COMPLIANCE STATEMENTS

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964
Section 100.3 of the Department of Education's Regulation (34 CFR) effectuating Title VI of the Civil Rights Act of 1964 requires that no person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program receiving Federal financial Assistance.

TITLE IX OF THE EDUCATION AMENDMENTS OF 1972
Section 901 of Title IX provides that no person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.

Title IX of the Education Amendments of 1972, as amended, is designed to eliminate (with certain exceptions) discrimination on the basis of sex in any education program or activity receiving Federal financial assistance, whether or not such program or activity is offered or sponsored by an educational institution as defined in part 106. Part 106 of 34 CFR, which effectuates Title IX, became effective on July 21, 1975.

SECTION 504 OF THE REHABILITATION ACT OF 1973
“No otherwise qualified individual with a disability in the United States shall, solely by reason of her or his disability, as defined in section 706(8) of this title, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance...” (29 U.S.C. §794[b]).

Part 104 of 34 CFR effectuates Section 504 of the Rehabilitation Act of 1973 which is designed to eliminate discrimination on the basis of disability. On October 29, 1992, the Rehabilitation Act Amendments of 1992 had three significant consequences relative to Section 504: 1) the term “disability” replaced the term handicap, (2) certain conditions were explicitly excluded from the definition of disability, and (3) complaints alleging employment discrimination under Section 504 were to be judged by the standards of Title I of the Americans with Disabilities Act (ADA). 04/08/93

STATEMENT OF COMPLIANCE WITH FEDERAL AND STATE LAW
Wayne County Community College District (WCCCD), pursuant to the requirements of Titles VI and VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, the Vietnam-Era Veterans Readjustment Act of 1974, the Elliot-Larsen Civil Rights Act, Executive Order 11246, and Title II of the Americans for Disabilities Act (ADA), complies with all Federal and State laws and regulations prohibiting discrimination and with all requirements and regulations of the U.S. Department of Education.

It is the policy of WCCCD that no person, on the basis of race, color, religion, national origin, age, sex, height, weight, marital status, disability, or political affiliation or belief, shall be discriminated against, excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination in employment or in any program or activity for which it is responsible or for which it receives financial assistance from the U.S. Department of Education. (Policy adopted by the Wayne County Community College District Board of Trustees 7/28/93, revised 7/6/94.)

NOTICE OF NONDISCRIMINATION POLICY
Any questions concerning Title IX of the Education Amendments of 1972, which prohibits discrimination on the basis of sex, or inquiries related to Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination on the basis of disability, and inquiries related to Title II of the Americans with Disabilities Act (ADA), which provides comprehensive civil rights protection for individuals with disabilities, or the College's Statement of Compliance with Federal and State law, should be directed to Mark Sanford, Wayne County Community College, 801 W. Fort, Detroit, MI 48226 or by calling 313-496-2765.

DRUG-FREE WORKPLACE POLICY
Wayne County Community College District will make every effort to provide a drug-free workplace and environment. The College expressly prohibits the unlawful manufacture, distribution, dispensation, possession, or use of any controlled substance in the workplace. The term “controlled substance” shall mean a controlled substance in schedules I through V, of Section 202 of the Controlled Substance Act (21 U.S.C. 812).

Any individual found to be in violation of this policy is engaged in gross misconduct and subject to disciplinary action, up to and including termination.
All employees will, as a condition of their employment, abide by the terms in this policy. In addition, employees engaged in the performance of a federal grant or contract will notify their supervisor and/or personnel department of any criminal drug statute conviction occurring in the workplace no later than five (5) days after such conviction. (Policy adopted by the Wayne County Community College District Board of Trustees 06/28/89, revised 09/23/92)

**SMOKE-FREE WORKPLACE POLICY**
Wayne County Community College District and its facilities are smoke-free in compliance with the Michigan Clean-Air Act of Smoke-Free Workplaces. (Policy adopted by the Wayne County Community College District Board of Trustees 05/26/93)

**WORKPLACE VIOLENCE**
It shall be the policy of the Board of Trustees that the College will provide a safe environment for its employees. Threats, threatening behavior, or acts of violence against employees, visitors, guests, or other individuals by anyone on Wayne County Community College District’s property will not be tolerated. Violations of this policy will lead to disciplinary action which may include dismissal, arrest and prosecution.

Any person who makes substantial threats, exhibits threatening behavior, or engages in violent acts on Wayne County Community College District property shall be removed from the premises as quickly as safety permits, and shall remain off Wayne County Community College District premises pending the outcome of an investigation. Wayne County Community College District will initiate a decisive and appropriate response. This response may include, but is not limited to, suspension and/or termination of employment, and/or seeking arrest and prosecution of the person or persons involved.

In carrying out this policy, it is essential that all personnel understand that no existing College policy, practice or procedure shall be interpreted to prohibit decisions designed to prevent a threat from being carried out, a violent act from occurring or a life threatening situation from developing.

All College personnel are responsible for notifying the designated management representative of any threats which they have witnessed, received, or have been told that another person has witnessed or received. Even without an actual threat, personnel should also report any behavior they have witnessed which they regard as threatening or violent when that behavior is job-related or might be carried out on a College-controlled site, or is connected to College employment. Employees are responsible for making this report regardless of the relationship behavior between the individuals who initiated the threat or threatening behavior and the person or persons who were threatened or were the focus of the threatening behavior.

This policy also requires all individuals who apply for, or obtain a protective or restraining order which lists College locations as being protected areas, to provide to the designated management representative a copy of the petition and declarations used to seek the order, a copy of any temporary protective or restraining order which is granted, and a copy of any protective or restraining order which is made permanent. The designated management representative for central administration shall be the Director of Human Resources and the Provost for each campus. (approved: 3/27/96)

**GRIEVANCE PROCEDURES**
Title VI of the Civil Rights Act of 1964
Title IX of the Education Amendment of 1972
Section 504 of the Rehabilitation Act of 1973

If any student believes that Wayne County Community College District or any part of the school organization has not applied the principles and/or regulations of (1) Title VI of the Civil Rights Act of 1964 (2) Title IX of the Education Amendment of 1972, (3) Section 504 of the Rehabilitation Act of 1973, the student may bring forward a complaint, (which shall be referred to as a grievance through this text) to the local Equal Opportunity Compliance Coordinator at the following address:

Director of Human Resources
Wayne County Community College District
Human Resources Department
801 W. Fort Street
Detroit, MI 48226

The appropriate grievance procedures must be followed by the student in order for his/her complaint to be thoroughly reviewed for merit: The grievance procedures (steps) are outlined below.

Grievance Procedure:
The person who believes he/she has a valid basis for a grievance shall discuss the grievance informally on a verbal basis with the Equal Opportunity Compliance Coordinator, who shall in turn investigate the complaint and reply with an answer to the grievant.

The student may begin formal procedures according to the following steps.

Step 1
A written statement of the grievance signed by the student shall be submitted to the Equal Opportunity Compliance Coordinator written five (5) business days of receipt of the answers to the informal grievance.
The coordinator shall further investigate the matters of grievance and reply in writing to the student within five (5) business days.

Any complaint submitted under this procedure shall be filed at Step 1 within twenty (20) business days after the student became aware, or reasonably should have become aware of the complaint. If the complaint is not served within that time, the complaint will not be considered. Failure by the student to appeal the complaint from Step 1 to Step 2 within the time limit procedure shall also nullify the complaint.

Step 2
If the student wishes to appeal the decision of the Equal Opportunity Compliance Coordinator, the student may submit an appeal to the President of the College within five (5) business days after receipt of the Coordinator’s response. The president (or his designee) shall meet with all parties involved within (10) ten business days to formulate a conclusion, and response in writing to the student within ten (10) business days.

Step 3
If at this point the grievance has not been satisfactorily settled further appeal may be made to the Office of Civil Rights, Department of Education, Washington, D.C. 20201.

Any complaint submitted under this procedure shall be filed at Step 1 within twenty (20) business days after the student became aware, or reasonably should have become aware of the complaint. If the complaint is not served within that time, the complaint will not be considered. Failure by the student to appeal the complaint from Step 1 to Step 2 within the time limit procedure shall also nullify the complaint.

**SEXUAL HARASSMENT POLICY**

Sexual harassment is an infringement on an employee’s right to work and a student’s right to learn in an environment free from unlawful sexual pressure. It is the policy of Wayne County Community College District to prohibit unlawful sexual harassment of employees and students.

Sexual harassment consists of overt activity of a sexual nature, which has a substantial adverse effect on a person in both the workplace and in the academic setting. It may include, but is not limited to, the following:

1. Demands for sexual favors accompanied by threats concerning an individual's employment or academic status;
2. Demands for sexual favors accompanied by promises of preferential treatment concerning an individual's employment or academic status;
3. Verbal, written or graphic communication of a sexual nature;
4. Patting, pinching, or other unnecessary body contact with another employee or student.

Any employee or student should report, in writing or orally, any and all incidents of such activity. Complaints may be directed to the employee’s supervisor or the Director of Human Resources. Student complainants should report, in writing, or orally, any and all incidents to the appropriate Campus Provost.

There will be no retaliation against an employee or student for making a complaint or taking part in the investigation of a complaint under this policy. To the extent it can, the College will keep matters confidential. The Director of Human Resources shall promptly investigate all incidents of sexual harassment and direct a report with recommendations to the Board of Trustees following the report of an employee. The Campus Provost shall promptly investigate all incidents of sexual harassment and direct a report with recommendations to the Vice President for Educational Affairs following the report of a student. Violation of this policy shall subject the offending party to appropriate disciplinary action up to and including discharge from employment. (Policy adopted by the Wayne County Community College District Board of Trustees 03/25/87, revised 03/27/91, 03/25/92)

**CLERY ACT**

In compliance with the Student Right-to-Know and Campus Security Act enacted Nov. 8, 1990, later formally renamed the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, and commonly referred to as simply the Clery Act. The Wayne County Community College District Campus Safety Department collects and publishes specific information on campus crime statistics, security policies and services. The WCCCD Campus Safety Department is service-oriented, trained in professional standards and dedicated to the safety and comfort of our students, faculty, staff and visitors. Our primary concern is to protect life and property and to allow the educational process to evolve safely.

All criminal incidents and emergency situations are to be immediately reported to the campus safety officer located at the security station at each of the District’s campus facilities. Depending on the nature of the situation, appropriate police authorities will be contacted. Incident reports are prepared and reviewed by District administrative personnel, and, if warranted, further actions are taken as governed by law, employee labor contracts, and student conduct policies. All staff, faculty, students, and visitors are encouraged to report any suspicious persons, activities, events, as well as actual incidents and emergency situations to the District security personnel immediately.