take FMLA leave; • notify the employee as soon as the College decides it will deny job restoration, and explain the reasons for this decision; • offer the employee a reasonable opportunity to return to work from FMLA leave after giving this notice; and • make a final determination as to whether reinstatement will be denied at the end of the leave period if the employee then requests restoration. A "key" employee is a salaried "eligible" employee who is among the highest paid ten percent of employees at the College.

Date: 11/04/2019

PROCEDURES	**Determining Affected Employees** Individuals who hold positions that, due to budget considerations, reorganizations or other operational matters, are eliminated are subject to layoff. In making the decision for a layoff, where the choice is not clearly dictated by the work to be eliminated and range of skills engaged in it, the department head should carefully consider an employee's length of service, performance evaluation and experience. No one criterion automatically outweighs the other. They must be judged and balanced in such a way as to be as fair as possible to the individuals concerned while serving the needs of the College for an effective staff. **Advisory Review** A vice president must submit to the Office of Human Resources an analysis and explanation that sets forth the reason for the reduction and explains why these positions were selected. When some, but not all, of the positions of the same job title are being eliminated, the vice president must provide to the Office of Human Resources the overall evaluation ratings for the persons holding the position being eliminated. Before the reduction in force occurs, representatives from human resources, the Office if the President and such other persons as may be designated by the president will meet to ensure compliance with this policy and will forward their approvals and the plan for staffing reduction to the area vice president for his or her approval. **Insurance Benefits** Under the Consolidated Omnibus Budget Reconciliation Act (COBRA), laid-off employees may continue group health benefits by paying the total cost of the premium. An employee's COBRA benefits must be initiated within thirty (30) days of the date of the layoff or buyout. Affected employees may contact the benefits office for further information. **Vacation and Sick Leave** Affected employees will be paid for accrued but unused vacation. Accrued but unused sick leave benefits will be re-credited to any laid-off employee who is reemployed within six (6) months. **Retirement/Withdrawal of Employee Contributions** Laid-off employees are urged to speak with the College's benefit representative about the consequences of withdrawing employee contributions. **Responsible Party Action** *President* 1. Request vice presidents to develop plans for making major reductions in their areas. *Vice Presidents* 1. Plan budget reduction and/or reorganizations, including reduction in staffing within the unit. 2. Prepare a written explanation for the reduction and the basis for determining the positions to be eliminated. Submit the plan to the president.

	3. Prepare a reduction in force (RIF) analysis on the affected employees, including the evaluation ratings of the incumbents in the positions to be eliminated. 4. Upon approval by the President, the RIF analysis, justification letter and organizational chart may be submitted to the Director of Human Resources for review. *Advisory Review* 1. Review the reduction plan and the completed RIF analysis to determine that appropriate procedures were followed and that selection of employees to be severed was determined appropriately. 2. Sign the RIF form and submit it along with the plan to the appropriate vice president for review and signature. 3. Instruct Human Resources Director to prepare notice letters, for the signature of the area vice president, to affected.

Replaces policy: *Date*

Board of Trustees Policy Number: **STAF 11.01**	**Date of Adoption: April 1, 2016** **Date of Revision: November 23, 2019** **Date of Revision: July 11, 2020**

SUBJECT	Student Complaints
AUTHORITY	Dean of Student Experience and the VP of Academic Affairs
APPLICABILITY	The Policy applies to student grievances about the actions of the Board of Trustees and their individual members, students, faculty and staff of Bennett College. This Policy ***does not*** apply to complaints about alleged misconduct related to sex, interpersonal relationships, or gender, including allegations of sexual assault, sexual harassment, violence or other misconduct in the course of an interpersonal relationship, and stalking. Complaints about these issues are governed by Bennett College's Sexual and Relationship Misconduct Policy. This Policy also does not apply to student grievances about disciplinary sanctions. Such grievances may be made by filing an appeal of the disciplinary sanction as provided in the Bennett College Student Code of Conduct.
PURPOSE	Bennett College is committed to providing an educational climate that is conducive to the personal and professional development of each student. In order to ensure that commitment, the College will make sure concerns and complaints from students are resolved fairly and promptly.
POLICY	Any student who has an unresolved disagreement or dissatisfaction with a faculty or staff member, another student, student group or administrator has the right to file a written complaint without prejudicing her status with the College.

DEFINITIONS	**Complainant:** A complainant is a student who lodges a complaint under this Policy. **Complaint**: A complaint is a written report by a student conveying a concern concerning the actions of another member of the Bennett College community. Complaints may be academic or nonacademic, as defined below. **Academic complaint**: An academic complaint is a written report by a student conveying concerns about the provision of education and academic services affecting her role as a student. Such academic issues can include, but are not limited to, the following types of allegations: • discriminatory action toward students within the classroom by a faculty member—e.g., singling out specific students for either preferential or adverse treatment; • failure of a faculty member to follow policies in the conduct of classes or examinations; or • capricious or unreasonable arbitrary actions by a faculty member that adversely affects student performance. **Nonacademic complaint**: A nonacademic complaint is a written report by a student conveying a concern about issues unrelated to the provision of education at the College. Such nonacademic issues can include but are not limited to the following types of allegations: • violations of the Student Code of Conduct or the Belle Honor Code; • student disputes unrelated to the complainant's education; • student services; or • records and confidentiality.
PROCEDURES AND RULES FOR FILING COMPLAINTS	Every student is encouraged to attempt to resolve all grievances covered under this Policy at the lowest possible level. When the student feels comfortable doing so, she may first attempt to resolve the issue by approaching the person(s) whose decision or action is being contested to resolve the issue. Otherwise, she may file a written complaint as provided below. A complaint should normally be filed within 10 working days of the underlying incident. The complaint must be filed with the Office of Student Experience via the Bennett College Website. The Student Complaints Form is available at http://forms.issuetrak.com/issuetrak/bennettedu. The complaint must provide the following information:

	• The alleged facts of the complaint • The Policy or provision of the Student Code of Conduct that the student, faculty, or staff member alleged was violated • The corrective action the student requests A complaint must be based on a claimed violation of a Bennett College Policy or provision of the Student Code of Conduct or Belle Honor Code. Any student who brings a complaint has the burden of proof and must provide documentation and evidence—including testimony of the student or others—to support the allegation.
HOW BENNETT COLLEGE INVESTIGATES COMPLAINTS	**Academic complaints**: Upon receiving an academic complaint, the Office of the Vice President for Academic Affairs or designee will ensure that the complaint receives a timely response. The investigation is usually conducted within thirty days of the date that the complaint is filed. The Office of the Vice President for Academic Affairs or designee may seek out additional information, including asking to speak with persons involved in the complaint and requesting documents. As provided in the Student Code of Conduct, all students are obligated to cooperate with investigations conducted under this Policy. After completing its investigation, the Office of the Vice President for Academic Affairs or designee will render a written decision and provide its decision to the complainant. **Non-academic complaints**: Upon receiving a non-academic complaint, the Dean of Student Experience will forward the complaint to the appropriate student services or non-academic administrative unit for resolution. The Dean of Student Experience will ensure that the complaint receives a timely response. The investigation is usually conducted within thirty days of the date that the complaint is filed. The Dean of Student Experience or their designee may seek out additional information, including asking to speak with persons involved in the complaint and requesting documents. As provided in the Student Code of Conduct, all students are obligated to cooperate with investigations conducted under this Policy. After completing its investigation, the Dean of Student Experience or their designee will render a written decision and provide its decision to the complainant.

Board of Trustees Policy Number:	**Date of Adoption/Revision:**
STAF 11.02	**REV July 2020**

Subject	Sexual and Relationship Misconduct Policy
Authority	Division of Enrollment Management and Student Experience
Applicability	This Policy applies to alleged conduct by students or against students of Bennett College by faculty, staff, contractors, business partners, and visitors of Bennett College which may potentially violate Title IX of the Education Amendments Act of 1972 ("Title IX"). Alleged conduct by faculty, staff, and employees of Bennett College against other faculty, staff or employees will be referred to and investigated by Bennett College's Human Resources Department, in coordination with the Title IX Coordinator, according to the procedures described in Bennett College's Employee Handbook. This Policy applies to all alleged student conduct: 1. On the campus or property of Bennett College; and 2. Away from the campus or property of Bennett College—including online, through electronic communication, and on social media—when: a. the conduct was in connection with a program or activity conducted or recognized by Bennett College; or b. the conduct may have the effect of creating a hostile environment for a member of the Bennett College community.
Purpose	Bennett College is committed to maintaining a safe and healthy learning and working environment in which no member of the College is, on the basis of sex, sexual orientation, or gender identity, excluded from participation in or denied the benefits of any College program or activity. The policies and procedures described in this Policy are intended to prevent and address gender-based harassment, sexual harassment, and sexual violence, which are forms of sex discrimination that deny or limit an individual's ability to participate in and benefit from the College's programs and activities.

	Accordingly, this Policy is designed to ensure a safe and non-discriminatory environment that meets the legal requirements of federal, state, and local laws, including Title IX of the Education Amendments of 1972; the Violence Against Women Reauthorization Act; the Clery Act; and other applicable state and federal law.
Prohibited Conduct Policy	Bennett College strictly and broadly prohibits sexual assault, sexual harassment, violence in the course of an interpersonal relationship, and stalking. Bennett College also prohibits acts that knowingly encourage, promote, or aid any of these prohibited acts. Bennett College also prohibits acts taken with the intent to retaliate against any individual for, or discourage or prevent any individual from, reporting or cooperating in the investigation of any of these prohibited acts. The description above is a non-exhaustive summary of conduct prohibited by this Policy, which conduct is described more fully below under "Definitions."
Definitions of Terms Used in this Policy	
Consent	***Consent*** is voluntary and clearly-indicated agreement to engage in sexual contact. A person has not provided consent if they are so impaired or incapacitated—because of drugs, alcohol, sleep, unconsciousness, or any other reason—that they are, or reasonably appear to be, incapable of knowingly and voluntarily agreeing to sexual contact. This Policy also covers a person whose capacity to consent is altered due to mental disability. A person consenting to certain sexual contact does not necessarily mean that person consents to other sexual contact. A person consenting to sexual contact on one occasion does not necessarily mean that the person consents to the same or other sexual contact on other occasions. A person does not consent to sexual contact when they do so under force or coercion. "Coercion" is the use of pressure to compel another individual to initiate or continue sexual activity against an individual's will. Coercion can include a wide range of behaviors, including harassment, intimidation, manipulation, threats, or blackmail. A person's words or conduct are sufficient to constitute

	coercion if they impair another individual's ability to choose whether or not to engage in sexual activity. A person does not necessarily consent to sexual contact because they do not verbally or physically oppose or resist the sexual contact.
Sexual Assault	***Sexual assault*** is having or attempting to have sexual contact with a person when the person has not consented to the sexual contact. Sexual assault may include sexual contact when the person has only provided consent due to harassment, threats, or other conduct that is intended to, or has the effect of, compelling the person to consent to the sexual contact. Sexual assault may also include sexual contact with someone who is incapable of knowingly providing consent. Included in the definition of sexual assault are sexual activities such as forced sexual intercourse, forcible sodomy, sexual assault with an object, forcible fondling, incest, and statutory rape: • Forced Sexual Intercourse - Penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the Complainant. • Forcible Sodomy - Oral or anal sexual intercourse with another person, forcibly and/or against that person's will (non-consensually) or not forcibly or against the person's will in instances where the Complainant is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity. • Sexual Assault With An Object—To use an object or instrument to penetrate, however slightly, the genital or anal opening of the body of another person, forcibly and/or against that person's will (non- consensually) or not forcibly or against the person's will in instances where the Complainant is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity. • Forcible Fondling - The touching of the private body parts of another person (buttocks, groin, breasts) for the purpose of sexual gratification, forcibly and/or against that person's will (non-consensually) or not forcibly or against the person's will in instances where the Complainant is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity. • Incest - Nonforcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by North Carolina law. • Statutory Rape - Sexual intercourse with a person who is under the statutory age of consent. In North Carolina, the age

	of consent is sixteen (16) years old. Anyone under this age cannot legally give consent.
Sexual Harassment	***Sexual harassment*** includes the following conduct: ***Quid pro quo sexual harassment*** is unwelcome conduct of a sexual nature—including unwelcome sexual advances, requests for sexual favors, and other verbal and nonverbal conduct of a sexual nature—when submission to or rejection of such conduct is a condition of receiving an academic or employment benefit. ***Hostile environment sexual harassment*** is unwelcome conduct of a sexual nature that is sufficiently severe, persistent, pervasive, and objectively offensive that it effectively denies a person's equal access to benefit from College education or work programs or activities. The determination of whether an environment is "hostile" must be based on all of the circumstances. These circumstances could include, but are not limited to: ● The frequency of the conduct; ● The nature and severity of the conduct; ● Whether the conduct was physically threatening; ● Whether the conduct was humiliating or perceived as humiliating; ● The effect of the conduct on the reporting party's mental or emotional state; ● Whether the conduct was directed at more than one person; ● Whether the conduct arose in the context of other discriminatory conduct; ● Whether the conduct unreasonably interfered with the reporting party's educational or work performance; ● Whether the statement is a mere utterance of an epithet which engenders offense in an employee or student, or offends by mere discourtesy or rudeness; ● Whether the speech or conduct deserves the protection of academic freedom or the First Amendment.
Sexual Misconduct	***Sexual Misconduct*** occurs when a person is subject to sexual conduct and the person: (1) did not request, invite, or consent to it; and (2) regarded the unrequested or uninvited conduct as undesirable or offensive. Sexual misconduct includes, but is not limited to, exposure of oneself to a person who did not invite or consent to it and regarded the exposure as undesirable or offensive. Sexual misconduct also includes physical acts of a sexual nature—including nonconsensual

	touching—regardless of severity. Nonconsensual touching is touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person without his or her consent, or of a person who is unable to consent or refuse. Thus, nonconsensual touching constitutes sexual misconduct if it is unwanted and offensive even if it would be inoffensive to a person who had invited or consented to the touching.
Sexual Misconduct by Incapacitation	***Sexual misconduct by incapacitation*** is sexual contact with a person is so impaired or incapacitated—because of drugs, alcohol, sleep, unconsciousness, or any other reason—that they are, or reasonably appear to be, incapable of requesting, inviting, or consenting to the conduct Incapacitation is a state where an individual cannot make an informed and rational decision to engage in sexual activity because the individual lacks conscious knowledge of the nature of the act (e.g., to understand the who, what, when, where, why or how of the sexual activity) and/or is physically helpless. Incapacitation may result from the use of alcohol or drugs, but consumption of alcohol or drugs alone is not sufficient to establish incapacitation. The impact of alcohol and drugs varies from person to person, and evaluating incapacitation requires an assessment of how the consumption of alcohol and/or drugs impacts an individual's decision-making ability, awareness of consequences, ability to make informed judgments, and capacity to appreciate the nature and the quality of an act.
Gender-Based Discrimination	***Gender-based discrimination*** occurs anytime a person's gender becomes a factor or basis in treating them unfairly. Gender-based discrimination includes behaviors such as sexual assault, sexual harassment, any non-consensual behavior of a sexual nature, domestic or dating violence, and stalking. Such behaviors could be committed by force, intimidation or exploitation of a person's incapacity.
Gender-Based Harassment	***Gender-based harassment*** is verbal or nonverbal aggression, intimidation, disparagement, or hostile conduct toward a person based on sex, sex-stereotyping, sexual orientation or gender identity when such conduct is sufficiently severe, persistent, or pervasive that it interferes with or limits the person's ability to participate in or benefit from the College's education or work programs or activities.

Sexual Exploitation	***Sexual exploitation*** is any sexual conduct that is intended to, or has the reasonably foreseeable effect of, taking advantage of a person's sexuality, sexual orientation, gender, or gender identity without the person's consent. Sexual exploitation includes, but is not limited to: 1. Threatening to disclose a person's sexual orientation, gender, or gender identity; 2. Observing another person when they are nude or engaged in sexual contact, or knowingly aiding someone else in doing so, without the knowledge and consent of everyone observed; and 3. Creating, viewing, or distributing images or recordings of a person when they are nude or engaged in sexual contact, without the knowledge and consent of everyone involved. 4. Revenge Porn: knowingly disclosing an image or video of another person with the intent to coerce, harass, intimidate, demean, humiliate, or cause financial loss to the depicted person, or cause others to coerce, harass, intimidate, demean, humiliate, or cause financial loss to the depicted person, and the depicted person is identifiable from the disclosed image or from information offered in connection with it, the depicted is nude or engaged in sexual conduct in the disclosed image, the person discloses the image without the affirmative consent of the depicted person, and the person discloses the image under circumstances such that he or she knew or should have known that the depicted person had a reasonable expectation of privacy.
	Interpersonal violence is any unwelcome and harmful act by a person who is, or has been, in a romantic, intimate or other personal relationship with the person who is subject to the act. Interpersonal violence includes unwelcome or harmful acts in the context of a domestic or dating relationship. • Domestic Violence is defined by the Clery Act as a felony or misdemeanor crime of violence committed by: a current or former spouse or intimate partner; a person with whom the individual shares a child in common; a person who is cohabitating with, or has cohabitated with, the individual as a spouse or intimate partner; a person similarly situated to a

	spouse of the individual under the domestic or family violence laws of North Carolina; or any other person against an adult or youth who is protected from that person's acts under the domestic or family violence laws of North Carolina • Dating Violence - "Dating Violence" is violence committed by a person— (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) The length of the relationship. (ii) The type of relationship. (iii) The frequency of interaction between the persons involved in the relationship.
Relationship and Abuse Violence	***Relationship Abuse and Violence*** encompasses a broad range of behavior, including, but not limited to, "domestic violence" and "dating violence." It includes acts of coercion, abuse, violence, or threats of violence between partners in a personal, intimate relationship. The coercive, abusive, violent, or threatening behaviors can be physical, sexual, psychological, verbal, and/or emotional. Relationship Abuse and Violence can occur between current or former intimate partners who have dated, cohabitated, or been married.
Stalking	***Stalking*** is a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others; or suffer substantial emotional distress.
Complicity	***Complicity*** is any act that a person knows, or reasonably should know, will have the effect of aiding, assisting, promoting, or encouraging another person to commit any act that violates this Policy. Individuals who are found to be complicit with a violation of this Policy may be punished as provided in this Policy.
Retaliation	***Retaliation*** is any verbal or nonverbal act against a person that is intended to, or that the person committing the act reasonably should know will, harm a person for, or prevent a person from, reporting or

	participating in the reporting or investigation of any act that violates this Policy.
False Reporting	***False reporting*** occurs when someone alleges a violation of this Policy without a good-faith basis for believing the alleged conduct has occurred. False reporting will be investigated and may be punished as provided in this Policy.
Rape	***Rape*** is defined as any penetration no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without consent.
Statutory Rape	***Statutory Rape*** is sexual intercourse with a person who is under the statutory age of consent. In North Carolina, the age of consent is sixteen (16) years old. Anyone under this age cannot legally give consent.
Complainant	***Complainant*** is an individual who is alleged to be the victim of sexual harassment or other conduct in violation of this Policy. Depending on the nature of the allegations, there may be more than one Complainant.
Respondent	***Respondent*** is an individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment or other conduct in violation of this Policy. Depending on the nature of the allegations, there may be more than one Respondent.
Supportive Measures	***Supportive measures*** are non-disciplinary, non-punitive, individualized services that are offered as appropriate, and as reasonably available, to the Complainant or the Respondent before or after the filing of a formal complaint or where no formal complaint has been filed. Such measures are designed to restore or preserve equal access to Bennett College programs, or activities without unreasonably burdening the other party, including measures designed to protect the safety of all parties or the educational environment, or to deter sexual harassment. Bennett College will maintain as confidential any supportive measures provided to the Complainant or Respondent to the extent that maintaining such confidentiality would not impair the ability to provide supportive measures.

	Possible supportive measures and additional remedies include: ● No-contact order between Respondent and Complainant ● Limiting access to certain Bennett College facilities or activities (including "social probation") ● Limiting access to campus to specific times of the day ● Alteration of class schedules ● Alteration of on-campus housing arrangements ● Removal from on-campus housing ● Changing campus work schedules or job assignments ● Suspension from on-campus employment ● Suspension from student organizations ● Rescheduling of exams, papers, or other assignments ● Taking an incomplete in a class ● Authorized withdrawal from a class ● Alternative course completion options ● Voluntary leave of absence ● Access to counseling services ● Providing an escort to ensure safe movement between classes and activities ● Providing academic support services ● Other remedies that may be tailored to the involved individuals to achieve the goals of this Policy
Title IX Coordinator	The ***Title IX Coordinator*** is responsible for overseeing the Bennett College's response to Title IX reports and complaints and identifying and addressing any patterns or systemic problems revealed by such reports and complaints. The Title IX Coordinator also has responsibility for weighing a student's request for confidentiality and determining whether supportive measures and additional remedies are appropriate. The Title IX Coordinator is available to advise you about the courses of action available at and outside of Bennett College, including reports to law enforcement. The Title IX Coordinator's responsibilities include, but are not limited to: ● Communicating with all members of the Bennett College community regarding Title IX and the Violence Against Women Act (VAWA) and providing information about how individuals may access reporting and support options; ● Reviewing applicable Bennett College policies to ensure institutional compliance with federal and state law; ● Monitoring the Bennett College's administration of its own applicable policies, including record-keeping and procedural requirements; ● Conducting training regarding Title IX, the Clery Act, VAWA, and this Policy;

	● Responding to any complaint or report regarding conduct that may violate this Policy. In this capacity, the Title IX Coordinator shall oversee the investigation and resolution of such reported misconduct, direct the provision of any remedial measures, and monitor the administration of any related appeal. Bennett College's Title IX Coordinator: Kimberly Drye Dancy Office of Title IX 900 East Washington St, Box 364 | Black Hall - 2nd Floor Greensboro, NC 27401 Telephone: (336) 517-2298 Email: titleix@bennett.edu
Investigator	The ***Investigator*** is an individual who has received specialized training in conducting sexual misconduct investigations and has been assigned to investigate an alleged violation of this Policy. Investigators are neutral fact-finders who, during the course of the investigation, typically conduct interviews with the Complainant, the Respondent, and third-party witnesses; take custody of any physical or electronic records or documents to be included in an investigation report; visit and take photographs at each relevant site; and, where applicable, coordinate with Campus Safety or law enforcement agencies. Investigators prepare a written investigation report for the Title IX Coordinator to use to determine whether to charge the Respondent with a violation of this Policy.
Advisor	An ***Advisor*** is any individual who provides the Complainant or Respondent support, guidance or advice. The Complainant and Respondent may have the advisor of their choice present during any meeting or proceeding related to complaint resolution under this Policy. The Advisor's role in any meeting or proceeding is limited to requesting reasonable breaks to confer privately with the advisee. Advisors may not record the meetings or proceedings, take notes, ask questions, or otherwise actively participate in meetings or proceedings. At the student's request, Bennett College will provide a list of trained staff and student advisors available to provide guidance and support to the student. Students are not required to choose an advisor from the list of trained staff and students.
Sexual Misconduct Hearing Panel	The ***Sexual & Relationship Misconduct Hearing Panel*** is composed of four (4) members, one of whom shall be the Chair. The members

	are appointed by the President or the President's delegate. Every effort will be made to maintain gender balance on the Panel and membership normally will be limited to full-time faculty and staff members. The Title IX Coordinator shall arrange for the Hearing Board members to receive annual training.
Chair	The ***Chair*** of the Sexual & Relationship Misconduct Hearing Board shall preside over any meeting and be the decision maker, but shall not have a vote in the Hearing Board's deliberations. The Chair shall review the investigation report, statements made by the parties or witnesses, and other relevant materials gathered during the investigation. The Chair determines whether the information is relevant and material to the determination of the charged violation(s) of this Policy and will redact (remove) information that is irrelevant, immaterial, more prejudicial than probative, repetitive, or constitutes statements of reputation or personal or expert opinion. The Chair is also responsible for policing behavior during the investigation and hearing process to ensure both parties are treated fairly.
Preponderance of the Evidence	***Preponderance of the evidence*** is the evidentiary standard that the Hearing Panel uses to determine whether allegations under this Policy are substantiated. Under this standard, the College will conclude that allegations are substantiated if, and only if, it determines that the evidence shows that there is a greater-than-50% chance that the allegations are true.
Appeal Officer	The ***Appeal Officer*** is independent counsel selected by Bennett College to consider appeals under this Policy.
Bennett Employees Required to Report Violations of this Policy	Reports made to an ***Official with Authority*** will be referred to the Title IX Coordinator for assessment. An Official with Authority who receives a report must report all relevant details about the reported misconduct to the Title IX Coordinator, including the date, time, and location of the reported misconduct, and the names of: the person who provided the report, the individual who experienced the reported misconduct, the individual(s) accused of committing the reported misconduct, any other students involved in the reported misconduct. Officials with Authority include: the Title IX Coordinator, College President, Chief Operating Officer, Vice President of Academic Affairs, Vice President of Student Experience and Enrollment Management, Director of Human Resources; any Bennett College faculty member or teaching assistant; any Resident

<table>
<tr><td></td><td>Advisor, Residence Director, or employee of Residence Life; any member of the Board of Trustees; and any employee of Campus Safety.</td></tr>
<tr><td colspan="2">Reporting Procedures</td></tr>
<tr><td>How to Seek Help Following an Incident</td><td>Bennett College and the City of Greensboro offer important resources to the victims of sexual violence, including medical treatment, counseling and advocacy. At Bennett College, the Dean of Student Experience Student Experience and the Counseling Center are available to assist students free of charge. These offices will help victims consider their options and navigate available any resources. A victim does not need to make a formal report to law enforcement or Bennett College to access the following resources:
<table>
<tr><th>Resource</th><th>Contact Number</th><th>Location</th></tr>
<tr><td>Counseling Center</td><td>336-517-2229</td><td>Catchings Complex</td></tr>
<tr><td>Student Health Center</td><td>336-517-2230 or
336- 517-2241</td><td>Catchings Complex</td></tr>
<tr><td>Title IX</td><td>336-517-2298</td><td>Black Hall Administration Building</td></tr>
<tr><td>Family Services of the Piedmont, Inc.</td><td>336-273-7273</td><td>311 E. Washington St. Greensboro, NC 27401</td></tr>
<tr><td>Cone Health</td><td>336-832-7000</td><td>1200 N. Elm St. Greensboro, NC</td></tr>
<tr><td>North Carolina Coalition Against Sexual Assault</td><td>919-871-1015</td><td>811 Spring Forest Road, Suite 900 Raleigh, NC 27609</td></tr>
<tr><td>Family Justice Center</td><td>336-641-7233</td><td>201 S. Greene St Greensboro, NC 27401</td></tr>
</table></td></tr>
</table>

<table>
<tr><td></td><td>Family Solutions (Community Counseling Resource)</td><td>336-899-8800</td><td>234 E. Washington St. Greensboro, NC 27401</td></tr>
<tr><td>How to Report an Incident</td><td colspan="3">Any individual who has been the target of sexual misconduct, stalking, or relationship abuse or violence, or other conduct that may violate this Policy is strongly encouraged to report the incident.
How to Report
Bennett College provides the following options for reporting an act of sexual misconduct, stalking, relationship abuse and violence, or other acts prohibited under this Policy. You are encouraged to report an incident even if you do not want to file a criminal report or initiate Bennett College's internal complaint procedures. By your reporting, Bennett College can ensure you have access to counseling services, academic support services, and any other supportive measures that are appropriate. Incident reports also provide information to help Bennett College provide a safe and non-discriminatory environment for all members of the college community.

All non-confidential reports will be reported to the Title IX Coordinator, who will meet with you to review your options and all available resources. Bennett College will limit disclosure of information included in a non-confidential report to those individuals involved in the College's response to the report and to legally required or permitted disclosures. This means only people who need to know will be told.

1. Report to Campus Safety. Sexual assault (including rape), physical violence, and stalking are serious criminal acts and you are strongly encouraged to report criminal acts to the police. Although the Bennett College strongly encourages all members of its community to report violations of this policy to law enforcement, it is your choice whether or not to make such a report and you have the right to decline involvement with the police.
Campus Safety officers can assist you with personal safety, seeking medical attention, preserving evidence, or filing a police report. Campus Safety also can contact other on- and off-campus resources to assist you. Campus Safety will record the report for</td></tr>
</table>

	Clery Act purposes, but shall do so without disclosing any personally identifiable information about the Complainant in order to maintain confidentiality. Bennett College Bennett College Office of Campus Safety Phone : 336-370-8621 2. **Report to Title IX Coordinator. Bennett College** has designated a Title IX Coordinator to oversee compliance with Title IX, which prohibits discrimination on the basis of sex in education programs or activities. Sexual misconduct is a form of sex discrimination prohibited by Title IX. All reported incidents of sexual misconduct involving students are reviewed by the Title IX Coordinator. The Title IX Coordinator will provide you with a written explanation of your rights and options under this Policy, including resources and services available to you, your options to request assistance or supportive measures and additional remedies, and an explanation of the Bennett College's internal complaint resolution procedures. The Title IX Coordinator also will report the alleged incident to Campus Safety for Clery Act purposes, but may refrain from disclosing personally identifiable information about you to Campus Safety at your request. If a reporter wants to make a confidential report, they can report through the College's confidential online portal, which is available on the Campus Safety portion of Bennett's website at http://forms.issuetrak.com/issuetrak/bennettedu Bennett College Office of Title IX 900 East Washington St, Box 364 | Black Hall - 2nd Floor Greensboro, NC 27401 Telephone: (336) 517-2298 Email: titleix@bennett.edu **Report to an Official with Authority.** Reports made to Officials with Authority will be referred to the Title IX Coordinator for assessment. An Official with Authority who receives a report must report all relevant details about the reported misconduct to the Title IX Coordinator, including the date, time, and location of the reported misconduct, and the names of: the person who provided the report, the individual who experienced the reported misconduct, the individual(s) accused of committing the reported misconduct, and any other students

	involved in the reported misconduct. Officials with Authority include: any Bennett College faculty member or teaching assistant; any employee of Counseling Services; and any employee of Campus Safety. Officials with Authority include: the Title IX Coordinator, College President, Chief Operating Officer, Vice President of Academic Affairs, Vice President of Student Experience and Enrollment Management, Director of Human Resources; any Bennett College faculty member or teaching assistant; any Resident Advisor, Residence Director, or employee of Residence Life; any member of the Board of Trustees; and any employee of Campus Safety. 3. **Anonymous Reporting** Any individual may report conduct prohibited by this Policy to Bennett College without disclosing their name and without identifying the Respondent, and without requesting any action. However, Bennett College's ability to respond to an anonymous report may be limited depending on the level of information available about the incident or individuals involved. The "Confidentiality" section below outlines the obligations that various faculty and staff members have to keep obligations confidential.
Confidentiality	
Confidentiality Policy	Bennett College recognizes the sensitive nature of sexual and gender-based harassment and violence and is committed to protecting the privacy of any individual who reports an incident under this Policy. If a student wishes to report an incident and would like it to remain confidential, it is imperative that they contact the Student Health Center where medical providers and counselors will help the student while keeping their report confidential. While Bennett College is committing to protecting the confidentiality of persons who report potential violations of this policy, under certain circumstances, the College's ability to maintain complete confidentiality may be limited in some respects. It is important that anyone considering a report make an informed decision about the confidentiality of their report. College employees and staff members differ in their ability to maintain complete confidentiality of a person's report.
	When a person reports a potential violation of this Policy, the College will exempt the reporter from drug, alcohol and other conduct policy

Amnesty for Reporting Parties	violations that may be implicated. The College encourages persons who believe that this Policy has been violated to report incidents without fear of penalty for violation of other College policies.
Confidentiality of Reports to Licensed Medical and Mental Health Professionals	Counselors in the College's Counseling Center are considered "privileged communicators" and are therefore required to maintain complete confidentiality of reports under this Policy. These "privileged communicators" include professional, licensed counselors and medical professionals employed by the College. Privileged communicators will not report allegations to the College's Title IX coordinator if the person reporting the allegations requests that they be kept confidential.
Confidentiality of Reports to Non-Professional Counselors and Advocates	Individuals who work in the Student Health Center will maintain complete confidentiality of reports under this Policy and will not report allegations to the College's Title IX coordinator.
Confidentiality of Reports to Pastoral Counselors	Pastoral counselors and other clergy members employed by the College will also maintain the confidentiality of allegations under this Policy and will not report allegations to the College's Title IX coordinator.
Confidentiality Under the Clery Act	The Clery Act is a federal law requiring colleges and universities that receive federal funds to maintain and disclose information about certain crimes on campus. Under the Clery Act, all College faculty and staff are required to report allegations of certain on-campus crimes—including sex offenses, crimes based on the victim's gender, gender-identity, or sexual orientation, dating and domestic violence, and stalking—to the Clery Officer on campus who is responsible for facilitating Clery Act compliance. In order to comply with Clery Act requirements, campus officials are required to report the nature, date, time and general location of an incident to the Clery Officer***. This report is limited and includes no information that would directly or indirectly identify the reporter***. The Clery Officer is also required to issue timely warnings to alert the campus of potential threats after a report is made. The Clery Officer is required to submit an annual report including the statistics of the reports made within the last year; this report can be found on our campus website under the section titled "Campus Safety."

State Law that May Limit Confidentiality	North Carolina requires that the College report certain offenses, including sexual assault or rape. *See* N.C. Gen. Stat.§ l 15C288(g).
Investigation and Hearing Procedures	
How Bennett College Investigates Reports	Bennett College is committed to providing prompt and equitable investigation and resolution of reports under this Policy. Bennett College will undertake an appropriate inquiry into all reports regardless of whether the Complainant wishes to pursue resolution of any kind. The specific steps in the Bennett College's inquiry will vary depending on the nature of the allegations, the information available to the college, and whether the Complainant elects to pursue criminal charges, files a formal complaint, or requests the college not to pursue action, and other factors. A full investigation occurs only if a formal complaint is filed. If the allegations in the formal complaint constitute a violation of this Policy, the College will: • Prepare a written Notice of Investigation which will include: the nature, time, and place of the reported violations, (including the specific prohibited acts), the name of the Complainant, the name and contact information of the Investigator, a statement regarding confidentiality of the process, and a statement on the policy which prohibits retaliation. • Implement supportive measures during the course of the investigation, which may include taking steps to separate the Complainant and Respondent; • Promptly begin an investigation; • The Title IX Coordinator will designate an investigator who has specialized training in conducting sexual misconduct investigations. The investigator may be someone not employed by Bennett College.

How Bennett College Investigates Reports	• Provide the Respondent sufficient time to prepare a written response to the allegations (at least (3) three calendar days); • Interview the Complainant, Respondent, and other members of the College community who may have relevant information; • Provide the Complainant and Respondent the opportunity to present witnesses and evidence and to review evidence submitted by other parties relevant to the investigation, including available police reports; • Offer informal resolution procedures if all relevant parties wish to engage in such procedures and the College determines that such procedures are appropriate given the allegations. The process may take the form of mediation or restorative justice. Informal mediation is not an option to resolve allegations that an employee sexually harassed a student; • The Chair of the Sexual and Relationship Misconduct Panel shall arrange for Complainant and Respondent to access the investigation report separately (typically within three (3) calendar days). The parties may not make copies or take photographs of the information; • Within one (1) calendar day of accessing the information, each party shall notify the Chair whether the party requests to meet with the Investigator for the purpose of responding to this information. The Investigator will record each party's responses to the information and submit a written report of the responses to the Chair; • If new and relevant information is submitted during this review and response period, it will be shared with Complainant and Respondent and each will have an opportunity to respond to the new information via the Investigator within a time frame determined by the Chair; • If the written reports of the parties' responses include information deemed by the Chair to be irrelevant or immaterial, the Chair shall redact (remove) the irrelevant or immaterial information prior to permitting the other party to access the information;

	• Following the review and response period (typically within three (3) calendar days after its conclusion), the Chair will issue to the Sexual & Relationship Misconduct Panel the final investigation packet, comprising the investigation report and any exhibits thereto; the written reports of the parties' responses, if any; written notices to the parties (notice of investigation, notice upon conclusion of investigation); and the formal complaint; • Provide the Complainant and Respondent an opportunity to meet with the investigator to review the investigation report and respond before the Sexual and Relationship Misconduct Hearing is scheduled. The responses will be recorded by the investigator and included in the investigative report. The parties may not make copies or take photographs of the information.
Hearing & Sanctioning Procedures	The Sexual & Relationship Misconduct Panel determines whether a Policy violation occurred and imposes sanctions for Policy violations as appropriate. The Sexual & Relationship Misconduct Panel will review the final investigation packet and may request any additional relevant information from the Investigator or third parties. The parties will have the opportunity to access any such requests for additional relevant information and any information produced in response to such requests prior to the Sexual & Relationship Misconduct Panel hearing. The parties may not make copies or take photographs of the additional relevant information. The following procedures apply to a complaint that proceeds to a hearing panel: • Notice. Both the Complainant and the Respondent will be notified at least seven (7) days in advance of the date and time of the hearing and the names of the hearing panelists. Both parties will be given the opportunity to have an initial meeting with the Title IX Coordinator and Chair of the Sexual & Relationship Misconduct Panel where they may be accompanied by an advisor. The purpose of this meeting will be to review the hearing procedures, provide both parties a copy of the procedures, and answer any questions or concerns either party has regarding the hearing process. • Hearing Packet. In advance of the hearing, the Chair shall prepare the Investigative Report packet with information it deems relevant to the case to be shared with the hearing panel.

	• Witnesses. The hearing panel may, at its discretion, exclude witnesses or witness testimony the panel considers irrelevant or duplicative. • Hearing Procedure. Hearings will be recorded. The hearing panel has general authority over the conduct of the hearing (e.g., it may set time frames for witness testimony and it may limit opening/closing statements or their length, etc.). The general course of procedure for a panel hearing is as follows: introductions; Respondent's statement accepting or denying responsibility; opening comments from the Complainant; opening comments from the Respondent; oral questioning by each party's advisor to the other party and any witnesses follow-up questions, including those challenging credibility; questions from the panel; closing comments from both the Complainant and Respondent. The parties may not question each other or other witnesses directly, but may raise questions to be asked of that party through the hearing panel, which will determine whether to ask them. Questions that are irrelevant, inappropriate, or are not in accordance with this Policy will be excluded by the Chair. • Relevance and Admissibility. In evaluating the relevance of information, the hearing panel chair, as appropriate, shall make determinations regarding whether the testimony or information offered bears on a fact at issue in the case, is more prejudicial than probative, or is duplicative. • Executive Session. After a hearing, the panel will apply a preponderance of evidence standard when arriving at a determination of whether a policy violation occurred. The panel will meet in executive session following the conclusion of the hearing and will base its determination solely on information presented as part of the complaint resolution process (information from the Final Investigation Packet and that obtained during the hearing). A majority of the panel must concur in the determination that a policy violation occurred. • Record of Hearing. The Chair will prepare a written digest of the hearing for the purpose of preserving a record of the hearing proceedings in the event of an appeal. The Chair shall include as an exhibit to the written digest any materials distributed to the panel prior to a determination on sanctions (that is, any written impact statement or mitigation statement,

	and a copy of the items from Respondent's file considered by the panel in determining appropriate sanctions, if any). • Imposition of Sanctions. If the panel determines a policy violation occurred, the panel will impose sanctions and in determining sanctions, the panel will attempt to fairly fit the sanction to the violation seen in total context. A majority of the panel must concur in the decision to impose any particular sanction. • Potential Sanctions: Individuals found to have violated this Policy shall be subject to disciplinary sanctions under the College's Honor Code and disciplinary action under the College's Personnel Policy, which may include suspension, removal from the College, termination of employment, or other sanctions. Conduct that violates this Policy may also constitute a crime under the laws of the jurisdiction in which the incident occurred, which may subject a person to criminal prosecution and punishment in addition to any sanctions under the College's policies. • Notice of Action. The Complainant and Respondent will (concurrently) receive the written decision of a hearing panel of whether a Policy violation occurred (including the specific prohibited acts and the panel's determination of responsibility for each prohibited act), the rationale for the decision, and the sanctions imposed, if any, no later than five (5) calendar days after the hearing.
Appeal Process	Either the Complainant or Respondent can appeal the finding of the Sexual & Relationship Misconduct Panel or the sanctions imposed on the following grounds: a) Procedural irregularity that affected the outcome of the matter; b) New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made and that could affect the outcome of the matter; c) The Title IX Coordinator, Investigator(s), or decision-maker(s) had a conflict of interest or bias for or against the Complainants or Respondents generally or the individual Complainant or Respondent that affected the outcome of the matter.

	Previously unavailable, relevant evidence that could significantly impact the result of the panel's determination must be brought to the attention of the Chair within five (5) calendar days of receiving the written Notice of Action. In that event, the Chair will reconvene the panel to determine whether the information would have affected the result.
Additional Programs and Resources	Bennett College is committed to increasing the awareness and prevention of sexual violence. All incoming students and new employees are provided with programming and strategies intended to prevent conduct in violation of this Policy. These programs include: • Student Orientation • New Employee Orientation • Bystander training • Housing and Residence Life Workshops • Faculty and Staff Workshops • Alcohol, Drug and Sexual Assault Prevention Annual Fair

Board of Trustees Policy Number:	**Date of Adoption/Revision:**
STAF 11.03	April 1, 2016/September 16, 2017

SUBJECT	On-campus Residence Requirement
AUTHORITY	Dean of Student Experience
APPLICABILITY	The policy applies to all students with freshwoman or sophomore status.
PURPOSE	This policy is designed to provide a consistent standard for supporting the residential philosophy, student success, and financial objectives of the College.

POLICY	Students classified as freshwomen and sophomores are required to live on campus in Bennett residential housing facilities. The only definite exceptions, which must be granted through a waiver process are 1) a parent or pregnant student, and 2) a student 24 years of age or older. 3) Students classified as freshwomen and sophomores who live within a 50 mile radius of the campus with a parent or guardian. Other exceptions to the policy, due to extenuating personal circumstances or hardship, must also be granted through the waiver process by the Dean of Student Experience. Freshwomen and sophomores who fail to adhere to the on- campus residency requirement will be charged the full cost of room and board.
PROCEDURES	1. Until a completed and approved waiver to the on-campus residence requirement is submitted and approved, all freshwomen and sophomores will be billed for room and board. 2. During the last 30 days of a spring semester, the opportunity to obtain and submit Waiver Requests to the on-campus residence requirement for the following year shall be available to all students who are either freshwomen or sophomores. The same information is made available to new students, with instructions in the initial housing information they receive. 3. As Waiver Requests are submitted with the proper documentation, designated staff may begin responding to students by email to their @Bennett.edu email accounts. If the necessary documentation does not exist, the entire submission should be returned to the student within three business days with an explanation of needed documentation. <u>Definite Exceptions</u> Those students who have provided the appropriate information for one or

	more of the definite exceptions will be notified, once the information submitted has been confirmed by staff. Extenuating Personal Circumstances/Hardship Those students who have other circumstances will be considered by Dean of Student Experience. The primary emphasis of each decision should rest with the documentation provided by the student. Consideration should be given, in the following order, to 1) the personal circumstance and/or hardship the student faces and its potential impact on the student's success, 2) the authenticity and relevance of the documentation submitted, and 3) the likelihood of the student's ability to succeed academically in the desired housing arrangement. If necessary, for the purpose of gaining further clarity, a student may be contacted to meet with a designated administrator(s). After reviewing the materials presented by students and making a decision, students will be contacted by email. For the Spring semester, the only waivers granted will be for new students and those students with one of the definite exceptions. Responses to Waiver Requests should be dated within 10 business days of receipt. The Chief Housing Officer will notify the Office of Business and Finance of all students who are granted on-campus residence waivers. Following each waiver request period, a report should be compiled of all students who submitted Waiver Requests, along with the status of each request.

Replaces policy: Residence policy - Bennett College is a residential college and encourages its students to live on campus during their enrollment. Students classified as freshwomen and sophomores who do not live within a 50 mile radius of the campus with a parent or guardian must reside on campus, regardless of years enrolled. However, the College recognizes that definite characteristics may prevent on-campus living. Such cases will be considered by the Dean of Students or designee on an individual basis. Approved by the Board of Trustees on October 15, 1994.

Board of Trustees Policy Number:	Date of Adoption/Revision:
STAF 11.04	January 28, 2017

SUBJECT	**Anti-Bullying Policy**
AUTHORITY	Dean of Student Experience
APPLICABILITY	Students Currently Enrolled at Bennett College and Current Faculty and Staff
PURPOSE	To communicate to all students, that Bennett College will not tolerate bullying behavior.

POLICY	Bennett College will not tolerate bullying behavior. Students, faculty, and staff found in violation of this policy will be disciplined under applicable procedures established under Bennett College's Student Code of Conduct, Faculty and Employee Handbooks.
DEFINITIONS	**Bullying behavior, defined as: the systematic and chronic infliction of physical hurt or psychological distress by teasing, social exclusion, threat, intimidation, stalking, physical violence, theft, harassment, or destruction of property.** Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intention of the alleged bully is irrelevant, and will not be given consideration when appropriate disciplinary action is needed. Examples of bullying: • Verbal Bullying: slandering, ridiculing or maligning a person or his/her family; persistent name calling which is hurtful, insulting or humiliating; using a person as the butt of jokes; remarks that would be viewed by others in the community as abusive and offensive; persistently interrupting another person or otherwise preventing another person's legitimate attempts to speak; use of nicknames after being warned that the nickname is considered by the victim to be offensive; constant criticism on matters unrelated to a person's job performance or description or on matters that cannot be documented; • Physical Bullying: pushing; shoving; kicking; poking; tripping; assault, or threat of physical assault; damage to a person's work area or property • Gesture Bullying: non-verbal threatening gestures, such as, but not limited to, the following: approaching another person with fists clinched or with one or more other fighting gestures which, could reasonably be interpreted as threatening; brandishing a weapon; making gestures that would reasonably be interpreted as amorous or sexual in nature. • Social Bullying (which may include Cyber-bullying): engaging in verbal bullying via mail, email, text message, phone, voicemail, or social media; deliberately interfering with mail, email, text messages, phone, voicemail or other

	communication; spreading malicious rumors or gossip about another person.
PROCEDURES	1. Students, who believe they may have experienced bullying in any form, but are uncertain as to whether a complaint is justified or whether they wish to initiate a formal written complaint, may discuss their concerns confidentially and informally with the Director of Campus Life. Faculty and Staff who believe they may have experienced bullying or suspect a student may be involved in bullying, can submit formal written complaints to the 2. Students who have filed a formal written complaint will be notified within in seven business days of the status of the complaint by the Director of Campus Life. Faculty and Staff members will be notified by the 3. Individuals found not in compliance with this policy, may be subject to disciplinary action which may include, but is not limited to expulsion from the institution or termination of employment.

Replaces policy: *Date*

Board of Trustees Policy Number:	Date of Adoption/Revision:
STAF 11.05	March 25, 2017

SUBJECT	MISSING STUDENT NOTIFICATION
AUTHORITY	Director of Campus Life
APPLICABILITY	All students residing in campus residence halls
PURPOSE	To comply with the requirements of the Higher Education Opportunity Act of 2008 requiring the notification and investigation of missing students.
POLICY	Bennett College is committed to the safety and security of all students. Any residential student deemed missing or absent from the College will be reported to the appropriate sources and a thorough investigation of the student's status will be conducted. The College will make a determination of notification upon conclusion of the investigation.
PROCEDURES	**Official Notification for Missing Students** 1. Any concerned person who has information that a residential student may be a missing student must notify the Campus Safety Department or the Director of Campus Life as soon as possible so that an official determination may be made about whether or not the student is missing. 2. The Director of Campus Safety and the Director of Campus Life will gather all essential information about the residential student from the reporting person and from the student's acquaintances. Appropriate campus staff will be notified to aid in the search for the student. Appropriate staff will include the residence director on-call and residence hall staff of the alleged missing student. Investigating a missing student report includes, but is not limited to, the following: a. Check the student's room to see if they are present. (Residential Life Personnel will report findings to the Director of Campus Life). b. Attempt to contact the student via cell phone (if available) and/or email address. (Director of Campus Life) c. Contact roommates, friends, employers and members of clubs and organizations the student may be affiliated with, if known, to obtain information about when and where the student was last seen and if the student's absence is inconsistent with their established patterns of behavior. (Director of Campus Life)

d. Obtain information from the reporting individual about the student, such as a physical description, including clothes they may have been wearing when last seen; who they may be with or where they may be; their physical and mental well-being; and the reason(s) they believe the student is missing. (Director of Campus Safety)

3. If the above actions are unsuccessful in locating the student within 24 hours, or it is apparent immediately that the student is a missing person (e.g. witnessed abduction) the student will be determined a missing student. In the event of abduction, local authorities will be notified immediately.

4. Within 24 hours after a student is determined to be missing, (1) the Director of Campus Life, or designee, will notify the emergency contact per emergency contact process; and (2) Director of Campus Safety, or designee, will notify the appropriate local law enforcement agencies for assistance.

5. The Administration of the College reserves the right to notify the parents of a student under the age of 21 if she has been determined to be missing.

Designation of Confidential Emergency Contact Information

All residential students have the opportunity annually to identify an individual or individuals to be contacted by the Director of Campus Life not later than 24 hours after the time that the student is determined to be missing in accordance with the procedures set forth below. A designation will remain in effect until changed or revoked by the student. This information is maintained confidentially and will be available only to the Campus Safety Department, the and the Director of Campus Life.

For those students under the age of 18 and not an emancipated individual, the College is required to notify the emergency contact as well as the custodial parent or guardian no more than 24 hours after the student is determined to be missing.

External Communications

In case of a missing student, local law enforcement agencies may provide information to the media that is designed to obtain public assistance in the search for a missing student. In doing so, the local law enforcement agencies will consult with the Bennett College's Office of Communications and Marketing. Any media request to the College must be approved by the Office of the President or designee.

Replaces policy:

Date

Board of Trustees Policy Number:	Date of Adoption/Revision:
EOP 12.02	1/24/2014

SUBJECT	NON-DISCRIMINATION
AUTHORITY	Office of the President
APPLICABILITY	This policy applies to all constituents of the College.
PURPOSE	In accordance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disability Act of 1990, Bennett College will make adjustments in its policies and practices to ensure equal opportunity and access for qualified students, employees, and members of the public to applicable programs, services, activities and facilities.

POLICY	Bennett College does not discriminate on the basis of race, color, religion, creed, sex, age, marital status, national origin, mental or physical disability, political belief or affiliation, veteran status, sexual orientation, genetic information, or any other class of individuals protected from discrimination under state or federal law in any aspect of the access to, admission, or treatment of students, faculty or staff in programs and activities, or in employment and application for employment. Furthermore, Bennett College prohibits the harassment of students and employees (i.e., racial harassments, sexual harassment, and retaliation for filing complaints of discrimination). In accordance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disability Act of 1990, Bennett College will make reasonable adjustments in its policies and practices to ensure equal opportunity and access for qualified students, employees and members of the public to applicable programs, services, activities and facilities.
PROCEDURES	A. The Office of Disability Services is responsible for keeping the policy current, as well as communicating, monitoring, and reporting activities relating to this policy. The Director of the Office of Disability Services is the College's compliance officer for all forms of discrimination and is specifically designated as the University's Title IX Coordinator, responsible for the University's Title IX compliance efforts, including sex and gender discrimination, sexual harassment, sexual assault and violence, stalking, intimate partner violence, domestic or dating violence, retaliation and athletics. Inquiries concerning the application of Title IX and its implementing regulation may be referred to the designated Title IX coordinator(s) or to the Office for Civil Rights.

	The Director of Disability Services may be contracted at: Director of Disability Services Catchings Hall 336 517 1502 B. This policy is strictly enforced by the College and alleged violations receive prompt attention and appropriate corrective action. The College will take steps to prevent discrimination and harassment, to prevent the recurrence of discrimination and harassment, and to remedy the discriminatory effects of discrimination on victims and others, as appropriate. C. Complaints of discrimination by students against other students should be brought to the complainant's Dean of Students for handling. All other complaints involving students and employees, only employees, or third parties should be brought to the Director of Disability Services.

Replaces policy: *Date*

Board of Trustees Policy Number: **IT 13.01**

Date of Adoption/Revision: April 17, 2014

SUBJECT	Acceptable Use of Information Technology
AUTHORITY	Information Technology
APPLICABILITY	The policy applies to the Board of Trustees, faculty, staff and students of Bennett College.
PURPOSE	The College operates and maintains many information technology assets, including but not limited to: voice, video, and data systems. These assets are connected by networks and communications systems of many types. The College must act to protect the confidentiality, integrity and availability of information technology assets in accordance with applicable policies, standards and procedures. The College provides information technology resources for use by faculty and staff for College-related duties and responsibilities. The use of information technology resources for personal or other non-College purposes is strictly prohibited.
POLICY	All users of College information technology resources must adhere to applicable state and federal laws, statutes, and regulations; must comply with applicable policies, standards and procedures as defined by the College; must understand and acknowledge that information technology assets and data are for authorized use only; and must not compromise the confidentiality, integrity and availability of these assets and data.
PROCEDURES	**Definitions:** • The College's voice, video, and data systems, as described above, and those systems as defined below, will be referred to generally as "College information technology assets" in this document. • The term "user(s)" refers to any person(s) accessing College information technology assets, including but not limited to: students, faculty, staff, contractors, clients, consultants, invited guests, and others working at or for the College. • The phrase "College information technology assets" includes College owned, operated or maintained: workstations, servers, printers, telephones, switches, routers, wiring and hubs; wireless and cellular components; mobile devices such as smart phones, tablets, laptops and

	other portable computing devices; or any College owned, operated or maintained technology, software, components or devices that store, process or transmit information or data. • Personally owned technology such as mobile devices (e.g., smart phones, tablets, portable computing devices, etc.) or home computers that interface with College information technology assets will be subject to this policy. • The "College Information Technology Office" is defined as the group assigned to implement College-wide information security strategy and is led by the senior information security person as appointed by the College. • The term "access credentials" refers to the user identification, logon/login identification, or other system-specific means granted to a user permitting access to College information technology assets or data. • The term "authentication" is defined as a means to determine whether a user attempting to gain access to College information technology assets by means of particular access credentials is in fact the user those credentials were officially assigned to. • The term "authorization" is defined as a means to determine whether a user is permitted access to specific College information technology assets. • The term “consumable software” refers to College-purchased software that provides insignificant business value, as determined by the acquiring department, in terms of overall function relative to the original purchase price of the software; or to software that would cost the College more to track, reclaim, or redistribute than the original purchase price **Procedures:** The College Office of Information Technology will establish and maintain a set of requirements. • All users are responsible for complying with this policy and established IT standards and procedures. Users are responsible and accountable for all activity initiated or conducted through the use of assigned access credentials. Dissemination of unofficial, unsolicited mass communications via College information technology assets is prohibited. Violation of any portion of this policy may result in immediate loss of access to College information technology assets, initiation of legal action by the College, and/or disciplinary action. Users are responsible for reporting any actual or suspected violation of this policy to the Information Technology Office and designated security contact immediately. • System administrators or staff assigned the responsibility of maintaining or supporting College information technology systems or assets will be responsible for implementing requirements outlined in this policy and

	established standards and procedures. This includes monitoring vendor and public disclosure forums that report vulnerabilities, incidents, and other information of interest that could affect the confidentiality, integrity, or availability of the system or assets for which they are responsible and disseminating relevant information and/or recommended actions to their users. • All levels of management are responsible for ensuring that all users within their area of accountability are aware of responsibilities as defined in this policy and for ensuring a secure office environment. The head of each unit will authenticate the need for individual access to information technology assets and must request and obtain authorization for access to College data from the appropriate data steward. • Administrative and academic unit heads are responsible for taking the necessary steps to ensure that access to College information technology assets and data is appropriately limited or restricted for employees who transfer to another department within the College or are no longer employed by the College. • Consumable software shall not be tracked, reclaimed or redistributed, unless otherwise directed by an appropriate authority.

Replaces policy: *Date*

Board of Trustees Policy Number:	Date of Adoption/Revision:
IT 13.02	January 19, 2018

SUBJECT	Securing Network Connected Devices
AUTHORITY	Information Technology
APPLICABILITY	This policy applies to all College data regardless of its medium and/or form, and to all those who handle College information (faculty, staff and students).
PURPOSE	Outlines how computing and network devices are to be connect to the College's data communications network, and who is responsible for the security of those connected devices.

POLICY	A principal user who connects a device to the College network is responsible for working with information technology staff to secure the device against compromise. Specifically, any device connected to the College network must (when applicable): • Have an authorized fixed IP address or be appropriately registered for DHCP; • Be configured to run a supported version of an operating system for which patches for newly identified security breaches are developed and distributed in a timely manner; • Be configured in such a way that known vulnerabilities - such as open FTP ports and open relays - are eliminated or minimized; • Be maintained in such a way that patches which close known security breaches are applied as soon as they become available; • Have antivirus software installed on it that runs continuously and is updated regularly; • Be scanned and determined to be free of viruses and other known compromises that may have been introduced to its operating environment; and • Be used for appropriate purposes related to the educational missions of the College or to the conduct of its legitimate business activities. Further, it is highly recommended that firewalls be install and run continuously on devices, whenever possible and practicable. Principal users who fail to fulfill the foregoing responsibilities are subject to disciplinary action.
PROCEDURES	**Securing Compromised or Vulnerable Devices Connected to the College Network** A principal user who connects a device to the College network is responsible for

	working with the information technology staff to secure the device against compromise as soon as actions to address known vulnerabilities are identified. If a device is compromised, the principal user is responsible for working with appropriate staff to ensure that collateral risks or damage to the information technology infrastructure of the College, other devices on the College network, and other Internet-connected devices and networks around the world are prevented or minimized. **Compromised device** should be immediately secured, shut down, or disconnected from the College network by the principal user. The principal user is responsible for initiating or cooperating with efforts to secure the device. The principal user is also responsible for initiating or cooperating with efforts to identify and notify other principal users whose devices may have been affected. Principal users who reconnect disconnected devices that they know are compromised and have not yet been secured are in violation of College policies and are subject to further actions and, possibly, sanctions. **As a last resort, in the cases of compromised devices connected to the College network,** when time constraints permit no other course of action or when a principal user is unavailable or uncooperative, it may be necessary to suspend temporarily the network connection of the compromised device. When a campus computer is actively attempting to compromise the integrity and or availability of the College infrastructure, it will be disconnected from the network **immediately** and the owner and/or IT support staff will be notified of the problem and the protective actions taken. It may be necessary for the Office of Information Technology to suspend temporarily the principal user's account. This action should be taken, preferably, only after the principal user and (when applicable) have been notified. When a principal user who is a faculty or staff member cannot be notified prior to this action or is unresponsive or uncooperative, every reasonable effort will be made to communicate with (in ascending order): the affected department chair or head, the affected Dean or Vice President. In such an event, the parties who would normally be consulted should be notified of the suspension as soon as possible after the action is taken. Such temporary disconnections and suspensions should be imposed only until such time as the precipitating problem has been redressed. Principal users are strongly encouraged to seek the advice of an IT support professional before reconnecting a previously disconnected or suspended device. If such a device is reconnected to the network and has not been secured, further action may be necessary to ensure that the device is properly secured. Disconnection or suspension is considered a course of action to be avoided whenever possible and to be taken only when deemed necessary in the measured professional opinion of responsible parties in the Office of Information Technology. Within a reasonable time after the disconnection or suspension is

	imposed, a post-mortem analysis of the sequence of events leading to the suspension should be conducted. All affected or interested parties should be invited to participate in the post-mortem. The primary purpose of the post-mortem should be to determine - without recrimination - whether the suspension was justified by the facts and whether alternative, equally effective actions could have been taken.

Replaces policy: *Date*

Board of Trustees Policy Number:	Date of Adoption/Revision:
IT 13.03	January 19, 2018

SUBJECT	Individual and Password Protection Policy
AUTHORITY	Information Technology
APPLICABILITY	This policy applies to all users who have user and/or system accounts in any IT systems that interface with College authentication systems.
PURPOSE	Policies for individual accountability, security, viability, aging and third-party use of passwords associated with College's user names.

POLICY	**Individual Accountability:** All users of college systems are individually assigned a user-id and password for the purpose of accessing online systems. Users are individually accountable for activities performed with their user-ids and passwords. Passwords may not be shared with anyone, including with administrative assistants or secretaries. College passwords are considered to be regulated and private data.
	
	- Do not reveal a password over the phone to anyone
	- Do not reveal/include a password in an email message
	- Do not reveal a password to your supervisor, manager, or co-workers
	- Do not talk about a password in front of others
	- Do not fall for scams that attempt to get you to reveal your password or other personal information
	  - The College and legitimate businesses will never ask you to reveal your password in unsolicited email messages or telephone calls to you.
	- Do not use the "Remember Password' feature of applications
	
	Password Security: Passwords for College systems should not be identical to those used for personal/non-College online accounts.
	
	Password Strength Requirements: User and system passwords shall be constructed with strength and complexity that minimize the likelihood of successful password guessing or brute force attacks. Passwords with strength and complexity must have the following characteristics:
	
	- Between 8 and 32 characters in length
	- Must contain at least
	  - One lowercase character (a-z)

- One uppercase character (A-Z)
- One numeric character (0-9)
- One non-alphanumeric character from this set: !?#$%&'()*+,-./:;
- Have no more than two pairs of repeating characters, such as “aa”
- Cannot be an old password used within the past 365 days

Good passwords must be easy for you to remember. To create passwords that can be easily remembered, use the basis of something you know well, such as a song title, affirmation, or other phrase. For example, the phrase might be: "This May Be One Way To Remember" and the password could be: "TmB1w2R!" or "Tmb1W>r~" or some other variation.

Password Refresh (Aging): Passwords shall be refreshed periodically to reduce the impact of disclosure due to undetected theft of passwords. Passwords must be changed on a more frequent basis that depends on the risk to the information being managed, processed, or stored. If the account credentials of a user or system are suspected to have been disclosed or otherwise compromised, the user shall take immediate steps to change and protect the password.

- All passwords should be changed at least once every semester
- Passwords for users with access to non-public University data/information must be changed every 90 days.
- Passwords for users with access to regulated private data (including credit/debit card data, social security numbers, state-issued drivers’ license and non-drivers’ identification data, and protected health information) must change their passwords every 90 days.

System Requirements

- **Transmission of Passwords**: Security organization standards prohibit clear text transmission of passwords. The College adheres to these standards and prohibits transmission of passwords in clear text.

- **System-based Password Files**: The use of system-based password files raises the risk that a compromised system will expose the password file to attacks. College passwords should not be distributed to system-based password files.

- **Auditing and Testing**: College passwords should periodically be run through standard password tools to ensure that the password strength-checking done in the password reset facility is still effective and meets the standard for length specified in this policy.

- **Access Control**: Access to systems should be reviewed regularly, and access for individuals should be removed when they no longer meet the criteria for which they were granted access (i.e. termination of employment, retirement, and job duty changes). Access can be removed by the system/application administrator changing the account password or

	removing the userid. At a minimum, monthly reviews of access should be performed for all systems handling sensitive data, regardless of their authentication method. • **Third Party Use**: The use of College authentication directly or indirectly by an off-campus entity or other third party is explicitly prohibited without the approval of the Office of Information Technology.

Replaces policy: *Date*

Board of Trustees Policy Number: IT 13.04 **Date of Adoption/Revision: 10-10-14**

SUBJECT	**USE OF ELECTRONIC MAIL**
AUTHORITY	Information Technology Department
APPLICABILITY	These policies apply to the Board of Trustees, administration, faculty, staff, students and anyone using the information technology resources of Bennett College.
PURPOSE	These policies establish the requirements for using electronic mail at Bennett College.

POLICY	Bennett College owns all electronic mail account and the messages in those accounts. Subject to underlying copyright and other intellectual property rights under applicable laws and College policies, the college also owns data received, transmitted, or stored using electronic mail accounts.
PROCEDURE	1. ***Stewardship and Custodianship of Electronic Mail:*** those availing themselves of the use of the College email infrastructure do not acquire a right of privacy in communications transmitted or stored on the College information technology resources. Email custodians must not inappropriately access or disclose the content of mail transmitted or store on Bennett-owned or Bennett-controlled information technology resources, except in the following situations: a. As a response to a court order or other compulsory legal process b. In certain other circumstances only with the permission of authorized individuals c. When the correspondent is unavailable and the information and the information is necessary to conduct institution business d. In health and safety emergencies. 2. ***Mass Electronic Mailing***: All mass electronic emails must be approved by a Leadership Team member after which IT will determine the appropriate way of sending the mass message without disrupting the network. 3. ****Retention of Email after Graduation or Termination of employment***: continued or one time access to email accounts after graduation or termination of employment requires the approval of

	the Bennett College President. Unless otherwise authorized by the President, the purge policy is as follows: a. Students/Alumni i. Retain access to Bellenet to enable them to print unofficial copies of their transcripts or reapply b. Faculty i. Regular - immediately ii. Adjunct – end of contract + 30 days; except by authorization by Office of the Provost to keep email address in anticipation of rehire c. Staff – end of employment d. Administrators – end of employment ***4.*** The Information Technology Department is responsible for monitoring and managing the electronic mail system.

Replaces policy: *Date*

Board of Trustees Policy Number: IT 13.05 **Date of Adoption/Revision: 10-10-14**

SUBJECT	**USE OF BENNETT COLLEGE INFORMATION TECHNOLOGY (IT) SERVICES**
AUTHORITY	Information Technology Department
APPLICABILITY	These policies apply to the Board of Trustees, administration, faculty, students and anyone using the information technology resources of Bennett College.
PURPOSE	This policy establishes the requirements for use of the Bennett College IT network to ensure the integrity and security of the network.

POLICY	All users of Bennett IT resources are expected to follow all policies, rules, or procedures established to manage computers or network systems, including those established to control access to, or the use of, computer data, files, or other information. Every member of the Bennett community is required to exercise normal ethical and legal behavior
PROCEDURES	The IT Department authorizes and manages all IT services for the College utilizing in-house and outsource resources. Specifically, the IT Department is responsible for: 1. Administrative Computing 2. Cable, Satellite, and IP Delivered Television Services 3. Desktop Computing 4. Email 5. Network Usage 6. Social Media a. Limited to institutionally managed tools 7. Support for Student Computers 8. Telephone Services 9. Website Development and Access (Policy No. IT 13.08) 10. IT related issues resolution

Replaces policy:

Date

POLICIES *and* PROCEDURES

Board of Trustees Policy Number:	Date of Adoption/Revision:
IT 13.06	January 19, 2018

SUBJECT	Information and Security: Data Access and Security
AUTHORITY	Information Technology
APPLICABILITY	This policy applies to all College data regardless of its medium and/or form, and to all those who handle College information (faculty, staff, students, third party contractors, and any others).
PURPOSE	This policy is to ensure the protection of the College's information resources from accidental or intentional unauthorized access, damage, or disclosure, while preserving the open information-sharing requirements of the academic culture.
POLICY	This policy defines the data management environment and assigned roles and responsibilities for protecting the College's non-public information from unauthorized access, disclosure, or misuse. College employees who have access to non-public data and information are responsible for securing and protecting the data.
PROCEDURES	Users who request, use, possess, or have access to College administrative data must agree to certain guidelines. Examples of these guidelines are below as well as on the **Access to Information Compliance Form** completed by individuals seeking access to data. Data trustees will issue detailed guidelines for each functional area. • Access to non-public College information will be grant and revoke by the employee's supervisor in conjunction with the Office of Information Technology. Data owners will be identified for each subject area and provided approval for data access. Access will be grant only to those with a legitimate business need for the data. • Employees and their supervisors will be ask to complete and sign a user agreement, the Access to College Information Form, confirming that they will follow security guidelines before being given access to non-public College information. • Administrative data users may not transfer their data access rights to others, release administrative data to others, or use data for purposes other than those for which access was grant. • Computer systems used to support data will be required to adhere to the specific protective measures for the classification level. • Unencrypted Confidential Restricted data cannot be permanently stored on mobile devices, including laptops, USB drives without authorization.

Replaces policy:

Date

BENNETT COLLEGE

College Administrative Information Systems
ACCESS TO INFORMATION COMPLIANCE FORM

Personnel, student, financial and medical information contained within the College's Information Systems are considered confidential. Access to this confidential information and any other information made confidential by law and College policy is limited to those individuals whose position requires use of this information. By signing the statement below, you are acknowledging your acceptance and adherence to the confidentiality requirements imposed by federal and state law and College policy. If you have questions about the legitimate use or release of information, please contact the Office of Information Technology.

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By virtue of my position at Bennett College, I may have access to information which is confidential and is not to be disclosed to any person or entity without appropriate authorization, subpoena, or court order. In order to access confidential information, I agree to adhere to the following guidelines:

1. I understand and acknowledge that improper or inappropriate use of data in the College's Information Systems is a violation of College procedures and may also constitute a violation of federal and state laws.
2. I will only use confidential information in a manner consistent with my authorized access, and the duties and responsibilities of my position.
3. I will not provide confidential information to any individual or entity without proper authorization.
4. I will not review records or files for which I do not have a legitimate need to know in order to perform my duties.
5. I will not make copies of any records or data except as required in performance of my duties.
6. I will destroy any confidential information for which I no longer have an official business use in a manner appropriate to the medium and consistent with the applicable North Carolina State, Federal, and College Record Retention policies.
7. I will not share any Password used to access College resources with anyone, including my support staff.
8. I will not use the data for personal use or for commercial purposes.
9. I will refer all requests for information from law enforcement or governmental agencies, and other external entities to the Office of the President.
10. I will refer external requests for all College statistical, academic, or administrative data to the Office of Institutional Research and Effectiveness, Human Resources, Business and Finance or those departments that have been authorized to respond to such requests.
11. I agree to report any unauthorized access to confidential data immediately to my supervisor.

12. I understand that any improper or inappropriate use of data in the College's Information Systems may result in the removal of access privileges and could also result in appropriate administrative action, including, but not limited to, disciplinary and/or legal action.

I have read, understand, and agree to comply with the rules governing access to information.

_____ _____

Employee Signature Date

_____ _____

Employee Name (Printed) Employee
Department

I have reviewed this document with the employee and answered all employee questions.

_____ _____

Supervisor or Designated Supervisor or Designee Name
(Printed)
Department Representative Signature

1 The Federal Family Educational Rights and Privacy Act (FERPA) govern the disclosure of information from student records [20 U.S.C. § 1232g]. Health information is governed by and protected by state and federal statutes including the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and Public Health Law §18. The Gramm-Leach-Bliley Act (GLBA) protects financial information. Social Security Number disclosure is governed by the Federal Privacy Act of 1974 and NC State law, which tracks the Federal Privacy Act and limits the collection and use of social security numbers by colleges/universities.

Approved January 19, 2018

Board of Trustees Policy Number:	Date of Adoption/Revision:
IT 13.07	January 19, 2018

SUBJECT	Remote Access to Administrative Systems
AUTHORITY	Information Technology
APPLICABILITY	This policy is applicable to any Administrative System Software or Database
PURPOSE	Defines the appropriate security measures required for authorized users to connect remotely to the College's administrative systems from networks not controlled by the College.

POLICY	Access to College administrative systems and data from networks not controlled by the College. Access is restricted to a prescribed multilayer security strategy to defend against malicious attacks, unauthorized access to administrative systems and data, and potential compromise of the remote access device. There will be no other means of remote access to administrative systems.
PROCEDURES	**Multi-layer Security Strategy** Remote access to the College's administrative systems must comply with the following requirements: • A device owned by the College must be configure in a secure environment, including installation and support of the appropriate VPN software, and token key generator software or hardware token. • A personally owned device must be securely configured, including installation of the appropriate VPN software and utilize a hardware token. • Device configuration, regardless of ownership, must comply with university's recommended procedures for anti-virus, anti-spyware, firewall and vendor security updates. The College should include software with the ability to "scrub" remotely the device if lost or stolen. • Authorized individuals using two-factor authentication must use the appropriate VPN software exclusively to authenticate sessions to College administrative systems and data. **WARNING**: When you use your personally owned device to access, the College's administrative systems you accept the risk that your device may be required as part of a legal investigation.

	BACKGROUND Access to college's administrative systems through non-college networks possess substantial risks to confidential and restricted college data, and to personal information accessible via those administrative systems. The internet is by design an open and insecure suite of protocols that provide opportunity for surreptitious and malicious activities by interlopers. Applying appropriate workstation configuration procedures and standards, and implementing multi-layer security controls will better protect college administrative systems from hackers. Accordingly, two-factor authentication for authorized users is necessary is to ensure data stream encryption for sessions through the Internet.

Replaces policy: *Date*

Board of Trustees Policy Number: IT 13.08 **Date of Adoption/Revision: 10-10-14**

SUBJECT	**BENNETT COLLEGE WEBSITE**
AUTHORITY	Information Technology Department
APPLICABILITY	These policies apply to the Board of Trustees, administration, faculty, staff, students and anyone using the information technology resources of Bennett College.
PURPOSE	This policy is to authorize the official College website.

POLICY	Bennett College will maintain one website to represent the institution. ***Definition of the Bennett College Website:*** a collection of web pages that represent the College as a whole, and that promotes its brand and displays it logo. Categories of information presented on the website include but is not limited to academics, campus life, admissions, alumni, parents and donations. All information placed on the website must adhere to published style guide standards.
PROCEDURES	1. Bennett College will comply with W3C guidelines for Web accessibility. a. ***World Wide Web:*** The Information Technology department will be responsible for ongoing development and maintenance of the website 24 hours a day, 7 days a week, except for server or network maintenance and repair. b. ***Department Websites***: Department are responsible for maintaining the content of their web pages on the Bennett website. Only preapproved, authorized individuals may create pages and place information on the Bennett College Website. Requests to link department websites to the Bennett College official website must be approved by IT. c. ***Instructional Websites***: Pages created by Bennett faculty in support of courses they teach must be preapproved. d. ***Organization Websites***: organization websites are allowed for recognized student organizations and associations. If the group does not operate through Campus Life and Student Activities, no website is allowed. The Student Government Association and the Vice President for Student Affairs must monitor the content of the websites. e. ***Personal and Student Websites***: No individual will be allowed a personal website on the College Website f. ***Links on the Bennett College Website***: The institution will only include links with organizations whose aims and activities are consistent with the mission and vision of Bennett College. The College will not link to websites of commercial organizations, unless

	we have a commercial relationship with that company. The College does not accept advertising on the site, nor does it charge a fee for including a link on the website. Department/unit heads are responsible for authorizing links. Links may not contain commercial endorsements or advertisements. Links to dot.com websites are discouraged. The Office of Public Relations/Publications and the Department of Information Technology retain the right to determine how and where external links will appear on the Bennett College website. Every unit and every individual is responsible for adhering to these policies.

Replaces policy: *Date*

Bennett
COLLEGE

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