

# Student Consumer Handbook

## 2023-2024



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## MESSAGE FROM THE PRESIDENT

Dear Columbia, Central University student:

The decision about which institution to choose to study a profession in is a very serious one, as it not only impacts your potential employment, but your future as well. Today, more than ever, the economy in which we live places great professional demands on us. Change and adaptation to change are the key to success.

Aware of this reality and the seriousness of the decision, Columbia Central University (CCU) has a very clear mission: To transform and develop individuals for their success. This is what we have done, for nearly six decades, for thousands of students who have entrusted us with their professional preparation. CCU's curricula have been developed based on the needs of the industry, taking into consideration the input of employers, who, upon completion of their professional career, will be able to offer you employment opportunities. In the following pages, you will find a detailed description of these study programs. At the same time, the academic, student and administrative services offered by our university are presented.

The staff at CCU's main function is to help you achieve your professional career. They are at your disposal to answer your questions and provide you with a high-quality service. We look forward to the opportunity to serve you.

We wish you every success in your studies and career goals.

Respectfully,

José A. Córdova, CPA  
Presidente & CEO

## PROTECTION OF STUDENT PRIVACY POLICY (FERPA LAW)

Columbia Central University (CCU) according to the Family Educational Rights and Privacy Act, FERPA (1974 as amended) adopts the following privacy policy for active or inactive student records.

### **Applicability**

This policy applies to any student who is enrolled or has been enrolled in a university program.

### **Definitions**

**Student** - Refers to a person who is enrolled in or has been enrolled in CCU. This excludes applicants who did not in our institution.

**Educational record** - Includes those records that may contain information directly related to the student and that are used as work records by the university. The following are not educational records:

- Records about the student made by professors and administrators for their use and not shown to others (includes disciplinary records).
- Employment records, except where a currently enrolled student is employed because of his/her status as a student. (e.g. work-study or student intern).
- Records related to the activities of the person when he/she is no longer a student at the university.

### **FERPA - "Family Educational Rights and Privacy Act"**

Those practices regarding the use and handling of the personal information that you share with us and your rights over it are detailed below.

Annually, as necessary, or as required by law or regulation, we will notify you of our Protection of Student Privacy Policy (FERPA).

The policy allows students to inspect their educational records and limits the disclosure to others of personal information from educational records without the student's prior written consent. Provides the student the opportunity to request that educational records be corrected where appropriate.

### **How and What Information Do We Collect?**

CCU collects the following information from various sources namely:

- Through admission requests, "leads", or other forms
- By referrals from acquaintances
- Letters of recommendation, references, and others
- The College Board Office
- The student's academic progress
- Student behavior in college
- The financial condition, or that of their parents, provided through financial aid applications.
- Study costs, financial transactions such as account balances, payment history, payroll, financial aid.
- From the job you get during or after studying with us

### **Who Do We Share the Information With?**

Only the aforementioned information is shared with those people related to the university who have the right and/or need to know it.

CCU does not share personal information with third parties, except those permitted by law, especially by the FERPA Act. Third parties are people, companies, or organizations that are not part of our university.

### **Security Measures Implemented to Ensure the Protection of Information**

CCU limits access to your information only to those employees who need it to carry out their legitimate functions, or who need access to it to comply with federal and local regulations in the education industry. Our employees have been duly instructed not to violate the privacy rights of our students.

We also maintain the physical and electronic security measures necessary to safeguard the confidentiality of the information, as required by law and this policy.

### **Student's Right to Access Their Information**

All students have the right to access their educational records, except those records that contain financial information of their parents and confidential letters of recommendation received before January 1, 1975. Also, parents whose child is a dependent claimed on the income tax return.

### **Relinquishment of Rights**

A student may relinquish their right of access to confidential referrals in three areas: admissions to any educational institution, job placement, and receipt of honors and awards. The university will not require such a waiver of the right as a condition for admission or to receive any service

or benefit normally provided to students. If the student chooses to relinquish the right of access, they will be notified, when required, of the names of all the people who make the confidential recommendations. Such recommendations will be used only for the purpose for which they were specifically given. A waiver of the right can be revoked in writing, at any time, and the revocation will apply to all subsequent recommendations.

### **Procedures to Follow**

Access requests specifying the file to be inspected must be made in writing to the Registrar. The university will show only the specific file requested. The university will comply with the request within a reasonable time, at most within 45 days of receiving the request. In a usual case, arrangements will be made for the student to read his/her file in the presence of a university employee. A student can also obtain copies of their record by paying the reproduction costs. However, the university will not provide copies of official credit transcripts received from other institutions or schools.

It is part of this policy to limit the disclosure of personally identifiable information from education records without the student's consent.

### **Directory of Information**

The following items of credential information have been designated as a directory of information:

- Name
- Address
- Phone numbers
- Email
- Syllabus
- Student number
- Type of student
- Academic charge
- Participation in officially recognized activities and sports
- Dates attended at the University
- Degrees and awards conferred
- Educational institutions previously attended

CCU will provide students with an annual public notice of the categories of information and will allow a reasonable time after such notice for the student to inform the university that this information should not be used as information in a directory.

Directory of Information may appear in public documents and may be disclosed without the student's consent unless the student objects as provided in the previous paragraph.

## **When No Prior Consent is Required**

Prior student consent will not be required to release education records to the following persons or entities:

1. To university officials who have been determined to have a legitimate educational interest.
  - "University officials", includes teaching and administrative personnel, who are or may be in a position to use the information to support a legitimate educational objective.
  - "Legitimate educational interest" includes those interests directly related to the academic environment.
2. Officials of other institutions in which the student is interested in enrolling or is enrolled. As required, and at their own expense, the student will be provided with a copy of the records that have been transferred.
3. Authorized representatives of the US Comptroller General, the Federal Secretary of Education, the US Commissioner of Education, the US Assistant Secretary of Education, and state educational authorities, but only in connection with audits or evaluations of federally supported educational programs or complying with federal requirements regarding these programs. These officials will protect the information received in such a way that the student's identification will not be available to outsiders and the information must be destroyed when the aforementioned purposes are met.
4. In connection with a student's application for or receipt of financial aid, but only to the extent necessary for purposes such as: determining eligibility, amount, conditions, and enforcing the terms and conditions of the aid.
5. State officials for whom such information is required to be reported by law that was adopted before November 19, 1974.
6. Organizations conduct educational studies to develop, validate, or administrate predictive tests, administer financial aid programs for students, and improve education. Studies must be conducted in such a way that the student's identification will not be available to outsiders and the information must be destroyed when the aforementioned purposes are met.
7. Accrediting organizations for purposes related to their functions.
8. To parents of dependent students.
9. To appropriate parties in connection with an emergency where knowledge of the information is necessary to protect the health or safety of a student or other individuals.
10. In response to a court order or "subpoena". The university will use reasonable efforts to notify the student before complying with said order.

## **When Prior Consent is Required**

In all other cases, the university will not disclose personally identifiable information maintained in educational records or allow access to those records without the prior consent of the student. Unless such disclosure is to the student himself/herself, the consent must be in writing, signed,



and dated and must specify the record or information to be disclosed and the identity of who will receive the information or record. A copy of the record or information disclosed will be given to the student, if requested, at his/her expense.

### **Disclosure of Records**

The university will keep evidence of the request in the student's file for its disclosure, except for disclosures made to the same student, disclosures made at the written request of the same student, disclosures to the university's administrative or teaching staff, or directory of information disclosures.

The disclosure record may be inspected by the student, the records custodian (registrar or designee), other universities, or government officials.

### **Request to Amend the Records**

A student who believes that the information contained in his/her educational record is incorrect, mistaken, or in violation of privacy and other rights may submit a request in writing to the University Registrar, specifying the document(s) that are being objected to and the bases for said complaint. Within ten (10) business days from the date of receipt of the request, the university will decide whether to amend the records under the request. If the decision is to reject the amendment, the student will be notified and advised of the amendment's right to a hearing.

### **Right to a Hearing**

At the request of the student, the university will provide an opportunity for a hearing to challenge the content of the student's records. The request for a hearing must be made in writing and submitted to the Registrar. Within ten (10) days from the date of the request, the student will be notified in writing of the date, place, and time with a reasonable time for the hearing.

### **Hearing Process**

The hearing will be conducted by a university official who has no direct interest in the outcome of the hearing; the officer will be appointed by the campus chancellor. The student will have a fair and full opportunity to present evidence relevant to the arguments raised and may be assisted or represented by individuals selected by him/her, at his/her own expense, including an attorney. The officer conducting the hearing, after having considered all the relevant information, will make a recommendation to the University Registrar. Within five (5) business days after the completion of the hearing, the university will notify the student in writing of its decision. The decision will be based exclusively on the evidence presented at the hearing and will include a summary of that evidence and the reasons for the decision. If the university decides that the information in the student's record is incorrect or in violation of privacy or other rights, those records will be corrected; as necessary.

## **Right to Put an Explanation in the Records**

If as a result of the hearing, the university decides that the information is not incorrect or in violation of the privacy or other student's rights, the university will inform the student of his/her right to place in his/her file a statement commenting on the information and/or explaining the reasons for disagreeing with the college's decision. That explanation will be kept in the student's record while the disputed portion of the record is maintained in the student's record and will be released when the disputed portion of the record is released.

## **INFORMATION SECURITY POLICY**

### **Introduction**

Columbia Central University (CCU), as a measure to protect, manage, and conserve the information of our students and employees establishes the following internal safeguards in this program, since their privacy is most important to us,

### **Legal Base**

The Information Security Program is based on compliance with different state and federal laws. These are the Protection of Student Privacy Policy (FERPA Law), Policy to Prohibit the Use and Disclosure of the Social Security Number (Law 186), and our Acceptable Use of Technology Policy, all of which are published in the Student Consumer Manual and on the website [www.columbiacentral.edu](http://www.columbiacentral.edu), Student section, Publications.

### **Applicability**

This institutional program applies to CCU teaching and non-teaching staff, both full-time and part-time, professionals, and contractors. The program is a condition of employment and hiring with CCU.

### **Administrative Security**

Every employee is responsible for making good use of and handling of the personal information of our students, in addition to establishing his/her security measures to safeguard the confidentiality and integrity of the information he/she handles. Every employee becomes the custodian of the documents entrusted to him/her to avoid loss, alteration, and destruction.

The information that is linked or paired with other agencies such as Selective Service, Veterans Administration, Social Security, and the National Student Loan Data System (NSLDS), among others, will be made to help our students and this information is private.

## **Physical Security**

The Registrar and Financial Aid offices are custodians of active and inactive student records. These files contain various documents, such as application and admission documents, enrollments, withdrawals, and any other documents necessary until the degree is awarded. The files are archived in locked vaults, and the credit transcripts are in fireproof files in the vault and with a suppression system. Currently, the transcripts are in the Student Information System. Transcripts are for life.

The Registrar's Office will keep the records for no less than seven (7) years, starting from the last official academic activity. The Financial Aid files will remain in the vault for six (6) years from the last year of studies. After this, they will be destroyed according to the Federal Student Aid Handbook.

As a security measure, computer screens will not be exposed to the view of those who visit the offices and the student's information should not be left on the screen, that is, accounts, grades, scholarships, etc., or otherwise, the computer will a screensaver with a password.

An employee, before leaving the office, must take security measures with the student documents on his/her desk, such as storing these documents in drawers or closing the door and turning off the office light. If a work-study student is helping in the office, he/she will sign a non-disclosure of information commitment before being employed.

Similarly, all personnel who have access to student information, including employees and faculty, will ensure the privacy that this entails; making the best use of it and will not use or leave screens open to other unauthorized people. If there is an employee or faculty member suspicious of misusing the information, this must be notified to the Chancellor to proceed accordingly.

## **Technical Security**

The information in the Student Information System will be maintained and stored through backups carried out daily. Some of our systems are automatically backed up in Microsoft Azure ("cloud") and others on magnetic tapes that are stored in vaults outside our facilities. In the event of a disaster, attack, intrusion, or system failure, technical staff will reinstall the system (after repairing or replacing servers if necessary) using the most recent backup. As a security measure, access to our Computer Center, where the servers are located, is controlled with a password system that will be administered by the Director of Technology and he/she will coordinate access to the technical personnel who legitimately work with them. Security passwords on computers and student information systems will change every ninety (90) days.

# COMMUNICATION AND OPEN DOORS POLICY

## Introduction

Columbia Central University (CCU) understands that open communication is essential to maintain an environment where good relationships are fostered among all members of the university community. To this end, CCU has a Communication and Open Door Policy, the purpose of which is to support an open environment where staff and students can have open communication with designated staff to communicate any concerns or questions related to the service area, academic area, or labor aspects. All CCU offices are open for communication and dialogue.

## Applicability

This policy applies to all students enrolled in our university, faculty, and employees in general.

## Students

If you feel the need to present any doubt, complaint, or question during your studies, please contact your professor (if it is related to a particular course). In the absence of the professor, the concern will be addressed to the Director or Academic Coordinator, or in his/her absence, to the Dean or Coordinator of Academic Affairs, or in his/her absence to the Chancellor.

## Faculty and Employees in General

1. If you feel the need to raise a concern, complaint, or question in the course of your employment, please contact your immediate supervisor.
2. In the case of campus employees, if their situation cannot be addressed satisfactorily or is one that you prefer not to discuss with your immediate supervisor or within your department, you may contact the Chancellor. He/she will counsel and advise you on a variety of issues, as well as clarify questions regarding institutional policies. The Chancellor will coordinate with the corresponding areas to clarify or solve the matters brought to his/her attention. In addition, any CCU employee can request a meeting with the corresponding administrative staff (Human Resources Director, Vice Presidents, President, and/or CEO) at the Central Office for any issue not resolved in their department and related to the area of their competence.
3. If the employee requires the intervention of the Human Resources Office, they will refer it to this office to who will deal with the situation.
4. In the case of Central Office employees, if your situation cannot be addressed satisfactorily or is one that you prefer not to discuss with your immediate supervisor, you may contact the Human Resources Office.

# INSTITUTIONAL POLICY ON THE ILLEGAL USE AND ABUSE OF DRUGS, ALCOHOL, AND TOBACCO

## **Introduction**

Columbia Central University (CCU), aware of its responsibility to promote a work and study environment free of health and safety risks, establishes this Institutional Policy on the Illegal Use and Abuse of Drugs, Alcohol, and Tobacco.

## **Legal Base**

The Policy is defined under the following state and federal laws or regulations: Public Law 101-226, known as Drug-Free Schools and Communities, Public Law 101-690, Free Workplace of the 1988 Drug-Free Workplace, the Controlled Substances Abuse Act of 1971, and Act # 66 of March 2007 known as the "Act to Regulate the Practice of Smoking in Public Places."

## **Applicability**

This policy applies to any employee, student, visitor, contractor, supplier, or concessionaries.

## **General Disposition**

CCU establishes that no member of the university community will be involved in the illegal use, possession, manufacture, sale, or transfer of drugs within CCU facilities or educational activities outside the university and/or practice settings.

Additionally, alcohol consumption is prohibited inside the university. Only moderate consumption of alcoholic beverages by adults will be allowed in activities sponsored by the university that take place outside of the campus.

On the other hand, smoking is prohibited within the university campus, as established by law. This includes, but is not limited to classrooms, function rooms, library, hallways, cafeteria, restrooms, institutional vehicles, parking lots, squares, entrances, and any other common area. Additionally, the use of electronic cigarettes in the university is prohibited.

CCU is committed to guiding and educating the members of the university on the consequences of the illegal use and abuse of drugs, alcohol, and smoking in the work and educational environment.

## Definitions

1. Alcohol or alcoholic beverage  
Any beverage for human consumption that contains alcohol, whether produced by fermentation or distillation and whose manufacture, supply, sale, or use is regulated by the Puerto Rico Beverage Law, Act No. 143 of June 30, 1969, as amended.
2. Drugs or controlled substances  
Any illegal substance described in Article 202 of the Puerto Rico Controlled Substances Act, Act No. 4 of June 23, 1971, as amended and as amended, 24 LPRA 2101 and following, whose manufacture, supply, sale, possession, or use is illegal under the provisions of said law.
3. Smoking  
Smoking is the action of inhaling through the mouth the smoke produced by the combustion of an element, generally tobacco contained in a cigarette, cigar, or pipe.

## Impact of Drug, Alcohol, and Tobacco Abuse

The abuse of drugs and alcohol affects the physical and mental health of human beings, causing adverse effects on behavior, emotional, and social appearance. Drug dependence is related to diseases and health conditions such as pulmonary, cardiovascular, cancer, and mental disorders, among others. Some conditions that alcohol abuse can cause are damage to the nervous system, liver, causing "delirium tremens", and depression. Smoking can impact the central nervous system, causing heart and respiratory diseases and cancer, among other conditions. Smoking, especially cigarettes that contain many toxic substances such as nicotine or tar, is recognized as detrimental to health. This effect is involved in various diseases, especially respiratory and cardiac, which can cause the death of smokers.

Drug	Effects	Risk
<b>Alcohol</b> (legal)	Stimulant (low dose) Depressor <i>Disinhibition</i> <i>Euphoria</i>	<ul style="list-style-type: none"> <li>• Affects attention and coordination</li> <li>• Causes digestive disorders and cardiovascular diseases.</li> <li>• Withdrawal syndrome can be very serious, and can cause a so-called "delirium tremens".</li> <li>• It can cause risks in driving vehicles and sexual relations.</li> <li>• Increases the risk of suffering an occupational accident.</li> </ul>
<b>Anfetaminas/speed</b> (illegal)	Stimulating <i>Excitement</i> <i>Euphoria</i>	<ul style="list-style-type: none"> <li>• They can cause physical disorders (cardiovascular, liver complications,</li> </ul>

Drug	Effects	Risk
	<i>Decreased feeling of fatigue</i>	hyperthermia, etc.) and psychiatric (mood disorders, paranoia, hallucinations). <ul style="list-style-type: none"> <li>• They generate a strong addiction.</li> </ul>
<b>Hallucinogenic mushrooms</b> (illegal)	Hallucinogen <i>In low doses, laughter and mild alteration of perception.</i>  <i>In high doses, modification of the state of consciousness and "psychedelic trip".</i>	<ul style="list-style-type: none"> <li>• They can cause paranoia and anxiety.</li> <li>• Risk of experiencing a bad trip (loss of control of emotions, anxiety, panic).</li> <li>• Risk of experiencing revival (flashbacks: suffering some effects again after some time of the last consumption).</li> <li>• They can lead to mental health problems.</li> <li>• It can cause risks in driving vehicles and sexual relations.</li> </ul>
<b>Cocaine</b> (illegal)	Stimulating  <i>Euphoria</i>  <i>Decreased fatigue</i>  <i>Self-confidence</i>	<ul style="list-style-type: none"> <li>• In some people, it can cause anxiety and paranoia.</li> <li>• It can cause cardiovascular disorders, such as heart attacks and brain hemorrhage.</li> <li>• It can cause risks in driving vehicles and sexual relations.</li> <li>• It increases the risk of suffering a work accident.</li> <li>• Generates a quick addiction.</li> </ul>
<b>Cannabis</b> (illegal)	Depressor Hallucinogenic (some types of marijuana) <i>Laugh</i>  <i>Stimulation of creativity</i>  <i>Intensification of sensations</i>  <i>Relaxation</i>	<ul style="list-style-type: none"> <li>• Affects attention and coordination.</li> <li>• Affects memory and school learning capacity. It generates performance problems.</li> <li>• The risk of suffering a traffic or work accident increases.</li> <li>• Causes voltage drops.</li> <li>• Intense experiences can be lived negatively (paranoia, anxiety attacks).</li> <li>• Consumption is often associated with tobacco, in the long term it can increase the risk of respiratory and cardiovascular problems, and various forms of cancer.</li> </ul>
<b>Heroin</b> (illegal)	Depressor  <i>Euphoria</i>	<ul style="list-style-type: none"> <li>• The risk of transmitting infectious diseases (viral hepatitis, tuberculosis, HIV/AIDS) increases when consumer utensils are shared or reused.</li> </ul>

Drug	Effects	Risk
	<p><i>Pleasure</i></p> <p><i>Relaxation</i></p> <p><i>Welfare</i></p>	<ul style="list-style-type: none"> <li>• May cause overdose.</li> <li>• The interruption of consumption causes the appearance of a strong withdrawal syndrome.</li> <li>• It can cause risks in driving vehicles and sexual relations.</li> <li>• Generates a quick addiction.</li> </ul>
<p><b>Inhalants</b> (legal)</p>	<p>Stimulants (low doses) <i>Euphoria and disinhibition</i></p> <p>Depressants <i>Moderates how the central nervous system works.</i></p>	<ul style="list-style-type: none"> <li>• They increase the risk of suffering important physical disorders (liver, lung, neurological, circulatory, etc.) and mental (hallucinations, aggressive behaviors, delusions, etc.).</li> <li>• They generate a quick addiction.</li> </ul>
<p><b>Ketamine</b> (illegal)</p>	<p>Dissociative hallucinogen</p> <p><i>In low doses, a feeling of drunkenness and imbalance.</i></p> <p><i>In high doses, derealization (strong hallucination due to dissociative effects, body-mind separation).</i></p>	<ul style="list-style-type: none"> <li>• Involuntary eye movements, tremors, agitation, and stiffness may appear.</li> <li>• Mental health problems (anxiety, depression, paranoia).</li> <li>• Insensitivity to pain and numbness.</li> <li>• Risks in driving vehicles and sexual relations.</li> </ul>
<p><b>LSD</b> (illegal)</p>	<p>Hallucinogen</p> <p><i>In low doses, laughter and mild alteration of perception.</i></p> <p><i>In high doses, modification of the state of consciousness and psychedelic trip.</i></p>	<ul style="list-style-type: none"> <li>• May cause paranoia and anxiety.</li> <li>• Risk of experiencing a bad trip (loss of control of emotions, anxiety, panic).</li> <li>• Risk of experiencing revival (suffering some effects again after some time of the last consumption).</li> <li>• It can lead to mental health problems.</li> <li>• It can cause risks in driving vehicles and sexual relations.</li> </ul>
<p><b>Psychopharmaceuticals</b> (legal)</p>	<p>Depending on the dose and type of drug, they can act as anxiolytics (anxiety reduction) or hypnotics (sleep</p>	<ul style="list-style-type: none"> <li>• In high doses, they can cause drowsiness, memory deficits, or lack of motor coordination.</li> <li>• In very high doses, combined with other depressants (alcohol, for example), they</li> </ul>



Drug	Effects	Risk
	induction).	<p>can cause a serious decrease in the ability to react, a reduction in the rate of breathing (respiratory depression), and even coma or death.</p> <ul style="list-style-type: none"> <li>The use without medical supervision for a long time can induce the appearance of tolerance and dependence. These medications can help you feel better, but it is necessary to use them with medical supervision.</li> </ul>
<b>Tabacco</b> (legal)	Stimulants	<ul style="list-style-type: none"> <li>Increases the risk of cancer and cardiovascular and respiratory diseases, among many others.</li> <li>Decreases resistance in physical exercise, it alters the senses of taste and smell; causes premature aging of the skin, and stains the teeth and the skin of the hands and face.</li> <li>Generates a quick addiction.</li> </ul>
<b>Ecstasy (MDMA)</b> (illegal)	Stimulating <i>Desire to dance</i> <i>Connection with oneself, the music, and the people around.</i>	<ul style="list-style-type: none"> <li>The risk of heatstroke (increased body temperature) increases when accompanied by prolonged physical activity, such as dancing.</li> <li>As the consumer does not know its composition, it has more risks with the dosage.</li> <li>It can cause risks in driving vehicles and sexual relations.</li> </ul>

**Information on table retrieved from:**

[http://drogues.gencat.cat/es/ciudadania/sobre\\_les\\_drogues/taula\\_de\\_resum/](http://drogues.gencat.cat/es/ciudadania/sobre_les_drogues/taula_de_resum/)

**Additional information in the following internet links:**

**Substance Abuse and Mental Health Services Administration:**

[www.samhsa.gov](http://www.samhsa.gov)

**Mental Health and Addiction Services Administration:**

<http://www2.pr.gov/agencias/assmca/Pages/default.aspx>

## A. Policy violation

To comply with the Institutional Policy on the Illegal Use and Abuse of Drugs, Alcohol, and Tobacco, CCU will apply disciplinary measures against any employee, student, visitor, contractor, supplier, or contractor who violates this Policy or any other state or federal statute. State and federal statutes include the applicability of sanctions to activities of student organizations and activities sponsored by the university.

These measures may vary according to the severity of the offense and the times in which such behavior is incurred. The measures to be applied to students include a written warning, suspension, or expulsion, or withdrawal, as established in the Student Regulations. Employees may be subject to written warning measures, suspension, or termination of employment, depending on the severity of the offense, as established in the Employee and Faculty Manual. Suppliers, contractors, and contractors may immediately cancel the contractual relationship. Visitors may be prohibited from entering the premises.

If it is determined that a criminal act has been committed, as established by state and federal laws, the case will be referred to the corresponding law enforcement agencies.

### **United States Department of Education - Penalties**

If a student is convicted of a drug offense after receiving federal aid money, the Financial Aid Office must be notified immediately and that student will become ineligible for future financial aid and will be required to repay any aid received after conviction.

If a conviction arises, a student can take advantage of rehabilitation programs that could make them eligible for federal financial aid again.

### **Students Convicted of Drug Possession or Distribution**

A federal or state drug conviction may disqualify a student from receiving federal financial aid funds. Convictions only count if they were for an offense that occurred during an enrollment period for which the student was receiving Title IV aid; they do not count if the offense was not during that period. In addition, a conviction that was reversed, set aside, or removed from the student's record does not count; nor does one received while he/she was a minor unless he/she has been prosecuted as an adult.

The following table illustrates the period of ineligibility for federal financial aid, depending on whether the conviction was for the sale or use of drugs and whether the student had prior offenses. A drug distribution conviction includes convictions for conspiring to sell drugs.

	Possession of illegal drugs	Distribution of illegal drugs
First offense	1 year from date of conviction	2 years from the date of conviction
Second offense	2 years from the date of conviction	Indefinite period
Third+ offenses	Indefinite period	

If the student was convicted of both possession and distribution of illegal drugs and the periods of ineligibility are different, the student will be ineligible for the longest period. A student regains his/her eligibility the day after his/her period of ineligibility ends or when he/she completes a qualified drug rehabilitation program. Future convictions will make you ineligible. It is the student's responsibility to report that he/she has completed the rehabilitation program. Information is taken from the "Federal Student Aid Handbook, Volume 1 - Student Eligibility")

### **Medicinal Cannabis Regulation in PR**

In Puerto Rico, the so-called Regulation 8766 was approved on July 8, 2016, for the use, possession, cultivation, manufacture, manufacture, dispensing, distribution, and research of medicinal cannabis. Said regulation establishes the norms and procedures for the control of the use, possession, cultivation, manufacture, production, manufacture, dispensing, distribution, and research of Medicinal Cannabis and its derived products and medicines; to set the rights to pay for the registration required under the Controlled Substances Law, and to regulate scientific studies related to the use of Medicinal Cannabis carried out by public and private entities.

Regarding the use of cannabis, its use is illegal under federal law. CCU, being a federally funded university, has to enforce federal law; therefore, the use of medical cannabis at the university is illegal. Changes in state laws regarding marijuana or another controlled substance do not negate the applicability of federal laws or statutes.

### **B. Drug, Alcohol, and Tobacco Prevention Program**

As part of its responsibility and in compliance with federal regulation, the Drug, Alcohol, and Tobacco Prevention Program is developed, which is framed in the Institutional Policy on the Illegal Use and Abuse of Drugs, Alcohol, and Tobacco. The program aims to raise awareness and educate the university community about the problem that the use and abuse of drugs, alcohol, and tobacco constitutes for our society. The program will be reviewed every two (2) years or sooner, according to need.

## Goals

1. Annually distribute the Institutional Policy on the Illegal Use and Abuse of Drugs, Alcohol, and Tobacco.
2. Annually distribute informational material to students and employees.
3. Offer educational prevention activities, such as workshops, conferences, educational fairs, booklets, informative material, and orientation, among others.
4. Refer to other professional support services available in the community.
5. Offer individual or group counseling.
6. Promote healthy lifestyles.
7. Hold a biennial every two (2) years to assess and determine the needs of the university community and the effectiveness of the prevention program.

## Means of Dissemination

CCU will be used as a means of dissemination the use of educational materials, brochures, email, and internet pages, among others.

Rehabilitation: The university, committed to its employees and students, will encourage them to seek professional help or treatment to manage any dependency on chemicals and alcohol. Both employees and students will be provided with information on public and private agencies that provide professional help for addiction management.

Agencies, facilities, or organizations that offer mental health, prevention, substance, alcohol, and employee assistance program services:

1. Department Against Addiction Services  
<http://www2.pr.gov/agencias/assmca/Pages/default.aspx>
2. Hogares CREA: [www.hogarcreapr.org](http://www.hogarcreapr.org)
3. Alcoholics Anonymous: [www.aa-pr.org](http://www.aa-pr.org)
4. Al-Anon [www.alanonalateenpr.org](http://www.alanonalateenpr.org)
5. APS Clinics of Puerto Rico – [www.apspuertorico.com](http://www.apspuertorico.com). Cidra Tel: 787-714-0145 and Caguas Tel: 787-744-2710
6. Panamerican Hospital- [www.hospitalpanamericano.com](http://www.hospitalpanamericano.com). Tel: 1-800-981-1218
7. Mental Health Clinic for Children and Adolescents, Medical Center – Río Piedras Tel: 787-766-4646
8. San Juan Capestrano- 1-888-967-4357 Access line and 24 hour orientation - Caguas (787) 745-0190 and Ponce 787- 842-4070
9. Alcoholism Unit – Medical Center - Tel: 787- 763-7521
10. Inspira PR –Caguas Tel: 787-704-0705 / 787-704-0822 and Ponce 787- 709-4130
11. *Hogar Nueva Vida* –Gurabo Tel: 787 -737-2442
12. *Iniciativa Comunitaria*- San Juan Tel: 787- 250-8629
13. CIMA Mennonite Hospital Tel: 787-714-2462
14. Guara Bi, Inc- Caguas Tel: 787-746-4689

15. Therapeutic Institute Emmanuel- Cidra Tel: 787- 739-8654
16. Sor Isolina Ferré Center- Ponce Tel: 787- 843-1910
17. Rescue Mission -Sabana Grande Tel. 787- 873-0126

### **Procedure for Filing Complaints: Employee and/or Student**

Any employee and/or student who has indicative evidence that any member of the university community exhibits improper conduct, related to this policy, may file a complaint in this regard.

#### **Process**

The procedure begins with the filing, in writing, of the complaint before the corresponding authorities. If the complaint is related to an employee, it will be filed with the Human Resources Office. If it is related to a student, it will be filed with the Campus Counseling Office. If it is related to any visitor, contractor, concessionaire, or supplier, it will be filed with the Chancellor of the corresponding campus.

If the student is filing a complaint, it is required that the incident be investigated, and the disciplinary process contained in the Student Regulations of the Student Consumer Handbook be applied.

In the case of employees, filing a complaint requires that the incident be investigated, and the disciplinary procedure contained in the Faculty and Employee Manuals be applied.

The investigation of the complaints may lead to the convening of the Complaints Committee. Said committee will be convened by the Chancellor or President to formally investigate the complaint and determine the action to be taken. Strict confidentiality will be maintained during the process and information, or other evidence provided by the parties or witnesses will not be disclosed during an adjudicative process.

If the complaint involves an intervention by external agencies, the officer in charge will proceed to call the State Police to initiate a formal investigation. The investigation will be in charge of the State Police from the filing of the complaint in the judicial forum.

#### **Investigation Process**

The Complaints Committee shall conduct a prompt and detailed investigation upon receipt of the complaint of the alleged incident. The process of appointing the committee and beginning the investigation must be carried out on or before seven (7) business days from the receipt of the complaint. The Grievance Committee will notify the alleged offender on or before five (5) business days after the Committee has been appointed. The investigation should include:

An interview with the complainant, to establish the basic facts and identify witnesses and physical evidence if any.

An interview with the alleged offender, allowing him/her an opportunity to admit, deny, or explain each factual allegation in the complainant's statement and identify witnesses or physical evidence if any.

Interview of any witness. Witnesses will be informed that any matter that is discussed must be kept confidential.

The Complaints Committee must review the results of the investigation and decide in what way the Policy has been violated.

The Complaints Committee must issue its resolution within the first fifteen (15) working days from the end of the investigation. Said resolution shall specify the conclusions reached by the committee and its opinion following said conclusions.

The results of the investigation must be communicated to the complainant and the alleged offender through a letter.

When one or both parties do not agree with the results of the investigation, they may file a review of the resolution before the Institutional Board of Directors within a term of five (5) business days after having received the resolution of the Complaints Committee. The request for review will be filed when the complainant or alleged offender, in writing, delivers a request for review to the President and/or CEO of CCU stating the grounds for their request for review, who, in turn, will submit it to the Institutional Board of Directors. The Institutional Board of Directors must review the review writing and determine if it is substantiated. If it is not substantiated, it will be void by the Institutional Board of Directors and will not suffer any effect, leaving the opinion of the Complaints Committee final and irrefutable. As a result of the review, the Institutional Board of Directors may accept, reject, or modify the decision of the Complaints Committee within a term of fifteen (15) working days.

The filing of the petition for review will interrupt the effectiveness of the opinion of the Complaints Committee. The Institutional Board of Directors will air the requested review no later than fifteen (15) business days from the filing of the review.

The Institutional Board of Directors may only pass judgment on the opinion of the Board, based on the record of the proceedings before said Board, normally and ordinarily, it will respect the conclusions of the Complaint Committee.

The Institutional Board of Directors will draw up special minutes of all the disciplinary procedures raised before it and when issuing its resolution, it will state the reasons that support its determination.

The decision of the Institutional Board of Directors may confirm, modify, revoke or exonerate the opinion of the Complaint Committee. Likewise, the Institutional Board of Directors may, in the

spirit of achieving CCU's commitment to provide and ensure a safe work and study environment, confirm the violation of any disciplinary norm, as found by the Complaint Committee. The decision of the Institutional Board of Directors is final and irrefutable and will conclude the matter that is the subject of the same.

**Validity of the Policy:** The policy will be evaluated every two (2) years to adjust it to any change in law and/or requirements of state and/or federal agencies, or as needed.

**Publication of the Policy:** The policy will be published in the Employee Handbook, Student Consumer Handbook as well as on the institutional website: [www.columbiacentral.edu](http://www.columbiacentral.edu). Students and employees will receive an annual notification of the current policy. Contractors, suppliers, concessionaires, and visitors will be guided by the contracting party who will provide them with a copy of the policy. The evidence of said notification will be kept in the Human Resources area, the Vice Presidency of Student Affairs, and the contracting party, as applicable.

## INSTITUTIONAL POLICY AND PROTOCOL ON CAMPUS SECURITY

### (Jeanne Clery Disclosure of Campus Security Policy and Campus Statistics Act or Clery Act)

#### Introduction

State and federal law place a responsibility on educational institutions that receive Title IV Funds to provide protection and safety to members of their academic community. Columbia Central University (CCU) promotes a safe study and work environment for our university community, for which it prohibits and condemns any act or crime related to: sexual, domestic violence, hate crimes, theft, harassment or stalking, possession of weapons, intimidation, gender identity, aggression, damage to property, escalations, crimes on manufacturing, distribution and use of drugs, use and abuse of alcohol, and threatening human life, among others.

In addition, it recognizes the right of employees, students, prospects, and the general academic community to be informed about any criminal act that occurred on campus and public property, likewise, CCU has the responsibility to collect data, disclose, and keep informed their entire community about criminal incidents that occurred in their respective campus.

To this end, CCU has adopted this institutional policy and protocol on security at the university.

#### Applicability

This policy and protocol apply to all the people who make up the university community: employees, students, prospects, suppliers, visitors, and contractors.

## **Legal Base**

This policy and protocol are promulgated under Public Law 101-542, known as the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act or Clery Act. The Clery Act requires that every higher education institution publish an Annual Campus Safety Report, notify Alert Bulletins that threaten their safety, and keep a Daily Record of crimes reported to the Security Office. Public Law 113-4 Violence Against Women Reauthorization Act of 2013 (VAWA), which imposes new responsibilities on universities, such as reporting criminal incidents that arise. In turn, they are required to develop policies and procedures to address them.

Other federal and state laws, such as Law No. 54 of August 15, 1989, as amended, which establishes the public policy of the Commonwealth of Puerto Rico concerning domestic violence; Act No. 100 of June 30, 1959, as amended, which protects employed persons and applicants for employment against discrimination based on sex, among other reasons. These laws apply to government agencies that function as businesses or private companies, Act No. 69 of July 6, 1985, as amended, requires strict compliance with equal employment rights, both for men and women, and prohibits discrimination based on sex and Megan Law (1996) that requires institutions to inform the community where to obtain information on the Sex Offender Registry, among others.

## **Annual Disclosure on Statistics Occurring at the University**

The university is required to implement policies related to campus security and to release crime statistics annually to active students and employees, prospective students and employees, and the Federal Department of Education. Currently, such disclosure is made through email, bulletin boards, and the university's website [www.columbiacentral.edu](http://www.columbiacentral.edu), in addition to delivering a printed copy if required.

The incidents to report according to the law, are the following:

- Murders/Non-negligent homicide
- Wrongful death
- Forced sexual assault
- Unforced Sexual Assault
- Theft
- Theft/illegal appropriation
- Escalation
- Vandalism
- Motor Vehicle Theft
- Aggravated assault
- Simple Assault
- Intimidation
- Intentional Fire
- Domestic or spouse partner violence



- Dating violence
- Stalking
- Illegal possession of weapons
- Violation of controlled substances law
- Violation of the Alcohol Law

If the reported crimes were hate crimes, they will be classified as follows: race, color, age, religion, ethnicity, gender, gender identity, sexual orientation, national origin, and disability.

Likewise, the University is obliged to designate the campus security authorities, among which is the Campus Safety Administrator, who will submit the data annually through the electronic system of the Federal Department of Education.

### **Procedure for Reporting Criminal Actions or Other Emergencies on Campus**

Every employee, student, prospect, supplier, visitor, and concessionaire who is a victim or witness of any offense, criminal actions, or other emergencies within the university, must report the incident to the corresponding authorities: security officers, Chancellor, Facilities and Purchasing Director, and designated personnel at the time of the incident. The following will be considered offenses or criminal acts: the consumption of alcoholic beverages on university premises, acts of domestic violence, date rape, stalking or harassment, sexual assault, hate crimes, robbery, aggravated assault, murder or homicide, possession of weapons, simple assault, intimidation, destruction of property, and vandalism.

### **Process**

1. Any member of the university community who witnesses a situation that presents a risk to safety, life, and/or property or is the victim of a crime that violates this policy is responsible for immediately informing the security officer on duty or the Chancellor, Facilities and Purchasing Director, or the Human Resources Director. The immediate solution of the emergency will be completed, if possible, with the resources available at the time, without putting the life and safety of the university community at risk.
2. An incident and/or accident report or written complaint will be completed to initiate the established investigation and intervention procedure. The said complaint will be referred to the corresponding institutional officials; These are the Chancellor, the Human Resources Director, or whoever is designated in their absence, depending on the situation.
3. If the offense or criminal act is related to a student, the complaint will be presented and reported to the Chancellor or his/her representative. The filing of a complaint results in the incident being investigated and the disciplinary process contained in the Student Regulations is applied.
4. If the offense or criminal act is related to an administrative employee or faculty, the complaint will be presented to the Chancellor or the Human Resources Director. Filing a

complaint results in the incident being investigated and the disciplinary process contained in the Employee or Faculty Manuals applied.

5. If the offense or criminal act is related to a supplier, visitor, concessionaire, or contractor, the complaint will be presented to the Chancellor or the Facilities and Purchases Director. Filing a complaint result in the incident being investigated and the cancellation of contracts or contracted services evaluated. In the case of visitors, it could be determined not to allow entry to the facilities.
6. The assigned officer will interview the victim or person filing the complaint. You will be guided on:
  - the existing policy regarding the complaint investigation process.
  - the right to notify the police or not.
  - right to request a protection order.
  - the importance of preserving evidence and remembering characteristics to identify the alleged aggressor.
  - available resources regarding counseling, victim assistance, legal assistance, and other services.
  - accommodation alternatives in the work or study area.

It is important to establish that in the interview process the victim will not be forced to express matters of personal life that are not relevant to the intervention in the process. You must have a compelling professional reason to enter these private areas.

1. When filing a complaint, if the alleged or alleged perpetrator or offender is identified and belongs to the university community, it will be indicated in writing that a complaint has been filed and will be summoned for a separate interview. The Chancellor or the designated person will determine, according to the seriousness of the complaint, if the Complaints Committee is called or if the provisions contained in the Student Regulations apply.
2. If it is required to convene the Complaints Committee, it will interview the parties involved and witnesses through separate procedures.
3. The Committee will evaluate the standard evidence gathered in the interviews with the parties and witnesses and will determine recommendations for disciplinary action, if necessary. The result of the Committee's investigation and the actions to be taken will be reported to the parties involved in writing. The parties may appeal said determination to the Institutional Board of Directors (JDI).
4. If the complaint involves an intervention by outside agencies, the officer in charge will proceed to call the state police to initiate a formal investigation. The investigation will be in charge of the state police from the filing of the complaint in the judicial forum.
5. CCU will evaluate the decision determined by the corresponding judicial forum to determine the action to take regarding the alleged perpetrator.
6. The officers in charge of the process will write a report on the action and interventions with the victim and alleged perpetrator or offender.

## **Adjudicatory Procedure for Disciplinary Actions**

It is our policy to apply discipline progressively and thus allow the student or employee to correct their behavior, except in cases of a harmful or criminal nature, which warrant immediate and definitive resignation or termination of studies or employment. These measures may vary according to the severity of the offense and the times in which such behavior is incurred.

When the assigned officer has determined that the offense or criminal act violates the safety of the person and property, he/she may take one of the following actions:

1. When the alleged or alleged perpetrator or offender is a student, the disciplinary action may range from a written warning to expulsion, as determined by the Student Regulations.
2. When the alleged or alleged perpetrator, offender, or offender is an employee, the disciplinary action may range from a written warning to termination or expulsion from employment as determined in the Employee Manual or Faculty Manual.
3. When the alleged or alleged perpetrator, offender, or offender is a prospective student or prospective employee, the Chancellor or the Human Resources Office may take the action to deny the application for admission or employment.
4. When the alleged or alleged perpetrator or offender is a contractor or concessionaire, the contractual relationship with the university may be terminated.
5. When the alleged or alleged perpetrator or offender is a visitor, said visitor may be prevented from entering the university.
6. If it is determined that a crime has been committed as established by state and federal laws, the case will be referred to law enforcement agencies.
7. Written reprimands and disciplinary sanctions shall be recorded in the student's disciplinary file or the employee's disciplinary file. Said warnings or sanctions will specifically indicate the nature of the offense or criminal act caused.

## **Confidentiality**

It is important to note that all personnel who interact with the victim will take into account the ethical criteria to carry out the interventions and highlight the importance of confidentiality.

The person in charge of caring for the victim will keep all information provided by the victim strictly confidential. The information expressed by or related to the victim may not be shared with third parties without their consent, except when there is a situation that endangers their life or that of a minor or that of any other person when an order is issued, judicial or for extremely dangerous reasons. In addition, the victim will have access to the files of this intervention and to any document included in it that concerns him/her.

All agreements, protective measures, or accommodations provided to the victim will be kept confidential and only those responsible for compliance with them will be notified.

### **Retaliatory Action**

The university does not support or encourage adverse actions to be taken against the person(s) who files a complaint related to this policy or any other policy. Taking adverse action against the complaining party constitutes retaliatory action.

When it has been determined that retaliatory conduct exists, the university will investigate such action and impose sanctions based on the disciplinary process determined in the Employee Manual, Faculty Manual, and Student Regulations, as applicable.

### **Campus Security Officers**

CCU has private security services on the premises. The hired officers provide services related to attending, watching over, reporting situations, and enforcing the established rules and policies. The responsibility of protecting the university community, as well as property, rests with these security officers.

### **Recommendations for Personal Protection or Defense**

Common efforts of the entire university community are required to combat crime and or violent acts. It is important to recognize that safety is everyone's responsibility.

#### **A Safety tips**

1. Avoid walking alone through low-traffic areas, desolate areas, classrooms, or empty buildings.
2. Always be alert and watch closely what is happening around you.
3. Walk through illuminated places. Don't take unnecessary risks.
4. Avoid going to restrooms alone, especially during non-working hours.
5. Look over your shoulder to avoid being surprised.
6. Carry books in a bag or backpack to keep your hands free.
7. If you are mugged, do not resist if you understand that you are endangering your safety.
8. If you find yourself being followed, try to get to a security officer as soon as possible. If necessary and you can, run and drop books or backpacks that may slow your progress.
9. If you do not feel safe in an area, ask the security officer to accompany you.
10. Don't stay in the car alone for a long time.

#### **B Belongings**

1. Label the objects you own with your student number.
2. Store your belongings in the trunk of your car.
3. Do not leave visible valuables, such as wallets, briefcases, packages, calculators, and cameras, among others.

4. Don't bring more money than necessary.
  5. Avoid wearing expensive clothes.
  6. Protect yourself by sticking purses or bags to your body.
  7. If you are an employee, keep your valuables while you are on duty in a safe place.
- C. Defense mechanisms in case of aggression or assault
1. Don't lose control.
  2. Stay calm.
  3. Think of resources and options.
  4. Assess the situation.
  5. Do not resist if the attacker is armed, it can cause death.
  6. If you can, use some negotiation strategy.
  7. If you can, flee to safety.
  8. Be assertive.
  9. Yell to attract the attention of others.
  10. In the event of sexual assault, to preserve evidence it is recommended that the victim not shower or change clothes.
  11. You must observe the person who commits the crime well unless under threat he instructs you otherwise.
    - a. Characteristics to observe:
      - Height and weight
      - skin color
      - face shape and eye color
      - hair color, haircut, and presence of mustaches
      - marks, scars, or tattoos
      - voice tone
      - clothing
      - do not destroy any type of evidence

### **Maintenance and Security Measures in Physical Facilities to Reduce Risks to the University Community**

1. Lighted areas and luminaires will be kept in good condition.
2. Shrubs and trees should be kept pruned at a prudent height within sight of people.
3. Student and employee parking areas will be identified.
4. Security officers will require identification from visitors.
5. Security officers will make preventive rounds through all areas.
6. Security officers may close areas as preventive measures.
7. All vehicles must have a visible parking stamp that identifies you as a student, faculty, or administrative employee.

## **Safety Awareness Program**

### Students

1. Speeches will be offered to students each term.
2. Information will be sent via email regarding the policy and available resources.
3. Information related to these topics will be published via email.
4. Information tables will be established to offer information regarding said topics.
5. Written notification will be provided via email to students about resources for counseling, health, mental health, victim assistance, legal assistance, and other services within the university and outside of it.

### **Faculty and Administration**

1. Speeches will be given annually.
2. Information will be sent via email regarding the policy and available resources.
3. A written copy of the policy will be delivered, and employees will be notified that it is a condition of employment to respect the statutes of the policy.
4. Written notification will be provided regarding counseling resources, health, mental health, victim assistance, legal assistance, and other services within and outside the university.
5. Written notification will be provided to victims regarding accommodation options related to working conditions upon request.

### **Means to Guide and Educate the University Community**

The university will guide students and employees regarding these issues through:

1. Workshops
2. Special projects
3. Booklets
4. Information tables
5. Sending communications via email
6. Website: [www.columbiacentral.edu](http://www.columbiacentral.edu)

### **Sex Offender Registry**

Information on the Sex Offender Registry can be obtained through the following email address:  
<http://prcjisweb.gobierno.pr/>

## **Protocols in Emergency Situations and the University or Facility Eviction Plan**

CCU has a Procedures Manual to carry out the protocols in emergencies and the Eviction Plan of the facilities or university, where the university community is provided with information on the recommendations to follow in the event of an emergency in our facilities. For more information, refer to the Manual published on the website [www.columbiacentral.edu](http://www.columbiacentral.edu).

## **Institutional Policy on the Illegal use and abuse of drugs, alcohol, and tobacco**

CCU has a policy on the illegal use and abuse of drugs, alcohol, and tobacco. This policy provides that no member of the university community will be involved in the illegal use, possession, manufacture, distribution, or transfer of drugs within CCU facilities or educational activities outside the university and/or practice scenarios.

Additionally, alcohol consumption is prohibited inside the university. Only moderate consumption of alcoholic beverages by adults will be allowed at university-sponsored activities that take place off-campus.

For more information, refer to the policy included in the following publications: Faculty Manual, Employee Manual, Student-Consumer Manual, and institutional website.

## **Institutional Protocol on Domestic Violence**

CCU has a written protocol for handling domestic violence situations. It provides uniformity to the measures and procedures to be followed when an employee or a student is a victim of domestic violence. An employee or student who considers himself/herself to be a victim of domestic violence will be oriented about his/her rights and available resources to effectively handle the said situation. Employees and students should be aware that practices considered domestic violence are prohibited, for which action will be taken against those who threaten the safety of others.

For more information refer to the protocol included in the following publications: Faculty Manual, Employee Manual, and Student Consumer Manual.

## **Timely Warnings**

Security alerts should reach the entire campus. Because the nature of criminal threats is often not limited to one location, security alerts or timely warnings must be issued in a way that can reach the entire campus community. The purpose of a security alert or timely warning is to allow people to protect themselves. These alerts respond to crimes announced by designated agents of the university or local police within the geographic area of the university, as established by the Clery Act. They are considered a serious threat. Timely warnings may be updated when new and accurate information becomes available. These notifications will be issued through the alert system that includes calls, emails, and text messages.

## **Emergency Notifications**

They are triggered by a broader potential threat: any significant emergency or dangerous situation that poses an immediate threat to the health or safety of students or employees on campus includes public property on campus that falls within your Clery Act geography. This could overlap and include a crime under the Clery Act, such as a shooting, but also covers crimes that are not required to be reported under the Clery Act as well as non-criminal incidents such as an outbreak of a contagious disease, an impending weather emergency, or a gas leak. Notifications must be issued without delay after confirmation of the emergency by the responsible authorities previously identified by the university in its annual Clery Act reports. These notifications will be issued through the alert system that includes call, email, and text messages, social networks, university websites, and media.

## **INSTITUTIONAL POLICY ON TITLE IX LAW**

### **Against Gender Discrimination**

Columbia Central University (CCU) promotes a healthy environment, free from intimidation, harassment, and discrimination. The University, in an affirmative manner, prevents, discourages, and addresses any conduct that could be interpreted as discriminatory based on gender under the amendments on Title IX that establish that:

"No person in the United States, for reasons of sex, may be excluded from participating in, be denied benefits of, or be subject to discrimination under any educational program or activity that receives federal financial aid."

It is CCU's policy to guarantee equal opportunities to its applicants for employment and admission as well as to students and employees, both in terms of study and employment opportunities as well as in the enjoyment of services and academic programs that are offered and in terms and work conditions. The University does not exclude participation, does not deny benefits, or discriminate against any person regardless of their sex, sexual orientation, gender identity, their partial or full study time status, disability, race, or national origin, as well as the beneficiary of activities and educational programs. Any candidate for admission or student, as well as any applicant for employment or employee that he/she understands, has been subjected to discrimination for the above reasons, may initiate a written complaint with the Title IX Coordinator.



## **Legal Base**

The establishment and compliance of this Policy, as well as its publication, is under the federal regulations for the implementation of Title IV of the Federal Higher Education Act of 1965, as amended, and with Section 504 of the Rehabilitation Act of 1973. In addition to the Education Amendments of 1972, Title IX and the implementation of its regulations contained in 34 CFR Part 106 (Title IX).

State laws also support compliance with this Act. Based on this, we can cite Article I, Section 1 of the Constitution of the Commonwealth of Puerto Rico, which provides that the dignity of the human being is inviolable, that all persons are equal before the laws, and prohibits the establishment of any discrimination based on sex, among others. The purpose of this document is to reaffirm CCU's nondiscrimination policy. With this, the best interest of the University is promoted to protect the integrity, rights, and equity between staff and students.

## **Scope**

This policy is extensive and applicable to the entire university community including supervisors, employees, professors at all levels, the student community, and visitors. Utilizing this, the student body, and other people of each of the CCU campuses and locations are protected regardless of their sex, sexual orientation, gender identity, their partial or full study time status, disability, race, or national origin as well as a beneficiary of educational activities and programs. It is established that all members of the university community have the responsibility of complying with this policy and it is recognized that they will be subject to investigation in cases of alleged discrimination.

## **Examples of Prohibited Behaviors**

They constitute discriminatory actions, among others:

- Encourage the hiring of a person for specific jobs by his/her gender.
- Remunerate two (2) people of different gender who occupy the same position differently, solely based on gender.
- Excluding students from academic activities or educational programs, based on gender.
- Establish differentiated behaviors, sanctions, rules, or academic processes based on gender.
- Segmentation of groups in classrooms or educational activities based on gender.
- Physical sexual acts are committed against the will of a person or when the person is unable to consent due to intellectual or other disability. Several acts fall under the category of sexual violence including rape, sexual assault, and sexual coercion. All of these acts of sexual violence are forms of sexual harassment under Title IX.

## TITLE IX AND ITS REQUIREMENTS RELATED TO SEXUAL HARASSMENT AND VIOLENCE

Sexual harassment is unwanted conduct of a sexual nature. It includes unwelcome sexual advances, requests for sexual favors, and other verbal, non-verbal, or physical conduct of a sexual nature. Sexual assault is a form of sexual harassment prohibited by Title IX.

CCU recognizes that sexually harassing conduct creates a hostile environment and, when severe, interferes with or limits the student's ability to participate in or benefit from the program of study. The same applies to your employees in your work environment. Based on this, our University affirmatively prevents, discourages, and addresses any type of sexual harassment and protects students in academic programs and other activities in and outside of it. For the application of these principles, the following measures will be taken:

- Publish a notice on non-discrimination on CCU's web page, on social networks (social media), the Institutional Catalog, the Student-Consumer Manual, and on other sources of information that it deems pertinent.
- Adopt and publish the procedure to be followed to deal with complaints of harassment and sexual violence that arise inside and outside the University.
- Train those employees who are prone to witnessing or receiving reports of sexual violence and harassment.
- Maintain a confidential log to monitor incidents, to help identify students and employees with multiple complaints filed against or repeatedly addressed and who have demonstrated some systematic pattern or problem that has alerted security officials.
- If necessary, increase security measures such as surveillance, supervision, security in certain places, or activities where harassment has occurred.
- Periodically, the effectiveness of the efforts made will be reviewed to ensure that the University is free from sexual harassment and gender discrimination. It will use this information to recommend future proactive measures to comply with Title IX and protect the university community.

### **Procedure to Submit Complaints**

CCU will ensure to maintain an environment, for its students and employees, free from gender discrimination in all aspects of the educational, academic, and extracurricular activities experience. To do this, it will provide its beneficiaries with a system for resolving complaints equitably and immediately. The same will apply to all the Campuses and localities. In turn, it will disseminate this Policy through the different means of communication that the University understands are accessible to the entire university community.

## **Procedure for Attending Complaints**

The complaint process has the purpose of providing the administrative staff, the faculty, and the students a uniform and democratic procedure before which they can present any type of complaint about alleged discriminatory acts against any member of the university community. All complaints will be channeled through the Title IX Coordinator who will apply the mechanisms established by CCU to investigate incidents of discrimination or harassment as soon as possible. Any person who understands that he/she has been subjected to discrimination or prejudice due to gender in his/her academic record will have the right to complain following the established procedure:

- If the complainant is a student, he/she will follow the procedure established in the Student Regulations found in the Student-Consumer Handbook.
- If the complainant is an employee, he/she will follow the procedures established in the Employee Manual of the Office of Human Resources. Every employee recruited for the first time at CCU receives a copy of the Manual. You can also access it through the University intranet service and website.

In the case of contractors, service suppliers, guests, or visitors, the University will not be responsible, unless the following conditions exist:

- The University has been notified of the offensive conduct.
- The University is in a position to take action on such conduct.
- The University does not take immediate and appropriate corrective action to the situation.

Anyone who understands that they have been the victim of discrimination or harassment should immediately report it to the administrative offices of Columbia Central University.

## **Notice of the Non-Discrimination Policy**

The content of the Notice of the Non-Discrimination Policy that will appear on the CCU web page will be as follows:

The University, in an affirmative manner, prevents, discourages, and addresses any conduct that could be interpreted as discriminatory based on gender under the amendments on Title IX that establish that:

## INSTITUTIONAL POLICY TITLE IX NON-DISCRIMINATION

In compliance with the federal Title IX Education Amendments Act of 1972, Section 504 of the Rehabilitation Act of 1973, and other federal, local, and state laws, CCU guarantees equal opportunity to its applicants for employment and admission, as well as to students and employees, both in terms of study and employment opportunities, as well as in the enjoyment of services in general and financial aid, as well as the academic programs offered and in terms and conditions of work. The University does not exclude participation, does not deny benefits, nor does it discriminate against any person for reasons of race, color, gender, birth, age, origin or social condition, ancestry, marital status, religious or political ideas or beliefs, sexual preference, nationality, ethnic origin, status as a veteran of the Armed Forces or disability in any phase of your employment process, or because of political or religious ideas.

Any candidate for admission or student, as well as any applicant for employment or employee who understands that they have been subjected to discrimination for the above reasons, may initiate a complaint in writing with the designated official. CCU has designated a Title IX Coordinator to investigate any claim of violation of the non-discrimination policy or the non-sexual harassment policy. To report any incident involving students, faculty, or employees of the University, please contact:

Norelis Rodriguez  
Title IX Coordinator  
Angora Industrial Park  
Building G, Angora Avenue  
Caguas, PR 00725  
norodriguez@columbiacentral.edu  
787-704-1020, ext. 140

For more information on the nondiscrimination notice, visit <http://wdcrobcop01.ed.gov/CFAPPS/OCR/contactus.cfm> for the address and phone number of the office serving your area, or call 1-800-421-3481.

### **Institutional Commitment**

CCU is committed to taking the necessary measures to prevent, discourage, and address gender discrimination in the provision of services and education. By this responsibility, the University must guarantee the development of an internal procedure to deal with any complaint that may arise.

In its commitment to fully comply with the policy and other provisions of Title IX, the University:

- It will create awareness of the scope of the laws that prohibit discrimination and will promptly disseminate the institutional policy in this regard.
- Emphasize the protection of gender equality rights.

- It will carry out the procedure established in its policy to deal equitably and immediately with any allegation or complaint that may arise from any of the members of the university community, including the applicable investigation process.

### **Amendments**

This Policy must be reviewed annually to update the procedures that apply in cases against gender discrimination, if there is any change in the university, and incorporate the amendments to the Title IX Law if so required by the Federal Department of Education and the Office for Civil Rights. The Chief Executive Officer of CCU will authorize this guideline.

## **HARASSMENT AND INTIMIDATION POLICY (BULLYING)**

### **Introduction**

At Columbia Central University (CCU) we recognize the right of students and employees to personal safety, free from harassment and intimidation (bullying and cyberbullying) to study and work in a safe and healthy environment.

CCU promotes a safe university environment where the student's teaching-learning process and work relationships are positively focused.

It is the responsibility of each member of the university to ensure that intimidation or harassment does not occur at any level within the university. The university community must be aware of such conduct and its effect on the dignity of the human being, which is unacceptable and requires disciplinary measures for its correction.

CCU establishes that any form or type of harassment or intimidation is unacceptable and that all incidents and complaints must be treated seriously by the personnel designated to handle them.

### **Justification**

Harassment and intimidation (bullying) affect human dignity and negatively impact the student and work environment. Because of this and to educate the university community, CCU creates this policy following Law 204-2016 Law against harassment and intimidation or bullying of the Commonwealth of Puerto Rico, known as "Alexander Santiago Martínez Law".

### **Definitions**

1. **Harassment, intimidation, or bullying** - It is any pattern of actions carried out intentionally, whether through psychological, physical, cyber, or social abuse that has the effect of frightening a person or a group of people and interferes with it, their school, or

employment opportunities and their performance, both in the classroom, in their work environment, and their immediate social environment. Harassment or intimidation and/or “bullying” is a pattern of harassment made up of more than one act, and usually lasts for weeks, months, and even years.

2. **Harassment or intimidation by any electronic means or through the use of the Internet or Cyberbullying** - It is the use of any electronic communication (oral, written, visual or textual), to harass, intimidate, and afflict a person or a group of people that usually results in damage to the physical, mental, or emotional integrity of the affected person, and/or their property and unwanted interference with the opportunities, performance, and benefit of the affected person.

### **Behaviors Constituting Harassment and Intimidation (Bullying)**

The following behaviors are constitutive of bullying, not limited to:

- Mock
- Nicknames
- Spread of rumors and/or lies
- Make up stories to involve other peers in trouble
- Kicking, dropping, or shoving a member of the university community
- Annoy other members of the university community, make derogatory comments about their culture, religion, ethnicity, weight, physical appearance, disability or medical conditions, tastes
- Intimidate others
- Damaging the property of other students
- Threaten other students
- Manipulate others; get them to do things they don't want to do.
- Assaulting other students
- Use computer networks to spread rumors, harm, humiliate, threaten, etc.
- Any conduct constituting a crime as defined in the Puerto Rico Penal Code.

### **Behaviors Constitutive of Harassment and Cyberbullying**

Cyberbullying or cybernetic harassment is carried out using some virtual means such as the following:

- the chat
- social networks
- blogs
- text messages
- the webpages
- others

This intimidation occurs through these means anonymously or non-anonymously and the purpose is to defame and humiliate the victim. Such action causes victims to be harassed inside and outside the classroom or workplace through electronic means.

Cyberbullying tends to occur among adolescents and young people out of revenge or with the simple objective of publicly ridiculing or annoying another. This behavior is a repetitive one where it is sought to humiliate the person through virtual means.

### **Effects of Harassment and Intimidation**

- Anxiety
- Lack of concentration
- Increased blood pressure
- Depression
- Hostility
- Poor performance
- Substance and/or alcohol abuse
- Low self-esteem
- Sleep disorders
- Attempt against life or suicide
- Abuse or harass others

### **Expectation and Institutional Policy**

It is expected that, with the established policy and protocol, the entire university community will be in a position to know and channel any situation that may arise regarding harassment and intimidation. It is institutional policy to prohibit such conduct.

### **Responsibilities of the University**

CCU is responsible for:

- Support and take action against acts of harassment and intimidation in the workplace and education for constituting a criminal act against employees and students.
- Offer guidance to staff and students on examples of acts of bullying or harassment.
- Commit to taking steps to provide a safe place to work and study.
- Offer help and support to the victim of bullying and harassment on available resources in the community, legal resources, and available licenses.
- Motivate employees and students to report any situation or incident that occurs as soon as possible.

### **Prevention Strategies**

CCU to educate the university community has established the following prevention measures:

1. Educational activities that include, but are not limited to:
  - Information tables
  - Online modules
  - Training through talks and workshops
  - Booklets
  - Among others
2. Referrals to the Counselor

### **Students and Employees**

Procedure for the documentation of cases, confidentiality, and maintenance of files related to complaints about intimidation and harassment:

1. Students
  - Once any oral or written complaint is received, the Counseling Office will proceed to document the same and create a file with the respective evidence.
  - The cases will be handled in strict confidentiality in the Counseling Office and information will only be shared with the concerned areas depending on the case.
  - All complaint files will be kept in the Counseling Office and once the investigation is concluded, they will be kept in the vault.
2. Employees
  - Once any oral or written complaint is received, the Human Resources Department will proceed to document it and create a file with the respective evidence.
  - Cases will be handled with strict confidentiality and information will only be shared with the areas concerned depending on the case.
  - All complaint files will be kept in the Human Resources Department.

### **Procedure for Reporting Cases**

Anyone who understands that they are being intimidated or harassed should report the situation to designated personnel in detail in writing:

- In the case of a CCU employee, to the immediate supervisor, Rector, Director of Human Resources, or President.
- In the case of a student, to the Counselor, and in her absence to the Rector.

The officer, once the complaint is received will proceed to guide you on your rights and channel it.

During the process, the confidentiality of the parties will be protected.



## **Complaint Investigation Strategies**

The representatives designated by the university to investigate this type of complaint will proceed to interview the defendant and, based on the information obtained, will proceed to convene the Complaints Committee.

## **Procedures for the Investigation of Charges of Intimidation or Harassment by the Grievance Committee**

The Complaints Committee shall conduct a prompt and detailed investigation upon receipt of the complaint regarding the alleged incident. Notification to the alleged offender will be made on or before seven (7) business days upon receipt of the complaint. The process of starting the investigation must be carried out on or before five (5) business days from the notification to the parties. The investigation should include:

1. An interview with the complainant, to establish the basic facts and identify witnesses and physical evidence if any.
2. An interview with the alleged offender, which allows him/her an opportunity to admit, deny, or explain each factual allegation in the complainant's statement and identify witnesses or physical evidence if any.
3. Interview of any witness. Witnesses will be informed that any matter that is discussed must be kept confidential.
4. The Complaints Committee, based on the results of the investigation, will determine if the policy has been violated or not.
5. The Complaints Committee must issue its resolution within the first fifteen (15) working days from the end of the investigation. Said resolution shall specify the conclusions reached by the Complaints Committee and its opinion following said conclusions.
6. The results of the investigation must be communicated to the complainant and the alleged offender through a letter to be sent by certified mail.

When one or both parties do not agree with the results of the investigation, they may file a review of the resolution before the Institutional Board of Directors within a term of five (5) business days after having received the resolution of the Complaints Committee. The request for review will be filed when the complainant or alleged offender, in writing, delivers to the President and/or CEO of CCU a request for review stating the grounds for their request for review, who, in turn, will submit it to the Institutional Board of Directors. The Institutional Board of Directors must review the review writing and determine if it is substantiated. If it is not substantiated, it will be void by the Institutional Board of Directors and will not suffer any effect, leaving the opinion of the Complaints Committee final and firm. As a result of the review, the Institutional Board of Directors may accept, reject, or modify the decision of the Complaints Committee within a term of fifteen (15) working days.

1. The filing of the petition for review will interrupt the effectiveness of the opinion of the Complaints Committee.
2. The Institutional Board of Directors will air the requested review no later than fifteen (15) working days from the filing of the review.
3. The Institutional Board of Directors may only pass judgment on the opinion of the Complaints Committee, based on the record of the procedures before said Board, normally and ordinarily, it will respect the conclusions of this.
4. The Institutional Board of Directors will draw up special minutes of all disciplinary procedures brought before it and when issuing its resolution, it will state the reasons that support its determination.
5. The decision of the Institutional Board of Directors may confirm, modify, revoke, or exonerate the opinion of the Complaints Committee. Likewise, the Institutional Board of Directors may achieve CCU's commitment to provide and ensure a safe work and study environment, confirm the violation of any disciplinary norm, as found by the Complaints Committee, however, to the foregoing, suspend the effectiveness of the sanction imposed by it.
6. The decision of the Institutional Board of Directors is final and irrefutable and will conclude the matter that is the subject of the same on behalf of the University.

When the Grievance Committee has determined that harassment or intimidation has occurred, it may take one of the following disciplinary actions:

When the offender is an employee, disciplinary action may be taken following the provisions of university policies and procedures. Disciplinary action must correspond to the offense, and it may fluctuate between verbal, written warning, or dismissal as established in the Employee or Faculty Manual.

When the offender is a student, disciplinary action may be taken following the provisions of university policies and procedures. Disciplinary action must correspond to the offense, and it may fluctuate between verbal, written warning, or expulsion as established in the Student Consumer Handbook.

When the offender is a vendor or other person who does business with CCU, the President may determine and take appropriate action, up to and including, termination of the business relationship.

In determining the action to take, any prior history of intimidation or harassment should be taken into consideration.

### **Guidelines for Referrals to Health Professionals**

The personnel designated to work on these cases (Counselor and Human Resources Director) will guide the people involved in the protocol and institutional policy. A list of health resources and providers will be provided. You can assist in the process of contacting the necessary resource.

Resources available for victims

### **Emergency Line**

- Puerto Rico Police (787) 793-1234
- First Hospital Panamericano Cidra (787) 739-5555
- San Juan Capestrano Hospital (787) 625-2900
- Children and Adolescents Psychiatric Hospital (787) 786-7373 (787) 740-1925
- CIMA Mennonite Hospital (787) 653-0550
- ASSMCA Centers (Children and Adolescents)
  - Tasc Juvenil Caguas (787) 745-0630
  - Mayagüez Mental Health Center (787) 805-3895
  - Direct Prevention Center ASSMCA
- ASSMCA Center (Adults)
  - San Patricio Mental Health Center (787) 706-7949
  - Mayagüez Mental Health Center (787) 833-0663 Outpatient Clinics
  - Inspira - Caguas (787) 704-0705
- San Juan Capestrano System - Mayagüez (787) 265-2300

### **Protocol Disclosure Procedure**

The policy and protocol will be published on the university's website [www.columbiacentral.edu](http://www.columbiacentral.edu), in the Student Consumer Handbook, and/or by email. Additional will be included in the Faculty and Employee Manuals.

### **Prohibition of Retaliation**

Any conduct that is reasonably perceived as retaliation, retaliation, or retaliation, such as harassment, calls, writing to the complainant, or encouraging third parties to disturb the complainant because of their complaint may be considered an independent violation of this policy.

## **SEXUAL HARASSMENT POLICY**

### **Introduction**

Columbia Central University (CCU) aims to provide a work and study environment that is pleasant, professional, free from intimidation, hostility, harassment, or other offenses that may interfere with the performance of its employees and students. Sexual harassment of any kind, whether verbal, physical and/or visual, will not be tolerated and is prohibited.

## **Legal Base**

Law No. 17 of April 22, 1988, prohibits sexual harassment in employment, clearly states that discrimination may not be made based on ethnic origin, race, color, gender, age, social condition, or political or religious ideas.

The Civil Rights Act of 1964 is the Federal Law that prohibits discrimination in employment based on race, gender, national origin, and religion.

The Jeanne Clery Act (1990) establishes that every university institution that receives federal funds must report and disseminate information on crime and violent acts on campus and in the areas surrounding it. In March 2013, it was amended to include the rights of victims of domestic violence, rape, bullying, or harassment, and dating violence within educational institutions.

The Occupational Safety and Health Act, Act No. 16 of August 5, 1975, and the Occupational Safety and Health Act of 1970 (OSHA), provides that every employer is responsible for offering people who employ a place free from known hazards that are causing or are likely to cause death or serious physical harm.

The Violence Against Women Act (VAWA) of 1994 is the federal legislation that provides legal protections for battered women.

Title IX (1972) focuses on sexual violence that includes physical acts against the will of the person or if the person is unable to consent to such actions. Prohibits discrimination based on gender in educational programs and activities sponsored by institutions of higher education that receive federal funds, such as admissions processes, recruitment, academic programs, student services, counseling, discipline processes, recreation, employment, evaluations, grades, vocational education, and classroom assignments.

## **Applicability**

The sexual harassment policy applies to students, faculty, administrative staff, the Institutional and Corporate Board of Directors, suppliers, and any other person who does business with the University.

Procedure for filing complaints related to violations of established policy:

Any employee and/or student who has indicative evidence that any member of the university community exhibits improper conduct, related to this policy, may file a complaint in this regard.

## **Sexual Harassment in the Workplace and Study Center**

Sexual harassment is defined as a form of conduct that undermines the integrity of the relationship in the employment or study environment. No employee or student should be subjected to conduct or advances of a sexual nature.

Sexual harassment does not refer to occasional flattery that is socially acceptable. It refers to unwelcome behavior that is personally offensive, that attacks morale, and thus interferes with effectiveness at work or school. It includes unwanted sexual advances, requests for sexual favors, and any other conduct of a verbal or physical nature when:

- The submission to such conduct by the student or employee is made, implicitly or explicitly, a condition of employment or academic requirement to obtain benefits in employment or studies.
- The submission or rejection of such conduct is used as the basis for decisions regarding employment that affect the individual or her academic status.
- Such conduct has the purpose or effect of unreasonably interfering with the individual's performance regarding work or studies, creating an intimidating, hostile, or offensive environment.

Sexual harassment can occur in the following circumstances:

- The victim, as well as the harasser, can be of the opposite gender or the same gender.
- The harasser may be the victim's supervisor, a supervisor in another area, a co-worker, or someone who is not an employee. Additionally, can be a teacher harassing a student or a student harassing another fellow student.
- The harasser's conduct must be unwelcome, unrequited.

Any employee who is proven to have engaged in such conduct or who condones such action by subordinates will be subject to disciplinary action up to and including termination. An employee may also be subject to individual responsibility and penalties as a harasser.

### **Report Inappropriate Behavior**

It is necessary that the person who understands that he/she is being sexually harassed immediately notify his/her supervisor and/or the Human Resources Director in cases of employees. If the alleged victim is a student, he/she must report it to the Chancellor or Counselor. In the case of an employee, if his/her supervisor is involved in the situation, he/she should directly notify the Human Resources Director at the university. Once the written complaint is received, the corresponding investigation will be carried out, summoning the parties and possible witnesses through the Complaints Committee facility.

It shall be the duty and obligation of every employee and student to report any act of an improper sexual nature of which they are a victim or have witnessed in their place of work or study.

### **Violation of Policy**

To comply with the institutional policy on sexual harassment, CCU will apply disciplinary measures against any employee, student, visitor, contractor, or licensee who violates this policy or any other state or federal statute. State and federal statutes include the applicability of sanctions to activities of student organizations and activities sponsored by the university.

These measures may vary according to the severity of the offense and the times in which such behavior is incurred. Measures to be applied to students range from a written reprimand, suspension to expulsion. Employees may be subject to suspension and termination of employment. Suppliers, contractors, and concessionaires may immediately cancel the contractual relationship. Visitors may be prohibited from entering the premises.

### **Prohibition of Retaliation**

Any conduct that is reasonably perceived as retaliation, retaliation, or revenge, such as harassment, calls, writing to the complainant, or encouraging third parties to annoy, harass or intimidate him, as a consequence of the filing of the complaint, may be considered a violation independent of this policy.

### **Process**

1. The procedure begins with the filing, in writing, of the complaint before the appropriate authorities. If the complaint is related to an employee, it will be filed with the Human Resources Office. If it is related to a student, it will be filed before the Chancellor and/or Councilor. If you are related to any visitor, contractor, concessionaire, or supplier, will be filed with the Rector.
2. Filing a complaint result in the incident being investigated informed and the Complaints Committee convened. Said meeting will be called by the Chancellor or President to formally investigate the complaint and determine the action to drink. Strict confidentiality will be maintained during the process and no disclosure of information or other evidence supplied by the parties or witnesses during an adjudicative process.
3. If the complaint involves an intervention by external agencies, the officer in charge will proceed to call the State Police, to initiate a formal investigation. The investigation will be in charge of the State Police from the filing of the complaint in the judicial forum.

## Investigation Process

The Complaints Committee shall conduct a prompt and detailed investigation as of the receipt of the complaint of the alleged incident and the notification to the alleged offender. The process of appointing the Complaints Committee and beginning the investigation must be carried out on or before fifteen (15) working days from the notification to the parties. The investigation should include:

1. An interview with the complainant establish the basic facts and identify witnesses and physical evidence, if any.
2. An interview with the alleged offender, allowing him an opportunity to admit, deny, or explain each factual allegation in the complainant's statement and identify witnesses or physical evidence if any.
3. Interview of any witness. Witnesses will be informed that any matter that is discussed should be kept confidential.
4. The Complaints Committee shall review the results of the investigation and decide on what form of politics has been violated.
5. The Complaints Committee must issue within the first fifteen (15) business days its resolution as of the completion of the investigation.
6. The results of the investigation must be communicated to the complainant and the alleged offender via letter.

When one or both of the parties do not agree with the results of the investigation, they may file a review of the resolution before the Institutional Board of Directors within a term of five (15) business days after having received the resolution of the Committee of Complaints. The request for review will be filed when the complainant or alleged offender, in writing, delivers to the CCU President and a written review stating the grounds for their request for review. The Institutional Board of Directors must review the Brief Review and determine if it is substantiated. If it is not substantiated, it will be void by the Institutional Board of Directors and will not suffer any effect, leaving the opinion of the Complaints Committee final and irrefutable. As a result of the review, the Institutional Board of Directors may accept, reject, or modify the decision of the Complaints Committee within a term of five working days.

1. The filing of the petition for review will interrupt the effectiveness of the opinion of the Complaints Committee.
2. The Institutional Board of Directors will air the requested review no later than fifteen (15) working days from the filing of the review.
3. The Institutional Board of Directors may only pass judgment of the Board's opinion based on the record of the proceedings before said Board and normally and ordinarily, it will respect the conclusions of the Complaints Committee.
4. The Institutional Board of Directors will draw up special minutes of all disciplinary matters raised before it and when issuing its resolution, it will state the reasons that substantiate their determination.

5. The decision of the Institutional Board of Directors may confirm, modify, revoke, or exonerate the opinion of the Complaints Committee. Thus, too, may the Board of Directors, in the spirit of achieving CCU's commitment to provide and ensure a work and study environment free from intimidation and harassment, confirm the violation of any disciplinary norm as found by the Committee on Complaints, notwithstanding the foregoing, suspend the effectiveness of the sanction imposed by said Board.
6. The decision of the Institutional Board of Directors is final and firm and will conclude the matter object of it.

## **POLICY TO PROHIBIT THE USE AND DISCLOSURE OF THE SOCIAL SECURITY NUMBER**

### **Legal Base**

Public Law No. 186 of September 1, 2006, known as the Law to prohibit the use of social security numbers as routine identification in public and private educational institutions, prohibits educational institutions from showing or displaying the social security number of any student or prospect in a place or object visible to the general public to identify, post, or publishing note lists, lists of students enrolled in courses or any other list given to professors; nor include it in student directories or any similar list, except for confidential internal use; nor make it accessible to any person who has no need or authority to access this data.

Columbia Central University, according to this Act, has the policy of guiding its students on the use and disclosure of the social security number by the University. The social security number will be limited to identity verification only and not for routine use.

### **To Whom This Policy Applies**

This policy applies to all employees and faculty of the University.

### **Policy Layout**

The policy provides the following:

1. The social security number will not be used for routine identification at the university. The university has a system for routine identification purposes of students, which is the assignment of a student number.
2. The social security number may only be used for legitimate official purposes, when required by the university, governmental, and educational authorities provided they are related to procedures in which there is a legitimate need.



3. The university will notify the student, father, mother, or legal guardian under what legitimate circumstances said information will be used.
4. The father, mother, legal guardian, or student may voluntarily renounce, through written consent to the university, the protections of the Law and authorize the use of the social security number for other procedures.
5. The university must ensure that it identifies the officials who may have access to the social security number contained in the file for legitimate official uses. The authorized departments are admissions (application for admission), registry (custodian of files), and financial assistance (verify identity). Auditing personnel, personnel from licensing and accreditation agencies, and any other personnel that are covered by the law will also be authorized to have access to the records.

## INSTITUTIONAL POLICY ON VAWA LAW

### Introduction

Columbia Central University is committed to promoting a healthy work and study environment. In addition, it must promote positive attitudes that promote integral health and contribute to a favorable social environment of the intellectual, physical, and emotional well-being of the institutional community. The Institution, in its function of maintaining a safe and fear-free climate, prohibits and does not tolerate any type of conduct or behavior that constitutes or may be interpreted as harassment, violence, assault, or sexual crime.

Members of the Institution should be aware that such behavior is prohibited by federal and state laws as well as by institutional policy. Columbia Central University will apply the necessary measures to prevent and correct these acts.

### Legal Base

Section 304 (SaVE ACT) of the Campus Sexual Violence, Domestic Violence, Dating Violence and Stalking Education and Prevention of the Violence Against Women Reauthorization Act (VAWA), passed on March 7, 2013, amended the Jeanne Clery Act (Clery Act) and imposed new responsibilities on the universities and educational institutions covered under this Act. Among these, is to report criminal incidents arising from Domestic Violence, Dating Violence, Stalking, and Sexual Assault. In turn, they are required to develop policies and procedures in this regard. The crimes reported in these new categories must appear in the Annual Safety Report for this year, as required by the Federal Department of Education.

In addition to the Jeanne Clery Act, various provisions of the law, state and federal, seek to have prevention and safety elements in the study and workspaces in Puerto Rico. The Act for the Prevention and Intervention with Domestic Violence, Act No. 54 of August 15, 1989, as amended,

establishes the public policy of the Commonwealth of Puerto Rico concerning domestic violence, where it is recognized that it is one of the most complex and serious problems facing our society and it is strongly repudiated. The Law provides legal, civil, and criminal remedies for people who are the object of acts constituting domestic violence.

Other state laws that are pertinent to the safety and well-being of the Institution are the Law Against Stalking in Puerto Rico - Law No. 284, the Law for the Registration of Persons Convicted of Sexual Crimes and/or Child Abuse - Law No. 266 and the Occupational Health and Safety Act - Act No. 6.

### **Scope**

This Policy is extensive and applicable to the entire university community. Columbia Central University seeks to create and maintain a community in which students, faculty, administrative staff, outsourced personnel, and visitors can study, work, or carry out any business in an environment free from violence, sexual assault, and stalking. It is established that every member of the university community has the responsibility of complying with this policy. Any manifestation of prohibited behavior will be subject to the due processes established by state and federal laws, as well as by the institutional policies of Columbia Central University. Institutional policy on VAWA also applies to extracurricular activities sponsored by the Institution, regardless of whether the events take place in or outside of it.

### **Purpose**

Columbia Central University, through compliance with the VAWA Law (Violence Against Women Act), intends to reaffirm its policy of promoting a healthy work and study environment, free from violent incidents, by ensuring the safety of the people who are part of it, the university community and those who visit the campus. With this institutional policy it is intended:

- Expand transparency regarding sexual violence in the Institution.
- Guarantee and implement the rights of victims of sexual violence.
- Establish disciplinary norms and procedures to deal with incidents of sexual violence.
- Develop educational and awareness programs for the entire university community.
- Establish changes to Columbia Central University's Annual Safety Report to incorporate criminal incidents of dating violence, domestic violence, sexual assault, and stalking. In addition, include two new categories to the classification of hate crimes: national origin and gender identity.
- Incorporate in the Annual Security Report new policies, procedures, and notifications related to VAWA amendments to address the cases reported to the Institution regarding these crimes.

## **VAWA Law Requirements**

These amendments have an impact on Columbia Central University's Annual Safety Report in terms of the statistics reported and the statements of the procedures to be followed in cases of sexual violence and assault. It is established that each of these aspects will be part of Columbia Central University's action to comply with federal regulations. The amendments to the VAWA Act become effective as of July 1, 2015.

## **Annual Safety Report**

### **1. Reports of required crime statistics**

Changes in the presentation of the Institution's Annual Security Report (IAS) must show the new crimes reported on dating violence, domestic violence, sexual assault, and stalking, as well as the categories of national origin and gender identity in the classification of hate crimes. The Institution will keep a record of the statistics on reported criminal incidents. In addition, it will clarify the circumstances in which the Institution would remove the reports of unsubstantiated crimes and will inform the Federal Department of Education and disclose in the annual security report the number of complaints of unfounded crimes.

### **2. Columbia Central University Annual Safety Report Policy Statements**

The Annual Institutional Security Report shall have a specific policy statement that captures the elements in each of the categories mentioned in the VAWA amendments to the Clery Act.

### **3. Relations with Public Order and Jurisdiction Authorities**

As part of compliance with this Policy, Columbia Central University will establish collaboration agreements with state and local law enforcement authorities to assist in the investigation and follow-up of reported crimes. In addition, it will indicate the jurisdiction that the security personnel will have in each of its precincts.

The Institution will indicate in its annual report the responsibilities of the security personnel to attend to the complaints that arise concerning these cases and the relations with the local and state agencies that assist in the investigation or that provide victim support services.

### **4. Procedures to follow if a criminal incident of sexual assault occurs**

Columbia Central University will state in its Institutional Policies on Sexual Harassment and Domestic Violence the procedures to be followed to investigate and follow up on reported cases of Dating Violence, domestic violence, sexual assault, and stalking.

The Institution will maintain its commitment to disclose in its Annual Security Report and, through the different communication media, the following written and/or electronic information on the procedures to follow if a crime of this nature occurs, the importance of preservation of evidence that can help show that the alleged crime or criminal offense occurred, how and to whom the alleged offense must be reported. In addition, it will disclose the options on the participation of the authorities of public order and the campus

in the investigation of said crimes and notification of the options that the victim must accept or not to be assisted by the police or campus authorities. It will also make known the rights of the victims and the institutional responsibilities for protection orders, non-contact orders (no-contact), restraining orders, similar legal orders issued by a criminal, civil or Institutional court.

5. Confidentiality

Columbia Central University's policy on confidentiality seeks to create a balance between the confidentiality needs of victims and the public's right to know information about incidents of a criminal nature that occur on the premises. However, maintaining the confidentiality of the victim is the primary concern. If there is a danger that the perpetrator may commit a similar action, the Institution is obliged to alert other members of the community and will always maintain the confidentiality of the identity of the person attacked. When the person attacked or stalked receives counseling services, confidentiality will be protected considering the applicable laws.

The Institution must notify about the receipt of reports of incidents of domestic violence, sexual assault, and stalking, but such notification does not require identifying the person attacked. The victim has the right to request confidentiality regarding her name and other personal information that identifies him/her.

6. Disciplinary Action

Columbia Central University's Annual Safety Report will disclose the disciplinary measures it will take to address reported cases of Domestic Violence, Dating Violence, Stalking, and Sexual Assault. Any student or employee who engages in unwanted conduct will be sanctioned following the institution's student or employee regulations. The sanction may include expulsion of the student or employee. If you have incurred a crime of a criminal nature, the due processes of law established in the Criminal Code of PR will be applied and the pertinent authorities will be informed.

7. Written Notice

Through the Institution's Annual Security Report, help services available to victims of Domestic Violence, Dating Violence, Stalking, and Sexual Assault inside and outside the Institution will be notified. In addition, written notification will be provided regarding available assistance, options to request changes in your academic program, accommodation, transportation, or protective measures if required.

## Definitions

1. **Domestic violence** - When the use of physical force, psychological or sexual violence, intimidation, or persecution against a person by his/her partner is used to cause physical damage to her property or third parties to cause serious emotional damage.
2. **Dating violence (date rape)** - It is the violence committed by one person towards another, be it physical, emotional, and sexual abuse, during a romantic or intimate social relationship that they do not cohabit.
3. **Sexual harassment** - Sexual harassment is a form of conduct that undermines the integrity of the relationship in the job or area of study (student/teacher). No employee,

male or female, should be subjected to sexual conduct or innuendo. Sexual harassment does not refer to occasional flattery that is socially acceptable. It refers to unwelcome behavior, that is personally offensive, that attacks morale, and therefore interferes with work effectiveness.

4. **Gender-based harassment** - Acts of verbal, non-verbal, or physical aggression, intimidation, or hostility based on gender or stereotypes, including acts that do not involve conduct of a sexual nature.
5. **Consent to sexual activity** - Manifestation of express or tacit will by which a person approves a sexual act that he performs with another person.
6. **Partner** - Person who is or was in an intimate social or romantic relationship with the abuser.
7. **Protection order or restraining order** - Written order issued by a criminal or civil court whose purpose is to prevent the perpetrator from committing acts of violence, acts of harassment, threats, sexual violence, contact or communication, and/or physical proximity with the alleged victim.
8. **Sexual violence** - Sexual acts perpetrated against a person without their consent or where a person is unable to consent due to the use of alcohol or other drugs.
9. **Sexual assault with object** - Using an object or instrument to illegally penetrate, lightly, the genital or anal opening of the body of another person without the consent of the victim, including cases where the victim is unable to give consent, due to at your age or because of your temporary or permanent physical or mental disability.
10. **Rape** - Penetrating the vagina or anus, no matter how slight, with any part of the body or object, or oral penetration by a sexual organ of another person, or by a sexual object without the consent of the victim. It includes instances where the victim is unable to consent due to her age or physical or mental state.
11. **Sodomy** - Oral or anal intercourse with another person, without the consent of the victim, including cases where the victim is unable to give consent, due to his/her age or because of his/her temporary or permanent physical or mental disability.
12. **Non-forced sexual offense** - The perpetrator knows the victim, it may be a family member, who has a sexual relationship without using physical force. The victim may be a minor for which it is classified as a technical violation.
13. **Sexual coercion** - Using pressure, force, alcohol, or other drugs to have sexual contact with someone against her will.
14. **Intimidation** - When someone is forced to do something employing threats, manipulation, and/or physical force.
15. **Vandalism** - Deliberate damage or destruction of the property of third parties, whether public or private, without the permission of its owner.
16. **Theft** - Any person who illegally appropriates personal property belonging to others, stealing it from the person in his/her immediate presence and against his/her will, through violence or intimidation.
17. **Escalation** - Any person who penetrates a house, building, or other construction or structure, or its dependencies or annexes, to commit any crime of illegal appropriation.
18. **Counselor** - Person who provides services to victims of sexual assault, stalking, domestic violence, dating violence, among others.

19. **Emotional abuse** - Exercise control over the victim by attacking him/her self-esteem by insulting, humiliating, threatening, destroying her belongings, isolating him/her, being possessive, and jealous.
20. **Physical abuse** - The perpetrator uses force intending to cause harm to his/her partner or ex-partner. Physical abuse includes, but is not limited to hitting, slapping, choking, kicking, biting, burning, using knives, guns, locking, and raping.
21. **Stalking** - Behavior pattern where the perpetrator engages in repetitive behaviors such as sending verbal and written communications, threatening, and persecuting to intimidate the victim.
22. **Harassment** - It is defined as the act of harassing, intimidating, constantly chasing, and annoying another person. Harassment can arise through obscene comments and innuendo or physical contact.
23. **Assault** - Any person who illegally by any means or form causes another injury to his/her bodily integrity.
24. **Discrimination** - It is defined as the distinction in treatment on arbitrary grounds such as race, gender, gender identity, socioeconomic status, others.
25. **Hate crime** - The victim was intentionally selected because the perpetrator is prejudiced against him/her. Categories of prejudice include the victim's current or perceived race, religion, gender, gender identity, national origin, and disability.
26. **Sexual orientation** - Capacity of each person to feel an emotional, affective, or sexual attraction for people of a gender different from their own, or of the same gender, or more than one gender.
27. **Gender identity** - Refers to how the person identifies himself/herself, how he/she recognizes himself, regarding the gender that may or may not correspond to his/her biological sex or assigned at birth.
28. **Procedures** - Refers to the hearing process to gather evidence when filing a complaint.
29. **Result** - Information obtained after an investigation.

### **Institutional Commitment**

Following the amendments established by VAWA to the Clery Act, Columbia Central University reaffirms its commitment to guarantee and support the rights of victims of sexual violence by improving and expanding the security and protection measures available in favor of the academic community and the entire community, the external community that benefits from the Institution's services, as well as fostering and promoting healthy lifestyles with prevention and safety programs that contribute to improving the quality of life in our community.

### **Amendments**

This Policy must be reviewed annually to update the applicable procedures, as provided by the Federal Department of Education.

# DOMESTIC VIOLENCE PROTOCOL

## Introduction

Domestic violence consists of a cycle of abuse that includes, but is not limited to, physical/sexual abuse, threats, intimidation, isolation, and financial abuse. Domestic violence is a problem that concerns us all and that transcends ethnic, cultural, social class, ideology, and sexual orientation barriers. Anyone can be abused or be a victim of domestic violence. Everyone must play a more active role in promoting equitable and interpersonal relationships.

## Purpose

The purpose of this Protocol is to prevent situations of domestic violence and violence in the workplace through a guide to standardize procedures. This Protocol provides uniformity to the measures and the procedure to be followed when an employee is a victim of domestic violence and/or violence in the workplace. Through these preventive and effective security measures, adequate handling of cases that may bring with them elements of danger in the work environment will be achieved.

## Applicability

This protocol applies to all employees, students; as well as all those people who visit our university.

## Legal Base

- Article I, Section 1 of the Constitution of the Commonwealth of Puerto Rico, provides that the dignity of the human being is inviolable, that all persons are equal before the laws, and prohibits the establishment of any discrimination based on sex, among others.
- Article I, Section 16 of the Constitution of the Commonwealth of Puerto Rico, recognizes the right of every person who works to be protected from risks to their health or personal integrity in their work.
- Law No. 20 of April 11, 2001, as amended, the Law of the Office of the Ombudsman for Women, creates the Office of the Ombudsman for Women. It expresses as a public policy of the Commonwealth to guarantee the full development and respect of the human rights of women and the exercise and enjoyment of their freedoms. It also provides that the Attorney General's Office will prioritize the achievement of affirmative actions by public and private organizations to guarantee gender equality in areas where domestic violence persists, among other manifestations of inequity and oppression. It provides that the agency shall have the function of overseeing compliance with the public policy established in this Law, ensuring the rights of women, and ensuring that public agencies comply with and adopt affirmative or corrective action programs.

- The Law for the Prevention and Intervention with Domestic Violence, Law No. 54 of August 15, 1989, as amended, establishes the public policy of the Commonwealth of Puerto Rico concerning domestic violence, where it is recognized that it deals with one of the most complex and serious problems facing our society and it is strongly repudiated. In addition, it recognizes that domestic violence is a manifestation of inequality between the sexes that particularly affects women. The Law provides legal, civil, and criminal remedies for people who are the object of acts constituting domestic violence.
- The Occupational Health and Safety Act, Act No. 16 of August 5, 1975, as amended, provides that each employer must provide, to each of the persons he employs, a place of employment free of recognized risks that are causing or may cause death or physical harm to the people you employ.
- Law No. 100 of June 30, 1959, as amended, protects employees and applicants for employment against discrimination based on sex, among other reasons. This Law applies to government agencies that function as businesses or private companies.
- Law No. 69 of July 6, 1985, as amended, requires strict compliance with equal employment rights, both for men and women, and prohibits discrimination based on sex. This Law applies both to private employers and to government agencies and instrumentalities.
- Title VII of the Federal Civil Rights Act of 1964, prohibits discrimination in employment based on sex, among other reasons. The United States Supreme Court has interpreted sexual harassment at work as a manifestation of discrimination covered by this Act.
- The Occupational Safety and Health Act of 1970 (OSHA) provides that every employer is responsible for offering employees a workplace free from known hazards that are causing or are likely to cause death or serious physical harm.
- The Law Against Stalking in Puerto Rico, Law No. 284 of August 24, 1999, as amended, defines stalking as “conduct through which surveillance is exercised over a certain person, unwanted verbal or written communications are sent to a certain person, written, verbal, or implicit threats are made to a certain person, acts of vandalism are carried out directed at a certain person, repeatedly harassed by words, gestures or actions aimed at intimidating, threatening or persecuting the victim or members of their family ”. The Stalking Law provides a protection order similar to that provided by Law No. 54, cited above. The process to obtain it is the same and the application form can be requested at the Court.
- Act No. 538 of September 30, 2004, amends Act No. 54 and provides that an employer may request a protection order in favor of one of his/her employees, visitors, or any other person in the workplace if one of its employees is or has been a victim of domestic violence or conduct constituting a crime, as established in Act No. 54, and the acts of conduct constituting domestic violence have occurred in the workplace. Before beginning this procedure, the employer must notify the employee who is or has been a victim of domestic violence or conduct constituting a crime, as established in Law No. 54.
- Act No. 542 of September 30, 2004, amends Act No. 54, ante, and provides that when the Court so understands or when it issues protection or stalking order, it will immediately order the promoted party to deliver to the Puerto Rico Police for their custody, any



firearm belonging to the promoted person and on which they have been issued a license to have or possess, or carry, or target shooting, hunting or of any kind, as the case may be. The order for the surrender of any firearm, as well as the suspension of any type of firearm license, will be compulsory. Likewise, when said order is issued by a Court, said opinion will have the effect of suspending the corresponding license even when it is part of the professional performance of the accused. Said restriction will be applied at least for the same time that the order is extended. Federal Firearms Prohibition, 18 U.S.C. §922 (g) (8); 18 U.S.C. § 922 (g) (9). The Violence Against Women Act of 1994 (VAWA) is federal legislation that provides legal protection for battered women. It prohibits a person against whom a protection order has been issued and any person who has been convicted of a misdemeanor of domestic violence from possessing firearms and ammunition. However, there are "official use" exceptions to these prohibitions. The federal statute is retroactive, so it applies to convictions that occurred before the Act went into effect. In compliance with federal Title IX Education Amendments Act of 1972, Section 504 of the Rehabilitation Act of 1973, and other federal, local, and state laws, Columbia Central University does not discriminate against anyone based on gender, race, color, birth, age, origin or social condition, ancestry, marital status, religious or political ideas or beliefs, sexual preference, nationality, ethnic origin, veteran status of the Armed Forces, or disability in its programs and activities. The following person has been designated by the University to answer questions related to non-discrimination policies:

Norelis Rodriguez  
Title IX Coordinator  
Angora Industrial Park  
Building G, Angora Avenue  
Caguas, PR 00725  
nrodriguez@ediccollege.edu  
787-704-1020, ext. 140

## Definitions

For this Protocol, the following words have the following meanings:

- Relationship with a partner - Means the relationship between spouses, ex-spouses, people who cohabit or have cohabited, those who maintain or have sustained an intimate consensual relationship, those who have procreated a son or daughter among themselves, and those who support or have sustained a dating relationship. Includes relationships between people of the opposite sex and people of the same sex.
- Cohabiting - Means maintaining a consensual relationship similar to that of the spouses.
- A person who incurs acts of domestic violence - A person who uses physical force or psychological violence, intimidation, or persecution against his/her partner.
- Workplace - Any space in which a person performs functions as an employee and the surroundings of that space. When it comes to a building or physical structure, it includes the surrounding spaces such as gardens and parking.

- Persecution or persecution - This means to keep a person under constant or frequent surveillance with a presence in the immediate or relatively close places in what is pertinent here to the workplace, in such a way that it can instill fear or fear in the mind of an average person.
- Serious emotional damage - Means and arises when, as a result of domestic violence, the person who is the object of the conduct repeatedly manifests one or more of the following characteristics: paralyzing fear, feelings of helplessness or hopelessness, feelings of frustration and failure, feelings of insecurity, helplessness, isolation, weakened self-esteem or other similar behavior, when it is the product of repeated acts or omissions.
- Intimidation - Means any action or word that, manifested repeatedly, has the effect of exerting moral pressure on the spirit of a person, who, for fear of suffering some physical or emotional damage to his/her person, his/her property, or the person of another or another, is obliged to carry out an act contrary to his/her will.
- Protection Order - Means any mandate issued in writing under the seal of a Court, in which measures are dictated to a person who incurs acts of domestic violence to refrain from incurring or carrying out the same.
- Victim/Survivor - Any person who has been the subject of acts constituting domestic violence.
- Domestic violence - The use of physical force, psychological or sexual violence, intimidation, or persecution against a person by his/her partner to cause physical damage to her property or third parties to cause serious emotional damage.
- Psychological violence - Means a constant pattern of conduct exercised in disgrace, discredit or contempt for personal worth, unreasonable limitation to access and management of common property, blackmail, constant surveillance, isolation, deprivation of access to food or adequate rest, threats of depriving the custody of the sons or daughters, or destruction of objects treasured by the person.

### **Disclosure and Training Plan**

The declaration of the Protocol on Domestic Violence in the workplace will be made public throughout the University. It will be posted on the INTRANET for access by all employees.

1. Information on this Protocol will be provided once a year to all personnel, following the Law.
2. It will be available on the University website.
3. The Human Resources Office, supervisors, and counseling staff will receive at least one annual training course on Domestic Violence and the use and scope of this Protocol.
4. The Human Resources Office will coordinate the offering of talks and educational activities to raise awareness among staff.
5. The Counseling Office will coordinate the offering of talks and educational activities to make students aware of domestic violence as a social problem.

6. The University will send training on domestic violence and other related to the personnel that it deems necessary.

### **Coordinators of the Protocol**

1. Office of Human Resources
2. Rectors of the Campus
3. President
4. Professional Counselor (in the case of students)
5. Academic Dean (in the case of students)

### **Responsibilities**

#### Supervisor

Supervisors should receive training on how to care for victims/survivors of domestic violence, how to identify their needs, how to prepare safety plans, and about the resources available to victims/survivors.

The supervisor will be trained in the same areas as the person in charge of domestic violence matters, in addition to the areas of supervision applicable to situations of this nature.

The supervisors will have the responsibility of attending preliminarily those matters related to domestic violence that any employee who is being affected by this type of situation reports to them, even if they are people who are not under his/her supervision.

The supervisor, together with the person in charge of domestic violence issues, will be in charge of guiding the employee, carrying out an analysis of their needs, and preparing a safety plan, together with the employee or employee.

### **Domestic Violence in the Workplace**

The Human Resources Office will be in charge of compliance with the policy on handling domestic violence situations. Office staff should be trained so that they understand the issue of domestic violence and develop skills to interact with victims in a safe, confidential, and non-judgmental manner. This person will be in charge of coordinating education and training for supervisory personnel and other personnel on domestic violence in the workplace. In addition, the person will support supervisory staff in handling domestic violence situations in the workplace. Also, will be in charge of preparing a safety plan, together with the supervisor and the employee affected or affected by the situation of domestic violence in the workplace.

He/She will coordinate the offering of talks and activities to raise awareness about the problem that domestic violence represents, how it affects all staff on and off the job, and the need to

support victims/survivors. It will offer advice and guidance to all people employed at the University who request it.

### **Case Management Process for Employees**

When an employee voluntarily goes to the Human Resources Office or the immediate supervisor to expose a situation of domestic violence that may affect their job performance or when a member of the University identifies that a situation of this type could affect it, the situation will be handled as follows:

1. The Human Resources Office or the Campus Chancellor will meet or summon the person involved and both parties will sign the Confidentiality and Consent Agreement before starting the interview.
2. An initial interview will be held, and the form established for that purpose will be filled out.
3. If there is a protection order, a copy must be kept in the file that will be opened on the case.
4. The case will be evaluated, and it will be determined whether it merits consultation with the corresponding authorities.
5. If necessary, the Committee for the Management of Situations of Domestic Violence, together with the person involved, will prepare a Personal Safety Plan that must consider the following factors:
  - A. Risk situations which the victim is facing
  - B. Status of the aggressor
  - C. Exposure of minors to abuse
  - D. Economic and shelter needs of the victim and his/her children
  - E. Threats by the aggressor to the victim's families or friends
  - F. Risks for employees or visitors to the University
  - G. The people in the areas affected or involved in the situation will be informed of the recommendations in the case and the security plan prepared.
  - H. The victim/survivor will be referred to appropriate agencies or specialized domestic violence organizations for support services. (The Referral Authorization Sheet will be completed.)
  - I. The situation will be followed up as needed.
  - J. The following forms will be used in case management.

### **Personal Safety Plan**

The University, through the Human Resources Office, will prepare for each employee affected by acts of domestic violence, a personal safety plan following the elements of violence and risk. Considering the available resources, a plan will be designed within the next 72 hours, after the incident is reported.

Any security plan must take into account the access to the University, as well as the work and study areas, and it must be extended to the place or physical space where you work (if you are an employee) or study (if you are a student) the victim, taking into consideration the following:

- Instructions to security personnel not to give access to the aggressor, to provide him/her with a photo or description of the victim.
- Allow the victim to temporarily park in a closer location.
- Move the employee to a safer place within the employer's facilities, to the extent possible.
- No phone calls transferring from the perpetrator.
- Constant monitoring of the main areas.
- Agreements with the Puerto Rico Police, both state and municipal, for preventive patrols near the University grounds.
- Training in safety and precautionary measures for management personnel and other personnel.
- Keep any document, fax, or email from the perpetrator to be used as evidence in any procedure.
- If there is a protection order, keep it in a confidential place and instruct the security personnel on its existence so that the entry of the perpetrator is prevented, and the Police are called.
- Report to the Police in case of situations that may degenerate into violence at work.

### **Process for Handling Student Cases**

- Any student who understands that is facing a situation of domestic violence or psychological violence may turn to the Counseling Office to request help in handling the situation and to request that measures be taken to guarantee their safety and that of their classmates.
- All information provided by the student will be kept under the strictest confidentiality. Any meeting or discussion on the subject must take place in a private space and without the intervention of third parties who contribute nothing to the process.
- The security measures to be taken will be discussed with the student and the input of the student will be taken into account when determining them.
- The Professional Counselor will meet or summon the person involved and both parties will sign the Confidentiality and Consent Agreement before starting the interview.
- An initial interview will be held, and the form established for that purpose will be filled out.
- If there is a protection order, a copy must be kept in the file that will be opened on the case.
- The case will be evaluated, and it will be determined whether it merits consultation with the Academic Dean.

If necessary, the Professional Counselor, together with the person involved, will prepare a Personal Safety Plan that must consider the following factors:

- Situations of risk in which the victim finds himself
- The dangerousness of the aggressor
- Exposure of minors to abuse
- Economic and shelter needs of the victim and her children
- Threats by the aggressor to the victim's families or friends
- Risks to employees, students, or the public.
- The people in the areas affected or involved in the situation will be informed of the recommendations in the case and the security plan prepared.
- If there is no protective order and if deemed necessary, one will be requested.
- The victim will be referred to appropriate agencies or specialized domestic violence organizations for support services. (The Referral Authorization Sheet will be completed).
- The situation will be followed up as needed.
- The following forms will be used in case management:
  - Confidentiality Agreement and Consent
  - Initial Interview
  - Report of Incident and Situation of Domestic Violence
  - Authorization for Referrals
  - Personal Safety Plan

### **Personal Safety Plan**

In the case of students, this plan will be prepared by the Counseling Office staff. Taking into account the available resources, a plan will be designed within 72 hours after the incident is reported.

Some short-term suggestions are:

- Consider carpooling so that the person does not travel alone to and from their house.
- Offer guidance on alternative routes to follow.
- Identify the agencies with which they should communicate, such as the Puerto Rico Police, the courts, and shelters, among others.
- Obtain a photograph of the aggressor or aggressor so that it forms part of the Personal Safety Plan and so that the Human Resources and Security personnel can identify this person.
- Retain as evidence facsimiles, emails, and letters sent to the victim, in the case of threats.
- Call the police quickly if the aggressor is violating the protection order.

### **Other Provisions (For Employees)**

1. Columbia Central University is not responsible for any damage, act, or omission caused by the professionals to whom the employees have referred.
2. The Human Resources Office will maintain confidentiality in the assistance it provides to the employee. A separate file will be prepared for each employee who receives services.
3. Columbia Central University will take the necessary measures to guarantee the confidentiality of communications and information received by the employee during the provision of services to prevent and intervene with victims of domestic violence.
4. The participation of the employee will be voluntary and, once the services are freely accepted, the employee will sign the consent. The employee will choose the professional, public, or private resources available that he/she considers necessary to solve their problem.
5. Among other resources, the Resource Directory provided by the Office of the Ombudsman for Women will be used to provide the help that the employee needs.
6. The Human Resources Office will obtain the written consent of the employee to disclose or request information related to the situation that he/she is presenting, under the conditions established above.
7. Columbia Central University reserves the right to deviate from the steps established in this Protocol, depending on the circumstances of each case, and this does not create a cause of action against the University.

### **Other Provisions (For students)**

- Columbia Central University is not responsible for any damage, act, or omission caused by the professionals to whom the students have referred.
- The Counseling Office will maintain the strictest rules of confidentiality in the assistance it provides to the student. A separate file will be prepared for each student receiving services. Said files will be archived and kept with strict security measures. The only person who will have access to the file will be the Professional Counselor or by order of the Court. The office Counseling will take the necessary measures to guarantee the confidentiality of communications and information received from the student in the course of providing services to prevent and intervene with victims of domestic violence. All communication will be private and will be protected by the privilege of confidentiality established in the Rules of Evidence of Puerto Rico.
- The student's participation will be voluntary and, once the services are freely accepted, the student will sign the consent; The student will choose the professional, public, or private resources available that he/she considers necessary to solve her problem.
- Among other resources, the Counseling Office will use the Resource Directory provided by the Office of the Women's Ombudsman to provide the help that the student needs.
- The Office will obtain the written consent of the student to disclose or request information related to the situation that he/she presents, under the conditions established above.

- The Counseling Office reserves the right to deviate from the steps established in this Protocol, depending on the circumstances of each case, and this does not create a cause of action against Columbia Central University.

### **Separability**

The provisions of these rules are separable from each other, so the declaration of nullity of any of them will not affect the others, which may be applicable regardless of those declared null.

### **Repeal and Amendments**

This normative document may be amended or repealed by the President of Columbia Central University or its Board of Directors.

### **Validity**

This normative document will be effective immediately as of September 1, 2015.

## **NON-VIOLENCE POLICY**

### **Introduction**

Columbia Central University (CCU) promotes a safe study and work environment for our university community, for which it prohibits and condemns any act of violence that threatens the physical and emotional integrity of its members.

To this end, CCU has adopted this policy of non-violence in the workplace and studies.

### **Target**

This policy has as its main objectives to protect the physical and emotional integrity of employees, students, suppliers, and visitors in general and to provide guidance on zero tolerance of behaviors that promote violence.

### **Definition**

**Violence** - violence is defined as those actions or words that endanger or harm other people or result in a reasonable belief that other people may be in danger. (FBI Academy: Workplace violence: issue in response, 2013). Violent behaviors include, but are not limited to threats, physical or emotional violence, intimidation, sexual harassment, harassment, among others.



## **Report of Violent Behaviors**

Employees, students, suppliers, or visitors are responsible for reporting any violent or threatening acts that occur to their supervisor or designated institutional official (Security Officer, Chancellor, Director of Human Resources, Counselor). The established complaint process will be used to investigate acts of violence at the university and determine the action to be taken in the face of the facts presented.

Once information is received that an incident of violence is occurring or that it has already occurred, it must be reported to the Chancellor or Counselor or Director of Human Resources or security officer. The type of incident will be evaluated, and the necessary measures will be taken to protect the safety of people. Once the incident is evaluated and it is established that there is no immediate threat to security or assistance has been provided to the injured(s), those involved will be informed that they will be interviewed, and a written complaint will be requested.

Upon receipt of the written complaint, the corresponding investigation will be carried out, summoning possible witnesses.

The university will determine whether to install the Complaints Committee to proceed with the investigation and adjudication of disciplinary measures, if necessary.

## **Violation of Policy**

To comply with the institutional policy on non-violence, CCU will apply disciplinary measures against any employee, student, visitor, contractor, or dealer who violates this policy or any other state or federal statute. State and federal statutes include the applicability of sanctions to activities of student organizations and activities sponsored by the university.

These measures may vary according to the severity of the offense and the times in which such behavior is incurred. Measures to be applied to students range from a written reprimand, suspension to expulsion. Employees may be subject to suspension and termination of employment measures. Suppliers, contractors, and concessionaires may immediately cancel the contractual relationship. Visitors may be prohibited from entering the premises.

## **Prohibition of Retaliation**

Any conduct that is reasonably perceived as retaliation, retaliation, or revenge, such as harassment, calls, writing to the complainant, or encouraging third parties to annoy, harass or intimidate him, as a consequence of the filing of the complaint, may be considered a violation independent of this policy.

## **Procedure for Filing Complaints Related to Violations of Established Policy**

Any employee, student, supplier, or visitor who has indicative evidence that any member of the university community exhibits violent behavior, related to this policy, may file a complaint in this regard.

Process:

1. The procedure begins with the filing, in writing, of the complaint before the corresponding authorities. If the complaint is related to an employee, it will be filed with the Human Resources Office. If it is related to a student, it will be filed with the Chancellor and/or Counselor. If it is related to any visitor, contractor, concessionaire, or supplier, it will be filed with the Chancellor of the Campus.
2. Filing a complaint result in the reported incident being investigated and the Complaints Committee is convened. Said meeting will be called by the Chancellor or President to formally investigate the complaint and determine the action to be taken. Strict confidentiality will be maintained during the process and information, or other evidence provided by the parties or witnesses will not be disclosed during an adjudicative process.
3. If the complaint involves an intervention by external agencies, the officer in charge will proceed to call the State Police, to initiate a formal investigation. The investigation will be in charge of the State Police from the filing of the complaint in the judicial forum.

### **Investigation Process**

The Complaints Committee shall conduct a prompt and detailed investigation as of the receipt of the complaint of the alleged incident and the notification to the alleged offender. The process of appointing the Complaints Committee and beginning the investigation must be carried out on or before seven (7) business days from the notification to the parties. The investigation should include:

1. An interview with the complainant to establish the basic facts and identify witnesses and physical evidence, if any.
2. An interview with the alleged offender, which allows him/her an opportunity to admit, deny, or explain each factual allegation in the complainant's statement and identify witnesses or physical evidence if any.
3. Interview of any witness. Witnesses will be informed that any matter that is discussed must be kept confidential.
4. The Complaints Committee shall review the results of the investigation and decide in what way the policy has been violated.
5. The Complaints Committee must issue its resolution within the first twenty (20) business days of the end of the investigation. Said resolution shall specify the conclusions reached by the committee and its opinion following said conclusions.
6. The results of the investigation must be communicated to the complainant and the alleged offender through a registered letter.

When one or both of the parties do not agree with the results of the investigation, they may file a review of the resolution before the Institutional Board of Directors within a term of five (5) business days after having received the resolution of the Committee on Complaints. The request for review will be filed when the complainant or alleged offender, in writing, delivers to the President of CCU a Writ of Review where he expresses the grounds for his/her request for review. The Institutional Board of Directors (JDI) shall review the Review Brief and determine if it is substantiated. If it is not substantiated, it will be void by the Institutional Board of Directors and will not suffer any effect, leaving the opinion of the Complaints Committee final and irrefutable. As a result of the review, the Institutional Board of Directors may accept, reject, or modify the decision of the Complaints Committee within a term of five working days.

1. The filing of the petition for review will interrupt the effectiveness of the opinion of the Complaints Committee.
2. The JDI will air the requested review no later than fifteen working days from the filing of the review.
3. The JDI will only be able to pass judgment on the opinion of the Board, based on the record of the proceedings before said Board, and normally and ordinarily, it will respect the conclusions of the Complaints Committee.
4. The JDI will draw up a special record of all the disciplinary procedures brought before it and when issuing its resolution, it will state the reasons that support its determination.
5. The decision of the JDI may confirm, modify, revoke, or exonerate the opinion of the Complaints Committee. Likewise, the Board of Directors may, in the spirit of achieving CCU's commitment to provide and ensure a work and study environment free of intimidation and harassment, confirm the violation of any disciplinary norm as found by the Committee on Complaints, however, to the foregoing, suspend the effectiveness of the sanction imposed by said Board.
6. The decision of the JDI is final and firm and will conclude the matter that is the subject of the same.

## ELECTRONIC SURVEILLANCE SYSTEM POLICY

### **Purpose**

The purpose of this policy is to establish the scope of the electronic surveillance system that we use at the University and the management of the information and images that are collected.

### **Applicability**

This policy details the operation of the electronic surveillance system and applies to the entire university community and visitors.

## **Politics**

To safeguard the safety of the university community, visitors, contractors, suppliers and to protect property, Columbia Central University has installed an electronic surveillance system in common areas, corridors, and some laboratories, depending on the campus. Through this system, the areas will be monitored to identify unwanted events such as assault or robbery, fire, vandalism, accidents, and access by unauthorized personnel, among others.

The electronic surveillance system, through video cameras, will be located in critical points of the university. However, under the Constitution of the Commonwealth of Puerto Rico, it is stated that the right is expressly recognized of the individual to their dignity, privacy, and personal integrity. To this end, it is the policy of Columbia Central University to always guarantee such rights.

The university has specifically determined areas, departments, or points that are more vulnerable or that can provide a clear vision of the activities that are carried out.

Respecting the importance of maintaining the privacy expectations of students, faculty, employees, visitors, contractors, and suppliers, cameras have not been installed in the following areas:

- Bathrooms
- Employee lounge/dining room
- Lactation Rooms
- Massage Laboratories

### **Frequency/Nature of data to be obtained:**

1. The equipment (video camera) will be recording actively and continuously.
2. The equipment consists of technology that:
  - Records videos and sound in the nursing laboratory (Caguas and Yauco Campus) and only videos in the rest of the areas.
  - If necessary, can zoom in on a specific area.
3. The selected strategic points are monitored 7 days a week, 24 hours a day.
4. The data and information recorded will be reviewed periodically and action will be taken, according to the need of each case.
5. The University:
  - It will keep the recorded data in a locked and confidential area.
  - The system retains the recordings for one month, then the system itself eliminates the recordings.
  - Only recordings that can serve as evidence in those cases in which it is determined that an unauthorized access violation, incidents, or illegal activities have occurred in

the selected areas will be retained in a confidential file. The rest of the material will be discarded automatically.

- Access to recorded information will be limited to the following people: IT Administrator, Facilities and Purchases Director, Human Resources Director, Chancellor, President, and CEO, as required.

### **Monitoring Equipment**

The monitoring team in the venues will be the responsibility of the Chancellor and in the Central Office of the IT Administrator. They must maintain control of access to it. In case of any abnormality, the Facilities and Purchases Director and/or the Human Resources Director will be notified immediately, to channel the emergency or event as appropriate. It is the Chancellor's responsibility or the IT Administrator, as applicable, to prepare a report on any abnormality that has occurred. This document will be identified as confidential and must be kept in the relevant files to guarantee limited access.

### **Staff/Visitors/Students**

The electronic surveillance equipment, through video cameras, will cover all people in the selected points or areas of the different areas of the university, excluding those that by their nature there is a clear expectation of privacy. Recorded information will not be used to determine employee productivity, efficiency, and performance.

### **Complaints**

If for any reason any employee, student, or visitor understands that their rights to privacy and/or confidentiality could be affected, they must immediately communicate their concern in writing, directly to the Chancellor or President. The complaint will be dealt with, and the complainant must meet to address his/her concern and clarify his/her doubts. A written report on the actions taken or agreements reached must be issued and filed.

Any questions or information that employees, faculty, students, visitors, suppliers, or contractors; understand that must be clarified or provided, must be managed with the Chancellor or his/her immediate supervisor, who will attend to the situation presented.

## FINANCIAL AID

### **Mission**

The Financial Aid Office's mission is to guide and guide students about the different financial aid programs offered by our university. Provides orientation about the requirements to be able to participate in these grants.

### **Homework**

The Financial Aid Office is responsible for:

1. Safeguard the information collected from each student, maintaining their security and privacy.
2. Review and organize the documents delivered by the student for the financial aid process.
3. Correctly manage the funds allocated.
4. Comply with established federal and state regulations.

### **Eligibility Requirements**

All students interested in receiving funds from some of the financial aid programs must meet the following requirements if required for Financial Aid.

1. Annually complete the Free Application for Federal Financial Assistance known as the FAFSA.
2. Demonstrate financial need.
3. Meet the Standards of Satisfactory Academic Progress.
4. Do not owe any refund of federal Title IV funds and/or not being in default on the payment of Secured Student Loans (Loan Delinquency).
5. Certification in Selective Service. All male students between the ages of 18 and 25 must be registered with the Federal Selective Service as a condition for receiving financial aid. If the student is over 25 and never did, he should contact the Selective Service and report the reason why.
6. Be a US citizen or an eligible non-citizen.
7. Possess a Fourth Year High School diploma or its equivalent (GED).
8. Possess a valid social security number.

### **Financial Aid Programs**

We describe below the different financial aid programs that our students can apply for:

1. Federal Pell Grant

The Federal Pell Grant is financial aid for postsecondary students in programs leading to a bachelor's degree, associate's degree, or certificate. Eligibility for this program is determined using a standard need analysis formula.

2. Federal Supplemental Educational Opportunity Grant (FSEOG)

The Federal Supplemental Scholarship is awarded to undergraduate students with exceptional financial needs. Pell Grant participants are served first in this program and with zero EFCs, they will maintain priority over other students, regardless of when they complete their Financial Aid file.

3. Federal Work-Study Program (FWS)

Federal Government funding for this program is increased with a contribution from Columbia Central University. Participants are assigned a job for which they will receive a salary that allows them to defray part of the expenses of their education. To the extent possible, the student will be assigned work that is related to her field of study.

If the student qualifies, the hours to work will be determined according to financial need and their class program. It may not exceed 80 hours per month and will earn the current federal minimum wage. Payments to participants in this program will be made once a month, approximately 15 business days after the end of the month.

- All interested students will have to visit the Institutional Financial Aid Office to request to be evaluated for this federal aid.

4. Direct Subsidized Loans

Direct Subsidized Loans are available to undergraduate students with financial needs. The Institution determines the amount that the student can borrow and said amount cannot exceed its financial need. On subsidized loans, the U.S. Department of Education pays interest:

- while the student is enrolled with a minimum part-time load,
- for the first six (6) months after being out of the institution, known as the grace period, and
- during a deferral period.

Subsidized loans have a 150% usage limit. This percentage is multiplied by the total duration of the enrolled study program and the result is the total number of years you have to receive subsidized loans.

Loan Disbursement

The University will apply the funds received to the pending balance that the student has with the University. If there is any excess, it will be returned to the student within fourteen (14) calendar days. Before the loan money is disbursed, the student can cancel all or part of the loan at any time by notifying the University. After the loan has been disbursed, the student can cancel all or part of the loan for a certain time. The loan

promissory note and the additional information to be received from the institution will explain the procedures and timeframe for repaying a loan.

The student can access <https://studentaid.gov/complete-aid-process/receive-aid> where they can obtain information on subsidized and unsubsidized loans, interest according to the type of loan, and amounts that they would qualify according to the level of studies.

#### 5. Veterans (Caguas, Bayamón and Carolina Campuses)

Columbia Central University (CCU) is approved by the Puerto Rico State Approving Agency to provide academic training to the students under the various GI Bill® programs. GI Bill® is a registered trademark of the U.S. Department of Veterans Affairs (VA). Approvals may vary by campus. Armed Forces veterans may be eligible for educational benefits from the U.S. Department of Veterans Affairs (VA). The VA pays some benefits directly to the student veteran and others to the school, depending on the program in which the veteran participates.

The student must process the benefits directly with the VA, and the CCU Certifying Official will certify the student's enrollment and academic progress. The VA makes monthly payments to the student or institution based on this certification. The student who covers the cost of studies through the above-mentioned institutions must notify the VA prior to enrollment and provide the necessary documentation in which the company or agency commits with the university to make the payment directly. For this, there must be a certification or commitment of payment from the company or agency that will assume the cost of the study.

Students using veteran benefits and their beneficiaries need to provide the official transcript of credits from their previous post-secondary or university institution to be eligible for the Veterans Administration (VA) educational benefits. If the official transcript is not submitted, CCU cannot certify you for the VA benefits.

The CCU Registrar's Office is available to offer comprehensive support. They can help guide you through the process of filling out all necessary forms and submitting documentation for educational benefits under various GI Bill® programs such as; the Montgomery GI Bill chapter 30, Veteran Readiness and Employment chapter 31, Post-9/11 GI Bill® chapter 33, Montgomery GI Bill - Selected Reserve chapter 1606, Reserve Educational Assistance Program chapter 1607, and VA education benefits for dependents and survivors chapter 35. The Certifying Official in the CCU Registrar's Office is responsible for providing ongoing service to veterans and their families and oversees creating and maintaining records used to certify a student's status.

All new and active students planning to receive Veterans' educational benefits while enrolled at CCU should take note of the following: Ensure that you are certified. Just enrolling for classes at Columbia does not automatically mean that you are approved for VA benefits. To be certified, you must fill out the necessary forms via the Veterans Affairs Office.



- You are obligated to submit to the CCU Certifying Official a copy of transcripts of credits from all institutions you attended or are currently attending. All students (veterans and service members) must submit transcripts from Joint Service Transcripts.
- If the student does not submit transcripts, Certifying Officers must enroll, as the information needed to evaluate military education and training is available online. Transcripts are required, even if the student has never previously received benefits, as regulations stipulate that the CCU academic department must evaluate all prior education to receive educational benefits.
- As a student, it is your important responsibility to promptly report and submit documentation supporting any changes to your curriculum or Preliminary Program, degree objective, or course substitution, among other things. Your active involvement is key to ensuring the smooth processing of your benefits.

## WITHDRAWAL POLICY

### Introduction

Columbia Central University (Columbia) is a university that is not required to attend classes. However, for the best academic achievement, Columbia has made it a policy to take attendance. Starting from this premise, the Dismissal Policy is based, whether official or unofficial.

### Applicability

This policy applies to all students enrolled in any academic program at the university, except those at the graduate level.

### Definitions

- Official Drop-Off that is requested by the student from one or all of her courses.
- Unofficial Withdrawal - Withdrawal processed by the University because the student is absent from all his/her classes for fourteen (14) consecutive calendar days without having excused himself.

## **Dispositions**

### **Official Discharges**

They are those withdrawals that are processed through the student's request. Official withdrawals are classified as total withdrawals (including all enrolled courses) and partial withdrawals (does not include all enrolled courses).

1. The student will notify their intention to withdraw from the Counseling or Retention Office.
  - Intention to withdraw means that the student indicates her interest in not attending his/her classes or understands that at the time of notification he/she will stop attending classes.
2. All possible help will be offered to the student so that he/she can complete her academic goal. If the student makes the final decision to process the withdrawal, he/she will complete the Withdrawal Form to determine the last day attended the University.
3. Once the withdrawal form is completed, the student will be referred to the Treasury Office for signature and guidance on the debt acquired, if applicable.
4. Finally, the student will be referred to the Financial Aid Office where the status of his/her file, financial aid, and the signature of the Officer will be verified.
5. Finally, the student will be referred to the Registrar's Office where the withdrawal will be processed, and the copy will be delivered to the student and each corresponding office.

### **Unofficial Discharges**

They are those that are processed when the student stops attending the University. Students who are absent for fourteen (14) consecutive days (including counting Saturdays, Sundays, and holidays from all their classes without excusing themselves from their teachers will be processed a withdrawal, retroactive to their last day of attendance at the Registrar's Office:

1. The Retention Officer will check daily the students who have fourteen (14) consecutive days absent, to determine those that correspond to an Administrative Withdrawal.
2. The Retention Officer will follow up on absent students and will document the information obtained in the weekly report.
3. The Retention Officer will evaluate each situation and file a withdrawal in those cases in which the student has not returned to the University. The last day attended will be determined and the Withdrawal Form will be sent to the Registrar's Office to complete the process.
4. The Registrar's Office will evaluate the withdrawal form and process it.
5. The Withdrawal Form will be sent to the corresponding offices for the Signatures of the Officers and the processing thereof (Retention, Registrar, Treasury, and Financial Assistance).
6. Once the Withdrawal Form has arrived, completed by all the Officers; The Registrar's Office will proceed to send by mail a copy of the withdrawal made and a letter to the

student notifying him that he was withdrawn from the University. A copy of the withdrawal and the letter will be sent to the student's file.

### **Cancellation of Withdrawal**

1. Any student interested in continuing their studies after having processed any type of withdrawal may request that it be canceled within a term of seven (7) school days at the Registrar's Office.
2. To cancel any withdrawal process, the student must visit the Registry Office or Retention Office where he/she will request the Cancellation Form. Said document must be delivered complete and authorized in all its parts at the Registrar's Office. Cancellation must indicate that the student will continue to attend classes and intend to complete the academic term. In turn, he will sign the Orientation Sheet for Cancellation of Cancellation.
3. If after canceling the same, the student requests a new withdrawal, the effective date of the same will be the date on which the student first notified the university of his/her intention to withdraw.

### **Withdrawal Policy Applicable to Term Programs (Modules)**

The Federal Department of Education has established specific provisions for when a student executes a Total Withdrawal, and their study program is structured based on modules of instruction.

This provision establishes that when a student withdraws before attending one of the enrolled modules, the university will adjust their academic load for the credits enrolled in the modules they did not attend and will recognize as official academic load the credits enrolled in the modules where the student attended classes.

### **Definitions**

**Module** - The set of courses enrolled sequentially for an academic study period.

**Official Academic Load** - Number of credits registered by the student who attended classes at least once.

**Withdrawal** - Process in which the student withdraws from a course or its study program; the process initiated by the University when the student does not comply with the institutional norms or abandons a course or its study program without official notification.

**Enrollment Period** - Period where the student is actively enrolled and attending the selected courses (normally one semester).

## Additional Provisions

1. A student who does not attend any of his/her classes during their first study module of the enrollment period will be considered a cancellation, and their assigned financial aid will be canceled.
2. A student who attends classes in his/her first study module and who processes a withdrawal of all the enrolled classes for the enrollment period will be considered a withdrawal and his/her Official Academic Load will be adjusted only to the enrolled courses to which attended the first module of studies.
3. A student who attends any of the subsequent modules of studies and preceding the last module of studies enrolled, and this determines to withdraw or to whom a withdrawal will be processed, his/her Official Academic Load will be adjusted to only the courses where the student attended classes for purposes of establishing the Official Academic Load.
4. When a student begins to attend all study modules of the enrollment period (including the final module), it will be considered that the student has attended the total of his/her registered academic load, and it is not necessary to make adjustments to his/her academic load registered when calculating a withdrawal.
5. All adjustments to the eligibility, academic load, and disbursement of the Title IV Programs scholarships will be processed through the calculation of R2T4 (Return of Title IV Funds).

## TITLE IV FUNDS RETURN POLICY (R2T4)

Under the Title IV funding (federal financial aid) regulations issued by the U.S. Department of Education, the following policies have been established for those students enrolled in an eligible program who are withdrawn, expelled, or for any reason do not complete the period of enrollment or payment period in which they were enrolled. Please review CCU's Withdrawal Policy for information on the process to withdraw. A student is not considered withdrawn if any of the following applies:

1. The student completes the requirements for graduation before completing the payment period (applicable only to graduation from the student's program of enrollment as of that payment period).
2. If the student is enrolled in a program comprised of modules and any of the following applies:
  - a. The institution obtains written confirmation that the student will attend a later module in the same payment period or period of enrollment that begins no later than 45 calendar days after the end of the module the student ceased attending. (If the student is enrolled in any full-term courses during the payment period the 45-day timeline does not apply, but the student must confirm in writing that they will be returning to a module that begins later in the payment period),

- b. The student successfully completes one or more modules that, together, comprise at least 49% of the days in the payment period (excluding scheduled breaks of five or more consecutive days and all days between modules); or
- c. The student successfully completes coursework equal to or greater than the coursework required for half-time enrollment.

Regulations for the Title IV programs require that when a student ceases attendance during a payment period or period of enrollment, the amount of financial aid earned by the student up to that point be determined using a pro rata calculation. To determine the amount earned by the student, CCU performs a pro rata calculation that uses the number of days completed in the payment period (as of Last Day of Attendance) as the numerator, and as the denominator, the number of days in the semester, or as follows if enrolled in a semester containing modules:

- If eligible for Pell Grant, Iraq-Afghanistan Service Grant during the period - days in modules the student actually attended, or
- If eligible for Direct Loan or FSEOG funds during the period (regardless of eligibility for other Title IV programs) - days in modules the student was enrolled in on the first day of the period or enrolled in at any time during the period.

Institutional breaks of five (5) consecutive days or more, if applicable during the payment period, will be excluded from the calculation. For example, if, as of the last day of attendance, a student completed 50 days of a semester of 100 days, they will have earned 50% of their Title IV aid for that semester.

If the percentage that results from the formula is greater than 60%, the student earned 100% of the financial aid for which he/she was eligible.

If the percentage earned is 60% or less and the financial aid for which the student was eligible prior to ceasing attendance has already been disbursed, the University and/or the student will be responsible for reimbursing the portion of the funds the student did not earn. The unearned portion of Title IV funding the institution is responsible for, must be returned to the U.S. Department of Education no later than 45 days from the date CCU determined the student stopped attending (Date of Determination).

If the Institution is not required to return all of the unearned funds, the student may be required to return the remaining amount. If applicable, within 30 days from date of determination of withdrawal, CCU will contact the student to coordinate arrangements to return the student portion of unearned grant funds. Students must make satisfactory arrangements to repay unearned grant funds within 45 days of receiving CCU's notice of overpayment. If the student fails to make satisfactory arrangements, CCU will proceed to report the student's overpayment to NSLDS. Please note that failure to make satisfactory arrangements may result in the student losing eligibility for Title IV funds.

Any unearned funds are returned in the following order:

- Unsubsidized Direct Loans;
- Subsidized Direct Loans;
- Direct PLUS Loans;

- Federal Pell Grants;
- IASG Grants;
- FSEOG Grants;
- TEACH Grants.

The student portion of grants will not be returned if the grant overpayment is \$50 or less. Any loan amount returned by the borrower must be repaid according to the terms of the borrower's promissory note.

If the financial aid for which the student was eligible has not yet been disbursed, the student may be eligible to have the financial aid earned disbursed after the R2T4 calculation has been performed. If the R2T4 calculation determines the student has received less in Title IV disbursements than they have earned, the student may be offered a post-withdrawal disbursement (PWD). CCU may automatically disburse all or a portion of the PWD that consists of grant funds in order to satisfy tuition, fees, room, and board, as applicable, within 45 days of the date the CCU determined the student ceased attending. CCU will seek the student's permission to use PWD grant funds for all other educationally related charges. Any PWD of loan funds must be offered to the student or parent borrower in writing within 30 days and accepted by the student or parent borrower and disbursed within 180 days of the date CCU determined the student ceased attending. Loan borrowers who are offered a PWD of loan funds will receive written instructions for declining the PWD or accepting all or a portion of the PWD. A borrower can never receive a PWD for funds for which they did not meet the eligibility criteria at the time they ceased attending.

For additional information, the student can request a copy of the form used to calculate the Return of Title IV Funds entitled: "Treatment of Title IV funds When a Student Withdraws", which is available in the Financial Aid Office.

The R2T4 calculation is separate from CCU's refund policy. If a student ceases attending, the Title IV funds that previously paid or were anticipated to pay the student's balance due to CCU may be reduced resulting in the student owing a balance to CCU. CCU will seek payment from the student for any balance due on the student's account due to the return of funds to the U.S. Department of Education.

**CLARIFICATION:** This policy may be modified by new regulations issued by the Federal Department of Education and the Accrediting Agency, or as otherwise deemed appropriate. In that case, CCU will update the relevant publications. We encourage the student to consult the newsletters, catalogs, offices, or other means of the University concerning new refund policies to be issued, if applicable.

## INSTITUTIONAL REFUND POLICY

### Policy Statement

The Institutional Refund Policy regulates how Columbia Central University (CCU) will manage the charges when a student cancels their enrollment, adds and/or drops courses during the add-drop period, or withdraws prior to completing a payment period. The Institutional Refund Policy applies to all students enrolled at any of CCU locations, with the exception of students enrolled in courses/programs that do not lead to a degree.

### Enrollment Cancellations

The student has the right to cancel their enrollment agreement within three (3) business days from the student's signing their enrollment agreement or until the end of the add/drop period, as specified in the academic calendar, whichever ends later. To cancel the enrollment agreement, the student must complete the Enrollment Cancellation Request form, which is available at the Admission's Office. Upon cancellation of the enrollment agreement, the institution will cancel all of the student's financial obligations, other than books and supplies, if applicable, which are not returnable because of use.

### Add/Drop Period

Any student who is enrolled for a payment period will have until the end of the add/drop period, as specified in the academic calendar, to add/drop courses without any fee. Please refer to the academic calendar for specific dates. Any charges for tuition and fees, as well as any funds paid for supplies, unused books or equipment which can be returned to the institution during this period will be refunded. Except for exceptional circumstances, there will be no adjustments for these charges after this period.

### No Show

The institution will cancel all of the student's financial obligations for unattended payment periods, other than books and supplies, if applicable, which are not returnable because of use.

### Withdrawals

If a student attends but withdraws from school after the add/drop period and prior to completing a payment period, the percentage used to determine the applicable charges will be the percentage of completed days from the total days in the payment period, rounded to the nearest 10%. CCU will use the last day of attendance to determine the days completed in the payment period. The table below provides details about how percentages are determined.

Completed Days in Payment Period / Total Days in Payment Period	Percentage of Charges owed to the Institution	Percentage of Charges to be Refunded
Up to 10.0%	10%	90%
10.01% - 20.0 %	20%	80%
20.01% - 30.0%	30%	70%
30.01% - 40.0%	40%	60%
40.01% - 50.0%	50%	50%

Completed Days in Payment Period / Total Days in Payment Period	Percentage of Charges owed to the Institution	Percentage of Charges to be Refunded
50.01% - 60.0%	60%	40%
60.01% - 100%	100%	0%

Example of an Institutional Refund Calculation for a student that withdraws during a payment period that begins on 1/7/2019 and ends on 3/28/2019. Tuition charges for the period are \$5,420.00.

Last Day of Attendance	Percent Attended	Percent of Tuition to be Refunded	Refund Amount
1/18/2019	14.81%	80%	\$4,336.00
02/16/2019	49.38%	50%	\$2,710.00

The student is responsible for the outstanding balance on their account, after the institution has applied any financial aid for which the student is eligible. Institutional refunds shall be made within 30 days after the date that the institution determines that the student has withdrawn.

The Student Account’s Office has the responsibility to apply this policy to the accounts of students, which require it.

## PARKING REGULATIONS

The purpose of this regulation is to promote the responsibility of Columbia Central University (CCU), and of its internal and external clients, in the proper use of parking, for which we disclose the established rules of use, clearly and understandably, as well as the provisions for non-compliance with these. The use of the parking lot is a privilege, and it is subject to compliance with the rules and provisions of this regulation in the access, transit, and parking of motor vehicles and other university regulations.

Our purpose is to provide a safe and reliable environment, as well as to preserve the facilities in optimal conditions for use by students, faculty, employees, and visitors. CCU, through internal security, develops and applies the rules and procedures that must be observed, to implement actions that allow us to make our facilities safer.

Maintain harmony and security within CCU on its campuses, providing a safe and stable study or work environment.

### General Disposition

CCU, concerned about the safety of the university community, makes available the following information on the proper use of parking.

**Note:** To enter the campus on holidays, as well as during extraordinary hours, written authorization from the Chancellor or the Facilities and Purchases Director is required.



**Speed** - The speed limit allowed inside the parking lot will be five (5) miles per hour.

**Road signs** - The university has several signs across the parking lot; Respect the signage and traffic signs. Be courteous, yield to pedestrians at intersections and crosswalks. Stop before or after crosswalks, never over them.

**Green areas, sidewalks, and restricted areas** - Parking in green areas, on sidewalks, and areas painted yellow is strictly prohibited. It is forbidden to park for a long time in front of the main entrance, it must be available to drop off and pick up people. In the campus that is possible, an area marked in red will be established where parking is strictly prohibited, this is an area destined for emergency vehicles, such as firefighters, ambulances, policemen, etc.

**Exclusively for people with reduced mobility (PRM).** CCU has parking for people with reduced mobility, for cars and vans. This area is exclusive for those people who have their respective identification (card) issued by the state and who is the recipient of it; No person will be allowed to use these parking lots other than those with state-issued identification. In those cases where there is no space available, the security agent will assign spaces in an area with the same accessibility conditions. Those people who violate the law, using the areas designated for PMR, are exposed to the fine established by the state for said violation.

**Temporary medical condition.** If you have a medical condition that requires reasonable accommodation, you should request it through the Counselor if you are a student or the Human Resources Office if you are an employee. You must present certification by a specialized doctor, indicating your condition and the time for which you will need accessible parking. The Chancellor will evaluate the case and may authorize the use of accessible parking, but never one labeled for a person with reduced mobility.

**Pregnant women.** A parking lot will be assigned, whenever possible and available, near the facilities to those women who are pregnant and who are in their fifth (5<sup>th</sup>) month or more. These parking spaces will be assigned by the security agent and at the request of the pregnant woman in the counseling office if it is a student and the office of the Human Resources Director if it is a university employee.

**Motorbikes, bicycles.** You will be allowed access to the parking lot, and you will only be able to park in those areas designated for this type of transportation. The entrance to the buildings of any movement device such as motorcycles, bicycles, or other means of transportation or entertainment is prohibited. Each person must have the necessary accessories to secure their motor or bicycle in the assigned areas.

**Visitors and suppliers.** There is a designated area to park visitor vehicles. If additional spaces are necessary, the security agent will proceed to assign them, after user registration. In this situation, the area designated for students could be used. When the visits are to take a continuing education course or meeting, the Exclusive spaces. It is strictly forbidden to park in those places that are identified as “Reserved” and “Only Authorized Personnel”, these being used only by persons authorized by the administration.

**Vehicles linger.** No person will be allowed to remain in your vehicle beyond the time necessary to enter or exit it.

**Parking stamp.** Only those vehicles that visibly have the parking stamp will be allowed to enter the parking lot. This stamp only guarantees entry and stay in the parking lot; Therefore, internal security reserves the right to request that they show their identification as a student or employee of the university.

**Parking stamp request.** For better control of the vehicles, colors have been assigned by groups of people. The green seal is for student use, the blue one for teachers, and the gray one for administrative staff; said stamp is personal and for no reason is it transferable. This must be requested at the service offices by completing the "Access Permit" form to the parking lot where the vehicle to be used is identified. You will receive a parking stamp that is listed that will be permanent and another that will be renewable annually. For those who come to visit or to a seminar or workshop, a temporary permit will be provided for the duration of the seminar or workshop. Each student, faculty, and administration employee is responsible for requesting its renewal annually (January).

**No responsibility for the university.** Because parking is free or chargeable to students, visitors, suppliers, dealers, and contractors, **CCU is not responsible for theft, loss, or damage to your car or items left in it.**

**Acts that detract.** All those acts that distort or tend to distort the order of the parking lot, injure the rights of people, go against good customs, violate the provisions of other current regulations, and likewise, hinder or impede the use of goods or services that the university uses or provides.

**Sanctions** For CCU it is important to promote the correct use of the parking lot, its good condition, and likewise, ensure that it continues in good condition for you. That is why we must create awareness that the campus is ours and therefore we need to take care of it.

## Sanctions

1st breach:	A written warning will be given (notice of fault committed).
2nd breach:	\$ 20.00 sanction and notice to the file.
3rd violation:	Withdrawal of access to campus parking for one semester.
4th violation:	Permanent removal of access to the university parking lot.

Note: These sanctions will apply to students, teachers, employees, concessionaires, visitors, and suppliers. In the case of suppliers, their respective companies will be notified of their faults.

**Schedule.** Anyone who has left their vehicle after the established hours on campus, without notifying them of the situation, will be entitled to a report by internal security, in addition to the corresponding sanction. Once the gates are closed, no one will be able to have access to the university to take their vehicle out, until the next day when operation resumes, unless there is a permit from the administration.

**Speed.** That person who is caught exceeding the speed limit (five (5) miles per hour) according to the parking regulations, will be credited with a report, remaining as a precedent for future offenses.

**Road signs.** Any person who does not respect the traffic signs will be entitled to the aforementioned sanctions.

**Green areas and sidewalks.** Any vehicle that is parked in green areas, sidewalks, yellow lines, red lines, PMR parking, or invading parking entrances, will be eligible for the corresponding sanction.

**Exclusive, only authorized personnel.** Any vehicle that is not authorized to occupy these areas will be entitled to the corresponding sanction.

**Motorbikes and bicycles.** Anyone who ignores the instructions about where to leave their motorbike or bicycle will be entitled to a report by security.

**Visitors and suppliers.** In the case of visitors who do not respect the instructions of the security guard, they will be credited with a parking report. If there is a repeat offense, the entry will be conditioned. In the case of suppliers that do not follow instructions, they will be credited with a report to your company. In case of recidivism, access to the campus will be denied.

**Parking stamp.** It is mandatory for students, faculty, and employees to affix the parking stamp. It is stipulated to adhere it to the front glass to the lower left side. Internal security will reserve the right to allow access to the parking lot if the said vehicle does not have a visible seal.

**Smoking.** CCU promulgates the policy of a smoke-free university, for this reason, it is prohibited to smoke cigarettes, either tobacco or electronic cigarettes, in all areas of the university, including the parking lot and inside vehicles.

**Ignorance of the regulation.** This regulation is compulsory for all visitors, contractors, concessionaires, suppliers, students, administrative, and teaching staff of the campus, so their ignorance will not be an excuse to avoid the applicable sanctions for non-compliance.

### **Safety Recommendations**

Here are safety tips to consider inside and outside campus:

1. Before you leave your vehicle, **DO NOT FORGET YOUR KEYS** inside it. Make sure you have what you need and that it is properly locked (locks on, windows closed, alarm, and/or baton).
2. **DO NOT LEAVE VALUABLES** visible inside your vehicle.
3. **DO NOT LEAVE FLAMMABLE OBJECTS** inside your vehicle that could ignite or explode due to heat.
4. **WHEN LEAVING** the University, be very careful, many drivers ignore the change of light and do not stop with the light in red, this can cause an accident, drive with caution, do not trust the rearview mirror 100%.
5. Make sure **NOT TO LEAVE THE LIGHTS ON**, to avoid discharging the battery.
6. **WHEN LEAVING THE BUILDINGS AT NIGHT**, ask for internal security support to accompany you to your vehicle, if necessary.
7. **DO NOT STAY INSIDE YOUR VEHICLE**, to avoid uncomfortable and/or unusual situations in the university parking lot.
8. **RESPECT PEDESTRIANS BY NOT INVADING** the areas marked as a pedestrian crossing and give them the right-of-way. If you see people near your vehicle, take extreme **PRECAUTIONS**, if necessary ask a security agent to accompany you.
9. **TAKE THE NECESSARY MEASURES** to **NOT** be late for your commitments and try to **AVOID** peak hours when there is greater traffic and risk of an accident.
10. **DO NOT FORGET** to pay attention to all traffic signs, areas where you can and cannot park, allowed speed limits, hours of permanence, and above all to cover the basic requirements for entering the parking lot.
11. **DO NOT FORGET TO CHECK YOUR VEHICLE** before leaving your house (oil, water, and air from tires), to avoid accidents and setbacks.
12. When driving on streets and avenues, **DO NOT FORGET THAT YOU MUST OBSERVE TRAFFIC LIGHTS AND SIGNS** such as wearing a seat belt, not driving while intoxicated, with ingestion of medications that alter the nervous system, and not exceeding speed limits to avoid accidents.

13. When approaching an interception or intersection, **STOP, LOOK** both ways, and **LISTEN** before continuing to drive.
14. **DO NOT RISK YOUR LIFE**, driving in a hurry and playing races with other vehicles.
15. **BE COURTEOUS** with your driving habits, as they are a reflection of your upbringing and personality. **ALWAYS** that you drive, respect, and yield to the **PEDESTRIAN** and the **CYCLIST**.
16. **AVOID** the use of the horn and the excessive use of the radio inside and outside the university.

### **Basic Recommendations for Creating a Safe Environment Inside and Outside the University**

Maintaining security on campus **IS EVERYONE'S RESPONSIBILITY**.

1. **Personal items** - Do not forget to lock your personal and valuables, do not bring large amounts of money, do not leave your checkbook or credit or debit cards because of all people, do not display electronic equipment and/or computers (laptop).
2. **Strange people** - If you see a stranger near the parking lot or your place of study or work, report it immediately to internal security or a university official to avoid any unpleasant incidents.
3. **It is a duty to inform** - If you notice something illegal, report it immediately to internal security to avoid being involved or having a bad time.
4. **Caution when walking** - Never count your money in public; always use well-lit and busy routes, do not walk through dark or lonely streets, vacant lots, parks, construction in progress, or demolitions. When you must walk at night, always accompany one or more people, avoid groups of suspicious people and walk in another direction. Always walk away from the wall and in the opposite direction to the flow of traffic, if someone suspicious asks you for information about a place or address, avoid being near him or her.
5. **Caution when driving your vehicle** - Before starting your vehicle, do not forget to lock the doors, remember that many thefts occur at traffic lights and mandatory stops.

**Parking Rule.** When using a public or private parking lot, try to leave it parked in the exit form, since if you have to leave the place suddenly it will help you avoid accidents.

**Caution when handling keys.** Do not put the keys to your house and your car together, this way you will avoid that, if they get lost and you know your address, they can steal your house or vehicle.

# POLICY AND PROTOCOL ON THE PROHIBITION OF DISCRIMINATION BECAUSE OF IMPEDIMENT AND REASONABLE ACCOMMODATION

## **Introduction**

The Rehabilitation Act of 1973, Section 504, and Public Law 101-336 Americans with Disabilities Act (ADA) of 1990 prohibit discrimination based on physical or mental impairment. The Law offers people with disabilities the same rights and opportunities that other citizens enjoy. It establishes that all public and private entities that receive federal funds will not be able to discriminate based on the impediment of people to limit or exclude their participation in any program or activity that said entities carry out. Similarly, Law 250 of September 15, 2012, the Post-secondary Passport of Reasonable Accommodation Law, aims to establish a mechanism that facilitates students with disabilities to access higher education institutions equitably to their peers unimpeded and responsive to all their needs.

Under Section 504 of the Rehabilitation Act, the ADA, and Act 250, Columbia Central University (CCU) has developed and established a Policy and protocol on the prohibition of discrimination based on impairment and reasonable accommodation. It is aimed at providing and maintaining an accessible university community that encourages and guarantees people with disabilities an environment of equal opportunities and extended admission, thus achieving their total inclusion in the university community.

## **Responsibility**

It is important to recognize equal employment opportunity, access to public services, and promote full participation, independent living, and economic self-sufficiency for people with disabilities. For these purposes, no person may discriminate against people with disabilities.

This policy is administered by the Guidance and Counseling Office. The Counselor is responsible for planning, organizing, and evaluating all services for persons with disabilities. In addition, he/she processes complaints related to these services. In coordination with the Chancellor's Office and the Academic Dean's Office, he/she will ensure that this policy is complied with.

## **Applicability**

This policy and protocol apply to all the people who make up the university community: employees, student-faculty, visitors, prospective students, prospective employees, vendors, and people who provide some service to the university. It also applies to all people who make use of the university facilities for any reason.

It is up to everyone: students, university staff, and visitors, as a requirement to exercise their rights, fulfill their duties and observe the legal and administrative provisions to that effect.

### **Procedure to Notify Acts of Discrimination due to Impediments**

Legislation requires university institutions to establish complaint, appeal, and reconsideration procedures. In addition, it recommends that people not satisfied with the results of the aforementioned procedures submit their cases to the Office of the Prosecutor for People with Disabilities (Law number 2 of September 27, 1985).

Each campus has as part of its work team professional counselors trained to initially attend to any person who believes that they are being discriminated against or are aware that someone is being discriminated against for reasons of disability.

### **Steps to Follow**

1. The procedure begins with the filing, in writing, of the complaint before the Guidance and Counseling Office. Filing a complaint leads to an investigation by the Counselor into the actions related to discrimination. The Counselor who receives the complaint must instruct the complainant about the policy and their rights.
2. If the complaint can be heard on the premises, the Counselor will try to mediate between the parties to achieve a solution acceptable to the person or persons affected. As a general rule, information or other evidence provided by the parties or witnesses during the adjudication process will not be disclosed to third parties.
3. Filing a complaint results in the reported incident being investigated and the Board of Venture Complaints (JVQ) is convened, which cannot be resolved at the level of the Counselor or depending on the severity of the same. Said Meeting will be called by the Director. This Board will be composed of three members: the Rector, the Director of Human Resources, and a student, administration, or faculty representative, according to each applicable case. The process of appointing the Board and beginning the investigation must be carried out on or before five (5) business days from the notification to the parties. Each JVQ will have a life to air the issues that led to its call.

### **Process Before the Board to Ventilate Complaints**

1. The JVQ shall appoint a President and a Secretary at its first meeting. The JVQ will draw up the minutes of all its meetings and at the end of its work, it must deliver all the documents to its President, who will pass them on to the Chancellor's Office for filing and custody.
2. The Director will present the facts that motivated the call to the Meeting.
3. The JVQ must conduct a prompt and detailed investigation of the alleged discrimination. The investigation should include:
  - i. An interview with the complainant to establish the act of the alleged discrimination and identify witnesses or physical evidence, if any.

- ii. An interview with the alleged offender, allowing him an opportunity to admit, deny, or explain each factual allegation in the complainant's statement and identify witnesses or physical evidence if any.
- iii. Interview of any witness. Witnesses will be informed that any matter that is discussed must be kept confidential.
- iv. The JVQ will evaluate the results of its investigation and determine whether or not the complaint has merit.
- v. The JVQ must issue its resolution within the first fifteen (15) business days of the end of the investigation. Said resolution shall specify the conclusions reached by the Board and its opinion following said conclusions.
- vi. The results of the investigation must be communicated to the complainant and the alleged offender through a letter.
- vii. Considering the results of the investigation, the university will take the necessary corrective measures in those cases that show that there was the cause of the alleged discrimination.

**The process to be Followed when the Complainant Indicates that the Student Does Not Agree with the Results of the Investigation**

1. When the complainant does not agree with the results of the investigation, he/she may file a request for review of the resolution before the Institutional Board of Directors of the university within a term of five (5) working days, after having received the resolution of the JVQ. The request for review will be filed when the complainant, in writing, delivers to the President of the university a request for review in writing where he/she expresses the grounds for said request.
2. The Institutional Board of Directors shall review the request for review and determine if it is substantiated. As a result of the review, the Institutional Board of Directors may confirm, modify, revoke, or exonerate the decision of the JVQ within a term of fifteen (15) working days. The Institutional Board of Directors will draw up special minutes of all the procedures and when issuing its resolution, it will state the reasons that support its determination.
3. The filing of the petition for review will interrupt the effectiveness of the opinion of the JVQ.
4. The Institutional Board of Directors may only pass judgment on the opinion of the Board, based on the record of the proceedings before said Board, and normally and ordinarily, it will respect the conclusions of the JVQ.
5. The decision of the Institutional Board of Directors is final and firm and will conclude the matter that is the subject of the same.

A person not satisfied with the results of the aforementioned procedures may submit a complaint to the Office of the Ombudsman for Persons with Disabilities (Law number 2 of September 27, 1985).



## **Penalties for Violation of the Policy**

When the JVQ has determined that discrimination has occurred, it can take one of the following actions:

When the offender is an employee or student, disciplinary action may be taken under the provisions of the university procedures. The disciplinary action must correspond to the discrimination, and it may fluctuate between a written reprimand to the termination of employment or expulsion from the university.

## **Protocol of Services for Students or Prospects**

In keeping with the policy, the following protocol is adopted, which establishes the following objectives:

- Facilitate the integration and inclusion of the person with a disability with the rest of the university community.
- Offer support to the students to achieve their academic success following the mission of our university.
- Offer an extended admission process to those prospects who request it.
- Establish liaison with agencies that provide services to the population of people with disabilities.
- Promote and disseminate information related to current federal and state legislation.
- Establish a resource bank of professionals and people from the community or public and private agencies specialized in providing services to people with disabilities.

### **I. Physical Facilities and Direct Services**

The university has the necessary access, according to each assigned area within the physical facilities, as well as the direct services necessary to attend to the students with disabilities, through competent and specialized personnel. In turn, it has a referral service in those cases that are meritorious.

In addition, the university makes reasonable accommodations in the academic programs, services, and physical structures and facilities so that an impediment is not an obstacle for the student or prospect to develop the skills and knowledge contemplated in the curriculum and participate in the curricular and extracurricular activities that are held on the premises.

#### **1. Buildings**

The university will provide a map (sketch) of the location of the facilities on the campus for the population with disabilities.

#### **2. Parking facilities and access permit**

The university designates spaces for the parking of vehicles for people with disabilities. People with disabilities or temporary conditions with a medical recommendation may

request provisional access permits through the Guidance and Counseling Office. Other people who park, without the corresponding authorization, in spaces designated for people with disabilities will be fined according to current state law.

3. Reasonable accommodation

The university promotes reasonable accommodation for all those who require accommodation according to their need or health condition. Consequently, any person with a disability may request reasonable accommodation through the Request for Reasonable Accommodation available in the Guidance and Counseling Office. To complete this process, you must:

- A. Complete and file the application form.
- B. Accompany the request with a certification of necessity by a specialized professional that specifies the required accommodation.
- C. It is the responsibility of the person with a disability to request said accommodation, well in advance, for the Guidance and Counseling Office to evaluate his/her request and prepare a service plan. Each case will be evaluated individually.

**Reasonable Accommodation: Extended Admission and Tuition**

- People who, due to their disability, cannot carry out the admission process within the established period, because it requires accommodation, will proceed to notify the Admissions Officer so that this in turn will notify the Counselor.
- The Counselor will convene the Admissions Evaluation Committee, as required by Law 250 Post-secondary passport of reasonable accommodation. This committee will be composed of: Counselor, Admissions Director, Academic Director or Coordinator, Chancellor, or his/her representative.
- The Admissions Office will provide an officer to assist you in the process if required.
- Regarding enrollment, they may authorize in writing another person (duly identified) to carry out these processes.

4. Library facilities

The library has the necessary accessibility for users with disabilities. Anyone who requires specialized services will channel it through agencies or organizations to help the disabled.

5. Classroom facilities

The classrooms are provided with sufficient space to allow accessibility for people with disabilities. Anyone that requires a special service will contact the Counselor and/or Chancellor of the campus.

6. Tutoring

The university has a Tutoring Program available to all students. If you need a particular tutoring service, it must be requested at the Guidance and Counseling Office; so that it is referred to the Academic Deanery.

7. Student activities

The university promotes the participation of all its students in those activities of an academic, co-curricular, and extra-curricular nature, to promote intellectual and cultural development and create a sense of belonging among the entire university community.

## II. General services

The university has other services available to those with some limitation or disability. Among the services that can be requested through the staff of the Guidance and Counseling Office is:

- Access permissions
- Orientation and training
- Referrals
- File complaints or appeals
- Reconsiderations for alleged violations of Law 504, the ADA, and the institutional policy.

## III. Rights and responsibilities

1. From the student or prospect
  - A. Rights - Students or prospects with disabilities will have the right to:
    - a. Equal access to courses, programs, services, employment, activities, and facilities available at the university.
    - b. Appropriate and reasonable accommodation
    - c. Request an extended admission process
    - d. Academic adjustments
    - e. and. Use of ancillary equipment (student property) in the classroom
    - f. Determine, concerning your impairment:
      - the information that may be disclosed, and,
      - to whom (s) it may be disclosed
  - B. Responsibilities:
    - a. If reasonable accommodation is required, the person must request it through the Guidance and Counseling Office, during the first two weeks of the beginning of the academic term. Failure to do so, the student has the right to request accommodation, but it is not guaranteed that it will be provided with the same effectiveness.
    - b. Accompany the request for reasonable accommodation with documentation from the appropriate professional resource that indicates the nature of the impairment, functional limitations, and the need for specific accommodation with their recommendations.
    - c. If you need an extended admission, the person should notify the Admissions Office immediately, for due process.
    - d. Comply with institutional procedures to obtain reasonable accommodation and/or technical assistance.
    - e. Meet the academic and institutional requirements.
2. From the university
  - A. Rights and Responsibilities:
    - a. Guarantee the academic processes of the university.

- b. Require applicants updated documentation of their condition from the appropriate professional resource (physician, occupational therapist, psychologist, as applicable) to verify their need for reasonable accommodation and/or technical assistance.
- c. If necessary, to obtain additional information, the appropriate professional resource (physician, occupational therapist, psychologist) will be consulted as established in the Confidentiality Release.
- d. The Counselor is responsible for informing professors of the recommended reasonable accommodation.
- e. Select the most appropriate reasonable accommodation according to the applicant's disability, which does not imply an excessive or unreasonable financial investment for the university.
- f. To consider a request for reasonable accommodation and/or technological assistance, the documentation must:
  - Identify the impediment.
  - Document the needs of the required service.
  - Provide the requested documents on time, (as established in subsection I, C-2)
- g. Not to grant reasonable accommodation and/or technological assistance that is considered inappropriate or unreasonable, because:
  - Presents a direct threat to the health or safety of another person or the applicant.
  - It constitutes a substantial change or alteration to a course or program.
  - It presents an onerous cost for the university.

#### **IV. Disclosure and Training Procedure**

The policy and protocol are available in the Guidance and Counseling Office and the Human Resources Office. The protocol applicable to employees will be available in the Employee Handbook, Chancellor's Office, and the protocol applicable to students will be available in the Student Consumer Handbook; which is published on the website [www.columbiacentral.edu](http://www.columbiacentral.edu).

The Guidance and Counseling Office will keep the university community informed about the Policy and Protocol on the prohibition of discrimination due to disability and reasonable accommodation through email, extracurricular activities and/or workshops, information tables, brochures, among others.

It will be available in an alternate format.

## **V. Frequency of review**

This policy will be reviewed every two years, subject to compliance or changes with current legislation, the services and facilities available at the university, institutional procedures, and the needs of the population with disabilities.

## **ASTHMA PATIENTS' POLICY**

### **Introduction**

Columbia Central University (CCU) promotes a university environment that focuses on the well-being and safety of our student community, necessary to promote an effective teaching-learning process.

Columbia establishes this Policy in compliance with Act No. 56 of February 1, 2006, Act on the Treatment of Students Suffering from Asthma. This Law sets forth the right that students who suffer from asthma or any related condition have to self-administer medications in schools, with the prior consent of their parents, guardian, or manager.

### **Applicability**

This policy applies to all students enrolled in the university under the age of 21 and who have a medical certificate stating that they are asthma patients and need to administer medications.

### **Procedures to Follow**

1. The student will inform the Guidance and Counseling Office that he/she is an asthma patient and will present medical evidence that he/she suffers from the condition.
2. The Guidance and Counseling Office will deliver a copy of the policy, Parental Authorization Form for Self-Administration, and Medical Certification Form.
3. Once the student has all the required documentation completed, he/she must deliver it to the Guidance and Counseling Office.
4. The Counselor will inform the student's teachers of the student's authorization to self-administer the medication.
5. The teacher must allow the student during class hours to self-administer treatment and/or medications, as ordered by her doctor.
6. No person may interfere with the student's right to use in educational facilities the necessary medications for the treatment of her asthmatic condition.

# STUDENT REGULATIONS

## I. Philosophy

Columbia Central University (CCU) is a private university committed to the comprehensive education of its students. In this sense, we affirm that such training is not only based on the purely academic experience of the classroom, but also on the participation that the student voluntarily decides to exercise in activities for the benefit of the university and the community. It is clear that all student participation, to be truly meaningful, cannot be the product of the imposition of the CCU authorities. It is the student who has to be the protagonist of his/her own life at all times and undertake those activities that, considering his/her concerns, tend to his/her integral development as a human being.

Faced with the aforementioned boundaries, CCU considers that its students have the fundamental right to develop intellectually, without any limit, other than their own will. In this sense, each student has the right to establish communication channels with their professors to clear up any questions. In this effort, CCU recognizes the right of the student to support their ideas, to responsibly disagree with their professors, all within a climate that does not endanger, undermine or be precarious the reason for being of this university, which is, above all, an academic community. In discharging their prerogatives and rights, the student must remember that their right ends where that of their fellow students begins and that the exercise of a prerogative that implies the denial of rights to another person has no place in the university style that defines CCU.

In summary, CCU maintains that the highest right of the student is the right to be educated. That all other rights are subordinate to the previous only exist as an instrument to enable and achieve full education and never for strange purposes, unrelated to the educational nature of the university.

## II. Rights and Duties

### Rights

1. Demand that the classroom is not used to preach partisan political doctrines, religious and alien to the subjects of teaching.
2. Receive, orally and in writing, from their professors, at the beginning of each class, adequate guidance on the purposes and objectives of the course, study topics, readings, texts, required work, and the necessary teaching material (syllable). In addition, the evaluation criteria to be used, along with other aspects directly related to the development and approval of the course.
3. Request and receive information about the vision, goals, objectives, and accreditations of the University, academic programs, services, reasonable accommodation, if necessary,

and evidenced the credentials of the teaching staff, and the physical facilities available that facilitate the teaching process.

### **Obligations**

1. It will be the responsibility of all students to familiarize themselves with, know, and comply with the provisions of these Regulations, the University order rules, and the academic and fiscal policies adopted by the University.
2. Know, review, and consider all the information related to the policies,
3. rules, regulations, and provisions of the University. After enrolling, it is your responsibility to comply with all the regulations, as they appear in this document and any other that is considered an official document of the University.
4. During the laboratory or practical periods, the student will wear the full uniform from your study program, if applicable. The student will not display tattoos (if required by the practice center), flashy or flashy garments, body piercing with his/her uniform. By administrative order of the Department of Health, health professionals are required not to use artificial nails, natural nails must be kept short (a length no greater than 1/8 of an inch above the fingertips). Nail polish must not be cracked and must be light in color and garment wear is limited to a hoop and a watch.
5. Children will not be allowed in classrooms, laboratories, libraries, and other areas or dependencies of the University, except those cases in which they are participating for academic purposes in the students' practice.

### **III. Student Participation in Institutional Affairs**

The cardinal point of our educational philosophy is that each student must have the freedom to determine whether or not they are interested in getting involved in institutional matters. We reject the paternalistic concept of imposing a certain structure to enable student participation. Such a paternalistic concept, in its essence and real meaning, constitutes the very denial of student participation since it prevents the students themselves from being the ones who, harmoniously, determine their concerns in universities that, due to their bureaucratization and structural rigidity, would be denied the most rudimentary ways of student participation.

1. Students, in the exercise of their faculty, when participating in institutional affairs, are free to bring directly to the attention of the administration and faculty all suggestions, ideas, and proposals that according to their best knowledge and understanding tend to institutional development. In addition, to be able to participate in appraisal processes, committees, and any other that may arise.
2. The administration, for its part, firmly believes in the "open door" policy for student suggestions and ideas and is committed to receiving them and submitting them promptly to the competent bodies for their consideration and analysis.
3. The student at CCU will never stop being a person to become a number; For this reason, it is part of our educational philosophy that each student who voluntarily so determines,

can personally, without intermediaries of any kind, raise any matter for the consideration of the faculty and the administrative component.

### **III. (A) Of Student Activities**

1. CCU students will have the right to develop and carry out student activities that complement and enhance the teaching management to which the university is committed or promote the academic or educational progress of the student body in general. To develop student activities, it will be necessary to meet the following procedure and requirements:
  - A. The student or group of students under whose auspices it is intended to develop the activity will request authorization in writing to carry it out, from the student affairs officer or an authorized representative, with no less than ten (10) working days in advance of the scheduled date for the activity.
  - B. The student or group of students under whose auspices the activity has been planned will have to be responsible for ensuring that it does not interrupt in any way the institutional teaching management or violate, undermine, or contravene any other institutional regulation and/or may endanger the order, security and normal operation of CCU in any other institutional regulation.
  - C. CCU warns that the fact that it authorizes the celebration of a student activity does not mean in any way that it is sponsored, endorsed, or sponsored by the university or that it is responsible for any expression or behavior of any visitor, speaker, or panelist. It is provided and indicated that the authorization of CCU is for the sole purpose of verifying that the scheduled activity does not interfere with teaching management or any other activity and that it does not violate security and institutional order.
2. Any student activity, whether held on the institutional physical plant itself or outside of it, is the absolute and exclusive responsibility of the student, students, or student organization that sponsored it. The use of the name of the university in any type of promotion, agreement, contract, agreement, or any other document related to any type of student activity is prohibited. The use of the name of the university is the exclusive patrimony of the competent bodies of CCU and may only be used because of the written authorization of the Chancellor of each campus or the President.
3. It will be the sole and absolute responsibility of the organizers of student activity that it, even when it takes place outside the institutional physical plant, does not injure, or undermine in any way, the reputation of the university, its officers, administrators, employees, and students. In the alternative that, because of the activity, the university is confronted with legal actions of any nature, CCU warns and notifies that by the absolute and exclusive responsibility that the students organizing the activity contracted when sponsoring it, it will use all the mechanism in law available to act following the obligations contracted by the sponsoring students.



### **III. (B) From Student Publications**

1. Students will be fully responsible for the content of any student publication, even if the student group is identified as a CCU group. The university will not be responsible in any way for any student publication or its content. This does not mean that the university will not provide the appropriate facilities for the feasibility of a publication, lending or facilitating those resources necessary for its publication such as computers, reproducing machines, papers, and others.
2. No student publication may, in any way, make use of the CCU name or its logo as part of the identification or name of the magazine. However, the publication may indicate that its editors are CCU students. If so, it will be necessary for the publication to contain a statement to the effect of releasing the university from any responsibility for the journal and its content.
3. When a student or group of students is interested in posting any advertisement, promotion, article, document, or student publication in any area of expression of the university, it must be authorized by the corresponding student affairs officer.
  - A. To be a creditor of the corresponding authorization, the publication concerned must not contain any information that could be lent to be interpreted as defamatory. The publications must observe writing rules compatible with a private university of an educational nature and, therefore, tend to the best use of language.

### **III. (C) From the Student Council, organizations, and associations**

The right of students to establish a Student Council is established. It is provided that the right to establish student councils does not in any way impair the right of each student to personally present to the authorities concerns or opinions relevant to their relationship with the university or on any aspect of an academic, administrative, or student nature.

Following the institutional philosophy previously consigned, the creation of organizations, associations, and Student Council must be so that they truly mean student participation or initiative of the students themselves and never an institutional imposition. In the case of organizations and associations, these can count on the collaboration and promotion of a representative of student affairs, Director/Academic Coordinator, or faculty for the proper constitution.

1. The Student Council will have the following functions:
  - A. Notify the competent bodies of the university about any aspect that, according to their best knowledge and understanding, tends to raise the quality and institutional excellence that exemplifies CCU.
  - B. Raising opinions, recommendations, concerns, and suggestions related to the student or institutional life of CCU to the institutional bodies.
  - C. To always foster a climate of good understanding between all the components of the university.
  - D. Collaborate with the university in the achievement of goals institutions of CCU.

- E. Collaborate with the institutional authorities in the preservation of the fundamental right of each student to be educated.
  - F. Plan and develop student activities to implement the aforementioned functions, subject to the provisions of this regulation.
  - G. Write a report to the President stating his/her concerns and/or recommendations, to be presented to the Institutional Board of Directors at its annual meeting.
2. Eligibility to be a member of a Student Council:
    - A. Any student who, at the time of his/her election, is (1) an active student with an academic load of at least six (6) credits or more at the undergraduate level and three (3) credits at the undergraduate level will be eligible to be a member of a Student Council. graduate-level; (2) have an academic index of no less than 2.00 and (3) be at least in their second term of studies. At the end of each term, the student's academic progress and status will be evaluated to determine if he/she complies.
  3. Each Student Council will be composed of a President, a Vice President, a Secretary, a Treasurer, and five (5) Members, which must have representation from other graduate and undergraduate programs of the different sessions, which are not represented in the positions of President, Vice President, Secretary, and Treasurer. In the absence of representatives from academic branches in official positions, their participation should be extended to meetings to represent them. Within the Student Council, there may not be more than three students from the same academic branch.
    - A. They must be elected by secret ballot and voting in any block or under any kind of insignia will not be allowed. A student will not be allowed to run for more than one position or position on the Student Council.
  4. The term of responsibility of a Student Council is three academic terms or one calendar year, whichever is less and is chosen by the university community. The elections will take place when the university community requests it and must have the participation of at least 25% of the total enrollment per campus in the voting.
  5. When a member of the Council ceases or resigns (once a member resigns, there will be no opportunity to revoke it) in his/her functions or loses eligibility; her position will be filled by another incumbent of the position and if there are none, an election will be called to fill the vacancy.
    - A. For the Council to validly designate a substitute for a member who has ceased or resigned, at least five (5) affirmative votes are required in favor of the new member.
  6. Of the internal functioning of the Student Councils:
    - A. So that a Student Council can validly act, and form determinations are required:
      - 1) Having circulated on the expression boards of the university the corresponding call for a meeting at least two weeks in advance. The Retention Officer will certify the date of the summons.
      - 2) Attendance at meetings of at least six (6) members of the Advice.
        - a. Conduct its affairs, meetings, assemblies, and decision-making following acceptable internal functioning procedures for organizations, as defined and determined in reasonable practices of parliamentary procedures.

For more information on the constitution of the Student Council, please contact the Retention Office of your campus.

### **III. (D) Of the Institutional Committees**

The participation of a student representative in the institutional committees that the university establishes from time to time, freely and voluntarily, will be extended and promoted.

Student representation must meet the following requirements:

1. Be a regular student with an academic average of no less than 2.00. A regular student will be considered one who is enrolled in an academic load of at least six (6) credits or more per academic term and in the case of graduate students, a minimum of six (6) credits.
2. Not be under disciplinary sanction.
3. Be in at least their second term of studies.
4. Those administrative or teaching employees who take courses at the university, no matter how many credits they are enrolled in.

The student representation will be elected for a term of one year or until the election of its successor. This representative will be asked to the Chancellor so that together with the Academic Deanery and Counseling select him/her.

### **IV. Policies and Procedures on Student Discipline, Organizations, Associations, and Student Council**

1. Student Behavior - CCU relies on the good sense and sanity of its students to always act in respect of the institutional order, which is certainly essential to ensure that the educational reason that the university represents is fulfilled.
2. CCU will guarantee each student the privacy of their records and declares that the academic and disciplinary records if they exist, will be separate and distinct documents.
3. The student may establish those organizations, associations, and/or student council that are closely related to the curricular offerings of CCU and whose purpose is purely academic, recreational, and/or tends to increase the coexistence between the administration, faculty, and students. All the activities of said organizations, associations and student council will be subordinate to the fundamental right of the student; their right to an education and in no way the activities that they program may impair or endanger the right to an education of all students.
4. The means of disseminating academic, sports, recreational, social, and cultural, among others. They could be bulletin boards, electronic screens, electronic mail, and loose sheets, among others. The announcements, notifications, and notices must respect the university style, which is a fundamental part of CCU. The Chancellor or his/her representative will supervise everything concerning the dissemination and will issue the corresponding authorization for the publication of any notification.

The first responsibility of the student is to understand that his/her life as such runs in an academic community and all his/her actions must respect and protect the institutional order, the rights of the other components of the university, his/her fellow students, and the good name of CCU.

Therefore, any action that impairs or may make CCU's educational function impossible in violation of the student conglomerate's right to education; respect for teachers or administrators or those who may harm the university before the community it serves, is an action to the detriment of the university and is subject to disciplinary sanction. Likewise, the following actions entail the formulation of a disciplinary charge that can give rise to a verbal, written warning, suspension, expulsion or to process withdrawal (the latter in the case of testing positive for controlled substances in the practice scenario):

1. Disrupt the normal educational tasks of the university or endanger the performance of said functions or acts related to them, although said interruption, disturbance, or obstruction occurs outside the physical plant of CCU.
2. Disrespectful conduct towards another student, faculty, and/or an administrator.
3. Lack of intellectual honesty in academic work.
4. Damage to CCU's property.
5. Using, possessing, and/or distributing alcoholic beverages or controlled substances within of the university facilities or in educational activities outside the university and/or practice settings.

A. Practice Scenarios

1). First time

When a student tests positive for doping in a practice setting, he/she will not be able to continue in the course; so, he/she will have to process a withdrawal from it.

You can enroll in the course again in the next term, subject to availability of the same, and will have to present a negative doping test in the original.

2). Second time

If a doping test is positive again, in a practice scenario, the student will have to process a total withdrawal from the university.

He/She will be able to enroll again in the university, after having been out a term after the discharge; subject to course availability and you will need to submit an original negative doping test.

3). Third time

From the student testing positive again for doping, he will process a total withdrawal from the university and will be indefinitely expelled from CCU, unless he returns to a program that does not require practice.

6. Any act that has been classified as a public crime, regardless of the determination issued in its day by a Court of Justice.
7. Disobey or refuse to follow any specification or instruction of the faculty and administration in the exercise of their prerogatives as said officials.
8. Violating any of the institutional policies, programs, or processes.

## **A. Disciplinary Procedure**

- 1.1 Once a written complaint has been received in the office of the Chancellor or person in charge of the campus, the investigation process must be carried out on or before five (5) working days from the date of receipt of the complaint. Once it has been evaluated, the established disciplinary procedure will proceed.
- 1.2 When, in the judgment of the competent administrative authority, the student's action in contravention of the disciplinary norms may entail as a sanction the suspension of the student for a period greater than ten (10) school days, the Chancellor or the person in charge of the campus, will immediately summon the Board to ventilate student charges. This Board will be composed of three (3) members, among which there will be a student who is studying his/her penultimate or last academic term and whose accumulated academic average up to that date is greater than 3.25. The faculty will select a member of the Board from among those professors with at least three (3) years of service to the university and the administration will select the remaining member. The Board will meet, upon convocation by the Chancellor or the person in charge of the site, and at their first meeting, they will choose a president and a secretary from among themselves. The Board will keep minutes of all its meetings and at the end of its work, the records of said meetings will be delivered to the competent authority of the university for its filing and custody, for a reasonable time. Each Board selected, following the aforementioned, will have life to air the issues that are presented for two academic terms or until some of the members are no longer part of the university.

In the case of actions related to the violation of the Institutional Policy on the illegal use and abuse of drugs, alcohol, and tobacco, they will be channeled to the Guidance and Counseling Office for the course thereof.

- 1.3 The competent administrative authority that formulates the imputation of violation of the disciplinary norms will notify the imputed student, the nature of the charges or student violations imputed; no later than seven calendar days from the date of the airing of the position of the Board.
- 1.4 Hearing before the Board:
  - a. The accused student may present his/her version of the events that led to the filing of the charge against him. Likewise, he may present witnesses in support of his/her defense.
  - b. The competent administrative official will testify on the facts that motivated the filing of the charge and may also present witnesses in support of the charge presented.
  - c. The Board may question all the people who testify before it.
  - d. The Board, after the hearing, will issue within the next ten (10) calendar days its resolution. Said resolution will specify the conclusions reached by the Board and its opinion following these conclusions. The opinion will have to be based on the Board's conclusions.
- 1.5 A student not satisfied with the opinion of the Board may file a review of said opinion before the Institutional Board of Directors. He will have to file the said petition within a term of five (5) calendar days; after having received the opinion of the Board. The review will be filed

when the student, in writing, delivers to the President of CCU a Request for Reconsideration in which he/she expresses the grounds for his/her request for review. Review writing that is not substantiated, will be declared void by the Institutional Board of Directors and will have no effect whatsoever, leaving the Board's opinion final and firm.

- 1.6 The filing of the Request for Reconsideration will interrupt the effectiveness of the Board's opinion.
- 1.7 The Institutional Board of Directors will air the requested review, no later than fifteen (15) calendar days after the filing of the review.
- 1.8 The Institutional Board of Directors, except in extraordinary circumstances, may only pass judgment on the opinion of the Board, based on the record of the proceedings before the said Board and will normally and ordinarily respect the conclusions of the Board.
- 1.9 The Institutional Board of Directors will draw up special minutes of all disciplinary procedures brought before it and when issuing its resolution, it will state the reasons that support its determination.
- 1.10 The decision of the Institutional Board of Directors may confirm, modify, revoke, or exonerate the opinion of the Board to ventilate student charges. Likewise, the Institutional Board of Directors may, in the spirit of achieving the educational function that underpins the entire disciplinary process, confirm the violation of any disciplinary norm, as found by the Board to ventilate student charges and, notwithstanding the foregoing, suspend the effectiveness of the sanction imposed by said Board.
- 1.11 The decision of the Institutional Board of Directors is final and firm and will conclude the matter that is the subject of the same.
  - B. In all charges of violations of the rules of discipline that in the opinion of the competent authority entails sanctions less than suspension for a period not exceeding (10) ten school days, they will be resolved through meetings between the accused student and the administrative authorities. The students will be offered the opportunity to be heard and express their side of the story. Once said meeting or meetings are over, the competent authority will issue its opinion in writing, stating the reasons underlying it.
    - 1.1 If a student is dissatisfied with the opinion of the competent authority, he/she may request the constitution of a Board to review student cases for review, no later than (3) three business days after receiving the decision. The Board will be appointed in accordance with and accordance with the provisions of part (A 1.1) of these regulations. In each campus, said request for review will be made to the Vice President of Student Affairs.
    - 1.2 In these cases, the Board to ventilate student charges will act based on the case file and may revoke, modify, confirm, or exonerate the affected student from the opinion previously issued by the competent authority.
    - 1.3 In these cases, the opinion under review of the Board to ventilate student charges will be final and firm and will conclude the matter that is the subject of the request for review.

## C. Summary procedure

1.1 When, in the opinion of the competent authority of CCU, there are well-founded reasons to consider that a student or group of students represents a serious and imminent danger to the preservation of the institutional order, or the safety of students, professors or administrators, the university may suspend it. (s) summarily for a term not exceeding (15) fifteen school days. Within this term, once the student has been summarily suspended, CCU will notify him of the charges filed against him, his/her right to defend himself against them, and that the infractions charged will be brought before the Board to ventilate student charges. No summary suspension will be valid for more than fifteen school days unless the circumstance of imminent danger that caused it is still prevailing, in which case it may be extended for successive periods of five school days each and while the imminent danger remains in force.

1.2 The hearing before the Board to ventilate student charges will take place, with prior notification to the student, within (10) ten working days, after the summary suspension has expired.

## D. Nature and purpose of the disciplinary procedure

CCU declares that the nature and objective of the disciplinary procedure are to achieve a modification in the behavior of the student concerned to make him a better human being, aware of his/her responsibilities towards the academic community and his/her peers.

## ENVIRONMENTAL POLICY

This policy will apply to all employees and students at Columbia Central University (CCU) and companies affiliated with the University. In addition, this scope will include any person or entity that uses the facilities, land, or properties of the University, as well as any natural or legal person that provides its services to it.

Because of the damage caused to the environment during this century and especially in recent decades, due to ignorance about environmental issues, or due to carelessness, we have contaminated a large part of the atmosphere, soil, and bodies of water with effects such as acid rain, the greenhouse effect, and the partial disappearance of the ozone layer. Fortunately, environmental voices have raised awareness of this deterioration and have motivated governments to legislate to tackle the deterioration that has occurred and try to recover the delicate natural ecological balance.

Although environmental neglect has been a worldwide phenomenon, Puerto Rico has not been sufficiently proactive in conserving the environment, in keeping with its economic and cultural development. This has resulted in our bodies of water being contaminated, we have not been

able to handle solid waste and have a disposal problem, and that rivers no longer serve the usual purposes of providing water and recreation to the population.

### **Responsibility**

To be in harmony with what is promulgated by environmental laws, CCU and those reached by this policy will observe the following responsibilities:

1. Guard our environment for the benefit of present and future generations.
2. Foster a safe and friendly environment.
3. Promote the efficient and judicious use of all-natural resources, so that they can be used continuously and sustainably.
4. Contribute to conserving our natural heritage.

### **Administrative Measures**

When making administrative decisions, the highest priority will be given to those considerations consistent with the protection of the environment to achieve harmony between human activities and the environment.

1. If the projects are essential to CCU's functions and it is determined that they could significantly harm the environment, the necessary resources will be allocated to include measures that mitigate said impact as part of the project.
2. The necessary measures will be taken so that teaching and research laboratories, as well as other work areas in which dangerous substances are used, generated, or stored, are safe places to work.
3. A periodic evaluation of said physical facilities will be carried out to verify that they comply with the regulations regarding environmental protection, health, and occupational safety. The necessary measures will be taken to eliminate or reduce environmental noise to an acceptable level.
4. Water, energy, and other resources will be used sparingly and efficiently.
5. Special attention will be given to the conservation of existing green areas, as well as the creation of new green areas and areas with shade trees. To the extent possible, trees will not be removed to create spaces for car parking and, if necessary, they will be replaced once the works are completed. If for some reason it is unavoidable to eliminate a green area, it will be replaced by a similar one so that, as far as possible, the total green area is not substantially reduced.

### **Teaching and Research Activities**

CCU will carry out its teaching and research activities making efficient use of resources, safeguarding the health and safety of members of the university community, and protecting the environment.



1. The use of techniques, equipment, and materials that lead to a reduction in the use of chemicals and hazardous materials will be promoted.
2. The use, handling, and disposal of chemical substances and hazardous materials in laboratories, warehouses, and workshops will be carried out in compliance with the rules and regulations established by regulatory bodies and taking into account the protection of the environment.
3. Periodic inspection and preventive maintenance programs will be established for the laboratories' ventilation and gas extraction systems to guarantee adequate and hygienic mechanical ventilation.
4. Periodic inspection programs will be established to verify the microbiological and chemical quality of the air in teaching and research laboratories where dangerous substances are used and in all those closed spaces.
5. A policy on the management and disposal of biomedical and chemical waste will be adopted, which complies with the requirements established by the regulatory bodies.
6. Disciplinary mechanisms will be established and applied to handle cases of violations of institutional guidelines on management and disposal since such violations involve and compromise the public environmental responsibility of the University.

The Law on Environmental Public Policy and the Constitution of the Commonwealth of Puerto Rico establishes a public policy that applies to all entities of Puerto Rico. Act No. 416 of September 22, 2004.