



Voorhees University

**POLICY MANUAL
VOLUME II**

**Campus Community
and
External Affairs Policies**

March 2022

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Volume II

Community Policies

2.0 Introduction

The policies provided in Volume II of the *University Policy Manual* apply to all members of the Voorhees University community. General policies that affect all Voorhees University employees are set forth in Volume III. Those policies that pertain only to members of the faculty (including but not limited to faculty policies addressing Rank, Appointment and Selection, Promotion, Evaluation, Tenure, Separation, Faculty Rights and Responsibilities, Leave, and Grievances) are provided in Volume IV. Student life policies can be found in Volume V of the *University Policy Manual*.

Volume II of the *University Policy Manual* has been developed to describe some of the expectations of members of the Voorhees University community, as well as outline the University's community policies and programs. It is intended to be used as a guideline and is not intended to create, and does not create an expressed or implied contract. It supersedes all previous community-related policies and procedures published in prior personnel and/or student handbooks.

While Voorhees University has made this edition of Volume II of the *University Policy Manual* as comprehensive as possible, it is not possible to foresee every situation that may occur. Therefore, circumstances not specifically addressed in the *University Policy Manual* will be handled on a case- by-case basis, in accordance with established practice.

As Voorhees University continues to grow, the need may arise to improve, modify, revise, supplement, or rescind, suspend, terminate, or change policies, procedures, programs, or portions of this volume. Additionally, state and federal laws affecting University operations may require changes to the volume. Therefore, Voorhees University reserves the right to make any changes at its sole absolute discretion as deemed necessary. The campus community may receive updated information concerning these changes from time to time.

2.1 General Institutional Policies

2.1.1 Appearances before Governmental Agencies

Subject to specific control by the Board of Trustees, all official dealings on behalf of Voorhees University with all federal, state, and local government offices, boards, and agencies, including dealings with the South Carolina Independent Colleges and Universities, Inc., will be under the direction of the President or an authorized designee. Unauthorized appearances on behalf of

Voorhees University before federal, state, and local government offices, boards, and agencies are prohibited and subject to appropriate discipline. Please refer to the University's Advancement Related Government Relations Practices Policy for additional information.

2.1.2 Children on Voorhees University Property

Campus grounds and infrastructure are designed to provide an environment conducive to academic and work activities performed by students and employees. For reasons that include safety of children and assuring professional efficient performance of academic pursuits, operations, and services, the University will not accommodate children in campus workplaces, classrooms, laboratories, residence rooms (unless specific permission is granted), the Wright/Potts library (unless accompanied by an adult) and the Physical Plant Department.

The University recognizes there may be an occasion when it becomes necessary to accommodate a minor child on campus. When those circumstances arise, the following guidelines will be followed:

1. Children visiting campus for any reason must be under direct supervision at all times. A student, staff, or faculty member bringing a child to campus is solely responsible for the child's supervision, safety and actions and may not ask another student, staff or faculty member to accept responsibility for looking after the child. The University cannot and will not accept liability for the child's presence on campus.
2. Children shall not be brought to campus as a replacement for childcare services. If an emergency situation arises that requires faculty, staff, or students, to obtain alternate childcare, Voorhees University will make a reasonable effort to provide the employee with a reasonable amount of time away without pay for arranging alternate childcare.

2.1.3 Credit Card Marketing

Voorhees University prohibits the advertising, marketing, or merchandising of credit cards to students on University -owned, operated, or controlled property, and at any University - sponsored events without approval from the Provost/Vice President for Academic Affairs or the Vice President for Business and Fiscal Affairs. This prohibition applies to all banks and other commercial entities (including their third-party representatives) that engage in the on-campus marketing of credit cards to students through solicitation activities.

Upon receiving written approval from the Provost/Vice President for Academic Affairs, the bank or commercial entity's solicitation activities will adhere to the following:

1. The bank or commercial entity's representatives or agents (including their third-party representatives) will be confined to specific sites and times as designated by the Provost/Vice President for Academic Affairs.

2. The bank or commercial entity's representatives or agents (including their third-party representatives) will be required to display appropriate signage identifying the bank or commercial entity they represent.
3. The bank and commercial entity's representatives or agents (including their third-party representatives) must verify they have registered with the University, display and make available a copy of this policy, as well as provide debt education materials noting the responsible use of credit cards.

In addition to the above, the following conditions will apply:

1. All banks and other commercial entities (including their third-party representatives) are prohibited, while on campus, from collecting personal information from students specifically for credit card application purposes (including, but not limited to, completed credit card application forms and similar material), either at the time of solicitation or subsequently. Completed application materials may be mailed or hand-delivered by students once they have read and considered the materials and are in a position to make an informed decision to an off-campus office of the bank or other soliciting entity.
2. All banks and other commercial entities (including their third-party representatives) are prohibited from offering gifts to any student in exchange for completing a credit card application.

2.1.4 Consensual Relations

Voorhees University considers sexual relationships between employees of the University and students and between supervisors and their employees to be a violation of professional ethics and responsibility when one party has any professional responsibility for the other's academic or job performance or professional future. The following relationships, therefore, are expressly prohibited:

1. All employees who are in positions of authority are prohibited from having a romantic relationship with any student, to whom they are not married, who is currently enrolled at Voorhees University.
2. All employees (excluding those on the student payroll) are prohibited from having a romantic or outside relationship or permitting one to develop with any student who is enrolled in that person's class or is subject to that person's evaluation, even when both parties appear to have consented to the relationship.
3. All employees are prohibited from having a romantic or outside relationship or permitting one to develop with any other employee who is subject to that person's supervision, directly or indirectly, even when both parties appear to have consented to the relationship.

Notwithstanding the above, romantic relationships between any employee and any student are strongly discouraged, even if not expressly prohibited by this policy.

The University recognizes that consensual romantic and other outside relationships may exist

prior to the time an evaluative relationship begins. Under these circumstances, the following guidelines will be followed:

1. The employee in an evaluative role must report the relationship to his/her supervisor so that the student or supervisee can be reassigned if at all possible.
2. If it is not possible to reassign the student or supervisee, the supervisor will make arrangements for another appropriately qualified employee to grade, counsel, advise, evaluate work, establish salary, control working conditions, and other similar responsibilities.
3. All conflicts or potential conflicts must be reported by the employee or the employee's supervisor to the appropriate administrative officer.

This policy is not intended to limit romantic or outside relationships among peers or colleagues; however, employees involved in such relationships are cautioned to avoid situations that may contribute to a hostile environment for other employees or students.

Exceptions to any of these prohibitions (other than the reporting requirement which is absolute) will be considered by the appropriate administrative officer in conjunction with the Department of Human Resources on a limited, case-by-case basis. It is the duty of employees to consult with the appropriate administrative officer or the Department of Human Resources if there are questions about the application or effect of this policy to an existing or potential relationship in which they are or may become involved or in which employees they directly or indirectly supervise are or may become involved.

Suspected policy violations may be reported by anyone to the Director of Human Resources, Provost/Vice President for Academic Affairs, or any other administrative officer. The Director of Human Resources will coordinate the investigation of the complaint in conjunction with the appropriate administrative officer and the Provost/Vice President for Academic Affairs or department manager. If any of these individuals are included in the complaint, they will not be involved in the investigation or decision.

Should a relationship with a student or employee lead to a charge of sexual harassment against a faculty or staff member, the University will investigate and resolve the charge in accordance with its Discrimination and Harassment Complaint Policy. If the investigation concludes that sexual harassment did occur, disciplinary action will be taken in accordance with the University's Discrimination and Harassment Policy in this Volume.

If the investigation concludes that a violation of the Consensual Relationship Policy did occur, the University will take disciplinary action, which may include immediate termination of employment.

2.1.5 Demonstrations

Demonstrations must be registered 72 hours in advance with and approved in writing by the Provost/Vice President for Academic Affairs. The Provost/Vice President for Academic Affairs

shall notify the Department of Campus Safety and Security of the approval. For purposes of the policy, “Demonstrations” will include the presence of one or more persons in a University location with the intent to express a particular point of view in a manner that attracts attention, such as protests, rallies, sit-ins, vigils, or similar forms of expression.

All demonstrations (and expression of any form) must be peaceful and orderly and confined to campus. Demonstrations may be organized and led only by members of the Voorhees University community. Demonstrations or other forms of expression may not compromise the rights of other members of the Voorhees University community, nor interfere materially with the general operation of the University. Free speech is a cherished foundation of academia. Forms of expression, however, may not demean or degrade individuals on the basis of religion, national heritage, cultural background, sexual preference, gender, ability or disability. Violators of this policy are subject to appropriate corrective discipline.

2.1.6 Disability (ADA) Policies

It is the policy of Voorhees University to provide accessible programs, services, activities, reasonable accommodations, and a harassment/discrimination-free environment, for any student, employee, or campus visitor with a documented disability as defined by Section 504 of the Rehabilitation Act of 1973, as amended, and by the Americans with Disabilities Act of 1990.

2.1.6.1 Employees with Disabilities

Policies pertaining to employees with disabilities are located in Volume III, Subsection 3.3.11 of the *University Policy Manual*.

2.1.6.2 Admission of Students with Disabilities

The University’s policy pertaining to the admission of students with disabilities are located in Volume VI, Section 6.2 of the *University Policy Manual*.

2.1.6.3 Students with Disabilities

Policies pertaining to students with disabilities are located in Volume VI, Section 6.2 of the *University Policy Manual*.

2.1.6.4 Campus Visitors with Disabilities

Voorhees University provides reasonable accommodations to campus visitors with disabilities. For information regarding campus accessibility and accommodations for University -sponsored events or hosting guests, please contact the event sponsor. To request an accommodation, please contact the event sponsor at least ten days prior to the event/visit.

2.1.7 Discrimination and Harassment

Voorhees University is committed to providing a work and academic environment that is free of discrimination and harassment of any type, including sexual harassment and misconduct. In keeping with this commitment, Voorhees University maintains a strict policy prohibiting all forms of unlawful harassment (and discouraging conduct that, while not unlawful, could reasonably be considered discriminatory harassment as defined below). Discriminatory harassment of any kind is not appropriate at Voorhees University, whether it is based on race, color, religion, ethnic or national origin, sex, age, sexual orientation, genetic orientation or against qualified disabled persons, disabled veterans, or veterans of the Vietnam era, as identified and defined by law, or any factor that is a prohibited consideration under applicable law. These laws include, but are not limited to, the Civil Rights Act of 1866; the Equal Pay Act of 1963; Title VI of the Civil Rights Act of 1964; Title VII of the Civil Rights Act of 1964; Executive Order 11246, as amended; Title IX of the Education Amendments of 1972; the Rehabilitation Act of 1973; the Age Discrimination in Employment Act, as amended; the Americans with Disabilities Act; the Civil Rights Act of 1991.

At the same time, Voorhees University recognizes the importance of maintaining the right of academic freedom and the University's determination to protect the full and frank discussion of ideas. Thus, discriminatory harassment does not refer to the use of materials about or discussion of race, color, religion, ethnic or national origin, gender, age, disability, sexual orientation, veteran's status, genetic disposition, or any factor protected by applicable law for scholarly purposes appropriate to the academic context, such as class discussions, academic conferences, or meetings.

This policy applies to all employees, students, and independent contractors, vendors, and others doing business with Voorhees University. Furthermore, it prohibits unlawful harassment in any form, including verbal, physical, and visual harassment. It also prohibits retaliation of any kind against individuals who file valid complaints or who assist in a Voorhees University investigation.

2.1.7.1 Definitions

2.1.7.1.1 Discrimination

Voorhees University takes positive action to ensure that students and employees are treated in compliance with applicable laws and regulations governing non-discrimination on the basis of race, color, religion, ethnic or national origin, sex, age, sexual orientation, genetic orientation; or against qualified disabled persons, disabled veterans, or other veterans, as identified and defined by law, or any factor that is a prohibited consideration under applicable law. It is therefore a violation of University policy to discriminate in the provision of educational or employment opportunities, benefits, programs, activities, or privileges; to create discriminatory work or academic conditions; or to use discriminatory evaluative standards in employment or educational

settings if the basis of that discriminatory treatment is, in whole or part, the person's race, color, religion, ethnic or national origin, gender, age, disability, sexual orientation, veteran's status, genetic disposition or any other protected characteristic as established by law.

2.1.7.1.2 Harassment of a Non-Sexual Nature

The regulations defining sexual harassment clearly state that the same principles apply to harassment on the basis of any characteristic that is protected by law. Thus, it is the University's policy to prohibit discriminatory harassment of a non-sexual nature, which includes verbal, physical, or graphic conduct that denigrates or shows hostility or aversion toward an individual or group on the basis of race, color, religion, ethnic or national origin, gender, age, disability, sexual orientation, veteran's status, genetic disposition, or any factor protected by applicable law and that:

1. Has the purpose or effect of creating an intimidating, hostile, or offensive employment, educational, or living environment; or
2. Has the purpose or effect of unreasonably interfering with an individual's work performance or a student's academic performance.

Prohibited behavior may, for example, include conduct or material (physical, oral, written, or graphic, including e-mail messages posted or circulated in the community) involving epithets, slurs, negative stereotyping, or threatening, intimidating, or hostile acts, that serves no scholarly purpose appropriate to the academic context and gratuitously denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, ethnic or national origin, gender, age, disability, sexual orientation, veteran's status, genetic disposition, or any factor protected by applicable law.

2.1.7.1.3 Sexual Harassment

Sexual harassment is a form of sex discrimination, which is illegal under Title VII of the Civil Rights Act of 1964, and Title IX of the Higher Education Amendments of 1972, and the Human Rights Law of the state of South Carolina. Sexual Harassment is defined as unwelcome sexual contact of any nature, communication (either verbal or pictorial) of a sexual or gender -based nature, or solicitation of sexual contact of any nature, when any of the above contacts or communications is not mutually agreeable to both parties and any of the following conditions apply:

1. The submission to such contact, communication, or solicitation is made explicitly or implicitly a term or condition of an individual's employment or academic progress;
2. Submission to or rejection of such contact, communication, or solicitation by an individual is used or threatened as a basis for employment or academic decisions affecting such individual;
3. Such contact, communication, or solicitation has the purpose or effect of being sufficiently severe, pervasive/persistent and objectively offensive that it could alter the conditions of education or employment, by interfering with an individual's work,

academic performance, living conditions, or status.

Sexual harassment does not refer to occasional compliments or conduct of a socially acceptable nature. Nor does it refer to the use of materials or discussion related to sex and/or gender for scholarly purposes appropriate to the academic context. Rather, it refers to any non-academic remarks or actions of a sexual nature that are not welcome and are likely to be viewed as personally offensive. This can include but is not limited to any of the following activities that are unwelcome by the recipient: physical or verbal advances; sexual flirtations; propositions; verbal abuse of a sexual nature; vulgar talk or jokes; degrading graphic materials or verbal comments of a sexual nature about an individual or the individual's appearance; the display of sexually suggestive objects outside a scholarly context and purpose; and physical contact of a sexual or particularly personal nature. Cartoons, pictures, or other graphic materials that create a hostile or offensive working, academic, or residential environment may also be considered as harassment. In addition, no one should imply or threaten that an employee's, applicant's, or student's "cooperation" with unwelcome sexual advances or requests for sexual favors (or refusal thereof) will have any effect on the individual's employment, assignment, compensation, advancement, career development, grades, or any other condition of employment or status as a student.

2.1.7.2 Reporting Complaints

All faculty, staff, students, and other individuals associated with Voorhees University are subject to and responsible for complying with this policy. Members of the Voorhees University community who believe they have been subjected to discrimination or harassment in violation of this policy or suspects the occurrence of forbidden discrimination or harassment should address their concerns in writing to the appropriate staff official at the University as set forth below:

1. Students with complaints of sexual harassment against faculty members and staff members in academic departments, divisions or support units should contact the Title IX Coordinator or the Provost/Vice President for Academic Affairs who shall report the complaint to the Title IX Coordinator. Students participating in internships, field/practicum placements, student teaching, or similar academic experiences in settings off campus should report complaints of sexual harassment to the University faculty member providing supervision or to the Provost/Vice President for Academic Affairs, who shall report the complaint to the Title IX Coordinator. Student complaints of discrimination or harassment outside of academic departments, divisions or support units should be addressed to the Provost/Vice President for Academic Affairs.
2. Employees should report complaints of discrimination or harassment to the Director of Human Resources who shall report the complaint to the Title IX Coordinator, when applicable.
3. Vendors, contractors, 3rd parties should report complaints of discrimination and harassment to the Vice President for Business and Fiscal Affairs, who shall report the complaint to the Title IX Coordinator.

If the staff members listed above is the subject of the harassment allegations, or the complainant is otherwise uncomfortable approaching a designated staff member, the complainant should direct the complaint to one of the other appropriate staff listed above.

The written allegations should be made to the appropriate administrator in writing as soon as possible, but in all cases within 180 calendar days of the allegedly harassing or discriminatory event. The complaint must include the following information: name, address, and telephone number of the complainant; the nature of the complaint; date(s) and location(s) of the alleged occurrences(s); evidence on which the complaint is based; and the redress sought by the complainant.

2.1.7.3 Redress of Complaints

The University's Title IX Coordinator is responsible for the initial intake and handling of complaints of harassment or discrimination. Therefore, a staff official receiving a complaint against a University employee in accordance with the above reporting procedures will refer the matter to the Title IX Coordinator. Upon receipt of the written complaint the Title IX Coordinator will forward a copy of the complaint to the accused, allowing the opportunity for explanation or reply. The accused employee will provide a written response within five (5) business days of receiving to the complaint. Within five (5) business days of receipt of the employee's written response, the Title IX Coordinator shall determine whether to resolve the matter on an informal or formal basis.

Students are also bound by the principles and definitions outlined in this policy. However, complaints against students (when acting in the capacity as a student) will be resolved under the *Student Code of Conduct* and Student Disciplinary System as outlined in Volume V, Section 5.7 of the *University Policy Manual*.

The Title IX Coordinator shall conduct the investigation of complaints against students who are acting in the capacity of an employee, then report the investigation findings and recommendations to the Provost/Vice President for Academic Affairs as outlined below.

2.1.7.3.1 Informal Resolution of Complaints
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Informal resolution of a complaint is appropriate when a complaint is not severe enough to require disciplinary action to remedy the situation that is the subject of the complaint. The Title IX Coordinator facilitates informal resolutions. They can include coaching a complainant to address a situation directly, facilitating for a mediation conference between the parties, helping to modify a work or study situation, or arranging a documented meeting between a University official and the alleged offender where, at a minimum, the requirements of the University's Discrimination and Harassment Policy are discussed.

If the complainant or the accused employee chooses not to participate in the informal procedure, or feels that the informal procedure is inadequate or has been unsuccessful, the complainant may utilize the formal procedure outlined below.

2.1.7.3.2 Formal Resolution of Complaints

Formal resolution is appropriate when a complaint alleges serious allegations of harassment or discrimination or a pattern of harassment or discrimination. Formal resolution involves an official investigation of the complaint and the possibility of disciplinary action against the employee offender. In such cases, the Title IX Coordinator will forward copies of the complaint and response to the Grievance Committee for review and action.

1. The Title IX Review Committee will meet with each party and witnesses individually to ascertain the facts regarding the allegations.
2. The Title IX Review Committee will write a summary of facts and forward the same to the Title IX Coordinator.
3. The Title IX Coordinator will meet and present the summary of facts (of the accused employee) to the Provost/Vice President for Academic Affairs.
4. The Provost/Vice President for Academic Affairs, after consultation with the Title IX Coordinator will determine if the allegations are true and constitute a violation of the University Discrimination and Harassment Policy.
 - a. If yes, appropriate disciplinary action will be determined between the Provost/Vice President for Academic Affairs, and Title IX Coordinator. Proper notice will be included in the accused personnel file.
 - b. If no, the allegations will be closed. No notice will be placed in the accused personnel file.

Note: The President may summarily suspend an employee from the University for an interim period pending the formal resolution process. The interim suspension will become effective immediately without prior notice whenever there is evidence that the continued presence of the employee at the University poses a substantial and immediate threat to himself, herself, or others. During the period of such a suspension, the employee shall not, without prior written permission from the President or his/her designee, enter or remain on the campus of Voorhees University other than to attend scheduled hearing(s). Violations of any conditions of the interim suspension will be grounds for dismissal from the University. The interim sanction may remain in effect until a final decision has been reached, including any appropriate appeals process, at the discretion of the President or his/her designee.

2.1.7.4 Additional Reporting

The Equal Employment Opportunity Commission (“EEOC”) may also investigate and process complaints of sexual and other unlawful discriminatory harassment. In addition, any person who is dissatisfied with the University’s internal procedures utilized for handling complaints, or who is dissatisfied with the result of the investigation or the sanctions imposed, may seek redress through the EEOC, to the extent allowed by law. The EEOC may be contacted at 131 “M” Street, NE, Washington, D.C. 20507 or at (800) 669-4000. In the event that a complaint is filed with an external agency or court, the University reserves the right to determine, at its discretion, whether the University’s internal complaint resolution procedure should be discontinued or

continued separately.

2.1.7.5 Confidentiality

Investigations under this policy will be conducted in a manner that will protect, to the extent possible, the confidentiality of all parties. Voorhees University, however, cannot guarantee complete confidentiality where it would conflict with the University's obligation to investigate meaningfully and, where warranted, take corrective disciplinary action.

2.1.7.6 Appeals

If either party disputes the findings or is dissatisfied with the procedures outlined above, the party may appeal such findings by filing a written appeal with the President or his/her designee within 15 calendar days of receipt of the written report. The President or his/her designee will review the record of the matter and will reach a final determination as to any action to be taken within 10 calendar days of receipt of the appeal. The determination of the President is final.

2.1.7.7 Anti-Retaliation Statement

Retaliation against anyone who files a complaint, serves as a witness, or otherwise participates in the enforcement of this policy is strictly prohibited. Initiating a complaint of harassment or discrimination will not affect a complainant's employment, compensation or work assignments or, in the case of students, grades, class selection, or any other matter pertaining to student status. Distinguishing between harassing or discriminatory conduct and conduct that is purely personal or social without a harassing or discriminatory word or educational effect requires a determination based on all of the facts pertaining to the situation.

False accusations of harassment or discrimination can seriously injure innocent people. It is a violation of this policy, therefore, for anyone knowingly to make false accusations of harassment. A determination that a complaint is not meritorious, however, is not necessarily equivalent to a false allegation. A finding for the accused does not constitute a finding the complaint was in bad faith.

2.1.8 Electronic Devices Policy

Cellular phones, pagers, and other electronic devices will not be used in a manner that causes disruption in the classroom, library, or within any Voorhees University owned or operated facility. Abuse of cellular devices with photographic capabilities for purposes of photographing test questions, or other notes and materials is prohibited. Photographing individuals in secured areas such as bathrooms, locker rooms, or other areas where there is a reasonable expectation of privacy, and/or taking photographs of an individual against their will is strictly prohibited. Electronic transmission of photographs of any person without express permission is strictly prohibited. Violators of this policy are subject to appropriate discipline.

2.1.9 Equal Opportunity and Affirmative Action Policy

Voorhees University is an Equal Opportunity Employer. As such, the University affirmatively acts to ensure that applicants for employment and employees are treated in compliance with Federal and State laws and regulations governing equal opportunity and non-discrimination in employment on the basis of race, color, religion, ethnic or national origin, gender, age, sexual orientation, Genetic Information & Testing, Family & Medical Leave, protected veteran status, or any other characteristic protected by law. Employees who feel they have been subjected to discrimination shall immediately report such conduct to the Title IX Coordinator. Please refer to the University's "Discrimination and Harassment Policy" for additional information.

Similarly, Voorhees University is committed to equal opportunity in employment and education and does not discriminate on the basis of race, color, religion, ethnic or national origin, gender, age, sexual orientation, Genetic Information & Testing, Family & Medical Leave, protected veteran status, or any other characteristic protected by law, in the administration of its educational policies, admissions policies, scholarship and loan programs, athletic programs, and other school-administered programs, according to Federal, state, and local regulations. Students who feel they have been subjected to discrimination shall immediately report such conduct to the Provost/Vice President for Academic Affairs, who shall report such cases to the Title IX Coordinator.

2.1.10 Federal Educational Rights and Privacy Act (FERPA)

Access to and release of student education records are governed by federal law and University policy. The Family Educational Rights and Privacy Act of 1974 (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) commonly known as the "Buckley Amendment," seeks to ensure the privacy of the educational records of students through elaborate procedural guarantees. This Federal Act encompasses records maintained by most independent institutions and limits the disclosure of information to third parties. Based on FERPA, Voorhees University has established a policy that affords eligible students attending the University, and in some instances their parents², certain rights with respect to their education records. They are:

1. The right to inspect and review the student's education records maintained by the University within forty-five days of the day the University receives a request for access. Students should submit to the Custodian of Records written requests that identify the record(s) they wish to inspect. The custodian will arrange for access and notify the student of the time and place where the records may be inspected. If the custodian to whom the request was submitted does not maintain the records, that official shall advise the student of the correct official to whom the request shall be addressed. The student has no right of access to some records. These are:
 - a. Professional mental health treatment records to the extent necessary, in the judgment of the attending physician or professional counselor, to avoid detrimental effects to

- the mental health of the student or of others. These records may, however, be reviewed by a physician or other appropriate professional of the student's choice.
- b. Financial information furnished by the student's parents in support of an application for financial aid.
 - c. Confidential letters of recommendation that were placed in the student's file prior to January 1, 1975.
 - d. Confidential letters of recommendation concerning admission, employment, or honorary recognition, for which the student has waived access. (Voorhees University may not require a student to sign a waiver in order to obtain services, but a person writing a recommendation may insist on a waiver as a condition for writing it).
 - e. Personal notes made by a faculty member or counselor that are accessible only to that person and are not shared with others.
 - f. Materials in any admissions files, until the student has been admitted to, and has attended Voorhees University.
2. The right to request that the University amend the student's education records that the student believes is inaccurate or misleading. Students or eligible parents requesting an amendment to a record that they believe to be inaccurate or misleading should write the custodian responsible for the record, clearly identify the part of the record they want changed, and specify why it is inaccurate or misleading. Please note, however, that Voorhees University is not required to consider requests for amendment under FERPA that seek to change a grade, disciplinary decision or the opinions or reflections of a school official or other person reflected in an education record.
- a. If the University decides not to amend the record as requested by the student, the custodian will notify the student (or eligible parent) of the decision and advise the student of the right to a hearing regarding the request for amendment.
 - b. The request will be in writing and presented to the Provost/Vice President for Academic Affairs. A hearing officer appointed by the Provost/Vice President for Academic Affairs will conduct the hearing. The hearing will be conducted within a reasonable period after the request for the hearing has been received. The hearing officer will notify the student or eligible parent, reasonably in advance, of the date, place, and time of the hearing.
 - c. The student or eligible parent will be afforded a full and fair opportunity to present evidence relevant to the issue raised. One or more other persons may accompany the student but not address the hearing officer. Attorneys or other individuals may represent the student. The hearing officer will make a decision in writing based upon the evidence presented at the hearing within a reasonable time. The decision will include a summary of the evidence presented and the reasons for the decision.
 - d. If the hearing officer supports the complaint, the education record will be amended accordingly and the student or eligible parent will be so informed. If the hearing officer decides not to amend the education record, the student has the right to place

in the education record a statement commenting on the challenged information and/or stating the reasons for disagreement with the decision. This statement will be maintained as part of the education record as long as the contested portion of the record is maintained, and whenever a copy of the education record is sent to any party, the student's statement will be included.

2. The right to consent to the disclosure of personally identifiable information contained in the student's education records, except to the extent that FERPA authorizes disclosure without consent. Personally identifiable information (that is, information that would make the student's identity easily traceable) includes direct identifiers such as social security number (SSN), biometric records (a measurable biological or behavioral characteristic such as fingerprint or handwriting) as well as indirect identifiers such as the name of the student's parents or family members, mother's maiden name, and date and place of birth, that would allow a reasonable person in the community to identify the student with reasonable certainty. Generally, the University must have written permission from the student in order to release any information from a student's education record. However, FERPA authorizes disclosure of those records, without consent, to the following parties or under the following conditions (34CFR § 99.31):
 - A. University officials with legitimate educational interest. One exception that permits disclosure without consent is disclosure to school officials with legitimate educational interests. A school official is a person employed by the University in an administrative, supervisory, academic or research, or support staff position (including law enforcement unit personnel and health staff); a person or company with whom the University has contracted (such as an attorney, auditor, or collection agent); a person serving on the Board of Trustees; or a student serving on an official committee, such as disciplinary or grievance committee, or assisting another school official in performing official tasks.
 - i. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill the official's professional responsibility.
 - ii. Additionally, education records may be released to contractors, consultants, volunteers, and other outside service providers used by the University to perform institutional services and functions that it would otherwise use employees of the University to perform. The University must use "reasonable methods" to ensure that the school official obtains access to only those education records -- paper or electronic -- in which they have legitimate educational interests and the burden falls to the institution to justify access if questioned.
 - B. Other Colleges, Universities and/or schools to which a student is transferring. The authority to disclose or transfer education records to a student's new school does not cease automatically the moment a student has enrolled in the new school and continues to be enrolled at any future point in time so long as the disclosure is for purposes related to the student's enrollment or transfer. This means that a school may disclose any records or information, including health and disciplinary

records, that the school could have disclosed when the student was seeking or intending to enroll in the new school.

- C. Specified officials for audit or evaluation purposes. The regulations clarify that educational agencies and institutions may provide personally identifiable information within education records to state auditors without prior consent without violating FERPA.
- D. Appropriate parties in connection with financial aid to a student.
- E. Organizations conducting certain studies for or on behalf of the University. The final regulations require an institution using this exception to enter into a written agreement with the recipient organization that specifies the purposes of the study.

The written agreement must specify that the information from education records may only be used to meet the purposes of the study stated in the written agreement and must contain the current requirements in §99.31(a)(6) on re-disclosure and destruction of information, as described above. The written agreement must require the organization to conduct the study in a manner that does not permit personal identification of parents and students by anyone other than representatives of the organization with legitimate interests. The final regulations also require that the written agreement must specify the purpose, scope, and duration of the student's attendance at the University and the information to be disclosed. The organization is also required to destroy or return all personally identifiable information when it is no longer needed for the study; and must specify the period during which the organization must destroy or return the information.

- F. Accrediting organizations.
- G. To comply with judicial order or lawfully issued subpoena. The institution may disclose education records in response to a judicial order, a lawfully issued subpoena, or an order issued by the US Attorney General under the USA Patriot Act without consent or notice to the student that it would otherwise be required under the regulations.
- H. Appropriate officials in cases of health and safety emergencies. In making a determination under the health and safety exception, which allows educational institutions to disclose education records in the case of a health or safety emergency, institutions are now allowed to exercise judgment as follows:
 - i. An institution may take into account the "totality of the circumstances" pertaining to a threat to the safety or health of a student or other individuals.
 - ii. If an institution determines there is an "articulable and significant threat" to the health or safety of a student or others, an institution may disclose information from education records to third parties, whose knowledge of the information is necessary to protect them, including the health and safety of the student or others.
 - iii. If, based on the information available at the time, there is a rational

- basis for that determination at the time the decision is made.
- iv. A separate change was made to another section of the health and safety emergency provision to allow disclosure of personally identifiable information from an education record to “appropriate parties,” including parents of a student, if knowledge of the information is necessary to protect the health and safety of the student or other individuals.

Additionally, the Department of Education will require that the institution involved in a disclosure under these circumstances record the nature of the threat and the parties to whom it disclosed information under the “health and safety” emergency section. FERPA also allows disclosure to parents if the student has violated any Federal, State, or local law, or any rule or policy of the institution, governing the use or possession of alcohol or a controlled substance, if the institution determines that the student has committed a disciplinary violation regarding the use or possession and the student is under twenty-one at the time of the disclosure.

- 1. State and local authorities a juvenile justice system; pursuant to specific state law.
- j. To comply with the Campus Sex Crimes Prevention Act. To conform with the requirements of the Campus Sex Crimes Prevention Act, the regulations permit campus officials to release information they received from a state or community notification program about a student registered as a sex offender in the State. This is a new exception to the consent requirement to allow educational agencies to disclose information concerning registered sex offenders provided under state sex offender programs.
- k. Additional Points on FERPA Regulations and Pertinent Exceptions: The regulations clarify that the University may disclose educational records to the student’s parents without student consent if the student is a dependent for Federal Income Tax purposes.

Definition of Education Records. “Education Records” are currently defined as records that are directly related to a “student” and maintained by an “educational agency or institution” or by a party acting for the agency or institution. (The term “student” excludes individuals who have not been in attendance at the institution.) The regulations clarify that with respect to former students, the term education records exclude records that are created or received after an individual is no longer a student in attendance and are not directly related to the individuals’ attendance as a student. An example of a record excluded from the definition would be alumni services.

Directory Information. “Directory information” may be disclosed without the student’s written consent. Schools may disclose, without consent, “directory information” such as a student’s name, address, telephone number, date and place of birth, 3 honors and awards, and dates of attendance. However, schools must tell the student about directory

information and allow students a reasonable amount of time to request that the school not disclose directory information about them; in other words, permit the students the opportunity to opt out before making such disclosures. The regulations specifically provide that an institution may not designate as directory information a student's Social Security Number (SSN) or other student ID number. However, the directory information may include a student's user ID or other unique identifier used by the student to access or communicate in electronic systems, but only if the electronic identifier cannot be used to gain access to education records except when used in conjunction with one or more factors that authenticate the student's identity, such as a personal identification number (PIN), password, or other factors known or possessed only by the student.

The regulations allow an agency to continue to honor any valid request to opt out of directory information disclosures while the individual is still a student until rescinded.

Identification and authentication of identity. Requires the use of reasonable methods to identify and authenticate the identity of students, parents, school officials, and any other parties to whom personally identifiable information is disclosed.

Custodian of Records: University personnel responsible for the educational records of student; the Provost/Vice President for Academic Affairs, the University Registrar, the Director of Financial Aid, and the Director of the Health Center. Each of these persons shall have available a listing of records kept in their individual students' file.

4. The right to file a complaint with the U.S. Department of Education concerning alleged failures by Voorhees University to comply with the requirements of FERPA. The name and address of the office that administers FERPA is Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Avenue, SW., Washington, D.C., 20202-8520.

- a. For a complete description of FERPA regulations, please visit:

- <http://www.ed.gov/policy/gen/guid/fpc/index.html>, which is a link to the Family Policy Compliance Office in the Department of Education.

In addition to the above procedures, Voorhees University will, at least annually, notify students of its practices with regard to the types of student education records it maintains, the names of custodians of the records, the policies for reviewing and expunging records, the cost of reproducing copies of records, and the categories of what the University considers to be directory information. Moreover, the Office of Records and Registration will keep a log of all parties, other than University employees, who have requested or obtained access to a student's records. This log will contain the reason why access was requested. The log will not be made available to anyone other than the student and University employees. Any time information concerning students is requested by a third party, the party will be notified that it is illegal under the Family Educational Rights and Privacy Act of 1974 to share the information with anyone else without written permission from the student.

2.1.11 Gambling

Gambling, including gambling on University -athletic events, and/or “games of chance” for money or items of tangible value are strictly prohibited on Voorhees University’s property. Violators shall be subject to appropriate disciplinary action. The Vice President for Business and Fiscal Affairs and the Vice President for Institutional Advancement and Development must approve all raffles and sales for charitable purposes. See the Voorhees University Solicitation Policy in Subsection for additional information regarding on-campus fundraising efforts for non-profit charities.

2.1.12 Gramm-Leach-Bliley Act and Red Flag Compliance Policies

2.1.12.1 Gramm-Leach-Bliley Act

In compliance with the Gramm-Leach-Bliley Act (GLB), Public Law 106-102 (1999), Voorhees University protects the private non-public information of consumers, students, and employees. Voorhees University collects information such as:

1. Name
2. Social Security Number
3. Date and location of birth
4. Gender
5. Financial status
6. Salary history
7. Personal Check Information
8. Credit Card Numbers
9. Driver’s License Information

Voorhees University’s policy is to identify and safeguard this information with the appropriate procedures to ensure compliance with the GLB Act. Voorhees University will manage private non- public information in accordance with all applicable state and federal guidelines relating to the use, disclosure and retention of private non-public information.

2.1.12.1.1 Information Security Plan

GLB mandates that Voorhees University appoint an Information Security Plan Coordinator; conduct a risk assessment of likely security and privacy risks; institute a training program for all employees who have access to covered data and information; oversee service providers and contracts; and evaluate and adjust the Information Security Program periodically.

2.1.12.1.1.1 Information Security Plan Coordinator

In order to comply with the GLB Act, Voorhees University has designated the Vice President for Business and Fiscal Affairs as the Information Security Officer (ISO) to act as the Information

Security Plan Coordinator for the GLB Act. The ISO works closely with the Information Technology staff, as well as all relevant academic and administrative departments throughout the University.

2.1.12.1.1.2 Risk Assessment and Safeguards

The ISO must work with all relevant areas of Voorhees University to identify potential and actual risks to security and privacy of information. Each department head, or a designee, will conduct an annual data security review, with guidance from the ISO. Department heads will be asked to identify any employees in their respective areas that work with covered data and information. In addition, Information Technology staff will conduct a quarterly review of procedures, incidents, and responses, and will publish all relevant materials except in those cases where publication may likely lead to breaches of security or privacy. Publication of these materials is for the purpose of educating the Voorhees University community on network security and privacy issues.

In order to protect the security and integrity of the Voorhees University network and its data, Information Technology staff will develop and maintain a registry of all computers attached to the Voorhees University network. This registry will include, where relevant, IP address or subnet, MAC address, and operating system. Information Technology staff will also develop a plan to ensure that all electronic covered information is encrypted in transit and that the central databases are strongly protected from security risks.

In addition, Information Technology staff will develop written plans and procedures to detect any actual or attempted attacks on covered systems and will develop incident response procedures for actual or attempted unauthorized access to covered data or information.

Social security numbers are considered protected information under both GLB and the Family Educational Rights and Privacy Act (FERPA). By necessity, student social security numbers still remain in the University's student information system. Voorhees University will conduct an assessment to determine who has access to social security numbers, in what systems the numbers are still used, and in what instances students are inappropriately being asked to provide a social security number. This assessment will cover Voorhees University employees as well as subcontractors.

Finally, the Information Security Officer will periodically review Voorhees University's computer security, disaster recovery program, and data-retention policies and present a report to the President's Executive Cabinet.

2.1.12.1.1.3 Securing Information

Other specific safeguarding practices that departments must assess and implement, if applicable, include:

1. Maintaining physical security by locking rooms and file cabinets where customer and sensitive information is stored. Ensuring windows are locked and using safes when practicable for especially sensitive data such as credit card information, checks, and

- currency;
2. Maintaining adequate key control and limiting access to sensitive areas to those individuals with appropriate clearance who require access to those areas as result of their job;
 3. Securing the personal work area to discourage casual viewing of customer data by unauthorized individuals;
 4. Using and frequently changing passwords to access automated systems that process sensitive information;
 5. Protecting the confidentiality of passwords by not sharing or posting such passwords;
 6. Using firewalls and encrypting information when feasible;
 7. Users of mobile computing and storage devices must diligently protect such devices from loss of equipment and disclosure of private information belonging to Voorhees University, its students, faculty, administrators, and staff. At a minimum, any such information contained on a portable device will be password protected, and encrypted, where feasible;
 8. Protecting the confidentiality of electronic information that might be accessed remotely either from home or in travel status. Under no circumstances should safeguarded information be “viewable” by unauthorized individuals;
 9. Referring calls and mail requesting customer information to those individuals who are familiar with safeguarding information;
 10. Shredding and erasing customer information when no longer needed;
 11. Encouraging employees to report suspicious activity to supervisors and law enforcement authorities;
 12. Ensuring that agreements with third-party contractors contain safeguarding provisions and monitoring those agreements to oversee compliance.

2.1.12.1.1.4 Employee Training and Education

While department heads and supervisors are ultimately responsible for ensuring compliance with information security practices, Information Technology staff will work in cooperation with Human Resources to develop training and education programs for all employees who have access to covered data.

2.1.12.1.1.5 Oversight of Service Providers and Contracts

GLB requires Voorhees University to take reasonable steps to select and retain service providers who maintain appropriate safeguards for covered data and information. The Vice President for Planning and Information Management will develop and send form letters to all identified covered contractors requesting assurances of GLB compliance.

2.1.12.1.1.6 Evaluation and Revision of the Information Security Plan

GLB mandates that this Information Security Plan be subject to periodic review and adjustment. The most frequent of these reviews will occur within Voorhees University Office of Information Technology. Processes in other relevant offices such as data access procedures and the training program should undergo regular review. The plan itself as well as the related data retention

policy may be reevaluated annually in order to assure ongoing compliance with existing and future laws and regulations.

2.1.12.2 Red Flag Policy

Voorhees University has developed this Identity Theft Prevention Program (“Program”) pursuant to the Federal Trade Commission’s (“FTC”) Red Flags Rule, which implements Section 114 of the Fair and Accurate Credit Transactions Act of 2003.

2.1.12.2.1 Definitions and Program

2.1.12.2.1.1 Red Flags Rule Definitions Used in this Program

Identity Theft is a “fraud committed or attempted using the identifying information of another person without authority.”

A Red Flag is a “pattern, practice, or specific activity that indicates the possible existence of Identity Theft.”

A Covered Account includes all student accounts or loans that are administered by Voorhees University.

Program Administrator is the individual designated with primary responsibility for oversight of the program.

Identifying information is “any name or number that may be used, alone or in conjunction with any other information, to identify a specific person,” including: name, address, telephone number, social security number, date of birth, government issued driver’s license or identification number, alien registration number, government passport number, employer or taxpayer identification number, student identification number, computer’s Internet Protocol address, or routing code.

2.1.12.2.1.2 Fulfilling Requirements of the Red Flags Rule

Under the Red Flags Rule, Voorhees University is required to establish an “Identity Theft Prevention Program” tailored to its size, complexity, and the nature of its operation. The Program must contain reasonable policies and procedures to achieve the following:

1. Identify relevant Red Flags for new and existing covered accounts and incorporate those Red Flags into the Program;
2. Detect Red Flags that have been incorporated into the Program;
3. Respond appropriately to any Red Flags that are detected to prevent and mitigate Identity Theft; and
4. Ensure the Program is updated periodically to reflect changes in risks to students or to the safety and soundness of the student from Identity Theft.

2.1.12.2.2 Identification of Red Flags

In order to identify relevant Red Flags, Voorhees University considers the types of accounts that it offers and maintains, methods it provides to open its accounts, methods it provides to access its accounts, and its previous experiences with Identity Theft. The University identifies the following Red Flags in each of the listed categories:

2.1.12.2.2.1 Notifications and Warnings from Credit Reporting Agencies

1. Report of fraud accompanying a credit report;
2. Notice or report from a credit agency of a credit freeze on an applicant; Notice or report from a credit agency of an active duty alert for an applicant;
3. Receipt of a notice of address discrepancy in response to a credit report request; and
4. Indication from a credit report of activity that is inconsistent with an applicant's usual pattern or activity.

2.1.12.2.2.2 Suspicious Documents

1. Identification document or card that appears to be forged, altered or inauthentic;
2. Identification document or card on which a person's photograph or physical description is not consistent with the person presenting the document;
3. Other document with information that is not consistent with existing student information; and
4. Application for service that appears to have been altered or forged.

2.1.12.2.2.3 Suspicious Personal Identifying Information

1. Identifying information presented that is inconsistent with other information the student provides (example: inconsistent birth dates);
2. Identifying information presented that is inconsistent with other sources of information (for instance, an address not matching an address on a loan application);
3. Identifying information presented that is the same as information shown on other applications that were found to be fraudulent;
4. Identifying information presented that is consistent with fraudulent activity (such as an invalid phone number or fictitious billing address);
5. Social security number presented that is the same as one given by another student;
6. An address or phone number presented that is the same as that of another person;
7. A person fails to provide complete personal identifying information on an application when reminded to do so; and
8. A person's identifying information is not consistent with the information that is on file for the student.

2.1.12.2.2.4 Suspicious Covered Account Activity or Unusual Use of Account

1. Change of address for an account followed by a request to change the student's name;
2. Payments stop on an otherwise consistently up-to-date account;
3. Account used in a way that is not consistent with prior use;
4. Mail sent to the student is repeatedly returned as undeliverable;
5. Notice to Voorhees University that a student is not receiving mail sent by the University;
6. Notice to Voorhees University that an account has unauthorized activity;
7. Breach in the University's computer system security; and
8. Unauthorized access to or use of student account information.

2.1.12.2.2.5 Alerts from Others Red Flag

Notice to the University from a student, identity theft victim, law enforcement, or other person that Voorhees University has opened or is maintaining a fraudulent account for a person engaged in identity theft.

2.1.12.2.3 Detecting Red Flags

2.1.12.2.3.1 Student Enrollment

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

1. Require certain identifying information such as name, date of birth, academic records, home address or other identification; and
2. Verify the student's identity at time of issuance of student identification card (review of driver's license or other government-issued photo identification).

2.1.12.2.3.2 Existing Accounts

In order to detect any of the Red Flags identified above for an existing Covered Account, Voorhees University personnel will take the following steps to monitor transactions on an account:

1. Verify the identification of students if they request information (in person, via telephone, via facsimile, via email);
2. Verify the validity of requests to change billing addresses by mail or email and provide the student a reasonable means of promptly reporting incorrect billing address changes; and
3. Verify changes in banking information given for billing and payment purposes.

2.1.12.2.3.3 Consumer ("Credit") Report Requests

In order to detect any of the Red Flags identified above for an employment or volunteer position for which a credit or background report is sought, Voorhees University personnel will take the

following steps to assist in identifying address discrepancies:

1. Require written verification from any applicant that the address provided by the applicant is accurate at the time the request for the credit report is made to the consumer reporting agency; and
2. In the event that notice of an address discrepancy is received, verify that the credit report pertains to the applicant for whom the requested report was made and report to the consumer-reporting agency an address for the applicant that the University has reasonably confirmed is accurate.

2.1.12.2.4 Preventing and Mitigating Identity Theft

In the event Voorhees University personnel detect any identified Red Flags, such personnel shall take one or more of the following steps, depending on the degree of risk posed by the Red Flag.

2.1.12.2.4.1 Prevent and Mitigate

1. Continue to monitor a Covered Account for evidence of Identity Theft;
2. Contact the student or applicant (for which a credit report was run);
3. Change any passwords or other security devices that permit access to Covered Accounts;
4. Not open a new Covered Account;
5. Provide the student with a new student identification number;
6. Notify the Program Administrator for determination of the appropriate step(s) to take;
7. Notify law enforcement;
8. File or assist in filing a Suspicious Activities Report (“SAR”); or
9. Determine that no response is warranted under the particular circumstances.

2.1.12.2.4.2 Protect Student Identifying Information

In order to further prevent the likelihood of Identity Theft occurring with respect to Covered Accounts, Voorhees University will take the following steps to its internal operating procedures to protect student-identifying information:

1. Ensure that its website is secure or provides clear notice that the website is not secure;
2. Ensure complete and secure destruction of paper documents and computer files containing student account information when a decision has been made to no longer maintain such information;
3. Ensure that office computers with access to Covered Account information are password protected;
4. Avoid use of social security numbers;
5. Ensure computer virus protection is up to date; and
6. Require and keep only the kinds of student information that are necessary for Voorhees University purposes.

2.1.12.2.5 Program Administration

2.1.12.2.5.1 Oversight

Responsibility for developing, implementing and updating this program lies with the Vice President for Business and Fiscal Affairs, who has been designated as the Program Administrator. The Program Administrator will be responsible for ensuring appropriate training of Voorhees University staff on the program; for reviewing any staff reports regarding the detection of Red Flags and the steps for preventing and mitigating identity theft; determining which steps of prevention and mitigation should be taken in particular circumstances; and considering periodic changes to the Program.

2.1.12.2.5.2 Staff Training and Reports

Voorhees University staff responsible for implementing the Program shall be trained either by or under the direction of the Program Administrator in the detection of Red Flags and the responsive steps to be taken when a Red Flag is detected. Voorhees University staff shall be trained, as necessary, to effectively implement the Program. Voorhees University employees are also expected to notify the Program Administrator once they become aware of an incident of identity theft or of the University's failure to comply with this Program. At least annually or as otherwise requested by the Program Administrator, Voorhees University staff responsible for the development, implementation, and administration of the Program shall report to the Program Administrator on compliance with this Program. The report will address such issues as effectiveness of the policies and procedures in addressing the risk of identity theft in connection with the opening and maintenance of Covered Accounts, service provider arrangements, significant incidents involving identity theft and management's response, and recommendations for changes to the Program.

2.1.12.2.5.3 Service Provider Arrangements

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

1. Require, by contract, that service providers have such policies and procedures in place; and
2. Require, by contract, that service providers review the University's Program and report any Red Flags to the Program Administrator or the Voorhees University employee with primary oversight of the service provider relationship.

2.1.12.2.5.4 Non-disclosure of Specific Practices

For the effectiveness of this Identity Theft Prevention Program, knowledge about specific Red Flag identification, detection, mitigation and prevention practices may need to be limited to those employees with a need to know them. Any documents that may have been produced or are produced in order to develop or implement this program that list or describe such specific

practices and the information those documents contain are considered “confidential” and should not be shared with other employees or the public. The Program Administrator shall inform those employees with a need to know the information of those documents or specific practices which will be maintained in a confidential manner.

2.1.12.2.5.5 Program Updates

The Program Administrator will periodically review and update this Program to reflect changes in risks to students and the soundness of Voorhees University from identity theft. In doing so, the Program Administrator will consider the University’s experiences with identity theft situations, changes in identity theft methods, changes in identity theft detection and prevention methods, and changes in the University’s business arrangements with other entities. After considering these factors, the Program Administrator will determine whether changes to the Program, including the listing of Red Flags, are warranted. If warranted, the Program Administrator will update the Program.

2.1.13 Legal Liability

Voorhees University is not legally liable for damages or loss of personal property or failure or interruption of services due to weather or acts of God. Moreover, Voorhees University does not assume responsibility for lost, stolen, or damaged property. This policy covers not only personal possessions, but also those items in an individual’s charge (e.g. keys, laptops, etc.).

2.1.14 Pets

There are significant health and safety hazards and nuisances created by unrestrained pets on Voorhees University property. Accordingly, the following guidelines will be enforced:

1. With the exception of service animals, pets and animals are not permitted on the campus; in offices, buildings, residence halls, or in any University facility.
2. Certified service animals must have a valid license and tags as evidence of current rabies vaccinations.
3. Strays should be reported to Campus Safety and Security.

2.1.15 Political Activities

Voorhees University supports open dialogue on political issues and reserves the right to support or oppose issues that affect its values, mission and goals, welfare, the University itself, and/or values and welfare of higher education. Moreover, the University encourages its faculty, staff, administrators, trustees, students, and recognized campus organizations to participate actively in political activities on an individual basis. Accordingly, the policies of Voorhees University do not restrict the rights and privileges of faculty, staff, administrators, trustees, students, and

recognized campus organizations to express their opinions freely. Voorhees University is committed to preserving and encouraging a diversity of point of view and political opinion. Political activities on any Voorhees University campus or facility, however, must be conducted in a neutral and nonpartisan manner, and in furtherance of the University's legitimate exempt function (education).

As a tax-exempt organization under section 501(c) (3) of the Internal Revenue Code, the University cannot intervene in any political campaign on behalf of, or in opposition to, any candidate for public office. Violation of this prohibition could cause the University to lose its tax-exempt status or incur excise taxes imposed on political expenditures. To ensure the University does not jeopardize its tax-exempt status or incur excise taxes on political expenditures, the University, including any individual acting on behalf of the University or as a usual representative of the University, will not engage in any of the following on the University's property, during any University function or otherwise using the University's resources or facilities:

1. Endorsing any candidate for public office,
2. Donating or contributing to any candidate's campaign or political party,
3. Participating or engaging in political fundraising events,
4. Publishing or distributing statements for or against any candidate,
5. Engaging in any other activity that favors or opposes any candidate.

In addition to the above, to preserve the integrity of Voorhees University and to protect the neutrality of the University in political contests, the following guidelines will apply. The President is responsible for monitoring the guidelines.

1. All address lists used by the University are considered confidential and will not be shared with candidates or parties. Individuals not acting in their official capacity as a University employee or representative may personally deliver campaign literature, but University mail facilities are not to be used for addressing or distributing political materials.
2. No campaign posters will be posted in or on any of the Voorhees University buildings or on any campus grounds prior to or during election times, with the exception of those used for historical displays or educational purposes.
3. Voorhees University buildings and grounds will not be rented or used for political fund raising. Further, Voorhees University facilities and services may not be used by or on behalf of an outside organization or outside individual whose purpose is to further the cause of a particular candidate or political party. For example, a meeting on campus with an organizer for a specific candidate that is focused on recruiting campaign workers from the student population would be a violation of these guidelines. On the other hand, a
4. Voorhees University graduate now working for a particular candidate speaking on campus to a group of students about what it has been like to be in the political arena, and what the candidate's particular experience has been, would be allowable. The fact that this person casually offers an invitation at the end of the speech to join in on the campaign would not negate the overall educational focus of the event.
5. Campus organizations may use campus communications to announce political forums

- and discussions sponsored by officially constituted campus groups.
6. No campus political activities, including services and materials, may be paid for with Voorhees University funds.
 7. Funds or contributions for political candidates or campaigns may not be solicited in the name of Voorhees University or on any University facility under any circumstances, and Voorhees University resources may not be used in soliciting such funds. If Voorhees University students, administrators, faculty, or staff make political contributions, they must do so as individuals and not on behalf of the University.
 8. Voorhees University communications systems, including any postal service, phone system, or computer network, will not be used in support of one particular candidate.
 9. Voorhees University students are free to express their individual and collective political views provided they understand and make clear they are not speaking for or in the name of Voorhees University. Endorsement of a particular candidate by a registered student group is not permissible.
 10. Voorhees University's name, logo, and insignia may not appear on stationery or any other material used or intended for support of a particular candidate. This prohibition also applies to any Voorhees University entities supported in whole or part by Voorhees University funds, such as registered student organizations.
 11. Appearance of a candidate for public office on Voorhees University campus must be for an educational or informational talk to the University community and must be sponsored by a registered student, faculty, administrator, or staff organization. Appearances must be coordinated with Voorhees University, who will ensure that opportunities to appear on campus are extended to all viable candidates running for a particular public office. The event will not be conducted as a campaign rally, and the moderator shall make it clear that the institution does not support or oppose the candidate.
 12. Activities with evidence of bias that (a) would favor one candidate over another; (b) oppose a candidate in some manner; or (c) have the effect of favoring a candidate or group of candidates, will constitute prohibited participation or intervention.

2.1.16 Postings

1. All notices, handbills, pamphlets, newspapers and other writings to be posted on campus must be stamped and approved by either the Office of Student Engagement and Leadership or the Office of the Vice President for Enrollment Management and Student Affairs.
2. Content of posters and signs must be neat, legible, correctly spelled and in good taste. Any posters or signs considered inappropriate, inconsistent with the University's mission and goals, or in violation of University Policy (i.e., advertise alcohol, credit card marketing, etc.) will be removed.
3. Handbills, pamphlets, newspapers and other writings are treated in the same manner as notices and therefore must receive administrative approval prior to posting or distributing on campus.

4. Postings are to be placed only on designated bulletin boards. They may not be affixed to walls, windows, or doors.
5. Postings will be removed if regulations are not followed.
6. Posters and signs will be removed within 24 hours after the event or approval period. Failure to do so may result in penalties including, but not limited to, non-approval of posters and signs submitted for approval in the future and student activity based fines as applicable.

2.1.17 Reservation of Voorhees University Facilities

Voorhees University facilities are held and made available for internal University use as the first priority. All other requests will be considered and, when appropriate, efforts will be made to accommodate requests as received. Requests by non-student organizations to use a particular Voorhees University room or facility will be made seven business days in advance to the appropriate building coordinator. Copies of the request will be forwarded to the Office of the Vice President for Business and Fiscal Affairs and Campus Safety and Security. Student organizations will follow the reservation procedures outlined in Volume V, paragraph 5.8.2.3.3 of the *University Policy Manual*. Priority for room or facility utilization is given in the following order: classroom instruction, student organizations, University events, state agencies, non-profit organizations, for-profit organizations. The University reserves the right to accommodate or deny availability at its sole discretion.

2.1.17.1 Terms of Use

1. General Conditions: Voorhees University rules and regulations must be respected and followed by all users of facilities. These rules include, but are not limited to, the following:
 - a. Users may not engage in activity that interferes with the Voorhees University mission and goals, programs, and freedom of movement by the campus community.
 - b. The University's name, logo, and seal may not be used in conjunction with events that are not sponsored or co-sponsored by the University.
 - c. In accordance with the University's Alcohol and Drug Policy (referred to the policy # etc.), alcoholic beverages may not be served or consumed in Voorhees University facilities.
 - d. Voorhees University reserves the right to dismiss any event if deemed necessary.
 - e. Voorhees University reserves the right to impose additional or special restrictions on facility usage as needed.
 - f. The use of all tobacco products is prohibited in all campus facilities.
 - g. The use of candles is prohibited.
 - h. Organizations are responsible for leaving all facilities used in neat and orderly condition. Failure to do so may result in a service charge to the

- organization for cleaning or re-setting the facility.
- i. When an external or co-sponsored event is open to the public, is outdoor, involves more than 150 people, or the nature of the activity so indicates the need, a Campus Safety and Security officer may be assigned to the event. The sponsoring organization will be responsible for all appropriate fees.
 - j. Only those facilities assigned on the dates and times specified may be used.
 - k. The number of participants will not exceed the authorized room capacity.
 - k. The organization will be responsible for the conduct of its members/attendees.
 - l. Requests to move special properties into the University or onto the grounds prior to or on the date of the rehearsal or performance must be approved by the Vice President for Business and Fiscal Affairs (or a designee).
 - m. Requests to place decoration or scenery must be approved in advance by the Vice President for Business and Fiscal Affairs (or a designee)
 - n. Building keys will not be provided to any group.
 - o. Signage may be provided by the organization to direct participants to the event, but must be removed immediately after the event.
 - p. Furniture may not be relocated during the event. For room arrangements and special set-up of furniture, contact the Physical Plant. Diagrams should accompany requests for special set-ups and should be given to the Physical Plant at least ten days in advance of an activity.
 - q. Parking will be restricted to designated areas only.
 - r. Individuals reserving the Chapel or other campus facilities must adhere to the facilities' specific policies and procedures. These procedures can be located in the offices of Campus Security.
2. Promotional Disclaimer: External users may not state or imply Voorhees University sponsorship or endorsement of their activities without the University's consent. Promotional material and advertising for non-University-sponsored activities must include the following disclaimer: "This is not a Voorhees University program."

2.1.17.2 Use Fees

The use of Voorhees University facilities by non- University related groups is subject to a fee to cover utilities, maintenance, security (if necessary), parking, and other costs. If the use requires special services or equipment from Voorhees University, additional charges may be assessed for these services. The Vice President for Business and Fiscal Affairs determines and approves fees. In the event of a cancellation, written notification must be given at least 48 hours in advance in order to be eligible to receive a refund.

2.1.18 Solicitations

In order to avoid disruption in the workplace and in the academic setting, Voorhees University

has developed rules regarding the solicitation of products or services, distribution of literature or information, and collection of monies on University property in person or by means of its systems, supplies, services, and equipment including telephones, voice mail, e-mail, computer systems, FAX, interoffice mail, and bulletin boards.

1. Fund-raising activities may not conflict with Voorhees University's own efforts to raise funds for the institution as a whole. Soliciting alumni, business, industry, government, foundations or friends is strictly prohibited except with a written approval from the Vice President for Institutional Advancement and Development or the President. See Subsection 2.5.2 for additional information regarding Voorhees University's Institutional Advancement policies.
2. Individuals not employed by Voorhees University or not currently enrolled as students are prohibited from any form of solicitation or distribution of literature on University property at any time in any manner unless granted specific authorization by the Provost/Vice President for Academic Affairs, the Vice President for Enrollment Management and Student Affairs, or the Vice President for Business and Fiscal Affairs.
3. Bulletin boards may not be used to distribute any solicitous material for the purpose of advertising, promoting, or drawing attention to off-campus events that have not been recognized by the University.
4. Products being sold must be of good quality and from a reputable firm as determined by the Provost/Vice President for Academic Affairs, the Vice President for Enrollment Management and Student Affairs, or the Vice President for Business and Fiscal Affairs.
5. Potentially hazardous or dangerous items, as determined by the Provost/Vice President for Academic Affairs, the Vice President for Enrollment Management and Student Affairs, or the Vice President for Business and Fiscal Affairs, may not be sold.

This policy is not intended to infringe upon the rights of members of the University as individuals to freely express and exchange views and to associate with others. Rather, the policy is intended to ensure the continuity of University work and operations; to avoid the misuse of University facilities or resources in ways which would impair its nonprofit, independent, and nonpolitical status; and to preserve both the fact and the appearance of the University's impartiality. See also the University's Political Activities Policy in Subsection 2.1.15 above.

2.1.18.1 Voorhees University Community Members

Employees: Approaching fellow employees in the work place regarding activities, organizations or causes, no matter how worthwhile, important or benevolent, can create unnecessary apprehension and pressure for fellow employees. Therefore, the solicitation of products or services, distribution of literature or information, and collection of monies by employees, whether it is in person or by means of its systems, supplies, services, and equipment (including telephones, voice mail, e-mail, computer systems, FAX, interoffice mail, and bulletin boards) during working time is prohibited. Work time does not include break periods, meal times, or other specified periods during the workday when employees are not engaged in performing their

work tasks. Furthermore, the posting or distribution of non-work related material will be limited to non-work areas and in accordance with the University’s Posting Policy (see Subsection 2.1.16 above). Under no circumstance is it acceptable for an employee to try to coerce other employees to buy something. In special circumstances, the President’s Executive Cabinet may make an exception to this rule.

Students: The Vice President for Enrollment Management and Student Affairs must approve, in advance, any on-campus solicitation of Voorhees University campus community members by a student or registered student club/organization. Individual students may not engage in solicitation for personal profit on Voorhees University property in person or by means of its systems, supplies, services, and equipment including telephones, voice mail, e-mail, computer systems, FAX, interoffice mail, and bulletin boards. Moreover, no student or student organization may serve as the agent or representative of any off-campus agency for the purpose of selling or promoting the sale of goods or services on the Voorhees University campus unless the Vice President for Enrollment Management and Student Affairs gives advance approval.

2.1.18.2 Non-Voorhees University Community Members

Non-members of the Voorhees University community are prohibited from the solicitation or distribution of literature on Voorhees University property at any time and in any manner unless the Vice President for Business and Fiscal Affairs grants explicit written permission.

2.1.19 Use of the Voorhees University Name, Seal, and Logo

Members of the Voorhees University community, either individually or collectively, shall not officially use the name, seal, logo, or trade and service marks of Voorhees University in any activity outside of the regular work of the University. Violation of this rule is regarded as sufficient cause for dismissal or expulsion. Voorhees University’s name, seal, logo, trade and service marks are the exclusive property of Voorhees University and, consequently, may not be used in connection with goods or services offered by any outside organization without the prior permission of the Vice President for Institutional Advancement and Development. Members of the Voorhees University community publish a considerable number of reports in the form of bulletins, circulars, articles, monographs, and books, some of which are copyrighted and others of which are not. Materials from such recognized publications is, of course, quotable, and proper recognition should be given to both the individual author and to Voorhees University in connection with such quotations.

Official stationery may not be used in connection with “outside activities” except with respect to those academic and scholarly activities described above. No report or statement relating to outside activities may have the name of Voorhees University attributed to it. The use of official Voorhees University titles for personal gain or publicity is prohibited without the written approval of the Vice President for Institutional Advancement and Development.

2.2 Health Related Policies

2.2.1 HIV/AIDS

In response to the epidemic of infection with Human Immunodeficiency Virus (HIV), which causes the Acquired Immunodeficiency Syndrome (AIDS), Voorhees University has established the following policy and education program. Current reliable up-to-date materials and information will be provided to the University community relative to action that will prevent the occurrence and spread of HIV/AIDS. In the campus environment, many students are faced with new independence, self-determination, and strong peer pressure to adopt certain behaviors.

For some students, an uncertain sense of identity and self-esteem can further complicate decision-making. Experimentation with sexual behaviors and/or drug use may put university students at a greater risk of infection. Young adults often feel invincible and tend to deny personal risk. Many students believe that HIV infection and AIDS are problems faced elsewhere or are concerns only for “other kinds” of people. The prolonged latency between infection with HIV and the eventual development of full-blown AIDS will promote the relative invisibility of the infection, an effect which will seem to validate the myth among members of the university community that “it cannot happen here.” Voorhees University recognizes that HIV/AIDS can happen anywhere. As a result, the University is committed to providing an environment in which everything possible is done to prevent its students, staff, faculty and administration from being infected, to limit the consequences of established infections, to provide compassionate safeguards for all concerned, and to assure that the rights of an identified victim of HIV/AIDS are upheld.

HIV (Human Immune Deficiency Virus) and AIDS (Acquired Immune Deficiency Syndrome) are now viewed as a public health crisis of pandemic proportions. AIDS has affected millions of people throughout the world. HIV/AIDS is a disability under the Americans with Disabilities Act (ADA). The medical, social, legal and ethical issues facing our society as a whole are equally manifest on America’s college and university campuses. Voorhees University recognizes the seriousness of this health problem, and seeks to educate persons about the disease. Harassment of persons living with HIV/AIDS is prohibited.

The University will provide prevention/education programs related to HIV/AIDS. The programs will provide information about means of transmission, symptoms of the disease, and prevention of the spread of the virus.

Persons who know or have reason to believe that they are HIV positive or have AIDS are encouraged to seek medical advice about their condition and to conduct themselves responsibly for the protection of other members of the University community.

The University will adopt and adhere to the guidelines proposed by the Centers for Disease Control and Prevention authorities for handling blood and bodily fluids. These guidelines will also be adopted for classroom laboratory work. Faculty, staff, and students are expected to

practice universal precautions. This means that bodily fluids “including blood, semen, vaginal fluids” should not be touched without the use of latex gloves or other latex barriers.

Persons who need additional information about HIV/AIDS may contact the Director of Health Services at the Student Health Center located on the first floor of Halmi Hall.

Support Services: Persons with AIDS or other manifestations of HIV infection will be considered as having disabling conditions and will be entitled to whatever support services are provided for other members of the University family who possess disabling conditions. Such students are allowed regular classroom attendance in an unrestricted manner as long as they are physically and mentally able to do so.

Housing Placement: Decisions regarding University housing will be made on a case-by-case basis. Generally, when space permits, such students will be housed in private rooms. This is done to protect the health of the immuno-deficient student from exposure to certain contagious diseases.

Health Services: While the institution will not routinely ask students to respond to questions about the existence of HIV/AIDS infection, students or employees with HIV/AIDS infection should inform the Director of Health Services to enable the University to provide proper education, counseling and support. Such information will be kept strictly confidential in accordance with the University’s policy on confidentiality of records.

HIV Testing: Voorhees University Health Services will refer students or employees requesting HIV antibody testing to a proper source. Such persons will receive counseling services prior to such referrals. Such testing services will be in keeping with both University policies and South Carolina public health laws. Where such tests are performed, the following rules will apply:

1. Tests will be strictly confidential or anonymous and will be administered only on a voluntary basis.
2. Positive results on the screening test (ELISA test) will be confirmed by another procedure.
3. Both pre-test and post-test counseling will be given.

2.2.2 Alcohol and Drugs

2.2.2.1 Alcohol and Drug Use

It is the policy of Voorhees University to comply with the Drug Free Workplace Act of 1988 (41 USC 701-707). To this end, every reasonable effort will be made to provide and maintain a safe and healthy workplace and academic environment free from the dangers stemming from the manufacture, distribution, possession, and use of any controlled substance.

Accordingly, Voorhees University employees and students are prohibited, by the University, from using, possessing, manufacturing, dispensing, distributing or being under the influence of alcohol, controlled substances or illegal drugs on University -owned property, at University -

sponsored activities, or while attending off-campus events as an official representative of the University. Moreover, no Voorhees University employee shall sell, possess or consume alcoholic beverages on University property or as part of any of the University's activities, without appropriate prior written approval from the President. Finally, Voorhees University employees, students, and University - sponsored organizations must comply with applicable federal, state, and local laws pertaining to the use, possession, manufacture, dispensation or distribution of alcohol, controlled substances, or illegal drugs.

The term "controlled substances" as used in this policy refers to those drugs and substances whose possession, sale, or delivery results in criminal sanctions under South Carolina law. The University also prohibits the sale, possession, and/or distribution of drug paraphernalia including, but not limited to: hookahs, bong, pipes, etc., as well as the sale, delivery, or transfer of a prescription or prescription drug.

2.2.2.1.1 Sanctions and Penalties

Any member of the Voorhees University faculty, staff or student body that violates the University's Alcohol and Drug Policy will be subject to corrective disciplinary actions and sanctions. Student sanctions can range from suspension up to and including expulsion from University academic programs as outlined in the Student Code of Conduct and Disciplinary System (see Volume V, Section 5.7 for additional information). Faculty and staff sanctions can range from suspension up to and including termination (see Volumes III, Section 3.11 and IV, Section 4.8 respectively).

In addition to internal University sanctions, violators of the Voorhees University Alcohol and Drug Policy are subject to referral to the appropriate federal, state or local authorities for prosecution. Depending upon the nature of the crime, persons convicted of violating federal and state laws prohibiting the unlawful use, possession, dispensation, and distribution of alcohol, controlled substances, or illegal drugs may also face criminal prosecution.

A federal or state drug conviction can also disqualify a student for Federal Student Aid funds.

2.2.2.2 Drug-Free Workplace

Voorhees University adheres to the Drug Free Workplace Act. For additional information, please refer to Volume III, paragraph 3.4.7.1 of the *University Policy Manual*.

2.2.2.3 Advertisements and Promotions

Publications of any type and in any University -sanctioned media must not accept or contain commercial advertising or other materials that promotes, depicts or encourages the consumption, use or purchase of alcoholic beverages or controlled substances. Moreover, neither the University's name, the names of its organizations, nor its logos, mascots, marks or other identifying indicia may be used in conjunction with any materials, references or imagery, including commercial sponsorship, related to the consumption, use, or purchase of alcoholic

beverages or controlled substances.

2.2.2.4 Use of Alcohol at Athletic Events

Alcoholic beverages may not be possessed, consumed, or served at University intramural or intercollegiate athletic contests.

2.2.2.5 Serving Alcohol at University-Sponsored Events

If alcohol is to be served at a University -sponsored and approved event, approval must be obtained from the President's Office. At the initial meeting, the President's Office will assist in obtaining any necessary permits. All guidelines and regulations contained in the University's Alcohol and Drug Use Policy must be strictly observed, including the prohibition of students consuming alcohol while on campus. The sponsors of the event assume the responsibility of adhering to University guidelines and state and federal law, and ensuring that appropriate behavior is maintained at all times.

1. All events must terminate by the President's decision given prior to the event.
2. Alcoholic beverages are to be consumed only in the designated room(s) approved for the event.
3. Proof of legal drinking age will be required at the bar.
4. Only beverages provided by the sponsoring organization of an event are to be consumed. Individuals are not permitted to bring their own beverages to an event.
5. The University encourages low risk use of alcohol. No person will be served alcohol if they are already visibly intoxicated. No alcohol will be given away as a prize.
6. Drinking games will not be allowed.
7. No person may obtain alcohol for another person unless the person is present at the time of purchase, regardless of whether they are of legal drinking age.
8. Soft drinks and food must be made available for the duration of any activity where alcoholic beverages are served.

Voorhees University will discourage the inappropriate use of alcohol by any member of its community.

2.2.2.6 Alcohol and Drug Abuse Prevention and Counseling

Programs, regarding drug and alcohol abuse, are offered by the University on an on-going basis and are open to all members of the University community. Alcohol and drug counseling programs are available to members of the campus community through the University as well. Participation in counseling programs is strictly confidential.

2.2.3 Communicable Diseases

Employees or students with infectious, long-term, life threatening, or other serious communicable diseases may continue their work or attendance at Voorhees University as long as they are physically and mentally able to perform the duties of their job or meet their

academic responsibilities without undue risk to their own health or the health of other employees or students.

Communicable diseases for the purposes of this policy include, but are not limited to, hepatitis, tuberculosis, influenza, human immunodeficiency virus (HIV), and acquired immune deficiency syndrome (AIDS). Voorhees University will support, where feasible and practical, educational programs to enhance employee and student awareness and understanding of serious diseases. In the event of a pandemic, the University will follow its Pandemic Crisis Plan that can be found in Human Resources and the Health Center.

The mere diagnosis of a serious communicable disease is not, in itself, sufficient basis for imposing limitations, exclusions or dismissal. Harassment of individuals with or suspected of being infected with any disease is not acceptable behavior at Voorhees University and will be strictly censored. The diagnosis of the condition, as any other medical information, is confidential as are any associated medical records.

Individuals may be required to provide medical records or may be evaluated in person by a Health Center professional. Decisions about risk the individual poses to the health and safety of others at the University will be the responsibility of the Health Center staff and their decisions will be the final determinate of whether the individual will be permitted to return to employment or school activities. All reasonable considerations will be given in order to determine if reasonable accommodations can be made by Voorhees University to allow the individual to participate in a normal course of study or work without risk to the individual or others. In working with employees or students diagnosed with HIV/AIDS or any other serious communicable disease, Voorhees University will proceed on a case-by-case basis. With the advice of medical professionals, these factors will be considered:

1. The condition of the person involved and the person's ability to perform job duties or academic responsibilities;
2. The probability of infection of co-workers or other members of the Voorhees University community based on the expected interaction of the person in the Voorhees University setting;
3. The possible consequences to co-workers and other members of the Voorhees University community, if infected;
4. Possible reasonable accommodations and modifications to the individual's job or other obligations to take account of the condition;
5. Risk to the person's health from remaining on the job or in the Voorhees University community; and
6. Other appropriate factors.

Any determination with respect to an employee or student will be made following consultation with the affected employee or student, the employee or student's treating physician (if available), and such other persons as needed to be involved in such a situation.

Disclosure will take place only if deemed medically advisable and legally permissible. The appropriate Health Department will be informed.

2.2.4 Exposure to Blood Borne Pathogens

In accordance with the Occupational Safety and Health Administration's (OSHA) federal standard for Blood Borne Pathogens, those members of the campus community identified at high risk for the transmission of infectious disease include members of the Health Center, the Athletic Department, Campus Safety and Security and Physical Plant. These members of the campus community must comply with all segments of this policy. Failure to do so may result in discipline leading up to and including dismissal.

Universal precautions will be observed to prevent contact with blood or other potentially infectious materials. Under circumstances in which differentiation between body fluid types is difficult or impossible, all body fluids will be considered potentially infectious materials.

2.2.4.1 Compliance Methods

1. Universal precautions will be observed in order to prevent contact with blood or other potentially infectious materials. All blood or other potentially infectious material will be considered infectious regardless of the perceived status of the source individual.
2. Work practice controls will be utilized to eliminate or minimize exposure to employees. Where occupational exposure remains after implementation of these controls, personal protective equipment will also be utilized. The following controls will be utilized:
 - a. Protective gloves will be worn during patient contact.
 - b. Needles will be disposed of in sharps containers.
 - c. Specimens and disposable equipment will be disposed of in appropriately marked containers.
 - d. Protective gloves will be worn when cleaning rest rooms.
 - e. Bodily fluid spill kits are available in all custodial closets.
 - f. Double gloves should be worn when cleaning bodily fluid spills.
 - g. Infectious waste will be placed in red biohazard bags and then placed in designated red biohazard containers.
3. The above controls will be examined and maintained on a regular schedule. The schedule for reviewing the effectiveness of the controls is as follows:
 - a. Physical Plant personnel are responsible for reviewing the effectiveness of controls in cleaning rest rooms, repairing plumbing fixtures, and other maintenance related tasks.
 - b. The Physical Plant will also ensure that bodily fluid spill clean-up kits are available in all custodial closets.
4. Hand-washing facilities are available to the employees who incur exposure to blood or other potentially infectious materials. OSHA requires that these facilities be readily accessible after incurring exposure.

5. Immediately after removal of personal protective gloves or as soon as feasible, employees and students shall wash hands and any other potentially contaminated skin area with soap and water.
6. If employees or students incur exposure to their skin or mucous membranes, those areas will be washed or flushed with water as appropriate as soon as feasible following contact.

2.2.4.1.1 Contaminated Equipment

1. Equipment that has become contaminated with blood or other potentially infectious materials will be examined prior to servicing or shipping and will be decontaminated as necessary unless the decontamination of the equipment is not feasible.
2. Everything is either disposable or can be decontaminated.

2.2.4.1.2 Laundry Procedures

Laundry contaminated with blood or other potentially infectious materials will be handled as little as possible. Such laundry will be placed in marked bio hazard bags at the location where it was contaminated. Such laundry will not be sorted or rinsed in the area of use. All employees who handle contaminated laundry will utilize personal protective equipment to prevent contact with blood or other potentially infectious materials.

2.2.4.1.3 Personal Protective Equipment

All personal protective equipment used at the University will be provided without cost to employees. Personal protective equipment will be chosen based on the anticipated exposure to blood or other potentially infectious materials. The protective equipment will be considered appropriate only if it does not permit blood or other potentially infectious materials to pass through or reach the employees' clothing, skin, eyes, mouth, or mucous membranes under normal conditions of use and for the duration of the time that the protective equipment will be used.

Personal protective equipment is kept in all areas designated as having the potential for exposure. Gloves are worn on all occasions where there is potential for contact with bodily fluids. Utility gloves are kept with cleaning supplies and worn by custodians when cleaning restrooms.

All personal protective equipment will be cleaned, laundered, repaired, replaced, and/or disposed of by the employer at no cost to employees.

The OSHA standard also requires appropriate protective clothing to be used, such as lab coats, gowns, aprons, clinic jackets, or similar outer garments. All garments that are penetrated by blood will be removed immediately or as soon as feasible. All personal protective equipment will be removed prior to leaving the work area. All personal protective equipment is disposable and will be disposed of in properly marked, red biohazard bags and then placed in red receptacles located throughout campus. All reusable equipment is disinfected in a disinfectant solution after each use.

Gloves will be worn where it is reasonably anticipated that employees will have hand contact

with blood, other potentially infectious materials, non-intact skin, and mucous membranes. Gloves will be worn for any procedure with the potential for contact with body fluids. Disposable gloves used at the University are not to be washed or decontaminated for re-use and are to be replaced as soon as practical when they become contaminated or immediately if they are torn, punctured, or when their ability to function as a barrier is compromised. Utility gloves may be decontaminated for re-use provided that the integrity of the gloves is not compromised. Utility gloves will be discarded if they are cracked, peeling, torn, punctured, or exhibits other signs of deterioration or when their ability to function as a barrier is compromised.

Masks in combination with eye protection devices, such as goggles or glasses with solid side shield, or chin length face shields, are required to be worn whenever splashes, spray, splatter, or droplets of blood or other potentially infectious materials may be generated and eye, nose, or mouth contamination can reasonably be anticipated.

University facilities will be cleaned and decontaminated according to the following schedule:

1. Custodians do routine cleaning depending on room usage;
2. Rest rooms are cleaned daily.

Decontamination will be accomplished by utilizing approved disinfectants.

All contaminated work surfaces will be decontaminated after completion of procedures and immediately, or as soon as feasible, after any spill of blood or other potentially infectious materials, as well as at the end of the work shift if the surface may have become contaminated since the last cleaning.

All bins, pails, cans, and similar receptacles will be decontaminated following each use. The person using these receptacles shall be the one responsible for its cleaning. The person doing the clean-up shall wear gloves and use appropriate disinfectant.

Any broken glassware which may be contaminated will not be picked up directly with the hands. Glass will be collected with dustpan and broom from blood spill kit, located in each area, and placed in red bag container for disposal. The broom and dustpan will be soaked in a disinfectant after use.

All contaminated sharps will be discarded as soon as feasible in sharps containers. Regulated waste other than sharps will be placed in appropriate containers.

2.2.4.1.4 Needles

Contaminated needles and other contaminated sharps will not be bent, recapped, removed, sheared or purposely broken. OSHA allows an exception to this if the procedure would require that the contaminated needle be recapped or removed, no alternative is feasible, and the action is required by the medical procedure. If such action is required, then the recapping or removal of the needle must be done by the use of a mechanical device or a one-handed technique. All contaminated needles and other sharps are disposed of in red, marked, puncture resistant, leak-free containers.

2.2.4.1.4.1 Containers for Reusable Sharps

Immediately after use, or as soon as possible, reusable contaminated sharps are to be placed in appropriate sharps containers. All contaminated needles and sharps that are not to be reused, will be disposed of in red, marked, puncture resistant, leak-free containers.

2.2.4.1.5 Specimens

1. Specimens of blood or other potentially infectious materials will be placed in leak-proof containers during collection, handling, processing, storage, and transport of the specimens.
2. The container used for this purpose will be red in color in accordance with the requirements of the OSHA standard. (Note that the standard provides for an exemption for specimens from the labeling/color coding requirement of the standard provided that the facility utilizes universal precautions in the handling of all specimens and the containers are recognizable as containing specimens. This exemption applies only while the specimens remain in the facility.) Universal precautions will be observed at all times.
3. Any specimens that could puncture a primary container will be placed within a secondary container that is puncture resistant.
4. Sharps containers, all contaminated equipment, and all specimens are placed in a red bag that is placed in an appropriately labeled box. These are disposed of through collection by a qualified medical waste disposal service.
5. If outside contamination of the primary container occurs, the primary container will be placed within a secondary container that prevents leakage during the handling, processing, storage, transport, or shipping of the specimen.

2.2.4.1.6 Work Area Restrictions

1. In work areas where there is a reasonable likelihood of exposure to blood or other potentially infectious materials, employees and students are not to eat, drink, apply cosmetics or lip balm, smoke, or handle contact lenses. Food and beverages are not to be kept in refrigerators, freezers, shelves, cabinets, or on counter tops or bench tops where blood or other potentially infectious materials are present.
2. Mouth pipetting/suctioning of blood or other potentially infectious materials is prohibited.
3. All procedures will be conducted in a manner that will minimize splashing, spraying, splattering, and generation of droplets of blood or other potentially infectious materials. Methods at the University to accomplish this include:
 - a. Contaminated sharps and other contaminated equipment are disposed of in appropriate containers;
 - b. Covers are placed on centrifuges and/or coverings are placed on specimen containers.

2.2.4.2 Hepatitis B Vaccine

All employees who have been identified as having exposure to blood or other potentially infectious materials will be offered the Hepatitis B vaccine, at no cost to the employee.

The vaccine will be offered within 10 working days of their initial assignment to work tasks involving the potential for occupational exposure to blood or other potentially infectious materials unless the employee has previously had the vaccine or wishes to submit to antibody testing which shows the employee to have sufficient immunity.

Employees who decline the Hepatitis B vaccine will sign a waiver.

Employees who initially declined the offer to be vaccinated, but who later request it, may have the vaccine provided at no cost.

The Director of Health Services is responsible for ensuring that employees have been previously vaccinated, receive the vaccine, or sign waivers declining the vaccination. The vaccine is administered by the Health Center. Records documenting the vaccination, or the signed waiver, will be completed by the Health Center and maintained in the employee's personnel file.

2.2.4.3 Post-Exposure Evaluation Follow-up

When the employee incurs an exposure incident, it will be reported to the employee's supervisor and the Director of the Human Resources, or their respective designees, within 24 hours.

All employees who incur an exposure incident will be offered post-exposure evaluation and follow-up in accordance with the OSHA standard.

This follow-up will include the following:

1. Documentation of the route of exposure and the circumstances related to the incident.
2. If possible, the identification of the source individual and, if possible, the status of the source individual.
3. The blood of the source individual will be tested (after consent is obtained) for HIV/HBV infectivity.
4. Results of testing of the source individual will be made available to the exposed employee and the exposed employee will be informed about the applicable laws and regulations concerning disclosure of the identity and infectivity of the source individual.
5. The employee will be offered the option of having blood collected for testing of the employee's HIV/HBV serological status. The blood sample will be preserved for up to 90 days to allow the employee to decide if the blood should be tested for HIV serological status.
6. However, if the employee decides prior to that time that testing will or will not be conducted, the appropriate action can be taken and the blood sample discarded.
7. Note: Any employee who wants to participate in the medical evaluation program must have blood drawn.
8. The employee will be offered post exposure prophylaxis in accordance with the current

recommendations of the U.S. Public Health Service.

9. The employee will be given appropriate counseling concerning precautions to take during the period after the exposure incident. The employee will also be given information on what potential illnesses to be alert for and to report any related experiences to the appropriate personnel.
10. The Director of Human Resources and the Director of Health Services have been designated to assure that the policy outlined here is effectively carried out as well as to maintain records to this policy.

2.2.4.3.1 Interaction with Health Care Professionals

A written opinion will be obtained from the health care professional who evaluates employees of the University. Written opinions will be obtained in the following instances:

1. When the employee is sent to obtain the Hepatitis B vaccine/results.
2. Whenever the employee is sent to a health care professional following an exposure incident.
3. Health care professionals shall be instructed to limit their written opinions to:
 - a. Whether the Hepatitis B vaccine is indicated and if the employee has received the vaccine.
 - b. That the employee has been informed of the results of the evaluation, and that the employee has been told about any medical conditions resulting from exposure to blood or other potentially infectious materials. (Note that the written opinion to the employer is not to reference any personal medical information).

2.2.4.4 Training

Training for all employees will be conducted prior to initial assignment to tasks where occupational exposure may occur and then annually. Training for employees will include the following explanations of:

1. The OSHA standards for Blood Borne pathogens;
2. The epidemiology and symptomatology of Blood Borne diseases;
3. The modes of transmission of Blood Borne pathogens;
4. The exposure control plan, i.e., points of the plan, lines of responsibility, how the plan will be implemented, etc.;
5. Methods that are used at the University to control exposure to blood or other potentially infectious materials;
6. Personal protective equipment available and who should be contacted concerning exposure;
7. Post-exposure evaluation and follow-up;
8. Signs and labels used at the University;
9. Hepatitis B vaccine program at the University;
10. Rubella titer for positive antibodies;
11. Physical to assess physical status.

2.2.4.5 Record Keeping

The Department of Human Resources maintains all records required by the OSHA standards. These records will include:

1. Exposure Plan
2. Observance of Universal Precautions
3. Hepatitis B Vaccination
4. Post-exposure Evaluation and Follow-up
5. Hazard Communication
6. Information and Training
7. Record keeping.

2.2.5 Environmental Safety Programs

2.2.5.1 Fluorescent Light Fixtures

Leaking or smoking fluorescent light fixtures or ballasts are treated as emergencies and responded to as such. Occupants should turn off lights, open windows if possible, vacate the room, close the door, and notify the Office of Campus Safety and Security and the Physical Plant.

2.2.5.2 Refrigerants or Chlorofluorocarbons (CFCs)

The Federal Clean Air Act was created, in part, to prevent the release and to phase out the use of chemicals that contribute to the depletion of the ozone layer. Voorhees University has a Refrigerant Management Plan to comply with Clean Air Act requirements (see Appendix 2.2.5.2). These requirements entail specific procedures for inventory, servicing, and disposal. All products that were manufactured with, or contain, chlorofluorocarbons must be labeled appropriately. All CFCs must be captured and recycled while working on equipment. Only certified personnel are allowed to perform these operations. In addition, all CFCs must be drained from the equipment prior to disposal. The Physical Plant manages this responsibility.

To arrange for pickup of a refrigerant-containing appliance, please contact the Physical Plant.

2.2.5.3 Disposal of Universal Waste

Computers, monitors, televisions and other electronic equipment, rechargeable batteries, and fluorescent light bulbs contain relatively small amounts of heavy metals such as lead and mercury and are not allowed to be mixed with regular trash.

These items are known as “universal waste” and to keep heavy metals out of the environment, they must be recycled. (Regular household-type incandescent light bulbs and alkaline batteries can be placed in the normal trash.)

“Universal waste” is a term used by the Federal Environmental Protection Agency (EPA) to

identify certain widely generated hazardous wastes. Individually these items pose little threat to the environment or our health. When generated collectively, such as on a University campus, these small amounts can add up and create an environmental hazard. As a result, the EPA closely monitors Voorhees University's management of this waste stream.

Following are the University procedures for proper disposal of universal wastes:

Computer Equipment: Contact the IT Department.

Televisions and Miscellaneous Electronic Equipment: Request pick-up from the Physical Plant.

Fluorescent and Other Non-Incandescent Light Bulbs: Request pick-up from the Physical Plant.

Rechargeable and Lithium Batteries: Request pick-up from the Physical Plant.

2.2.6 Hazard Communication Program

The Hazard Communication Policy of Voorhees University fulfills the Hazard Communication Standard promulgated by the Occupational Safety and Health Administration (OSHA).

The University's Hazard Communication Policy applies to employees who are exposed to hazardous chemicals under normal operating conditions or in the event of a foreseeable emergency. A review of all departments and employee positions has been completed to determine which have reasonable potential for occupational exposure to hazardous materials during the performance of work. Following are the departments or programs that employ individuals covered by the hazard communication program: Physical Plant; Gymnasium; The Science and Technology Center; and Food Services.

In general, the hazard communication program does not apply to administrative office employees.

The Hazard Communication Standard has five primary components that Voorhees University must fulfill:

1. Hazard determination;
2. Written program;
3. Container labeling;
4. Material safety data sheets (MSDS); and
5. Training.

A copy of the OSHA Hazard Communication Standard is accessible on the Internet at www.osha.gov.

2.2.6.1 Hazard Determination

Chemical manufacturers must evaluate their products to determine associated hazards. The information about the chemical's hazards must be given to each purchaser of that chemical. Hazard warnings and other information are commonly provided on the container label and the Material Safety Data Sheets ("MSDS").

2.2.6.2 Container Labeling

Containers (e.g., spray bottles, 1-gallon jugs, 5-gallon pails, drums, etc.) of hazardous chemicals must be clearly labeled with the following information:

1. Chemical or Product Name;
2. Chemical formulas and acronyms are not acceptable forms of labeling when used alone;
3. Manufacturer's Name, Address, and Telephone Number;
4. Applicable Hazard Information (e.g., "Flammable," "Corrosive," etc.);
5. Appropriate Health Hazard Warnings (e.g., "Inhalation Hazard," "Eye Irritant," etc.).

2.2.6.3 Material Safety Data Sheets

All employees have unobstructed access to an MSDS for each chemical product they may use or potentially be exposed to during their work.

2.2.6.4 Training

To educate employees effectively, Voorhees University has developed a training program to meet the training requirements of the Hazard Communication Standard. Each department/program/division is responsible for providing its employees training for processes that are unique to that department/program/division. The Department of Human Resources shall provide, as part of the new hire orientation program, a discussion of the University's Hazardous Materials Program. Additional information will be provided whenever the potential for exposure to hazardous chemicals is altered or whenever new and significant information is received by the department/program/division concerning the hazard of a chemical. New or newly assigned employees shall be provided training before working with or in a work area containing hazardous chemicals.

Students registered in courses where they may be exposed to hazardous chemicals under normal operating conditions or foreseeable emergencies should be provided training before working with or in a work area containing hazardous chemicals/materials. Training is the responsibility of the instructor.

The training program will include, but is not limited to the following:

1. Information on interpreting labels and MSDS's and the relationship between these two
2. Methods of hazard communication;
3. How to obtain a MSDS;
4. Introduction to toxicology and risk assessment;
5. Acute and chronic effects, safety handling;
6. Protective equipment to be used;
7. First aid treatment with respect to the hazardous chemicals used by faculty, staff and students; and
8. General safety instructions on handling, cleanup procedures, and disposal of hazardous chemicals.

Departments/programs/divisions and individuals providing training will keep a record of the dates of training sessions and the names of the employees and/or students attending. Copies of training records will be submitted to the Department of Human Resources within five (5) working days of the training session.

2.2.6.5 Disposal

Please contact the Physical Plant to arrange for appropriate disposal of all hazardous materials and containers on campus.

2.2.6.6 Rights of Employees and Students

1. Employees and students shall not be required to work with a hazardous chemical from a container that does not have a label, except for a portable container intended for immediate use by the employee or student who performs the transfer.
2. Employees that are routinely exposed to hazardous chemicals shall be informed of such exposures and shall have access to MSDS's for the hazardous chemicals. In addition, employees shall receive training on the hazards of the chemicals and on measures they can take to protect themselves from those hazards.
3. The University will provide, at no expense to employees, appropriate personal protective equipment to protect employees from exposures to hazardous chemicals. Students may be required to purchase routine personal protective equipment (e.g., eye protection, lab coats, etc.) however, departments or divisions will provide specialized personal protective equipment (protective equipment (e.g., respirator, face protection, gloves, barrier creams, etc.).
4. No division/department/program will discharge, cause to discharge, discipline or in any manner discriminate against an employee because the employee has filed a complaint, assisted an inspector of the state or federal government, or has instituted or caused to be instituted any proceeding under or related to the Occupational Safety and Health Act or the Right to Know Act or has testified or is about to testify in any such proceeding or because of the exercise of any rights afforded pursuant to the provisions of the Act on behalf of the employee or on behalf of others, nor will pay, position, seniority or other benefits be lost for exercise of any right provided by the Act.
5. An employee or authorized representative may request, in writing, copies of all environmental monitoring records.

2.2.7 Health Insurance Portability and Accountability Act (HIPAA)

Voorhees University complies with all laws that govern employee and students' medical records, their review, and their dissemination. The University will not require individuals to waive their health privacy rights as a condition for treatment, payment, enrollment in the health plan, and/or eligibility for benefits. Voorhees University will not intimidate, threaten, coerce,

discriminate against, or take other retaliatory action against an individual for exercising health privacy rights.

Please refer to the website for the United States Department of Health and Human Services as <http://www.hhs.gov/ocr/hipaa> for more detailed information..

2.2.8 Personal Protective Equipment (PPE)

This policy is designed to cover any Voorhees University employee, who during the course of their duties must perform tasks in work areas where recognized hazards are present and personal protective equipment (PPE) may be required. PPE may not be necessary in areas where administrative or engineering controls are feasible and can provide protection equal to or greater than that offered by PPE. This procedure should serve as written compliance with OSHA’s “Personal Protective Equipment” regulations. PPE will always be used in accordance with manufacturer’s instructions as an interim measure until other control measures are identified so as to reduce the frequency and severity of injuries or illnesses.

2.2.8.1 Hazard Assessment

The Physical Plant Department will conduct worksite/task analysis to identify hazardous exposures to employees. The analysis will be reviewed semi-annually or updated when the hazardous exposures change. In those worksites/tasks that expose personnel to hazardous conditions that cannot be eliminated or controlled by other measures, PPE usage is the joint responsibility of both department heads and employees.

2.2.8.2 Training

The Physical Plant Department is responsible for seeing that all personnel who are, or are likely to be, exposed to hazardous conditions are appropriately trained, supervised, and required to follow PPE safety rules. The Physical Plant Department will certify and maintain records of training. Employees are responsible to use, maintain and dispose of PPE appropriately. Employees shall check the condition of their equipment before each shift. Employees should provide feedback to their supervisors about fit, comfort and suitability of PPE. Employees must notify their supervisors any time they have a questions/concerns about their safety or the safety of others.

Minimum training will include:

1. When the use of PPE is necessary.
2. What PPE is appropriate.
3. How to properly put on, adjust, use, and remove PPE.
4. Limitations of PPE.
5. Where to get PPE.
6. The proper care, maintenance, useful life, and disposal of PPE.

Once training is completed, employees must demonstrate correct use, care, etc., of PPE. Retraining is necessary when any employee fails to properly utilize PPE or as conditions change or PPE needs change.

2.2.8.3 General Guidelines

1. Ears: Employees shall use appropriate hearing PPE when required due to noise hazards associated with their job or workplace.
2. Eyes and Face: Employees shall wear appropriate protective safety glasses, goggles, or face shields when:
 - a. Working in or near areas where laser, ultraviolet, or other intense illumination is present.
 - b. Flying debris may strike the eyes.
 - c. There may be splashing of biologic agents including blood and other body fluids.
 - d. There may be chemical splashes, mists, gases, or vapors that may cause illness, injury, or impairment.

Additionally, safety glasses, goggles, and face shields will provide protection from flying debris entering from the side of the PPE and will accommodate prescription lenses, either by fitting over prescription lenses, or by incorporating them into its design.

Prescription eyeglasses, alone, normally do not meet the requirements of this section. Employees should discuss prescription safety glasses with their eye-care provider to ensure that they meet all relevant standards. The University is not responsible for the cost of purchasing or providing prescription safety glasses.

3. Feet: Employees shall wear appropriate shoes or boots when:
 - a. Working in or near areas where heavy objects may fall onto the feet.
 - b. Working with or near objects that may penetrate footwear and cut or puncture the feet.
4. Head: Employees shall wear appropriate protective hard hats or helmets when:
 - a. Working in or near areas where falling or moving objects may strike the head.
 - b. Working on or near exposed electrical conductors with which the head may make contact.
5. Hands: Employees shall wear appropriate protective gloves to protect their hands from:
 - a. Materials that may be absorbed through the skin or may damage the skin.
 - b. Objects that may cut or puncture the skin.
 - c. Biological agents.
 - d. Human or animal tissues.

- e. Radioactive materials.
- f. Other hazards that may cause illness, injury, or impairment.

Protective lotions or creams are not adequate substitutes for gloves.

Gloves will be chosen according to the type of work to be completed (e.g. gloves used for chemical work will be chosen for resistance to specific solvents or other compounds and for adequate break through time; gloves used for general cleaning and trash removal will be cut and puncture resistant).

1. Electrical Protection: Electrical protective equipment such as insulating blankets, matting, covers, lines hoses, gloves, and sleeves must be provided to employees who are exposed to electrical hazards.
2. Fall Protection: Fall protection must be provided when employees are exposed to a vertical fall of six feet or more over a lower level or at any height above dangerous equipment. Fall protection will consist of either passive (i.e. safety net) or active (i.e. lifelines, body belts, harnesses, or lanyards) fall preventing devices.
3. Respiratory System Protection: Employees will use appropriate respiratory protection when adequate ventilation, substitution of less toxic materials, or other primary control measures is not possible.

2.2.8.4 Monitoring

Department heads will monitor work site tasks for the introduction of new hazards or changes in existing hazards. If new hazards are discovered, task analysis will be conducted to identify appropriate PPE. Department heads will conduct a work site inspection of PPE use and maintenance at least semi-annually.

The University Safety Committee will monitor the effectiveness of this plan and make recommendations for improvement.

2.2.9 Tobacco-Free Campus Policy

The University seeks to provide a healthy environment for all employees (including faculty), students, and visitors and for any other person on the University campus. The intent of this Policy is to protect adults, children, and infants from the hazards of “Second Hand” smoke.

Accordingly, smoking any form of tobacco product or illegal drug is strictly prohibited in any building, stairwell, restroom, and all grounds and property on campus. Fines are associated with violations of this policy. Additionally, this policy extends to any function off-campus in which Voorhees University sponsors or participates. (See Volume V, Subsection 5.6.4.33)

2.3 Campus Safety and Security Information and Policies

2.3.1 Department of Campus Safety and Security

The University's main entrance to the campus Residential Area is guarded and the University provides foot patrols and surveillance and vehicular monitoring of the campus. Campus Safety and Security staff is on duty throughout the day for the safety and security of students, faculty, staff, and protection of property. Parking areas are designated and the Student Code of Conduct are strictly enforced in order to maximize the effect of protective mechanism.

The Campus Safety and Security staff at Voorhees University includes a Chief of Campus Safety and Security and contracted security officers. Campus Safety and Security staff are certified through the South Carolina Law Enforcement Division (SLED) to carry weapons and to enforce the laws of South Carolina. Voorhees University Campus Safety and Security Department staff are trained to serve, to investigate, to secure and to protect students, faculty, staff, parents, and visitors of the campus.

The mission of the Campus Safety and Security Department is to maintain security on all University properties, to ensure the safety of all students, faculty and the staff; coordinate with state and other local law enforcement agencies; and to enhance the security of the University and the surrounding communities. The Department endeavors to have security personnel become a visible and prominent presence on campus, to provide 24 hours of surveillance, to make regular area patrol, and to work with other administrative personnel and departments to promote the mission and goals of the University.

2.3.2 Federal Campus Safety Disclosure Policies

2.3.2.1 Campus Crime Reporting (Clery Act)

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act), codified at 20 U.S.C. 1092 (1) as part of the Higher Education Act of 1965 (HEA), requires that colleges and universities disclose policy information and crime statistics as part of a campus security report published annually by each institution. Institutions must also issue timely warning notices of crime and maintain a daily crime log.

The Clery Act seeks to ensure that parents, students, and other members of the campus community are adequately informed about crimes on or near campuses, campus security policies and procedures, and what institutions are doing to keep concerned individuals informed. The law covers public and independent institutions of post-secondary education participating in federal student aid programs authorized under Title IV of HEA. Failure to comply can result in fines or loss of Title IV eligibility.

The Voorhees University Campus Crime Report can be obtained by contacting the Office of the Vice President for Business and Fiscal Affairs, the Office of Campus Safety and Security, or the Campus Security link on the Voorhees University website at www.voorhees.edu.

2.3.2.2 Campus Fire Safety Reporting

In accordance with the Campus Fire Safety Right-to-Know Act, information is made available to all students and staff containing the University’s fire safety practices, statistics, and all fire-related events to students and their families. The University’s fire statistics and fire safety practices are also published on the Voorhees University website.

2.3.2.3 Campus Sex Crimes Prevention Act

The Campus Sex Crimes Prevention Act is a federal law that provides the tracking of convicted, registered sex offenders enrolled as students at institutions of higher education, or working or volunteering on campus. It also amends the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act to require institutions of higher education to issue a statement, in addition to other disclosures required under that Act, advising the campus community where law enforcement agency information provided by a State concerning registered sex offenders may be obtained. In compliance with the Act, please note that law enforcement agency information provided by the State of South Carolina concerning registered sex offenders may be obtained by accessing the South Carolina Sex Offender Registry, located at <http://scor.sled.sc.gov/ConditionsOfUse.Aspx>

2.3.3 Campus Security Policies

2.3.3.1 Access to Campus Buildings and Unauthorized Entry

Access to the University campus is limited only to members of the University community (i.e., faculty, students, administrators, staff), authorized guests of the University, and those having legitimate business with the University. Campus Safety and Security personnel of the University are authorized to challenge visitors on campus grounds or in campus buildings in circumstances when it appears to be appropriate. Members of the University community are expected to possess University ID at all times while on campus and should be prepared to cooperate in providing the identification, if requested.

Unauthorized entry into Voorhees University property, including but not limited to, entry into university -owned facilities and buildings and the unauthorized use of keys or access cards for access to University buildings or rooms, is strictly prohibited. Individuals violating this policy will be subject to appropriate discipline and, if applicable, criminal prosecution.

2.3.3.2 Campus Alerts

The Voorhees University Campus Safety and Security Department will post timely warning notices to notify members of the community about serious crimes through the VC Mobile App notification system against people that occur on campus, in compliance with the Clery Act. The decision to issue a timely warning will be decided on a case by case basis, after considering all available facts, including whether the crime is considered a serious or continuing threat to Voorhees University community and the possible risk of compromising law enforcement efforts. Timely warnings are usually issued for arson, burglary, robbery, aggravated assault, criminal homicide, motor vehicle theft, sex offenses, and any other crimes as deemed necessary. These warnings will be posted if the incident is reported to Campus Safety and Security, or the City of Denmark Police Department, if they notify the University about a serious crime or emergency situation that has occurred on or near campus.

The Campus Safety and Security Office issues campus alerts via blast e-mails, the VC Mobile App notifications to the University community, group pages, and the University Radio Station. Campus Alerts may also be posted in campus buildings, when deemed necessary. When a Campus Alert is posted in campus buildings, it is printed on large paper and posted in the designated areas of the affected building(s). Campus Safety and Security will send a copy of the crime alert to the President of the University for review and possible distribution to the members of the Board of Trustees, as deemed necessary and appropriate. Appropriate follow-up notices will be issued as necessary.

2.3.3.3 University Closings and Cancellations

The University will provide updates on any campus closings or delays due to inclement weather through the following outlets, among others:

Radio –Voorhees University Station

The VC Mobile App Notification System

Homepage – <https://www.voorhees.edu>

Social Media Networks

Employees and students are urged not to call Campus Safety and Security for weather related updates.

2.3.3.4 Emergency Plan

2.3.3.4.1 General

1. This plan presents a proactive response designed to protect students, staff and faculty, as well as the community and our environment in case of a major emergency or disaster. It facilitates compliance with certain regulatory requirements of federal, state and local agencies and enhances the University's ability to quickly return to normal operations

- following an emergency or disaster.
2. The plan will not, nor can it be expected to, address every possible emergency situation that the University could experience. Therefore, each unit of the University must become familiar with this plan, particularly the notification process, to ensure an adequate response to any and all possible emergencies.
 3. This plan outlines and assigns responsibilities for coping with emergencies affecting the safety and well-being of people and/or facilities on campus. This plan is a guide for managing an unusual occurrence on campus. “Unusual occurrences” suggest situations, generally of an emergency nature that may result from a single violent act, a terrorist incident, civil disturbances and disasters both natural and technology-based. Civil disturbances include riots, disorders and violence arising from dissident gatherings and marches. Disasters include flood, hurricanes, earthquakes, explosions, tornados, major fires, chemical spills and any event that has the potential for mass casualties.

2.3.3.4.2 Policy

1. The priorities for emergency response are life safety, property protection, and preservation of academic programs.
2. Each department is responsible for educating and training employees on the plan for developing their own supplement to the plan. Department plans should address at a minimum:
 - a. Evacuation.
 - b. Sheltering in place.
 - c. Actions to be taken to ensure operational continuity of key systems and services.
3. This plan will be reviewed, updated and communicated annually by Campus Safety and Security and the Disaster Response Team under the direction of the Director of External Affairs and Operations and Special Events and the Vice President for Business and Fiscal Affairs.

2.3.3.4.3 Incident Reporting and Notification

1. In the event of any emergency or disaster, immediate notification to Campus Safety and Security (803) 780-1112 is essential to ensure the timely response of emergency personnel.
 - a. Any member of the University community who provides false emergency information (fire, physical threat, bomb scare, etc.) will be subject to appropriate sanctions consistent with the University’s disciplinary policies.
2. Campus Safety and Security will ensure that the appropriate person(s) listed on the Emergency Notification Roster is contacted when an emergency affects their department.
3. In the event the President determines that there is a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus, the Office of Public Relations and Information Technology

will immediately notify the campus community. Unless the notification will, in the professional judgment of responsible University officials, law enforcement authorities, compromise efforts to assist victims or to contain, respond to, or otherwise mitigate the emergency.

- a. The Office of Public Relations and Information Technology will notify the campus community via the University's website, the VC Mobile App notification system, e-mail blasts, social media networks, and the University Radio Station.

2.3.3.4.4 Terrorist Threat Level Advisory System

The Department of Homeland Security uses the following system to indicate the terrorist threat level for the nation. The measures listed in subparagraph 2.3.3.4.4.1 are recommended actions for departments to follow at Voorhees University. Should a specific threat targeting the University or our surrounding area be identified, Campus Safety and Security will notify the Vice President of Business and Fiscal Affairs and provide recommendations for stricter security measures. Campus Safety and Security will advise departments of additional security measures to be implemented via e-mail once they have been approved.

2.3.3.4.4.1 Terrorist Threat Level Advisory System

The measures listed below are recommended actions for departments to follow. Should a specific threat targeting the University or our surrounding area be identified, Campus Safety and Security will notify the Vice President of Business and Fiscal Affairs and provide recommendations for stricter security measures. Departments will be notified via e-mail of any additional security measures to be implemented once they have been approved.

1. **Level # 1, Green**, low condition (low risk of terrorist attack):
 - a. Normal operations remain in effect.
 - b. Routine security measures remain in effect.
2. **Level # 2, Blue**, guarded condition (general risk of terrorist attack):
 - a. Departments should assess their vulnerabilities on a regular basis.
 - b. Initiate proper responses to changed or new vulnerabilities identified.
 - c. Conduct staff refresher training on internal security measures.
3. **Level # 3, Yellow**, elevated condition (significant risk of terrorist attack):
 - a. Raise the security awareness level of your staff.
 - b. Review and update your emergency response plans.
 - c. Coordinate changes to your plans with supporting activities and agencies.
 - d. Test internal and external communications procedures.
 - e. Consider increasing security measures at special events and at key facilities.
4. **Level # 4, Orange**, high condition (high risk of terrorist attack):
 - a. Heighten security awareness levels of your staff.

- b. Enhance mail and package screening procedures.
 - c. Take additional precautions at special events and key facilities.
 - d. Increase security patrols and checks of key facilities.
5. **Level # 5, Red**, severe condition (severe risk of terrorist attack):
- a. Call an initial meeting of EOC staff.
 - b. Consider implementing parking restrictions, especially near key buildings.
 - c. Consider closing or restricting access to key facilities.
 - d. Consider canceling non-essential activities.

2.3.3.4.5 Organization

When an emergency affecting the University reaches proportions that cannot be handled by routine measures, the following groups will be called into service to direct, control, and support the emergency operations of the University.

1. The Vice President of Business and Fiscal Affairs (or designee) is responsible for assessing the emergency and organizing personnel, equipment and supplies to respond immediately to the problem. With guidance from Campus Safety and Security, the Vice President of Business and Fiscal Affairs (or designee) will also be responsible for staffing the Emergency Operations Center (EOC) once it has been activated.
2. The Cabinet is responsible for planning and prioritizing the long-term recovery of the University following a disaster or major emergency. The Vice President for Business and Fiscal Affairs (or designee) heads this group and reports directly to the President.
3. The Vice President for Business and Fiscal Affairs (or designee) will notify the President of all updates and status reports.
4. When the Vice President of Business and Fiscal Affairs decides not to activate the EOC, the parties affected will respond to the emergency using existing policies and procedures.

2.3.3.4.6 Concept of Operations

1. The likelihood that a disaster or emergency situation may occur on a holiday, weekend, or after normal University office hours when staffing levels are minimal is very high. Since the Campus Safety and Security Department is staffed 24 hours per day, the Shift Supervisor or Officer in Charge at the time of an emergency is responsible for contacting the Chief of Campus Safety and Security initiating this plan. He/she will direct all available University resources to provide priority protection for life safety and preservation of property until relieved by a higher authority. Initial control of the emergency and all available resources belong under the Campus Safety and Security Department. Command and control will be transferred to the Vice President of Business and Fiscal Affairs upon the activation of the EOC.
2. The responding Campus Safety and Security Officer will perform the initial assessment in conjunction with the other responding agencies to determine the nature of the incident and additional resource needs.
3. The Shift Supervisor or the Officer in Charge will notify the Chief of Campus Safety and

Security of all events requiring additional resources. The Chief of Campus Safety and Security will notify Vice President for Enrollment Management and Student Affairs and the Vice President for Business and Fiscal Affairs, who will make the decision whether to convene the Cabinet.

4. When notified, members of the Cabinet will immediately report to the Emergency Operations Center (EOC) located in the office of Campus Safety and Security (first floor, Halmi Hall), with the alternate location being the Business and Fiscal Affairs Conference Room (second floor, Wright Hall).
5. Departments involved in the emergency will be required to keep documentation of all expenditures, nature of expenditures, as well as financial costs and will be required to submit a report at the end of the disaster or emergency to the Emergency Operations Center (EOC).

2.3.3.4.7 Emergency Operations Center (EOC)

The Emergency Operations Center (“EOC”) serves as the central management center for the Cabinet. The primary EOC location is the office of Campus Safety and Security (first floor, Halmi Hall), and the alternate location is the Business and Fiscal Affairs Conference Room, (second floor, Wright Hall).

Once an emergency has been declared and the EOC is opened, it will be staffed on a 24-hour basis by key members of the Cabinet, as directed by the Vice President for Business and Fiscal Affairs. Based on the type of emergency and at the direction of Vice President for Business and Fiscal Affairs, the divisions of Enrollment Management and Student Affairs, Institutional Advancement and Development, and Academic Affairs may also be required to provide staff for the EOC.

The EOC staff will be organized to ensure the following management activities or actions are performed:

1. Commander - the person in charge who is responsible for setting objectives and priorities and has overall responsibility of the incident.
2. Operations section - conducts operations to carry out the plan, develops tactical objectives, organizes and directs all resources.
3. Planning section - develops the action plan to accomplish the objectives, collects and evaluates information and maintains resource status.
4. Logistics section - provides support to meet the incident needs, provides resources and all other services needed to support the action plan.

2.3.3.4.8 Emergency Contact Information

Communications	(803) 780-1191
Dean of Students	(803) 780-1269
Athletics	(803) 780-1039

Battle Hall	(803) 780-1101
Blantons Hall	(803) 780-1103
WVCD 790 AM/96.5 FM Radio Station	(803) 780-1790
Guerry-Finlay Hall.....	(803) 780-1105
Halmi Hall.....	(803) 780-1107
Housing and Residential Life	(803) 780-1261
Human Resources	(803) 780-1189
Dominion Energy	(888) 333-4465
SC Emergency Management (SCEMD).....	(803) 245-4313
State and County Highway Departments.....	(803) 245-5181
American Red Cross	(803) 534-5735
Town of Denmark	(803) 793-3734
Campus Safety and Security	(803) 780-1119

Executive Group

Vice President for Business and Fiscal Affairs	(803) 780-1149
Vice President for Student Affairs and Athletics.....	(803) 780-1039
Provost/Vice President for Academic Affairs.....	(803) 780-1029
Vice President for Institutional Advancement and Development.....	(803) 780-1199
Vice President for Enrollment Management.....	(803) 780-1030
Chief of Staff.....	(803)780-1019

2.3.3.4.8.1 Introductory Information

The following procedures have been created to assist members of the campus community with reporting and responding to emergencies. In your judgment, if a situation requires the response of Campus Safety and Security, medical personnel, fire department, or other emergency personnel, follow the guidelines outlined in these procedures.

During an emergency, dialing 1112 from any campus phone reaches the Office of Campus Safety and Security, which is staffed 24-hours a day, year- round.

Media Inquiries: Refer all inquiries from the media and non- University personnel to the Director of Communications.

2.3.3.4.8.2 Active Shooter Response

College and University campuses are no longer immune to serious or violent crime. It is imperative that we provide students, staff and faculty with protocols on how to respond during potentially violent criminal attacks on campus.

1. Response to Potentially Violent Criminal: If you see or know that a person has a firearm on campus, or if you hear shots fired on campus, or if you witness an armed person shooting people, protect yourself first and move to a safe location or call the security gate at (803) 780-1112.
 - a. Tell the dispatcher your name, location, phone number and describe the situation you are reporting: who, what, when, where, how and why (if known). Is anyone hurt or injured?
 - b. If possible, alert others in the immediate area about the current situation.
2. Active Shooter Incident: An active shooter can be described as a person who causes death or serious bodily injury through the use of a firearm. This is a dynamic situation that usually evolves rapidly and demands an immediate response from law enforcement officers to terminate the life-threatening situation. The immediate response of the first officers on the scene is to take aggressive action to find and stop the shooter or shooters.
3. Active Shooter Response: Officers from Voorhees University, the Denmark Police, and Bamberg County Sheriff's Office will likely be the first to respond to the scene. As they move into the affected area, rescue efforts will be delayed until the shooter is located and stopped or no longer a threat to life safety.
 - a. If you are wounded or with someone who is wounded, these officers will bypass you to search for the shooter and stop the killing. Rescue teams will follow shortly to aid you and others.
 - b. To assist the police, please stay calm and patient during this time and do not interfere with police operations. If you know where the shooter is, and/or have the shooter's description, tell the police.
 - c. When you encounter the police, keep your hands empty and in plain view at all times. Listen to their instructions and do exactly what they say. If you are evacuating, carry nothing that could be mistaken for a weapon.
 - d. Rescue teams will follow shortly after the first responding officers enter the building. They will attend to the injured and remove everyone safely from the area.
4. If the shooter is outside your building:
 - a. Turn off all the lights, close and lock all windows and doors. If you cannot lock the door, try to block the door with desks and chairs.
 - b. If you can do so safely, get all occupants on the floor and out of the line of fire.
 - c. If you can do so safely, move to the core area of the building and remain there until the police tell you it is safe to leave. Do not respond to commands until you are certain a police officer is issuing them.

5. If the shooter is inside your building:
 - a. If it is possible to escape the area safely and avoid danger, do so by the nearest exit or window. Leave in the room books, backpacks, purses, etc.
 - b. As you exit the building, keep your hands above your head and listen for instructions that may be given by police officers. If an officer points a firearm at you, make no movement that may cause the officer to mistake your actions for a threat. Try to stay calm.
 - c. If you get out of the building and do not see a police officer, attempt to call the police by dialing 911 or 1112 from any campus phone. Tell the dispatcher your name and location and follow their instructions.
 - d. If you are unable to escape the building, move out of the hallway and into an office or classroom and try to lock the door. If the door will not lock, try barricading the door with desks and chairs. Lie on the floor and/or under a desk and remain silent. Wait for the police to come and find you.
6. If the shooter enters your office or classroom:
 - a. There is no set procedure in this situation. If possible, call 911 and talk with a police dispatcher. If you cannot speak, leave the phone line open so the police can hear what is going on.
 - b. Use common sense. If you are hiding and flight is impossible, attempts to negotiate with the suspect may be successful. Playing dead may also be a consideration.
 - c. Attempting to overcome the suspect with force is a last resort that should only be considered in the most extreme circumstances. Only you can decide if this is something you should do. Remember there may be more than one shooter.
 - d. If the shooter exits your area and you are able to escape, leave the area immediately. Do not touch anything in the area and remember to be alert for responding police officers, who may mistake you as the shooter.
 - e. While escaping, as soon as you see a police officer put your hands over your head and immediately comply with the officers' instructions.
7. What else can you do? Prepare a plan of action for an active shooter in advance. Determine possible escape routes and know where the nearest building exits are.

2.3.3.4.8.3 Bomb Threats

All bomb threats will be treated as a serious matter. Statistics show most bomb threats are meant to disrupt normal activities. However, this does not mean a bomb threat should not be considered "real." The decision to evacuate a building will be made by the proper authorities after evaluating the situation.

Emergency Actions - when a bomb threat is received by phone:

1. Keep the caller on the line and talking as long as possible (pretend to have difficulty in

- hearing - ask the caller to repeat what he/she said).
2. Try to get as much information as possible about the location of the bomb and a description of the bomb and the caller. Use the Bomb Threat Checklist to record all information.
 3. Stay on the line as long as the caller continues to provide useful information. If possible, have someone else use another line to call Campus Safety and Security.
 4. After the caller hangs up, immediately call 1112 and notify the Campus Safety and Security.
 5. If an evacuation of the building is ordered, take the Bomb Threat Checklist with you and give it to Campus Safety and Security.

Emergency Actions - when a suspicious object or potential bomb is discovered:

1. Do not touch, move or disturb any suspicious object you feel might be a bomb.
2. Keep people away from the area where the suspicious object is and call the Campus Safety and Security at 1112.
3. Be sure to include a description of the object and its location when reporting.

Emergency Actions - when an evacuation is ordered:

1. Collect your personal belongings (i.e. purse, briefcase, etc.) and take them with you as you exit the building.
2. Look around your desk and/or office for any suspicious items. Do not touch anything suspicious; instead report it to the Campus Safety and Security after you exit the building.
3. After evacuation, report to an Emergency Assembly Area.
4. Do not reenter the building until instructed to do so by appropriate personnel (Campus Safety and Security, Bamberg Sherriff Department or Denmark Fire Department).

2.3.3.4.8.4 Fire and Explosion

Quick Response: Protect Yourself

1. **Fire:** Everyone must evacuate to assembly area (See posted Evacuation Plan).
2. **Explosion:**
 - a. Take cover;
 - b. Assist the injured;
 - c. Everyone should evacuate to assembly area (See posted Evacuation Plan);
 - d. Know the location of fire extinguishers, fire exits, and alarm systems in your area and know how to use them.
3. **Small Fire Procedures:**
 - a. Avoid personal injuries and excessive risks.
 - b. Alert people in the immediate area and activate the alarm.
 - c. Call 1112 and give details of the fire location.
 - d. Smother fire or use the nearest fire extinguisher.
 - e. Always maintain a way to exit the room.

- f. Avoid smoke and fumes. Stay low.
- g. Campus Safety and Security will respond the scene to assist in building evacuation and to meet and assist Denmark Fire Department.
- h. Once Denmark Fire Department has arrived, the responding incident commander will take charge of all rescue and suppression activities.
- i. Do not re-enter the building until advised by the Fire Department or the Police Department.

4. **Operating a Fire Extinguisher:**

- a. Pull the pin.
- b. Aim extinguisher hose at the base of the fire.
- c. Squeeze the lever.
- d. Sweep from side to side.

5. **If You Are Trapped in a Building:**

- a. If a window is available, place an article of clothing (shirt, coat, etc.) outside a window as a marker for rescue crews.
- b. If there is no window stay near the floor where the air will be less toxic.
- c. Shout at regular intervals to alert emergency crews of your location. Do not panic.
- d. If the door is warm, do not open it. If smoke is entering through the cracks around the door, stuff something in the cracks to slow the flow.

For information concerning evacuation drills, fire alarms, and other emergency systems, please contact Campus Safety and Security at (803) 780-1112.

2.3.3.4.8.5 Hazardous Materials

The range and quantity of hazardous substances used in laboratories require proper pre-planning in order to respond to chemical spills.

1. **Chemical Spills Procedures:**

- a. For Major Spills:
 - i. Dial (803) 780-1112;
 - ii. Do not enter the contaminated area;
 - ii. Alert people in the area to evacuate;
 - iii. If spilled material is flammable, turn off ignition and heat sources;
 - iv. Close doors to affected area;
 - v. Locate appropriate material safety data sheets (MSDS);
 - vi. Have persons knowledgeable of area assist emergency personnel.
- b. For Minor Spills:
 - i. Alert people in the immediate area of the spill, and avoid breathing vapors from the spill;
 - ii. Begin clean up immediately;
 - iii. If further assistance is needed, call Campus Safety and Security at (803) 780-

1112.

2. **Biological (Blood) Spills Procedures:** Health care or housekeeping personnel trained in spill cleanup should follow established protocols. For blood or body fluid spills in residence halls, academic buildings, administrative buildings, or on outside surfaces, contact housekeeping in area.
 - a. Procedures:
 - i. Wear disposable gloves and absorb fluids with disposable towels;
 - ii. Clean area of all visible fluids with detergent (soap/water);
 - iii. Decontaminate area with an appropriate disinfectant;
 - iv. Place all disposable materials into plastic leak-proof bag. DO NOT throw bag in trash;
 - v. If further assistance is needed, call the Physical Plant at (803) 780-1249 or (803) 780-1243.

3. **Radiological Spills Procedures:** A major radiological spill is one which the laboratory staff is not capable of handling safely without assistance of safety and emergency personnel.
 - a. Procedures:
 - i. Protect yourself first and call (803) 780- 1112 as soon as possible.
 - ii. Attend to injured or contaminated persons and remove them from the spill area.
 - iii. Alert people in the area to evacuate.
 - iv. Have potentially contaminated personnel stay in one area until they have been monitored and are free of contamination.
 - v. Close doors and prevent entrance into affected area.
 - vi. Have a person knowledgeable of the incident and area assist emergency personnel.
 - vii. Document names of persons potentially contaminated.

For information concerning evacuation drills, fire alarms, and other emergency systems, please contact Campus Safety and Security at (803)780-1112.

2.3.3.4.8.6 Major Power Outage

Dominion Energy provides electrical power to Voorhees University. Electrical distribution within the individual campus buildings is managed by the Physical Plant Department.

All buildings are equipped with emergency exit lights to identify safe emergency exits in the event of a power failure. Most buildings have emergency backup lighting, which is battery-powered. However, you may want to have flashlights, a battery-operated radio and fresh batteries available as well.

If your area or floor is without power, try to determine if the rest of the building is affected. Then notify Campus Safety and Security at (803)780-1112.

2.3.3.4.8.7 Medical Emergency - Personal Injury

All medical emergencies occurring on campus should be reported immediately by calling Campus Safety and Security at (803)780-1112.

Medical emergencies include:

1. Any life-threatening situation;
2. Loss of consciousness;
3. Chest pain;
4. Excessive bleeding;
5. Seizures;
6. Head injury;
7. Compound fractures;
8. Allergic reactions with shortness of breath, excessive swelling;
9. Ingestion or inhalation of a toxic substance;
10. Lacerations of the eyeball.

In most cases, emergency response personnel are only minutes away, and unless an injury is life threatening, applying first aid may not be necessary. However, in the event of a disaster that extends beyond your location, response may be delayed, making it necessary for you to take appropriate action.

Quick Response:

1. Dial 911 or 780-1112;
2. Do not move victim unless safety dictates;
3. If trained, use pressure to stop bleeding;
4. Use CPR if no pulse and not breathing;
5. State that medical aid is needed and provide the following information:
 - a. Location of injured person (e.g., which building, room, number, etc.);
 - b. Type of injury or problem;
 - c. The individual's present condition;
 - d. The sequence of events leading to the emergency;
 - e. Medical history and name of injured person's doctor, if known;
 - f. The phone number where you are;
 - g. Stay on the phone with the dispatcher.

Illness or Injury to Faculty or Staff: Health Services provides emergency treatment for job-related work injuries or medical illness during hours of operation. When Health Services is closed, referral is made to the Urgent Care in Bamberg during the hours of 9 a.m. to 9 p.m. Otherwise referral will be made to the Regional Medical Center in Orangeburg. Health Services does not treat faculty or staff for non-work-related illness or injury.

Illness or Injury to Students: During the regular academic sessions, students with illness or injury should be referred to the Health Services, Halmi Hall (803) 780-1260. Serious illness or injury to students on campus should be reported to Campus Safety and Security (803) 780-1112. An officer will respond to evaluate the situation and arrange for the student to be transported for medical

treatment.

Illness or Injury to Visitors or Guests: Request emergency medical assistance by calling 911.

Personal Injury Procedures:

1. Clothing on Fire:
 - a. Roll around on floor to smother flame or drench with water;
 - b. Obtain medical attention; if necessary, call 911 or (803) 780-1112;
 - c. Report incident to supervisor and/or to Campus Safety and Security at (803) 780-1112.
2. Hazardous Material Splashed in Eye:
 - a. Immediately rinse eyeball and inner surface of eyelid with water continuously for 15 minutes;
 - b. Forcibly hold eye open to ensure wash behind eyelids;
 - c. Obtain medical attention. Make sure to take Material Safety Data Sheets (MSDS) of the chemical with you;
 - d. Report incident to supervisor and/or to Campus Safety and Security at (803) 780-1112.
3. Minor Cuts and Puncture Wounds:
 - a. Vigorously wash injury with soap and water for several minutes;
 - b. Obtain medical attention;
 - c. Report incident to supervisor and/or to Campus Safety and Security at (803) 780-1112.
4. Radiation Spill on Body:
 - a. Remove contaminated clothing;
 - b. Rinse exposed area thoroughly with water;
 - c. Obtain medical attention;
 - d. Report incident to supervisor and/or to Campus Safety and Security at (803) 780-1112.
5. Biological Spill on Body:
 - a. Remove contaminated clothing;
 - b. Vigorously wash exposed area with soap and water for one minute;
 - c. Obtain medical attention.
 - d. Report incident to supervisor and/or to Campus Safety and Security at (803) 780-1112.

2.3.3.4.8 Psychological Crisis

A psychological crisis may occur as a result of emergencies, disasters, or other critical incidents such as suicide, rape, violence, deaths, serious accidents, fires, explosions, bomb threats, threats to the public welfare, or other traumatic or tragic events affecting the campus community.

During the regular academic sessions, students wishing to speak to a counselor should be referred to Health Services, Halmi Hall (803) 780-1077.

General Incident Reporting: A university campus is a community of many diverse people who come from a variety of places to live, work, and attend school. A crisis or disaster can

have direct and indirect traumatizing effects on a wide range of campus community members.

For an unusual or potentially dangerous situation:

1. Never try to handle a dangerous situation by yourself.
2. Call Campus Safety and Security at (803) 780-1112 who will notify the on-call counselor.
3. Clearly state that you need immediate assistance; give your name, your location, and state the nature of the problem.
4. All suicide attempts must be reported to Campus Safety and Security so that proper procedures are followed to ensure the safety of those involved.

2.3.3.4.8.9 Severe Weather - Natural Disaster

Violent weather is very unpredictable, but with the aid of modern technology, the approach of such weather is often known in advance. Every reasonable effort will be made to warn the Voorhees University community when severe weather is imminent (via e-mail, voice mail, building announcements, etc.).

1. Tornado/Hurricane/High Winds:
 - a. Stay indoors;
 - b. Move away from windows and open doors (preferably into an interior hallway);
 - c. If possible, move to the lowest level of the building;
 - d. Do not use elevators, electrical equipment or telephone;
 - e. Sit on the floor and cover your head with your arms to protect from flying debris;
 - f. Await instructions from emergency management officials.
2. Earthquake:
 - a. Stay indoors;
 - b. Crawl under a table or desks or brace yourself by standing in an interior doorway;
 - c. Do not use elevators, electrical equipment or telephone;
 - d. Do not use open flame;
 - e. Be prepared for aftershocks;
 - f. Await instruction from emergency management officials.
3. Floods:
 - a. Stay indoors;
 - b. Never attempt to walk or drive through flood waters;
 - c. Await instructions from emergency management officials.
4. Winter Storms:
 - a. Stay indoors;
 - b. Do not walk or drive during the storm and risk becoming stranded;
 - c. Await instructions from emergency management officials.

2.3.3.4.8.10 Water Contamination

A water treatment plant owned by City of Denmark provides Voorhees University's water supply. Safety procedures and regulatory requirements are in place to assure a safe water supply. Water quality is monitored on a periodic basis at several points throughout the distribution system to assure no contamination. However, if you have reason believe there is a problem with the water in your building, notify Campus Safety and Security at (803) 780-1112 immediately and do not use the water until you have been assured that no problems exist. Be sure to instruct other building occupants not to use the water supply until notified.

2.3.3.5 Incident Reporting

All incidents of actual or attempted criminal behavior, violence, vandalism, threatening or suspicious circumstances, or emergencies that require the response of Campus Safety and Security, medical personnel, fire department, or other emergency personnel shall be immediately reported by dialing 1112 from any campus phone. Any member of the University community who provides false emergency information (fire, physical threat, bomb scare, etc.) will be subject to appropriate sanctions consistent with the University's disciplinary policies.

In addition, all injuries or accidents involving an employee at work or on official University business, and/or damages to a person/property must be reported promptly to Campus Safety and Security, the Department of Human Resources, and the immediate supervisor. A written incident report, completed by Campus Safety and Security, is mandatory, even for minor injuries, to ensure the right to compensation and insurance payments.

Accidents involving a student on campus must be reported promptly to Campus Safety and Security and the Office of Vice President for Enrollment Management and Student Affairs. A written incident report completed by Campus Safety and Security is mandatory, even for minor injuries.

2.3.3.6 Missing Student Policy

This policy establishes a framework for cooperation among members of the Voorhees University community aimed at locating and assisting students who are reported missing. A student shall be deemed missing when absent from the University for more than 24 hours without any known reason. All reports of missing students shall be directed to Campus Safety and Security, which will investigate each report and make a determination whether the student is missing in accordance with this policy. All students shall have the opportunity to identify an individual to be contacted by the University in case a student is determined to be missing. If a missing student is under 18 years of age Campus Safety and Security is required to notify the parent or guardian of the missing student not later than 24 hours after the determination by Campus Safety and Security that the student is missing. Campus Safety and Security will also notify the Bamberg Sheriff Department and the Denmark Police Department not later than 24 hours after determining that the student is missing. The Vice President for Enrollment Management and Student Affairs shall have the responsibility of making the provisions of this policy and the

procedures set forth below available to students.

Procedure:

1. Any report of a missing student, from whatever source will immediately be directed to Campus Safety and Security.
2. When a student is reported missing, Campus Safety and Security shall:
 - a. Initiate an investigation to determine the validity of the missing person report.
 - b. Contact the Vice President for Enrollment Management and Student Affairs, Dean of Students, or Provost/Vice President for Academic Affairs (in this order listed).
 - c. Make a determination as to the status of the missing student.
 - d. If the missing student is under the age of 18, notify the student's custodial parent or guardian within 24 hours of the determination that the student is missing.
 - e. Notify the Bamberg Sheriff Department and the Denmark Police Department within 24 hours after determining that the student is missing.

Student Contact Information: Students shall ensure that there is up-to-date emergency contact information on file at the Registrar's Office and with the Director of Housing and Residential Life (if living in campus housing).

Any incidents of missing persons will be documented in the annual Campus Safety and Security Reports as well as the annual Clery Act statistics.

2.3.3.7 Parking and Traffic

Motor vehicles must be registered with Campus Safety and Security. Each operator must possess a valid driver's license, show proof of liability insurance, and purchase a decal.

2.3.3.7.1 Traffic and Parking Regulations
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The motor vehicle regulations are applicable to everyone operating or parking a motor vehicle on properties of Voorhees University. All traffic rules will be enforced on all University premises at all times of the day and night throughout the calendar year. Campus Safety and Security is authorized and empowered to enforce these motor vehicle regulations.

Regulations:

1. The motor vehicle laws of the State of South Carolina are in effect on University property.
2. Traffic regulations on the campus are established for the safety and convenience of all employees, students, and visitors. Persons operating a motor vehicle on campus are expected to park in designated parking areas and observe the 15 M.P.H. speed limit. Drivers should be aware that campus pedestrians always have the right-of-way.
3. Voorhees University assumes no responsibility for damages to vehicles or loss by theft of items in a vehicle parked on campus and assumes no responsibility for towing vehicles or for damages to vehicles or loss by theft during the process of towing a vehicle or during

- storage of said towed vehicle.
4. All motor vehicles using University parking facilities must have a permanent decal or temporary permit valid for the time period indicated. Decals must be affixed to the front windshield of the vehicle.
 5. Visitors must obtain a parking permit from the Security Hut. See Campus Map in *University Catalog*.
 6. Registration of vehicles is to be completed at the beginning of each semester or summer session and within seven (7) days after the date of employment for new faculty or staff.
 7. Any student, faculty, or staff member with a physical disability may apply to the Office of Enrollment Management and Student Affairs or Campus Safety and Security for consideration in obtaining special parking privileges.
 8. Double-parking is prohibited at all times.
 9. Vehicles will not be parked in such a manner as to obstruct vehicular or pedestrian traffic, wheelchair ramps, interfere with normal operational activities, or create a hazard. Vehicles so parked will be towed at the owner's expense.
 10. Parking on grass, sidewalks, loading zones, or on roadways (except where specifically marked for parking) is prohibited. The fact that a person parks in an unauthorized space or area and does not receive a citation does not mean that the regulation is no longer in effect.
 11. Any vehicle parked on campus is parked at the risk of the owner.
 12. Overnight parking of any vehicle is prohibited unless Campus Safety and Security grants special permission.
 13. Disabled or abandoned vehicles that constitute a traffic or safety hazard are subject to be towed away at the owner's expense. This also applies to vehicles abandoned on campus for more than 48-hours. Locating a legal parking space is the responsibility of the vehicle's operator. Lack of a parking space will not be considered a valid excuse for violation of any parking regulation.
 14. Unauthorized persons parking vehicles in "handicapped" spaces are subject to a fine and having the vehicle towed at the owner's expense. Temporary "handicapped" parking permission may be obtained by contacting the Security Hut.
 15. Regulations concerning loading zones will be enforced at all times. Campus Safety and Security Officers may ticket all vehicles or operators involved in traffic, parking/non-moving, and decal violations. The citation will show the nature of the violation and the number of the issuing officer. The person to whom the decal is registered will be held responsible for violations. If the violator cannot be identified, then the registered owner will be held responsible.
 16. A fine for use of lost or stolen permits will be applied, and parking privileges will be revoked for the remainder of the permit year at the discretion of the Campus Safety and Security.
 17. All persons receiving citations for non-moving violations will pay such charges in person or by mail to the Cashier's Office.
 18. Unpaid Tickets will result in:

- a. Withholding parking and driving privileges on University property.
 - b. Preventing the person from registering as a student.
 - c. Withholding delivery of transcripts or degrees.
19. A vehicle may be towed if it:
- a. Has three tickets or fines.
 - b. Is blocking traffic or creating a hazard.
 - c. Belongs to a person whose on-campus parking privileges have been revoked.
 - d. Is parked in a designated tow-away zone.
 - e. Is illegally parked in a handicapped space.
 - f. Is illegally parked in a fire lane or in front of a dumpster.
 - g. Is apparently abandoned.
 - h. Is involved in a crime or is potential evidence.
 - i. Is left unattended due to the arrest of the driver.
 - j. Any and all charges against the vehicle must be satisfied prior to releasing the vehicle.
 - k. Wrecker services removing vehicles from the University are entitled to payment.
20. The University's speed limit is posted at all main roads.
All operators of vehicles are expected to operate vehicles in a responsible manner.
21. Pedestrians will have the right of way at designated crosswalks at all times.
22. Campus Safety and Security will hear the appeals of employees, students, and visitors.
Appeals information is printed on all parking tickets.
23. The University does not assume any responsibility for motor vehicles or their contents while they are operated or parked on University property. A schedule of fees for parking, decals, permits, and fines are available from the Security Hut or the Chief of Safety and Security.

2.3.3.7.2 Registration of Motor Vehicles

- 1. All motor vehicles operated on the campus by University employees and students must be registered. All vehicles must be registered with Campus Safety and Security within 14 days after arriving on campus. It is the responsibility of the motorist to keep his/her vehicle registered at all times.
- 2. All motor vehicles must be registered annually and a registration fee is charged. This registration and permit are valid for the fall and spring semesters and summer session. Parking permits are paid for at the cashier's window in Wright Hall at which time a receipt will be issued to obtain a parking permit from security.

2.3.3.7.3 Fines

A listing of current fines is published annually and is available at the Security Hut.

2.3.3.7.4 Termination of On-Campus Driving Privileges

All members of the campus community are granted the privilege of operating an automobile on campus; however, students and employees are obligated to operate the vehicle within the rules

established by the institution.

Termination of the privilege to drive and/or park on Voorhees University property may be either terminated or suspended by Campus Safety and Security, the Vice President for Business and Fiscal Affairs, or the Vice President for Enrollment Management and Student Affairs under the following conditions:

1. Failure to register vehicle with Campus Safety and Security and failure to display the vehicle sticker or hangtag on the proper place on the automobile within 14 days of the beginning of each semester.
2. Failure to pay fines resulting from vehicle violations on campus. All fines must be paid within 15 days from time of violation.
3. Failure to comply with disciplinary action as a result of a violation of the *Student Code of Conduct* violation in which the vehicle was involved.
4. The vehicle is involved in any type of illegal activity on or off campus.
5. Habitual violations of motor vehicle rules and laws on campus are listed below:
 - a. Parading, cruising or parking on campus with excessive volume on car radio.
 - b. Allowing the vehicle to be used by others to gain access to the residential or any areas on campus after hours.
 - c. Failure to observe security check at the guard gate or at any place on the Voorhees University campus.
 - d. Driving under the influence of alcohol or drugs.
 - e. Accumulation of three or more vehicle-related violations in one semester.
 - f. Driving with a suspended driver's license.
 - g. Reckless driving. Any person driving a motor vehicle at a speed greater than reasonable and/or through careless operation endangers the life and/or property of others is guilty of reckless driving.
 - h. Failure to observe security checks of the vehicle conducted by Campus Safety and Security Officers.
 - i. Failure to comply with the reasonable request of University staff and/or Campus Safety and Security Officers concerning the proper operation of a motor vehicle while on the Voorhees University campus.

2.3.3.7.5 Appeals

Any person cited for a violation for which a civil penalty is imposed or a vehicle is impounded or immobilized may appeal in person or in writing within 10 calendar days of issuance to Campus Safety and Security or his designated hearing officer.

Failure to meet the 10-day requirement will result in a forfeiture of all appeal privileges. The chief or his hearing officer shall review all written appeals and establish limited hours to review those in-person appeals.

Written appeals must be submitted on a standard appeal form, available from Campus Safety and Security.

Submitting an appeal does not substitute for payment of the towing and storage fees for removal of the impounded vehicle. Such fees must be paid. If the hearing officer decides the appeal in favor of the appellant, the costs of towing and storage will be refunded.

For more information, contact Campus Safety and Security at (803) 780-1129.

2.3.3.8 Persona Non-Grata Policy

In matters of clear and present possible physical harm by any Voorhees University student, employee, or visitor toward another individual or property at Voorhees University, the President (or a designee) has authority to declare an individual, or individuals, *persona non-grata* at the University. Such individuals are immediately suspended from classes or employment and, if on campus, will be escorted off campus, and shall not return to the campus without permission and escort unless and until such status is removed by the President or as a result of a special hearing board.

Each individual declared as *persona non-grata* shall have such status communicated to the individual by the President in writing. Such written communication will state the reason for such actions and indicate that within five class or business days a special hearing board will be assembled to hear and review this matter. Each student, employee, or visitor shall also be informed of the right to counsel at such hearing, to present information or evidence, and to make written and/or verbal statements.

In all such cases, the individual(s) will have the right to a special hearing within five class days of the *persona non-grata* notification. A special hearing board will be appointed consisting of three members including one administrator, one faculty/staff member appointed by the President, and one student appointed by the President. By majority vote, the special hearing board will recommend to the President that the assigned *persona non-grata* be removed or continued. If the *persona non-grata* is removed and the individual is allowed to return, the individual may then be charged through the regular Disciplinary Procedures for any offenses committed. A student who has been declared *persona non-grata* has no right to a refund as a result of their being placed on that status.

2.3.3.9 Security Awareness Programs

During University orientation, all new students are informed of services offered by the Department of Campus Safety and Security at Voorhees University. Students participate in special topic seminars via PowerPoint, video and slide presentations on ways to maintain personal safety and residence hall security. This includes information on crime statistics, reports, and information regarding crime off campus in the surrounding neighborhood as well as on campus.

Employees and students are supplied with information from CASA (Citizens Against Sexual

Assault) and the Victim Witness Program in nearby Bamberg. Access to crime prevention tips and information is available on a daily basis on the Campus Security webpage at www.voorhees.edu.

Periodically, during the academic year, the Department of Campus Safety and Security (in cooperation with other University organizations and departments) present crime prevention awareness sessions on topics such as sexual assault (rape and acquaintance rape), Rohypnol (date rape drug) abuse, theft and vandalism, as well as educational sessions on personal safety and residence hall security.

A common theme of all awareness and crime prevention programs is to encourage students and employees to be aware of their responsibility for their own security, and the security of others.

In addition to seminars, information is disseminated to students and employees through crime prevention awareness packets, security alert posters, displays, videos, and articles in the University newspaper.

When time is of the essence, information is released to the University community via security alerts posted prominently throughout campus, through the University's electronic mail system, the voice mail broadcasting system, and on the Campus Safety and Security webpage.

Students and employees are able to go to the Voorhees University Website (www.voorhees.edu) and click on the Campus Safety and Security Webpage to obtain information as well as provide and report anonymous tips.

2.3.3.10 Security Escorts

Campus Safety and Security offers a walking escort service on a 24-hour basis for Voorhees University students, staff, administrators, and faculty. A safe escort between any two locations on Voorhees University property and the immediate surrounding areas will be provided. For a safe escort, please contact Campus Safety and Security.

2.3.3.11 Sexual Assault Policy

Voorhees University is committed to creating and maintaining an educational and working environment where respect for the individual and human dignity is of paramount importance. Voorhees University does not tolerate sexual assault in any form.

2.3.3.11.1 Definition of Sexual Assault
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Sexual Assault (rape) is defined as any sexual act forced on a person without their consent. This includes touching, fondling, any forcible penetration vaginally, orally or anally, with a body part or an object. The victim may be unable to give consent, which may include but not limited to, the victim's use of alcohol or a substance placed in their drink by the alleged student. It does not matter if the victim has consented to sex with the alleged student before: NO MEANS NO!

2.3.3.11.2 Medical Treatment and Preservation of Evidence
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Because rape is everyone's concern, it is important for all Voorhees University students to know where to turn for help and what to do if she/he or a friend is raped. Whether the rapist was a stranger, acquaintance, close friend, or date, there are certain services a victim needs. All services to sexual assault survivors are confidential with the exception that physicians and hospital personnel are required by law to report rapes to the police. It is the survivor's choice, however, whether to talk to the police.

If the individual has survived a sexual assault, there are many decisions that are to be made immediately. Regardless of any physical injuries, the victim should have a physical exam. The examination will gather semen, saliva, hair, fibers, etc. that may be helpful in a legal case. The exam will also check for venereal disease and pregnancy.

The victim may obtain a medical exam at the emergency room at the Regional Medical Center in Orangeburg. The decision of where to go should be based on whether the student wishes to pursue legal actions against the assailant. The physicians at the Emergency Room, Regional Medical Center - Orangeburg (or other surrounding hospitals) are the only physicians in this community who can perform a medical examination in which the physical evidence of the assault is collected and preserved for legal action. If the victim is in an unsafe area, she/he should move to a place of safety. If the victim is on campus, she/he should contact security and the police. If the student is in the residence hall, she/he should contact the Residence Coordinator on duty, Campus Safety and Security, and the police.

After a rape a student should follow these guidelines:

1. Do not brush teeth or gargle.
2. Do not shower.
3. Do not douche.
4. Do not change clothes.
5. If you have changed clothes, bring them with you to the hospital. Clothes must be placed in brown paper bags. Do not use plastic bags. The clothes may be stained with blood or semen, which will make for good evidence. Also bring a change of clothes.

Preserving the evidence from the assault is important. Even if the victim does not wish to file a prompt police report, evidence should be preserved so the victim has the opportunity to pursue a criminal investigation should the victim decide to do so in the future.

If the victim needs transportation to the Regional Medical Center she/he should contact security at 780-1112. The University has access to counselors and health professionals who can provide counseling, advising, and referral services. The victim may contact the Student Health Center at (803) 780-1077. The services provided are free of charge and confidentiality is assured.

2.3.3.11.3 Investigation of Sexual Assault

Sexual assaults violate the standards of conduct expected of every member of the Voorhees University community. Sexual assault is a criminal act, which subjects the perpetrator to criminal and civil penalties under state and federal law. In all cases, Voorhees University will abide by and cooperate with local, state, and federal sanctions. Voorhees University disciplinary

action may include termination, suspension or expulsion depending on the seriousness of the situation.

2.3.3.12 Unauthorized Handling of Safety Equipment

The unauthorized alteration, misuse or tampering with of any equipment or device intended for use in preserving or protecting the safety of members of the Voorhees University community, including but not limited to keys, exit signs, fire extinguishers, fire alarms, fire boxes, standpipes, first aid equipment or telephones is prohibited. Violation of this policy is subject to appropriate corrective discipline.

2.3.3.13 Use of Bicycles, Rollerblades and Skateboards on Campus

Skateboards, rollerblades, and bicycles can provide a recreational outlet and a convenient and economic method of traveling across campus. It is expected that these conveyances will be operated in a proper manner with principal regard to the safety, well-being, and right of way of pedestrians. It is in this spirit that certain reasonable restrictions and prohibitions are necessary.

Restrictions and Prohibitions:

1. The use of skateboards, rollerblades, and bicycles is prohibited inside all University facilities and outside on all steps or stairways.
2. No person will operate a skateboard, rollerblades, or a bicycle on a sidewalk or walkway that duly interferes with pedestrian traffic; caution is to be exercised at all times and the right of way yielded to pedestrians.
3. No person will operate a skateboard, rollerblade, bicycle, or motorized vehicle on any artificial or specially prepared surface (i.e., running tracks, tennis courts and basketball courts).
4. Bicycle operations:
 - a. Any person who operates a bicycle on campus is expected to comply with and is subject to any state or local ordinances or campus regulations pertaining to the operation of bicycles, including adhering to all posted warning, caution, or speed limit signs.
 - b. In the absence of posted speed limits, bicycle operators are expected to act in a responsible manner and in respect of local conditions.
 - c. Bicycles are to be secured only to the racks provided; bicycles may not be secured to trees, light poles, posts, handrails, or buildings.
 - d. In residence facilities, bicycles may be kept in authorized storage areas.
5. Motorized vehicles:
 - a. Only authorized motorized vehicles, other than wheelchairs, may be operated on sidewalks.
 - b. Mopeds or other gas-powered conveyances may not be brought into residence facilities and may be parked in designated areas.

2.3.3.14 Weapons on Campus

Any device that could cause harm to others is strictly prohibited on the University campus or any location where the University may participate in an event. Firearms and other weapons, although not all-inclusive, include pistols, rifles, knives, and “homemade” devices.

The University reserves the right for Campus Safety and Security Officers to inspect any person, baggage (backpacks), automobile and any other item that may appear to be suspicious by a Campus Safety and Security Officer. Individuals are required to, immediately, report perceived suspicious or unusual behavior by anyone on campus to the Campus Safety and Security Department. Any individual exhibiting such behavior is not to be approached. Once reported, the Campus Safety and Security Department will respond as quickly as possible.

Any individual violating the University’s Weapons Policy will be subject to immediate disciplinary action or termination/suspension as applicable. Additionally, if a firearm or other weapon is discovered and the individual responsible does not hold a proper permit, the Campus Safety and Security Department will hold the individual and contact proper law enforcement officials for further action.

2.4 Information Technology Policies

2.4.1 Conditions of Use of University Computers and Network

1. Voorhees University’s computing and associated network facilities are intended for use for teaching, learning, research, and administration in support of Voorhees University’s mission and educational goals.
2. All persons using Voorhees University’s computers and its network will be responsible for adhering to the University’s Acceptable Use Policy (see below), and will observe any other conditions, policies and rules as published by the Director of Information Technology (“IT”) Department.
3. Voorhees University’s computing and associated network facilities are not to be used for personal, commercial, or non-Voorhees University-related purposes without written authorization from the University. Any dispute regarding the nature of the work, whether personal, commercial, or non-Voorhees University-related, will be assessed by the Chief Information Technology Officer
4. Users will not knowingly copy, move, transfer, record or process information/data that infringes any patent or breach any copyright (see Acceptable Use Policy).
5. Voorhees University will endeavor to protect the confidentiality of information and material furnished by the user and will instruct all computing personnel to protect the confidentiality of such information and material, but the University shall be under no liability in the event of any improper disclosure.
6. Voorhees University will endeavor to safeguard against loss of information within the

University's computing and associated network facilities but will not be liable to the user in the event of any such loss. The user must take reasonable measures, defined in formal guidance as "best practice methods," to further safeguard against any loss of information within the University's computing, learning, and networking facilities. Despite these safeguards, Voorhees University disclaims responsibility and will not be responsible for loss or disclosure of user information or interference with user information resulting from its efforts to maintain the privacy, security, and integrity of its computer and networking facilities and information.

7. Users of the University's computing and networking facilities recognize that when they cease to be formally associated with Voorhees University (e.g. no longer an employee, an enrolled student who has graduated or left the school or visitor to the University), their access to information/data may be removed from Voorhees University computers and networking facilities without notice.
8. Voorhees University reserves the right to limit permanently or restrict any user's access to the University's computer and networking facilities; to copy, remove, or otherwise alter any information/data or system that may undermine the authorized use of University computers and networking facilities; and to do so with or without notice to the user in order to protect the integrity of the University's IT network against unauthorized or improper use, and to protect authorized users from the effects of unauthorized or improper usage.
9. Voorhees University, through authorized individuals, reserves the right to periodically check and monitor its computers and networking facilities.
10. Voorhees University assumes no responsibility and provides no warranty against the non-delivery or loss of any files, messages or data nor does it accept any liability for consequential loss in the event of improper use of Voorhees University equipment, computer, or work related system or any other circumstances.
11. Voorhees University reserves the right to take emergency action to safeguard the integrity and security of the computing, learning and networking facilities. This includes but is not limited to the termination of a program, job, or on-line session, or the temporary alternation of user account names and passwords. Emergency actions does not waive the rights of Voorhees University to take additional actions, up to and including disciplinary actions, under this policy.
12. Users of the University's computing and networking facilities do so subject to applicable laws and Voorhees University policies and procedures.
13. Voorhees University disclaims any responsibility and/or warranties for information and materials residing on non-University computer systems or available over publicly accessible networks, except where such responsibility is formally expressed. Such materials do not necessarily reflect the attitudes, opinions, or values of Voorhees University, its staff, or students.
14. External work or use of the University's computing and networking facilities will not be undertaken which would prevent Voorhees University users from having their usual access to the facilities.

15. Users must sign for any hardware and/or software provided by the University. They must also provide any issued hardware and/or software upon record of request within one week for essential inventory and maintenance. Failure to comply may result in disciplinary action and/or payroll deductions equivalent to the replacement value of said material.

Violation of these conditions may result in appropriate disciplinary action, including but not limited to termination or dismissal.

2.4.2 Acceptable Use Policy

Appropriate and responsible use of the Voorhees University computing and networking facilities is defined as use that is consistent with the mission and education goals of the University. All uses inconsistent with these objectives are considered to be inappropriate use.

2.4.2.1 User Responsibilities

Users of the Voorhees University computing and networking facilities accept the following specific responsibilities:

1. Security:
 - a. To safeguard their data, personal information, passwords and authorization codes, and confidential data;
 - b. To take full advantage of file security mechanisms built into the computing and learning systems;
 - c. To choose their passwords wisely and to change them as required by the IT Department (see Guidelines on Passwords under 2.4.4.1);
 - d. To follow the security policies and procedures established to control access to and the use of administrative data.
2. Confidentiality:
 - a. To respect the privacy of other users; for example, not to intentionally seek information on, obtain copies of, or modify files, tapes, or passwords belonging to other users of Voorhees University;
 - b. Not to represent others, unless written authorization is provided explicitly by those users;
 - c. Not to divulge sensitive personal data to which they have access concerning staff or students without explicit written authorization.
3. To respect the rights of other users; for example, to comply with all Voorhees University policies regarding harassment and discrimination.
4. To respect legal protection provided by copyright and licensing of programs and data; for example, not to make copies of a licensed computer program; to avoid paying additional license fees; or to share with other users.

5. To respect the intended usage of resources; for example, to use only the account name and password, funds, transactions, data, and processes assigned by service providers, department or programs heads, or project directors for the purposes specified, and not to access or use other account names and passwords, funds, transactions, data, or processes unless explicitly authorized to do so by the appropriate authority.
6. To respect the intended usage of systems for electronic exchange (such as email, World Wide Web, etc.); for example, not to send forged electronic mail, mail that will intimidate or harass other users, chain messages that can interfere with the efficiency of the system, or promotional mail for profit-making purposes. Also, not to break into another user's electronic mailbox or read someone else's electronic mail without their permission.
7. To respect the integrity of the computing, learning and networking facilities; for example, not to intentionally develop or use programs, transactions, data, or processes that harass other users or infiltrate the system or damage or alter the software or data components of a system. Alterations to any system or network software or data component are to be made only under specific instructions from authorized academic staff, department or program heads, project directors, or administrators.
8. To adhere to all general Voorhees University policies and procedures including, but not limited to, policies on proper use of information resources and computing, learning and networking facilities; use of telecommunications equipment; legal use of software; and legal use of administrative data.
9. To report any information concerning instances in which Voorhees University policies or any of its procedures have been or are being violated, to IT, which will redirect the incident to the appropriate person(s) for action.

2.4.2.2 Specific Prohibited Activities

The following apply to specific activities:

1. **Illegal Activity:** In general, it is inappropriate use to store and/or give access to information on Voorhees University computing, learning and networking facilities that could result in legal action against the University.
2. **Objectionable Material:** Voorhees University computing, learning and networking facilities must not be used for the transmission, obtaining possession, demonstration, and advertisement or requesting the transmission of objectionable material, namely: offensives:
 - a. Pornography of any kind or form;
 - b. Material that promotes crime or violence, or incites or instructs in matters of crime or violence;
 - c. Material that is discriminatory or harassing in nature; or
 - d. Material that describes or depicts material, in a manner that is likely to be offensive to others.
3. **Restricted Material:** Voorhees University computing, learning and networking

facilities must not be used to transmit or make available restricted material to a minor.

4. Restricted Software and Hardware:

- a. In compliance with the Voorhees University **Acceptable Use Policy** users will not knowingly possess, give to another person, install on any of the computing, learning and networking facilities, or run programs or other information which could result in the violation of any Voorhees University policies or the violation of any applicable license or contract. This is directed towards but not limited to software known as viruses, Trojan horses, worms, password breakers, and packet observers/sniffers and includes hardware/software taken for personal use. Specifically, **you must avoid peer-to-peer (P2P) and sharing systems** such as Ares, BearShare, Morpheus, WinMX, Kazaa, Grokster, Shareaza, iMesh, Warez, Lime Wire, Bit Torrent, Gator and spyware/malware downloads that open your system to attack and use it to attack others. These programs illegally share copyrighted materials. Please consult the IT Help Desk and the Voorhees University website as both are excellent resources for up- to-date information on applications and websites to avoid. Authorization to possess and use Trojan horses, worms, viruses and password breakers for legitimate research or diagnostic purposes must be obtained from the Chief Information Technology Officer.
- b. The unauthorized physical connection of monitoring devices to the computing, learning and networking facilities that could result in the violation of Voorhees University policies or applicable licenses or contracts is considered inappropriate use. This includes but is not limited to the attachment of any electronic device to the computing, learning and networking facilities for the purpose of monitoring data, packets, signals or other information. Authorization to possess and use such hardware for legitimate diagnostic purposes must be obtained from the Chief Information Technology Officer.

5. Copying and Copyrights:

- a. Users of the computing and networking facilities must abide by the University's Copyright Policy.
- b. Respect for intellectual labor and creativity is essential to academic discourse. This tenet applies to works of all authors and publishers in all media. It includes respect for the right to acknowledgment and right to determine the form, manner, and terms of publication and distribution. If copyright exists, as in most situations, it includes the right to determine whether the work may be reproduced at all. Because electronic information is volatile and easily reproduced or altered, respect for the work and personal expression of others is especially critical in computing, learning and networking environments. Viewing, listening to, or using another person's information without authorization is inappropriate. Standards of practice apply even when this information is left unprotected.
- c. Most software that resides on the University's computing and networking facilities is licensed to the University and is protected by copyright privileges, licensing restrictions or contractual agreements. Users are required to abide by the terms and

conditions of software use and redistribution licenses. Such restrictions may include prohibitions against copying programs or data for use on the computing and networking facilities or for distribution outside Voorhees University including but not limited to the resale of data or programs, the use for non-educational purposes or for financial gain; and against public disclosure of information about programs (e.g., source code) without the proper authorization. University employees who develop new packages that include components subject to use, copying, or redistribution restrictions have the responsibility to make any such restrictions known to the users of those packages.

- d. With a greater emphasis on computer-based assignments, students need to be especially cognizant of the appropriate use of computing, learning and networking facilities.
6. Harassment: University policy prohibits sexual and discriminatory harassment (see Subsection 2.1.7 for additional information). The University's computing and networking facilities are not to be used to libel, slander, or harass any other person.
 7. Resource Degradation:
 - a. It is inappropriate to deliberately use or perform any act, which will impair the operation of any part of the computing, learning and networking facilities, or deny access by legitimate users to any part of them. This includes but is not limited to:
 - i. Wasting resources;
 - ii. Tampering with components or reducing the operational readiness of the facilities;
 - iii. Deliberate, unauthorized attempts to access or use the University's computers, computer facilities, networks, systems, programs, or data or the unauthorized manipulation of the University's computer systems, programs, or data;
 - iv. Deliberate, unauthorized use of Voorhees University's computer and network facilities, or equipment;
 - v. Deliberate, unauthorized activity which causes Voorhees University's computers, computer facilities, systems, programs, or data to be accessed or used; and deliberate activity (conducted in the course of one's employment with the University or in the course of one's enrollment as a student at the University), which causes non-Voorhees University owned computers, computer facilities, systems, programs, or data to be accessed or used in an unauthorized manner.
 - b. The willful degradation of computing, learning and networking resources is inappropriate use. Degradation includes but is not limited to passing chain letters, willful generation of large volumes of unnecessary printed output or disk space, willful creation of unnecessary multiple jobs or processes, or willful creation of heavy network traffic. In particular, the practice of willfully using the University's computing and networking facilities for the establishment of frivolous and unnecessary chains of

- communication connections is an inappropriate waste of resources.
- c. The sending of random mailings (“junk mail”) is discouraged but generally permitted in so far as such activities do not violate the other guidelines set out in this document. It is poor etiquette at best, and harassment at worst, to deliberately send unwanted mail messages to strangers. Recipients who find such junk mail objectionable should contact the sender of the mail, and request to be removed from the mailing list. If the junk mail continues, the recipient should contact IT Department.
8. **Game Playing:** Voorhees University computing and network services are not to be used for extensive or competitive recreational game playing unless it is part of an authorized and assigned research or instructional activity. Recreational game players occupying a seat in any of the computer labs must give up that seat when others need to use the computer or facility for academic or research purposes. Employees are to refrain from game playing during working hours.
 9. **Commercial Use -** Voorhees University provides computing, learning and network facilities for the support of its mission and goals. It is inappropriate to use the computing, learning and networking facilities for:
 - a. Commercial gain or placing a third party in a position of commercial advantage.
 - b. Commercial advertising or sponsorship except where such advertising or sponsorship is clearly related to or supports the mission and goals of Voorhees University or the service being provided.
 10. **Use for Personal Business:** The University’s computing, learning and network facilities may not be used in connection with compensated outside work nor for the benefit of organizations not related to Voorhees University, except in connection with scholarly pursuits (such as academic publishing activities) or in a purely incidental way. This and any other incidental use (such as electronic communications or storing data on single-user machines) must not interfere with other users’ access to resources (computer cycles, network bandwidth, disk space, printers, etc.) and must not be excessive.
 11. **Connection to the Campus-Wide Data Network:** To maintain the integrity of the University’s computing and network facilities, connections to the campus network are made only by specialized personnel under the direction of the IT staff. Users are encouraged to attach appropriate equipment only at existing jacks. All requests for additional Network connections or for the relocation of a connection should be directed to IT for review and disposition.
 12. **Use of Desktop Systems:** Users are responsible for the security and integrity of the University’s information/data stored on their assigned desktop or laptop. This responsibility includes making regular disk backups; controlling physical and network access to the machine, following installation parameters for updating, and implementing virus protection software and/or security updates for the desktop operating system upon availability. Users will avoid storing passwords or other information that can be used to gain access to other campus computing resources. Users should not store University passwords or any other confidential data or information on their home laptop or PC or

associated floppy disks, USB jump drives, CD's, etc. All such information will be secured after any remote connection to the Voorhees University network is completed.

13. Use of External Services: Networks and telecommunications services and administrative systems and services to which Voorhees University maintains connections have established acceptable use standards. It is the user's responsibility to adhere to the standards of such networks. Voorhees University cannot and will not extend any protection to users should they violate the policies of an external network.

14. Printouts: Users are responsible for the security and privacy of hard-copy versions of Voorhees University information, data, and reports.

Violating the University's **Acceptable Use Policy** is grounds for discipline, including but not limited to, termination and/or expulsion. In addition, the University may report violations to appropriate law enforcement authorities if it appears that the activity is a violation of local, state or federal law.

2.4.3 Appropriate and Reasonable Use of Electronic Mail

The electronic mail system provided by Voorhees University is intended for teaching, research, outreach, and administrative purposes. Voorhees University rules and policies, as well as applicable laws, govern its use. The use of the University's network for email is a privilege granted by the University to members of its community. It is not a right, and the privilege is contingent upon compliance with this policy.

Electronic mail may be used for personal communications within reasonable and appropriate limits.

Users will explicitly recognize their responsibility for the content, dissemination and management of the messages they send. This responsibility means ensuring that messages:

1. Do not contain information that is harmful to Voorhees University or members of the University Community
2. Are courteous and polite,
3. Are consistent with all Voorhees University policies, including but not limited to those outlined in *the University Policy Manual* and *the Voorhees University Style Guide and Manual*. Any use of email which is in violation of stated campus policy, state, or federal law will be deemed in violation of this email policy,
4. Protect others' right to privacy and confidentiality.
5. Do not contain obscene, offensive, or slanderous material,
6. Are not used for purposes that conflict with the University's interests,
7. Contain an accurate, appropriate, and informative signature;
8. Do not unnecessarily or frivolously overload the email system (e.g. spamming and junk mail are not allowed);
9. Are not for commercial purposes unless authorized by Voorhees University;
10. Users will cover periods of absence by adopting an appropriate functional account forward, or vacation message strategy.

Any violation of this policy may result in curtailment or loss of email privileges, and will be subject to any existing disciplinary procedures of Voorhees University. Violation of state and federal law may also subject users to prosecution by state and federal authorities. In any such prosecution or investigation, Voorhees University will cooperate with authorities.

2.4.3.1 Email Message Retention

Voorhees University's email message retention will be managed and facilitated using the following retention rates for electronic mail:

1. Inbox messages: 1 year then must be archived.
2. Sent messages: 1 year then must be archived.
3. Trash/deleted messages: 24 hours.

Each user is encouraged to create and save personal mail they would like saved to a personal mail folder on their local machines. Requests to have retention limits increased are to be forwarded to IT.

2.4.4 Confidentiality and Security

1. It is important to first note that any electronic mail is inherently not secure. Users, therefore, should exercise extreme caution in using email to communicate confidential or sensitive matters.
2. Voorhees University networks and computers are the property of the University and it therefore retains the right to allow authorized personnel to monitor and examine the information/data stored within. Users do not have privacy rights in materials created, sent, received, or maintained on these systems.
3. Users must ensure the integrity of their password and abide by the Voorhees University policy on password security. Passwords, however, are only intended to prevent unauthorized access to email. They do not grant implicit privacy rights.
4. Confidential information should be redirected or shared with others only where there is a need and with the permission of the originator, when and where possible.

2.4.4.1 Password Policy

1. Passwords should be memorized and **never** written down.
2. Passwords belong to individuals and **must never** be shared with others.
3. Users are required to change passwords every 120 days, or immediately if compromised.
4. To mitigate the possibility of someone cracking a password IT recommends that the guidelines listed below be followed:
 - a. A password should be 6 to 8 letters long and must contain at least one number.
 - b. Never make your password a name or something familiar, like your pet, your children, or partner. Favorite authors and foods are easily guessed.

- c. Never should your password be the same as your username or your real name.
- d. Avoid using words that can be associated with you.
- e. Avoid have a password consisting of a word from a dictionary. Most basic cracking programs contain over 80000 words, and plenty of variations.
- f. Choose something easily remember, that can be typed quickly and accurately, and includes characters other than lowercase letters.
- g. Passwords will not contain all or part of the user's account name.

2.4.5 Data Backups

Personal network folders are created for every user who has been assigned a network login account. Each user is encouraged to save critical information or data to the network assigned folder if they would like it included the weekly backup routine. IT has made every effort possible to make this as seamless a process as possible but it eventually becomes the responsibility of the individual user to insure their data is saved on this folder. Failure to do so will jeopardize any attempts to recover specific data from backups should it become damaged or lost.

2.4.6 Hardware and Software Policy

There are multitudes of hardware and software choices on the market, and people naturally prefer to use those that suit their individual preferences. But on the Voorhees University campus where many computer users rely on IT staff for training and support, it is impossible for the available staff to become experts on all hardware and software products. Also, introducing non-authorized software runs the risk of introducing harmful viruses. Therefore, computers and other hardware not approved by the Chief Information Technology Officer and purchased in accordance with the University's Purchasing Policy may not be connected to the University's network facilities. Moreover, no user of the University's computers or network facilities will install, upload, download, or use any software (including freeware and shareware) without seeking approval from IT. Users who make, acquire, or use unlicensed copies of computer software without IT approval or connect unauthorized hardware to the University's network are subject to disciplinary action.

According to applicable copyright law, persons involved in the installation and operation of unlicensed software can be subject to civil damages and criminal penalties including fines and imprisonment. Voorhees University does not condone the illegal duplication, installation, or operation of software. Industry watchdog organizations regularly survey organizations for software license compliance and can assess substantial penalties for noncompliance.

IT is responsible for assuring that the software running on all computers operated or managed by Voorhees University network users is appropriately licensed.

2.4.7 Voorhees University Website

Inasmuch as the Voorhees University Website is a major vehicle of communicating the nature of the University to a wide audience, its accuracy, quality, and messages are of vital importance to the integrity of the institution. To that end, the Office of Communications must approve substantive changes in content to the Voorhees University website. Upon approval from this office, only IT, Human Resources or Communications staff are authorized to make changes to the Voorhees University Website.

2.4.7.1 Web Advertising Policy

Voorhees University's Website must not be used for commercial, non-mission-related purposes. Accordingly, advertising for commercial purposes by businesses, organizations, entities, or individuals not associated with Voorhees University is generally prohibited. For purposes of this policy, "advertising" refers to any situation in which Voorhees University or one of its departments or divisions receives payment or in-kind gifts in exchange for a link or brand placement on a Voorhees University Web page.

While advertising cannot be sold at any level, links to vendors or other commercial entities may be made in the following specific situations upon written approval from the Vice President for Institutional Advancement and Development as determined on a case-by-case basis:

1. Links to a Contracted Vendor: The logo or link is to a vendor or other entity separately contracted to provide services to the University.
2. Sponsorship Recognition: The logo or link acknowledges a vendor or other entity's support of a University mission-related activity through sponsorship. The sponsorship announcement must meet IRS guidelines and be exempted from unrelated business income tax assessments; payment may not be accepted for the link or logo.
3. Educational Purposes: The text link provides information for educational or other mission-related purposes and the University has received no consideration for incorporating that link.
4. Links to Licensed Software Required for Web Viewing: The logo or graphic represents licensed software that represents a core function of the page at issue, e.g., Adobe Acrobat Reader.

In all of these cases, the link, as approved by the Vice President for Institutional Advancement and Development, will provide information for educational or other mission-related purposes and the University cannot have received financial consideration for incorporating the link.

Such links should in no way imply endorsement of products or services offered by the external commercial vendor or entity. Moreover, approval of links to web pages of commercial vendors and entities does not convey or imply approval to use the Voorhees University seal, logos, or other images without specific permission from the Vice President for Institutional Advancement

and Development (see the University's Use of Voorhees University Name, Logo and Seal Policy in Volume I).

In cases where a group of external hyperlinks is included, the following language will be included: *“Links to websites external to Voorhees University should not be considered endorsement of those websites or any information contained therein by Voorhees University.”*

2.4.8 Wireless Access Policy

The purpose of this policy is to provide guidelines for wireless connections to the Voorhees University network. It applies to approved Voorhees University employees, students, contractors, consultants, and other workers.

The goal of this policy is to protect Voorhees University's technology-based resources from unauthorized use and/or malicious attack that could result in loss of information, damage to critical applications, or damage to the University's public image. All users employing wireless methods of accessing University technology resources must adhere to the University's defined processes for doing so, using Voorhees University approved access points. Unauthorized access to the wireless network is not allowed.

Wireless networks are not a replacement for a wired network as the University's wireless network is an extension to the existing wired network. Wireless access should not be used for work sessions that require the transfer of large amounts of data (e.g., backups or file downloads) or for access to sensitive organizational data.

In order to provide wireless access to authorized users, IT installs “access points” in and around the campus. These access points are generally small, antenna-equipped boxes that connect directly to the local area network (LAN), converting the LAN's digital signals into radio signals. The radio signals are sent to the network interface card (NIC) of the mobile device (e.g. PDA, laptop, etc.), which then converts the radio signal back to a digital format the mobile device can use.

“Rogue” access points are antennas that are installed without the knowledge or permission of Voorhees University, used by individuals to gain illegal access to the University's network.

In addition, the following practices must be adhered to when using Voorhees University wireless access points:

1. All wireless access points within the University's firewall must be approved and centrally managed by the IT Department. The addition of new wireless access points within campus facilities will be managed at the sole discretion of IT. Non-sanctioned installations of wireless equipment or use of unauthorized equipment on campus premises are strictly forbidden.
2. The IT Department will occasionally conduct sweeps of the wireless network to ensure there are no rogue access points present.
3. The IT Department reserves the right to turn off, without notice, any access point connected to the network that it feels puts the University's systems, data, and users

- at risk.
4. Any device or equipment found to be interfering with access point signals may be subject to relocation or removal, including cordless phones, microwave ovens, cameras, light ballasts, etc.
 5. All computer equipment and devices used to connect to the University's network must display reasonable physical security measures. Users are expected to secure their University-connected devices when they are physically at their machines as well as when they step away.
 6. Wireless access users agree to immediately report to the University's IT Department any incident or suspected incidents of unauthorized access point installation.
 7. Use of the wireless network is subject to the same guidelines as the University's Acceptable Use Policies.

Failure to comply with the Acceptable Use Policy may result in the suspension of wireless access privileges and possible disciplinary action.

2.5 Public Relations and Advancement Policies

2.5.1 Public Relations Policies

2.5.1.1 Media Guidelines and Practices

Effective communication with the media is critical to Voorhees University's ability to carry out its mission and goals while promoting continued public support for the institution. Effective media relations best serve the University by:

1. Informing the public of how we can assist them for them;
2. Promoting the University's achievements, activities and events of significance;
3. Expanding the general visibility of the University; and
4. Ensuring that accurate information is conveyed to the public regarding incidents and issues of a controversial and/or sensitive nature.

The President (or a designee) serves as the official University spokesperson and conveys the official University position on issues of general University-wide impact or significance or situations that are of a particularly controversial or sensitive nature. Inquiries from the media about such issues must be referred to the Director of Communications.

Depending on the specific circumstances, the President may designate another University staff member to serve as spokesperson on a particular issue.

In cases of critical significance to the University, the Vice President for Institutional Advancement and Development will work with other University officials to develop a "position paper" to detail the known facts of the situation and summarize the University's position.

In the event of a crisis or emergency, the Director of Communications will handle all contacts with the media, and will coordinate the information flow from the University to the public. In such situations, all campus departments will refer calls from the media to the Office of Communications.

2.5.1.1.1 General Procedures for Dealing with the Media

Members of the faculty and staff are free to respond to requests from the media regarding their research, scholarship, teaching or professional expertise. In such cases, the appropriate vice president should be notified as soon as possible to inform him/her of the contact. Such notification can be particularly important if follow-up inquiries are made with other University personnel to ensure a coordinated, consistent response. Media inquiries should be referred to the Director of Communications if they involve issues with campus-wide significance and/or are of a controversial or sensitive nature.

All releases intended for external audiences must be routed through the Office of Communications.

Since positive media solicitation is an integral element of the University's communications program, any ideas for articles or pieces that would positively portray the institution, its work or its community should also be directed to the Office of Communications. In a similar manner, the Office of Communications should be notified of negative occurrences that are likely to rise to the level of a news story.

Guidelines for communicating with the media when the issue is non-controversial and limited to the faculty/staff member's area of expertise:

1. Obtain the name of the person calling, the media organization and, if available, the anticipated time of release of information in print or broadcast. This information should be included when the notification is made to the Office of Communications.
2. The best approach with the media is to be prompt, helpful and honest. All contacts from the media should be returned as soon as possible, in deference to reporters' deadlines. At the most, a call should be returned within a half-day. If that is not possible, an alternate employee (if appropriate) should be asked to handle the call.
3. Make sure you understand each question from the media before answering. If you cannot answer the question, or are uncomfortable providing a response, take the reporter's number and advise him/her that someone who can provide the information will contact him/her as soon as possible. Then follow-up by contacting the Director of Communications.
4. Do not offer speculations or gossip. Do not answer a reporter's question with "no comment." Do not be condescending or underestimate the reporter's intelligence, but make sure the reporter understands your responses. Provide your phone number and/or e-mail address for follow-up questions.
5. Remember that in responding to the media, you are seen as representing and speaking for the University." Personal opinions should be clearly and carefully identified as such.

6. Issues that should not be discussed with reporters are:
 - a. Legal issues;
 - b. Personnel issues;
 - c. Questions that involve the University's integrity, such as ethics or issues that may result in harm to others;
 - d. Legislative matters or policies affecting the University; or
 - e. A campus crisis or emergency. Refer all such inquiries to the Vice President for Institutional Advancement and Development.

2.5.1.1.2 Campus Emergency/Crisis Management Communications

Crisis communications have a lasting impact on institutional reputation and public support. How well we convey our message to the public greatly depends on what is reported to the news media. This is especially true in a crisis, during which the news media is the primary means of communication to our constituencies. Because of the emotions that usually accompany crises, images formed from crisis reporting are especially important in shaping long-lasting public impressions of the institution.

In the event of a major crisis on campus, it is essential that an effective communications plan be placed into effect to disseminate timely, accurate information and to ensure that inquiries are routed to the appropriate sources.

The Vice President for Institutional Advancement and Development and the Director of Communications, in consultation with the President, and Campus Safety and Security are responsible for the development and dissemination of all University communications, in the event of a campus emergency. This includes internal communications with students, faculty and staff, as well as communications with the media. The priority will be on maintaining timely and open communications with the media, providing complete and accurate information that has been confirmed about the emergency situation and the University's response to the crisis at hand. Communications with the media will be frequent throughout the duration of the emergency situation. Voorhees University's website will be utilized as a key medium for updating our campus community and the public on the details of the emergency situation and actions we are taking to address all related issues.

A media center will be established in the event of a widespread campus incident/disaster. The media center will include workspace for media personnel, electricity, telephones, Internet connections, campus and community directories and maps. The Director of Communications will establish rules of conduct for the media.

In a campus emergency, faculty, staff and students have a right not to speak with the media. The media has access only to the public areas. Any situations where individuals feel a reporter has abused their rights should be reported to the Vice President for Institutional Advancement and Development.

A communication information center may also be established if a high volume of incoming phone calls is expected.

2.5.1.1.3 Press Conferences

The Office of Communications coordinates all official University press conferences. Please contact the Office of Communications for coordinating a press conference. The Division of Institutional Advancement and Development will determine the location for the press conference.

2.5.1.1.4 Submitting Media Reports

The Office of Communications will prepare and disseminate all official Voorhees University press releases. Press releases are distributed to a variety of local, state and national media outlets.

For departments seeking publicity or marketing support, please submit a request two weeks prior to the event via e-mail to the Director of Communications.

This will allow an adequate amount of time for publicity. Essential information (who, what, when, where, why and how) should be included with the request. Also, the contact information of at least one person must be provided.

When submitting a press release, the Office of Communications reserves the right to make revisions to any documents prior to dissemination.

2.5.1.2 Photography

2.5.1.2.1 Staff and Event Photography

During each academic year, professional photo shoots are arranged. All photography work from photo shoots is available in the Office of Communications.

The Office of Communications will assist with the photography of special events on campus. Please submit a request two weeks prior to the event via e-mail to the Office of Communications.

The Office of Communications will also assist with identifying a professional photographer for special events on campus. Each department is responsible for the fee due the professional photographer. After identifying a professional photographer, the Office of Communications will forward the invoice to the responsible division/department.

All photographs, graphics and presentations must show a multicultural diversity of female, male, traditional and non-traditional students which comprise the University.

2.5.1.2.2 Permission to Photograph

Voorhees University is located on private property; thus, any professional photographers or videographers who are not members of the University community, including media members, may obtain photos/videos on University property only with permission of a) the subject(s) of

their photography; and b) the Office of Communications. Photographic releases are required for Voorhees University publications.

Amateur photography by members of the University community and guests/visitors at University events are generally allowed provided the photographer has permission of the photo subjects or is photographing general crowd shots of an event considered open to the public (i.e., athletic events, commencement). If any photography is deemed disruptive, intrusive, or out of compliance with Voorhees University policies, University faculty, administrators, or staff are empowered to restrict and/or forbid photography anywhere on campus. Prior to confronting the individual, however, an effort should be made to contact a Campus Safety and Security officer.

2.5.1.3 Publications/Advertising Policy

The VC Digest is published electronically throughout the year, and it informs the institution's constituencies about programs, achievements, employee accomplishments and newsworthy events on campus. If you would like to submit articles to be published, please e-mail the article to the Director of Communications.

All official Voorhees University publications will maintain a consistent institutional image and must be approved by the Office of Communications. Similarly, the Office of Communications must approve all advertising on behalf of Voorhees University. This includes all forms of paid and free advertising, including print (newspapers, magazines, etc.), broadcast (radio and television), Web, billboards, and signage. No advertising commitment may be executed without consulting the Director of Communications. The Director of Communications handles advertising space reservations and delivery of ads. This policy does not apply to position announcements and related advertising or items designed for on-campus distribution. However, advertisements must comply with the Use of the University Name, Seal, and Logo Policy. Please contact the Communications Director for additional information.

2.5.2 Institutional Advancement Policies

2.5.2.1 Institutional Advancement at Voorhees University

To advance the mission and goals of Voorhees University, it is the University's policy to seek external funding from private and public sources. Successful funding requires increased awareness of Voorhees University's mission and work. It also requires the cultivation of enthusiastic support among Voorhees University's institutional constituencies, key national and local leaders, and among the general public.

This policy outlines the University's practices governing institutional advancement activities (fundraising and public communications) and designates the University officials responsible for oversight of these activities and compliance with institutional advancement policies. It is the purpose of this policy to assure ethical, effective, and accountable advancement practices in support of Voorhees' mission and goals.

2.5.2.1.1 Advancement Ethics

Institutional Advancement and Development personnel are expected to observe the general ethical standards expected of all University employees as well as professional ethical guidelines. Voorhees University adheres to the following Statement of Ethics established by the professional organization for higher education advancement, the Council for Advancement and Support of Education (CASE):

Institutional Advancement and Development professionals, by virtue of their special responsibilities within the academic community, represent their colleges, universities, and schools to the larger society. They have, therefore, a special duty to exemplify the best qualities of their institutions, and to observe the highest standards of personal and professional conduct.

- 1. In so doing, they promote the merits of their institutions and of education generally, without disparaging other colleges and schools;*
- 2. Their words and actions embody respect for truth, fairness, free inquiry, and the opinions of others;*
- 3. They respect all individuals without regard to race, color, sex, sexual orientation, creed, ethnic or national identity, handicap, or age;*
- 4. They safeguard privacy rights and confidential information;*
- 5. They do not grant or accept favors for personal gain, nor do they solicit or accept favors for their institutions where a higher interest would be violated;*
- 6. They avoid actual or apparent conflicts of interest, and, if in doubt, seek guidance from appropriate authorities;*
- 7. They follow the letter and spirit of laws and regulations affecting institutional advancement;*
- 8. They observe these standards and others that apply to their professions, and actively encourage colleagues to join them in supporting the highest standards of conduct.*

The foregoing Statement of Ethics for advancement personnel is also applicable to all Voorhees University staff and faculty in their contacts and activities publicizing, representing, or seeking funds for the University and its education or other programs.

Institutional Advancement and Development and other employees will be informed of the necessity for general ethical conduct during their orientations, in faculty or staff institutes, and through University policy. In addition, employee briefings and policy documents will inform all employees that the foregoing professional advancement ethical standards and other advancement policies are available on the Voorhees University website and in the Office of Institutional Advancement and Development. Oversight of the observance of ethical advancement policies will be the responsibility of the Vice President for Institutional Advancement and Development subject to the verification and oversight of the President and the Institutional Advancement Committee of the Board of Trustees. Alleged infractions brought to the attention of the Vice President for Institutional Advancement and Development will be reviewed with and handled through appropriate University supervisory officials and through the University's personnel procedures governing faculty or staff performance and conduct.

2.5.2.1.2 Advancement Effectiveness

It is Voorhees University's policy to monitor Institutional Advancement and Development activities for effectiveness through the University's strategic planning and assessment processes. The fundamental policy effect to be achieved is increased financial support for Voorhees University on the part of current and prospective constituencies. Such support is also influenced and encouragement by increased awareness about and approval of the University's mission and performance.

Fundraising objectives in support of strategic advancement goals will be established and reviewed annually in the advancement planning process under the direction of the Vice President for Institutional Advancement and Development, subject to the verification and oversight of the University President and the Development Committee of the Board of Trustees. The Institutional Advancement and Development staff will review the effectiveness of specific fundraising and communication programs and overall fundraising results, and will pursue, revise, or end programs and practices as appropriate. Results appear in the University's Planning Documents.

Critical fundraising areas such as alumni giving, planned gifts, major gifts, capital or special project campaigns, or public affairs and communications will be the focus of periodic performance assessment through the University's Assessment Process, as reflected in the University's Assessment Documents.

2.5.2.1.3 Advancement Accountability

Voorhees University's policy is to assure accountability for all advancement activities with special emphasis on three priorities: (1) appropriate solicitations and proposals; (2) accurate and secure donor gift handling and records; and (3) reporting on and review of giving.

2.5.2.1.3.1 Appropriate Proposals, Solicitations, and Grant Implementation

All requests by Voorhees University faculty, staff, or students for funds from external sources must be consistent with Voorhees University's mission and goals and must be approved in advance by the Office for Institutional Advancement and Development and ultimately by the President or an officer designated by the President.

1. **Sponsored Research Proposals:** All faculty, staff or student research, or proposals from particular departments, offices, or programs, or from groups thereof seeking funds for a program, a project, or related equipment and facilities must comply with the grant clearance and implementation procedures established by the President and administered by the Office of Sponsored Research. Proposals in cooperation with or to be subcontracted from another institution are also subject to these same procedures. These clearance procedures are intended to assure consistency with the University's mission and goals, proper quality of proposal form and content, consistency with overall proposal and grant writing strategies, non-duplication of requests to particular sources, and general approval by relevant University officials. The Proposal/Grant Clearance and Implementation Procedures are intended to assure proper grant management and accounting and are managed through the

Office of Sponsored Research.

All proposals must contain accurate institutional data and information secured from or approved by the University official or Vice President with relevant jurisdiction. A general summary of official University facts and figures will be prepared annually by the Office of Institutional Advancement and Development for use in proposals and other communications. That summary is sent to all University officials and department or program heads.

A complete copy of any proposal should be kept on file by the submitting office. A copy should also be provided to the Office of the President, or in the case of institutional or capital proposals, to the Institutional Advancement Office. If funding is not received, a copy of the proposal so noted, should be sent to the Voorhees University Archives. If funding is received, a proposal copy with the award letter should also be provided to the Director of Sponsored Programs and Vice President for Business and Fiscal Affairs.

2. **Solicitations:** The Vice President for Institutional Advancement and Development and other Vice Presidents with relevant jurisdiction must approve any other solicitation of external contributions in Voorhees' name or in the name of a Voorhees University program, organization, or activity by Voorhees University faculty, staff, or students in advance.

Please see the University's Fundraising Coordination policy below for additional information.

3. **Institutional Proposals:** In contrast to proposals for particular departments or programs and in contrast to other solicitations, institutional proposals are those for major facilities, comprehensive programs, endowment funds, general scholarship funds and other institution-wide purposes. Concepts for institutional proposals, along with their proposed funding sources, must be cleared at their inception, both by the President and the Vice President for Institutional Advancement and Development. As appropriate, the Vice Presidents for Business and Fiscal Affairs, Provost/Vice President for Academic Affairs, as well as the Vice President for Enrollment Management and Student Affairs should clear proposal affecting their departments. Any of these officers may also ask the President for an opportunity to review or offer input on the final draft of a proposal. Moreover, the final version of institutional proposals must be approved by the President or a designee and by the Vice President for Institutional Advancement and Development, and must include a cover letter and/or application signed by the President or his authorized designee. Practices for file and archival copies of institutional proposals are the same as those for department or program proposals.
4. **Documenting and Processing Gifts and Grants:** Original documents or copies of all letters of award, pledges, and checks for private gifts and grants and for public institution-wide grants must be provided to the Institutional Advancement Office as outlined below; similar documents for public funding of specific projects or programs need only be sent to the Sponsored Programs Office. Actual cash, checks, stocks, bonds, or other non-cash-gifts received in the Advancement or other offices must be kept secure, copied for

Advancement and other relevant offices, recorded promptly in Advancement, and taken directly to the Fiscal Office for deposit or disposition.

5. **Reports and Reviews of Giving:** The Vice President for Institutional Advancement and Development reports on private gifts and grants three times each year to the President and the Board of Trustees. Voorhees University also reports its private gift and grant total annually in the *Voluntary Support of Education*, published by the Council on Aid to Education.

Institutional Advancement and Development files and donor records have been and are subject to review, in conjunction with Voorhees University’s annual audit by an independent firm. The Offices of Institutional Advancement & Development and Business & Fiscal Affairs must compare records to assure consistency in the classification of gifts by donor category such as “corporate,” “organization,” or “religious,” as they develop a “single entry” electronic system to record and classify gifts.

Public and external funding is reported to the President and the Board of Trustees at least three times each year.

2.5.2.1.4 University and Media Relations

Subject to the review and approval of the President and Vice President for Institutional Advancement and Development, the Director of Communications has developed internal procedures for conducting informational activities. The policy objective is to assure observance of professional standards in the design and content of Voorhees University’s institutional publications and electronic media and in the performance and practices of communications employees in their dealings with the news media, the public, and the Voorhees University community. The University’s Public Relations policies are set forth in Volume II, Subsection 2.5.1.

Public information activities must be strategically conceived to tell Voorhees University’s story in a way that is both accurate and motivational. Voorhees University communications must both inform and stimulate excitement for Voorhees University’s mission and goals, achievements, and need for financial support.

2.5.2.1.5 Advancement Policy Oversight and Dissemination

Oversight of Institutional Advancement and Development policy is the responsibility of the Vice President for Institutional Advancement and Development, subject to the review of the President and the Board of Trustees in accordance with Voorhees University’s governance processes. This document is distributed through the Voorhees University website (www.voorhees.edu) and copies are available in the Office of Institutional Advancement and Development.

2.5.2.2 Authority to Solicit and Accept Charitable Gifts

The Board of Trustees of Voorhees University recognizes the importance of charitable giving to

the well-being and future of the University, and encourages its community, alumni, faculty, staff, and friends to contribute generously to its annual fund, capital campaigns, and other purposes such as strategic initiatives approved within the Voorhees University planning process.

The President and Vice President for Institutional Advancement and Development (who reports directly to the President), on behalf of the Board of Trustees, shall be the officers, working with relevant individuals and groups, to solicit and accept all philanthropy to Voorhees University. The Vice President for Institutional Advancement and Development shall be responsible for determining that gifts and grants to Voorhees University are evidence of philanthropic intent and that the donor's philanthropy is in accord with the stated mission and goals of Voorhees University. The Board of Trustees will assure itself that all philanthropic promotions and solicitations are ethical.

The Vice President for Institutional Advancement and Development shall be guided by the standards of accounting and reporting established by the Council for Advancement and Support of Education (CASE) and the National Association of Colleges, the Association of Fundraising Professionals, and the National Planned Giving Council, as well as by applicable state and federal law in the management and reporting of gifts to Voorhees University. The Vice President for Institutional Advancement and Development shall review these standards and applicable law at least annually to ensure that the University's gift acceptance practices are in compliance.

2.5.2.3 Fundraising Coordination

To avoid conflicting programs, it is Voorhees University policy that no person or University organization or program is authorized to solicit an outright donation or gift-in-kind in the name of Voorhees University without clearance in advance, in writing, from the President or Vice President for Institutional Advancement and Development and other Vice Presidents with relevant jurisdiction. This includes the solicitation of ads for ad books, sponsorships, gifts or equipment, or direct contributions of money, plus anything else that qualifies as a "gift."

In addition, the following Division of Institutional Advancement practices and procedures must be followed.

2.5.2.3.1 Advancement Related Government Relations Practices

The South Carolina Independent Colleges and Universities, Inc., (SCICU) was established to promote the cause of independent higher education in South Carolina as well as communicate with the South Carolina General Assembly about the University's needs. Faculty, administrators, staff, and students are often invited by the SCICU to provide information, meet with legislators or provide consultation.

1. The President and/or designee are the only persons authorized to discuss Voorhees University issues with the SCICU.
2. Ideas on advancement initiatives will be explored with division chairs and/or directors who will work with their respective vice presidents in collaboration with the Vice

President for Institutional Advancement and Development in determining the advancement agenda proposed by the president.

3. As an independent organization, the SCICU assists in supporting the University's case before the General Assembly.

2.5.2.3.2 Alumni Recognition

The presentation of special honors and awards to recognize the accomplishments of alumni and friends serves as an effective cultivation tool in the advancement process.

1. The Voorhees University Alumni Association offers several awards on behalf of the University to include the following: Distinguished Service Citation; Elizabeth Evelyn Wright Medallion; Hall of Fame; Keeper of the Flame; Distinguished Service Award and the 10 under 40.
2. Academic programs also recognize individual alumni through a variety of awards. These are awarded in the name of the unit as an entity within the University. The following practices will enhance the effectiveness of awards as an advancement initiative.
 - a. Written guidelines and selection criteria on each award, along with the use of a selection committee, are important in conveying the significance of awards and ensuring appropriate selections. For assistance in promoting local, state, national or international awards, divisions should contact the Office of Communications.
 - b. After selection and awarding such honors, divisions should notify the Voorhees University Office of Alumni Affairs to ensure honors are recorded in biographical records.
 - c. The Office of Communications staff is available to assist divisions in developing news releases.
 - d. The design of plaques, certificates and other awards should reflect the importance of the award but should not be extravagant. Institutional Advancement staff members are available for consultation.

2.5.2.3.3 Appointment and Use of Advisory Boards

Advisory boards are effective when colleges clearly define the board mission and duties, carefully select board members and apply their talents appropriately. The following practices will enable these boards to function effectively:

1. Divisions/departments must obtain approval from the Vice President for Institutional Advancement and Development to establish advisory boards for advancement purposes prior to developing plans or selecting candidates for membership.
2. Administrators shall consult with the Vice President for Institutional Advancement and Development before approaching prospective advisory board members.
3. In order to ensure and coordinate optimum volunteer service by alumni and friends, divisions and departments will confer with the Vice President for Institutional Advancement and Development to review past and current University-related

commitments of those individuals proposed for advisory board membership. Furthermore, divisions and/or departments will review and articulate board member responsibilities to ensure that volunteers are sufficiently engaged and that their commitments are appropriate.

4. Administrators will forward to the Vice President for Institutional Advancement and Development, the names of board members and the length of their terms so that these organizations can coordinate and record their participation in local, regional and national events.
5. When appropriate, University administrators will coordinate with the Vice President for Institutional Advancement and Development to communicate funding needs with an advancement board to help ensure financial participation by board members.

This policy does not apply to professional groups organized for the purposes of providing consultation on topics such as curriculum, recruitment, research, or program development.

2.5.2.3.4 Communication Practices

The Division of Institutional Advancement and Development produces independent publications to communicate with alumni members and other interested University constituents.

The Voorhees University Office of Alumni Affairs will provide e-mail addresses to University offices that desire to deliver school/division specific e-mail communications. Alumni chapter presidents, acting on behalf of the Voorhees University National Alumni Association, may also request access to e-mail lists to communicate alumni news and events in coordination with the alumni association. The Voorhees University Office of Alumni Affairs E-mail Policy applies to any person or entity using alumni e-mail lists. All entities will follow University policy with regard to list confidentiality and other privacy issues. In addition, they should abide by e-communications best practices, including frequency of delivery, relevant content, strategic timing and coordination with other divisions. Failure to do so will likely lead to a decline in readership, interest and the number of graduates willing to provide e-mail addresses.

All e-mails using alumni e-mail lists must include an “opt out” opportunity and an opportunity to update their record with the Voorhees University Office of Alumni Affairs. Any “non-academic” unit e-mails must be delivered on an “opt in” basis, providing an opportunity to subscribe to a recurring e-mail communication. The Voorhees University Office of Alumni Affairs will provide support and coordination for alumni e-mail communications.

Divisions work with Institutional Advancement to ensure that all communications with alumni and friends maintain consistent standards of quality in editorial content and follow the University’s visual identity. The following practices will help enhance the effectiveness of University publications:

1. Newsletters should be distributed at least once a month, at regular intervals and websites should be updated on an ongoing basis.
2. Stories should focus on the University’s mission of teaching and public service and should include appropriate information on donors and alumni events, particularly when such stories heighten awareness of student and faculty involvement with alumni.

3. All newsletters should provide response forms for alumni to provide records changes to the Voorhees University Office of Alumni Affairs and should highlight the advantages of Voorhees University National Alumni Association membership.
4. Information on alumni received by divisions in the process of preparing newsletters should be shared with the Voorhees University Office of Alumni Affairs.
5. If the publication is to include information about the annual giving, the division should work with the Institutional Advancement so that the publication includes timely and accurate giving data.

2.5.2.3.5 Confidentiality Practices
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The Division of Institutional Advancement and Development acquires information about Voorhees University constituents -- alumni, students, parents, corporations, foundations and friends -- that may be confidential and/or highly sensitive. Institutional Advancement staff, staff in other areas, faculty and volunteers, who are authorized recipients of confidential and/or sensitive information are responsible for protecting the privacy of our constituents.

The Institutional Advancement and Development database exists for the purpose of promoting the University, building and sustaining relationships and securing charitable support from alumni, students, parents, corporations, foundations and friends. Using or sharing information, mailing lists and/or biographic information for private, commercial or political purposes, for the purpose of creating an independent database or for a purpose other than that which is approved by Institutional Advancement is strictly prohibited and will be considered a misappropriation of University property.

This confidentiality policy will be attached to any constituent information that is shared with authorized recipients. Constituent information received by authorized recipients must be properly disposed of by shredding or deleting from a computer hard drive after it is used for its intended purpose.

This policy details specific information that is considered confidential and/or sensitive; however, sound judgment will prevail so that we may respect the privacy and dignity of all constituents with whom we come in contact.

1. The Office of Institutional Advancement and Development may provide basic constituent biographic information to employees of Voorhees University and/or volunteers engaged in outreach and/or development activities that are coordinated by Advancement.
2. Detailed constituent information will only be shared with employees and/or volunteers who are engaged in a high level of outreach and/or development activity that is coordinated and monitored by Institutional Advancement.
3. General donor gift information such as giving levels published in the Voorhees University's Annual Report of Donors is considered public information for our constituents. However, gifts or pledge information that includes specific dollar amounts, funding vehicles and/or other personal details is not shared with anyone except those engaged in a high level of outreach and/or development activity that is coordinated and monitored by Institutional Advancement or employees who are responsible for

administration of the fund.

4. Public announcements of major gifts are encouraged; however, permission of the donor must be secured prior to an announcement.
5. Voorhees University may accept anonymous gifts provided acceptance of such a gift is consistent with the University's Gift Acceptance Policy. Institutional Advancement staff should explore with such donors the extent to which they wish to avoid publicity, and what, if any, disclosure of information related to the gift will be acceptable to the donor.
6. Only the Vice President for Institutional Advancement and Development and/or the President may request to be informed of the identity of an anonymous donor(s).
7. The Division of Institutional Advancement and Development does not disclose individual addresses, business, or any other information to any external party requesting such information. Office staff may forward mail or a message to a constituent.
8. All requests for information about donors by the media or for information in legal proceedings, such as subpoenas, will be forwarded or referred to the Vice President for Institutional Advancement and Development.
9. Individual constituent records are open to that particular individual constituent; hence that particular constituent may request to view their file. Constituent files are closed to the degree that individuals may not view constituent files other than their own.
10. Sensitive information, such as a donor's will, trust instrument, or financial statements will not be copied or provided to University personnel unless authorized by the donor. To the extent possible, such information will be maintained only as a single copy in central files in the Division of Institutional Advancement.
11. Students employed in the Division of Institutional Advancement and Development will be required to sign an agreement to comply with this confidentiality policy.
12. Failure to comply with this policy can jeopardize the University's relationship with constituents and may be grounds for disciplinary actions up to and including dismissal.
13. The Division of Institutional Advancement and Development will, at all times, remain in compliance with all applicable laws.

2.5.2.3.6 Fundraising Practices

All advancement activities have the potential of enhancing the generosity of alumni and friends of the University. In this context, all members of the University share in creating conditions favorable to fundraising. Institutional Advancement ("IA") staff is directly responsible for fundraising on behalf of the University and, in accordance with the University's fundraising policy, all solicitations on behalf of the University must be approved in writing by the IA Office. Administrators, faculty, staff and alumni, however, assume important roles in the University's fundraising efforts. The following practices are supportive of effective fundraising for the University:

1. Administrators must work closely with IA staff in assessing and prioritizing needs of their area, setting goals, planning and implementing fundraising initiatives. IA staff will

annually draft a Major Gift Development Plan to discuss fundraising activity for the University. This document will provide a framework for organized, effective fundraising planning and execution.

2. All charitable gifts for the benefit of the University, both unrestricted and restricted to particular programs and special purposes, are to be made to Voorhees University in accordance with the University's Gift Acceptance Policy 2.5.2.4. Care should be exercised when discussing with donors their preferences for use restrictions of gifts. Typically, the donor's preferences are well within the capability of the institution to carry out. On occasion, however, the conditions of a gift may not be appropriate or may be unnecessarily restrictive. Before a gift is accepted, staff will discuss the gift's implications with University administrators to determine acceptance feasibility. IA staff has been delegated the responsibility for negotiating appropriate gift conditions and must be involved in all discussions of potential gifts.
3. Potential donors often are not aware of the gift and fund type options available to them for contributing to benefit the University. IA staff is available to provide expertise on charitable gift options such as cash, appreciated securities, gifts-in-kind, bequests, life insurance, real estate, trusts and other gift instruments.
4. Timely receipting of charitable gifts is essential to maintaining good donor relationships. When academic units are presented with gifts sent directly to them, they should endeavor to transmit the gift to IA quickly.
5. When Voorhees University is the end user of an in-kind gift, it will receipt the gift in accordance with the University's Gift Acceptance Policy and communicate with the donor. On occasion, donors wish to make gifts of property for the use of the University directly, and in such situations the University's General Counsel will receipt an in-kind gift of property.
6. To the extent that donor records are made available to appropriate University personnel, such information is strictly confidential and remains the property of Voorhees University. After use of such confidential information, such records will be forwarded to the IA Office, which will retain or destroy the documents as appropriate in accordance with the University's Record Retention Policy.

IA staff is available to assist in complying with the policy on University's Fundraising Practices Policy.

2.5.2.3.7 Coordination of Alumni and Endowment Events

Local, regional and national activities offer opportunities for institutional advancement. These opportunities also exist at professional meetings where the Voorhees University Office of Alumni Affairs can coordinate with other schools to enhance learning opportunities. The following practices will increase the success of such gatherings:

1. The Voorhees University Office of Alumni Affairs will share information with administrators in late summer on the alumni events scheduled for the upcoming year.
2. Administrators shall make early decisions on which alumni and professional meetings

they or their representatives will attend during the academic year and share those plans with the Voorhees University Office of Alumni Affairs. Faculty and staff will be encouraged to participate, as appropriate.

3. Administrators who would like to conduct meetings in collaboration with the Voorhees University Office of Alumni Affairs will coordinate their plans with the appropriate staff in the Division of Institutional Advancement and Development (IA).
4. Once sites are determined, travel itineraries will be shared with the IA staff.
5. University administrators shall work with appropriate IA staff to determine how non-members of the Voorhees University National Alumni Association might be included in activities and how they might encourage membership.
6. University administrators shall work with IA staff to develop a multi-year plan to target metropolitan and rural areas.
7. The Voorhees University Office of Alumni Affairs and University administrators shall take special care when visiting with alumni and friends of the University off campus to ensure that their appointments do not interfere with attendance at Voorhees University events. Staff and administrators shall refer to the Voorhees University Office of Alumni Affairs Events Calendar to assist with the coordination of events and activities.

2.5.2.3.7.1 Alumni Records

The Office of Alumni Affairs is the official custodian of the biographical records of all University alumni and the provider of all mailing lists, labels, directories, direct access and inquiry of alumni records. The Office of Alumni Affairs maintains a computerized records system that is updated daily and, in cooperation with Advancement Services, has developed procedures for the maintenance and dispersal of alumni records.

The Office of Alumni Affairs is able to provide to any recognized office the following information about alumni: home and business addresses, telephone and fax numbers, e-mail addresses, and a variety of selections such as academic discipline, class year(s), geographic area, gender and birth, nickname, professional name and married names for alumni, etc. Information products, including up-to-date mailing labels and/or printed directories, are made available upon request for any authorized University purpose. Authorized administrators also may view the biographical information about their alumni from their own computers.

The following procedures will help ensure that the database system is accurate and serves both the University and its alumni well.

1. Because maintaining alumni biographical records and mailing lists at the local level is a costly duplication of effort, offices or volunteer groups are not allowed to maintain shadow databases.
2. Any address changes or updated biographical information will be forwarded to the Office of Alumni Affairs immediately upon receipt to ensure that records are as accurate as possible.
3. The Office of Alumni Affairs regularly requests address corrections of all alumni. Departments should refrain from requesting address corrections on second-, third-, and

fourth-class mailings in order to avoid unnecessary duplication of payment for address corrections.

4. Offices requesting information should provide two weeks' notice whenever possible.

Adherence to these procedures is important for several reasons. The institution is required to protect the confidentiality of alumni, donors and other records. Using a single alumni database allows the institution to conserve resources. A single database also significantly reduces the frustration alumni experience when their requested biographical record changes are not shared by academic units with the central database. A centralized, accurate and complete alumni information and records system is an essential component of a first-class advancement program.

2.5.2.3.7.2 Alumni Records Practices

In addition to following the aforementioned policy, divisions and/or departments can use the following practices to further enhance and use alumni biographical records:

1. Newsletters and other publications will include response forms so that alumni may update their records and formally correspond with the Voorhees University Office of Alumni Affairs.
2. Web sites will have prominent links to the Voorhees University Office of Alumni Affairs.
3. Posting of lost alumni by class year will be encouraged on websites and when classmates help find these lost graduates, address information will be shared with alumni affairs.
4. Returned mail with new addresses will be shared with the Voorhees University Office of Alumni Affairs, either by sending the original mail via campus mail or by electronic mail (e-mail).
5. Offices that have responsibility for monitoring certification or licensing records of graduates should forward updated information to the Voorhees University Office of Alumni Affairs.
6. All divisions/departments should emphasize to alumni the importance of membership in the Voorhees University National Alumni Association and of providing addresses and news about their lives to the organization.
7. Recognized University offices, which have signed the Confidentiality Agreement for Use of Alumni Information System, can view computerized biographical information on their alumni and former students maintained on the alumni records system. Access will include the ability to view, sort data, and print reports.

The Voorhees University Office of Alumni Affairs will maintain all alumni records.

2.5.2.4 Gift Acceptance Policy

The University's Gift Acceptance policy describes the mechanisms that allow Voorhees University to accept charitable gifts. In case of any questions not answered by the following policies, Voorhees University will abide by generally accepted charitable giving accounting standards and those prescribed by the Council for the Advancement and Support for Education,

the Association of Fundraising Professionals, and/or the National Planned Giving Council.

In accepting charitable gifts, Voorhees University will adhere to the following:

1. Voorhees University welcomes gifts of cash, publicly traded stocks and bonds, insurance policies, real and personal property and pledges, as well as deferred gifts such as trusts, annuities, and bequests. All gifts are accepted according to the standards listed below: for donor's records, gifts are dated at the time they leave the donor's possession; for Voorhees University's records, all gifts are dated when received. Voorhees University will pay no fees to any person in consideration of directing a gift or for the completion of a gift instrument to Voorhees University.
2. Individuals should consult their tax advisors concerning the treatment of these specialized gift techniques in their individual circumstances. For gift accounting, revocable gifts will be acknowledged and may be reported in a separate gift accounting but will not be booked or included in any campaign totals until realized.
 - a. **Cash Gifts:** An outright gift of cash by a donor, for which the donor receives an income tax deduction as prescribed by current law.
 - b. **Publicly Traded Securities:** A gift of stocks or bonds which are readily marketable. Marketable publicly-traded securities will be receipted at the average of the high and low market value on the date the donor relinquishes control of the assets in favor of Voorhees University or other valuation techniques approved by the Internal Revenue Service. The deduction for outright gifts of appreciated long-term securities (held more than 12 months) is equal to the fair market value of the securities on the date the donor relinquishes control of the assets to Voorhees University. Voorhees University's policy is to immediately liquidate any gifts of publicly traded securities, unless retention of the specific security is consistent with Voorhees University's investment practices.
 - c. **Closely Held Stocks:** A gift of stock of a private or family-held corporation. Gifts of closely held stock exceeding \$10,000 will be receipted at the fair market value placed on them by a qualified independent appraiser as required by the IRS for valuing stock that are not publicly traded. Gifts of less than \$10,000 may be valued at the per share cash purchase price of the most recent transaction. All such gifts of closely held stock will be held until liquidated, at which time the funds will be used consistent with the gift intentions of the donor(s) and the established policies of Voorhees University. Such securities will be conveyed to the Vice President for Institutional Advancement and Development's Office for sale.
 - d. **Bequests/Living Trusts:** A gift of cash, securities, or real property, made upon the donor's death, through provisions of a will or living trust. Such bequests will be credited, recognized, or commemorated at the value established at the time of probate and/or at the fair market value on the date of the transfer of the asset(s).
 - e. **Charitable Remainder Trust:** An irrevocable transfer of assets to a trust, naming Voorhees University as the only ultimate beneficiary or as one of several qualified charitable beneficiaries. The donor receives annually a life income of a set amount or a fixed percentage, based on the wishes of the donor and the trust's value each year. Gifts made to establish charitable remainder trusts (whether administered inside or outside

Voorhees University) where the remainder is not subject to change or revocation should be credited as future commitments (deferred gifts) at both the discounted present value of the remainder interest allowable as a deduction by the IRS and at face (fair market) value.

- f. **Charitable Gift Annuity:** An irrevocable gift in exchange for a guaranteed fixed income for life, which is calculated to take account of both the size of the gift and the donor's age at the time of the gift. To put this gift into effect requires a written agreement, authorized by the Vice President for Institutional Advancement and Development. Upon the donor's death, the assets of the trust are passed on to Voorhees University. A current charitable deduction is available based on the IRS annuity tables. Because Voorhees University will not receive the gift portion until the death of the final income beneficiary, gift annuities will be credited as future commitments (deferred gifts) at the face amount (fair market value).
 - g. **Charitable Lead Trust:** An income-producing asset placed in a trust, the income of which is contributed to Voorhees University for a designated period of time, after which the trusted asset is returned to the donor or non-charitable beneficiaries named by the donor.
 - h. **Gifts of Life Insurance:** Designation of Voorhees University as the owner and beneficiary of a policy.
 - i. **Corporate Matching Gifts:** Matching gifts are strongly encouraged and credited to the donor, as well as the corporate donor, in the proportion designated by the matching gift arrangement. The matching gift and individual pledge would count in full toward donor totals if in accordance with each corporation's policy.
3. Gifts of real estate and other property are accepted provided they can be used to advance Voorhees University's mission, or sold by Voorhees University; the customary procedure will be to sell these immediately, but the University retains the right to postpone a sale; the donor may not stipulate the timing of a sale. Any appraisal and/or environment assessments found necessary will be conducted at the expense of the donor prior to Voorhees University acceptance. Please be aware that such gifts will be accepted only after having been approved by the President and/or Vice President for Business and Fiscal Affairs.
 4. Gifts restricted for endowment, including endowed scholarships, may only be applied to a newly-named fund once the initial gift is \$10,000 or more. Additions to existing named funds will be accepted in any amount.
 5. The Institutional Advancement Committee will consider gifts that might require special action or may necessitate a change in procedure at Voorhees University prior to acceptance. In general, Voorhees University will not accept gifts with conditions that require changes in basic elements of the University values, plans, or programs unless the Board already approved those conditions during a planning process.
 6. Voorhees University may occasionally accept gifts with the provision that an endowment or scholarship fund, building, or other property be named in honor of the donor, a member of the donor's family, an honored friend of the organization, or another individual. Such

naming opportunities will be discussed by the Institutional Advancement Committee and approved by the Board prior to gift acceptance. The Board will set and approve the appropriate gift level for these naming opportunities. Funds or buildings or other spaces may customarily only be named for individuals or families, not for businesses, organizations, themes, or other entities.

- a. Honorees shall have exemplary character, an unqualified reputation for honesty, personal integrity, and the highest standards of personal and professional ethics.
 - b. Naming of facilities, spaces, endowments and programs in honor of individuals is generally expected to last the lifetime of the facility, space, endowment or program. Naming associated with a particular facility, space, endowment, or program will not preclude further naming within the facility, space, endowment, or program.
 - c. If at any time following the approval of a naming, circumstances change substantially so that the continued use of that name may compromise the public trust, the President will consult with the Board of Trustees, regarding future action. The University reserves the right to remove any name that would not reflect positively on the University or would conflict with the purpose or mission and goals of the University.
7. Voorhees University will not directly manage gift annuities; therefore, any such gifts must be made with the understanding that a third party (such as a community foundation or another organization with annuity management services) will manage the annuity and make income payments directly to the donor.
 8. Gifts cannot be applied to individual expenses such as residence fees, tuition, room, board or related expenses for personal benefit of a specific individual.
 9. Gifts may not be restricted for any purposes contrary to the values or mission of the organization, or for any purposes that would discriminate against any person or groups by reason of race, color, religion, ethnic or national origin, sex, age, sexual orientation, genetic orientation or against qualified disabled persons, disabled veterans, or veterans of the Vietnam era, as identified and defined by law, or any factor that is a prohibited consideration under applicable law.
 10. Most gifts offer some tax advantages to donors, and Voorhees University urges each donor to seek the most appropriate ways to maximize these advantages. While Voorhees University is willing to discuss gift planning with each donor in so far as it applies to their gift, the University will not and does not offer financial or estate planning advice on these giving methods, on gift or financial management, or on other aspects of the donor's charitable gift planning. Each donor is urged to seek financial counsel. As necessary in negotiating the terms of a gift, Voorhees University will also retain counsel for gift management advice.
 11. Voorhees University will steward and recognize donors and their gifts appropriately with appreciation and reports to donors about their donations. Donor requests for anonymity will always be honored. However, the Vice President for Institutional Advancement and Development may disclose such information or documentation as authorized by such a donor or as may be required by law. Practices for stewardship and recognition of donors will be reviewed annually.

2.5.2.4.1 Gift-in-Kind

These non-cash donations of materials or long-lived assets that serve to further the mission and purposes of Voorhees University will be reported on the gift recording system at \$1 unless independent verification of the fair market value or the donor provides a true accounting of the cost basis of the gift.

Gifts with values greater than \$5,000 will be reported at the value determined by a qualified independent appraiser. In accordance with IRS guidelines, the donor is responsible for obtaining an independent appraisal. The donor must submit a copy of IRS Form 8283 and a copy of the appraisal to the Vice President for Institutional Advancement and Development for review and approval. Gifts with a value of \$5,000 or less will be reported at the value placed on them by the donor, supported by an informal independent source such as eBay, classified ads in a trade publication, etc.

No written or verbal acceptance of any gift-in-kind will be provided to the donor by any staff member without a written acceptance of the gift by the Vice President for Institutional Development and Development. Submission for acceptance of any gift-in-kind must be in writing with adequate documentation of the purpose, nature, and approximate value of the gift.

2.5.2.5 Recording and Acknowledging Charitable Contributions

The Office of Institutional Advancement and Development is responsible for the processing, recording, acknowledging, and maintenance of records and files and related correspondence and documents for all gifts of cash, securities, gifts-in-kind, pledges, and grants from private sources including individuals, corporations and private foundations. Any member of the faculty or administrative staff reviewing such a gift or grant will promptly forward it and all pertinent correspondence to the Vice President for Institutional Advancement and Development for deposit, accounting, and acknowledgment. Only the Vice President for Institutional Advancement, after consulting with the President, may issue the official tax receipt for a monetary gift to Voorhees University. All acknowledgements letters will include language thanking the donor as outlined in the University's Donor Recognition Policy below.

After the recording of such gifts, securities and original documents, (such as wills, trusts, deeds, annuity agreements, contracts and correspondence) establishing restrictions on such gifts will be deposited into the custody of the Treasurer of the Board of Trustees.

2.5.2.5.1 Donor Recognition Policy

The proper recognition of donors for their support of the University is important in the advancement process. Effective donor recognition can encourage additional gifts and prompt others to contribute. The following practices will serve to enhance donor recognition activities.

1. Divisions or units will thank donors through letters from administrators, faculty, staff, students, alumni and friends; through stories in newsletters and other publications; and by hosting donors, their families and associates on campus or at other University-sponsored events.
2. All divisions or units will ensure that they avoid providing *quid pro quo* premiums to donors. The Internal Revenue Service (IRS) has specific guidelines limiting the practice of providing donors with “gifts” or “premiums” in return for a charitable contribution. Administrators must confer with IA staff prior to the initiation of such practices.
3. All offices will coordinate donor recognition activities and events with IA staff to ensure that donor wishes are respected. IA may have personal information on donors which make the recognition particularly meaningful to the donor.
4. When alumni are invited to campus to receive special recognition, it is helpful to coordinate plans with IA staff as there may be a need to visit with the donor. Such coordination can help make the campus visit successful. Often donors are engaged with multiple areas of the University and a specific stewardship may have an impact on another area’s relationship with the donor.

2.5.3 Endowment Fund Administration Practices

The availability of privately contributed resources for University faculty, staff, and students is the result of effective advancement activities. Proper stewardship of Voorhees University resources can enhance the potential for increased support.

1. Upon the establishment of a restricted endowment, IA staff will provide to the appropriate University employee, who is identified to recommend disbursements from the fund, appropriate information to guide the use of such fund resources.
2. All responsible parties will make a concerted effort to responsibly use available resources for the best benefit of the University, in keeping with donor restrictions.
3. Administrators shall communicate with IA staff about fundraising objectives, subject to approval requirements set forth in the policy on University fundraising.
4. University publications, news releases and website should publish articles about notable uses of endowment funds or establishment of new funds when appropriate.
5. Because student scholarships are the most popular donor-provided resources and because these resources are often highly scrutinized by donors and the media, scholarship funds deserve special attention to ensure they are used as effectively as possible. In addition to the above stewardship activities for all endowment funds, the following activities are emphasized for scholarship resources:
 - a. Upon the establishment of a restricted scholarship, Voorhees University staff will provide the Office of Admissions and the appropriate vice president with the name of the scholarship, the funding level, general and specific restrictions and any specific expectations of the donor. *Note: Scholarships may be paid only to aid in the pursuit of study and must not require the performance of any work-related duties.*

- b. The Office of Financial Aid shall communicate with the Office of Admissions in a concerted effort to use available scholarship resources on an annual basis in keeping with the needs of students who meet the various criteria for scholarships.
- c. Administrators shall encourage scholarship recipients to communicate their appreciation to donors.
- d. When appropriate, University leadership, including high-level administrators, shall communicate directly with donors about the use of scholarship funds and the importance of scholarship resources in advancing the mission and goals of the institution.
- e. Underutilized resources represent a lack of fiduciary responsibility to fulfill donor intent and damage donor stewardship efforts. When chronically underutilized funds are identified, IA staff may seek the counsel of appropriate University administrators to assist in ensuring the best use of contributed funds.

2.6 Research Policies

2.6.1 Human Subjects Research (IRB)

All faculty and students of the Voorhees University community contemplating research involving human subjects are responsible for familiarizing themselves with the requirements of the current IRB Guidelines of the Office for Human Research Protections (OHRP), available online at http://www.hhs.gov/ohrp/irb/irb_guidebook.htm. In addition, the policies of Voorhees University, as provided below, must be followed.

All faculty/students contemplating research involving human subjects must request and receive approval for their research from Voorhees University. This approval is received from an **Institutional Review Board (IRB)** (see Volume I for a complete description of the board). This requirement includes any research endeavor which (a) is funded by the University or through University channels, (b) is conducted by faculty, students or employees of Voorhees University who are acting in connection with their responsibilities or relationships to the University or who intend to invoke the name of the University in any report of the activity, (c) involves the records of the University, (d) occurs on the grounds of Voorhees University or uses as subjects Voorhees University students, faculty, or staff in their respective roles, or (e) uses Voorhees University faculty, staff, students, or employees to identify and/or contact clients, patients, or students to serve as subjects, and (f) to include the use of Voorhees University equipment for the purpose of research. Research for purposes of the Institutional Review Board is defined as any process that seeks to secure information from humans or about humans that differs in any way from customary medical or other professional practice. The process need not be interactive.

2.6.1.1 Submission Procedures

The procedure for submitting proposals for review is as follows:

Step 1: Complete the appropriate Application for Human Subjects Research: Exempt, Expedited, or Full Review.

1. **Exempt:** To be exempt from IRB review, the only involvement of human subjects must be in one or more of the categories listed below. Research that includes both exempt and non-exempt categories is not exempt. More detailed information regarding exemptions is found on the Office for Human Research Protections website: www.hhs.gov/ohrp.
 - a. The research will be conducted in established or commonly accepted educational settings, involving **normal** education practices (e.g., research on instructional strategies, techniques, curricula, or classroom management methods).
 - b. The research will involve the use of educational tests, survey procedures, interview procedures, or observation of public behavior where the investigator does not participate in the activity being observed, and no information is **recorded** in such a manner that human subjects can be identified directly or indirectly.
 - c. The research will involve collection or study of data, documents, or other records which were in existence **prior to the research proposal and to this application**, and are publicly available or will be recorded in such a manner that the human subjects cannot be identified directly or indirectly.
 - d. The research will examine public benefit or service programs and has been approved by the appropriate department or agency head.
 - e. The research will involve taste and food quality evaluation or consumer acceptance studies involving wholesome foods.
2. **Expedited Review:** Certain studies may qualify for expedited review. Expedited reviews are conducted by a single IRB member rather than a majority of the IRB members. The review may be carried out by the IRB chair or by one or more experienced reviewers designated by the chair from among members of the IRB. In reviewing the research, the reviewers may exercise all of the authorities of the IRB except that the reviewers may not disapprove the research. A research activity may be disapproved only after Standard Review. However, a single reviewer may recommend a standard review be conducted. Per the Office for Human Research Protections guidelines, the following research categories are eligible for expedited review. More detailed information and additional categories are found on the Office for Human Research Protections website: www.hhs.gov/ohrp.
 - a. Research involving materials that have been collected, or will be collected, solely for non-research purposes.
 - b. Collection of data from voice, video, digital, or image recordings made for research purposes.

- c. Research on individual or group characteristics or behavior or research employing survey, interview, oral history, focus group, program evaluation, human factors evaluation, or quality assurance methodologies.
3. **Full Review** is conducted at a meeting of the full IRB membership that has a majority of members present and includes at least one member whose primary concerns are in nonscientific areas. Approved research will receive the approval of a majority of those members present at the meeting.

Step 2. Return the signed application and five copies to the Chair of the Institutional Review Board.

Step 3. The Board will review the application (at which point the applicant may be asked to clarify or respond to questions).

Step 4. The Board will approve or deny the application.

It is essential that the proposal be submitted in sufficient time to allow for proper institutional review prior to initiation of research or submission of proposals to granting organizations. The Board meets on or about the 15th of each month. All applications (exempt, expedited, and full review) are due by the first of each month. Applicants should receive initial feedback within 5 business days after the meeting of the Board.

2.6.1.2 Faculty Research

Informed consent is required for all research projects requiring full IRB review and in most research projects which qualify for expedited review or are exempt from review. To qualify for a waiver of the informed consent requirement, a research project must meet the following guidelines: (1) the research must involve no more than minimal risk to subjects, (2) the waiver must not adversely affect the rights and welfare of the subjects, (3) the research cannot practicably be carried out without the waiver, and (4) where appropriate, the subjects must be provided with additional pertinent information after they have participated in the study.

In research with minors or other vulnerable populations, informed consent is especially necessary and must be obtained from parent(s) or legal guardian(s). An understandable explanation of the research procedures should also be given to the minors or other vulnerable participants (populations such as pregnant women, prisoners, those who lack the capacity to consent, non-English speaking individuals, etc.) for whom consent has been obtained, and they should be given the chance to volunteer to participate in the proposed activity. This is called “assent.” Their wishes determine their participation. (See: Parent/Guardian Consent Form which can be found in the Student Records Office.)

2.6.1.3 Student Course-Directed Research

“Course-Directed Human Subjects Research” refers to any student Human Subjects Research that is designed to develop or contribute to hands-on learning. Students may not be familiar with the federal government’s policies that govern this type of research. For this reason, proposed student Human Subject Research must be reviewed and approved by the Institutional Review

Board prior to initiation of the course work.

Students conducting Human Subjects research shall follow these parameters:

No Minors or Vulnerable Populations - The project cannot include minors or any other vulnerable populations such as pregnant women, prisoners, those who lack the capacity to consent, non-English speaking individuals, etc.

No more than “Minimal Risk - “Minimal risk” is the probability and magnitude of harm that is normally encountered in the daily lives of healthy individuals. This also precludes the study of any illegal activities.

No Deception - The project cannot include any deception. Individuals must be fully informed and given the opportunity voluntarily to consent to participation.

No Publication - Data from student projects approved under this review category cannot be used for publication nor for thesis/dissertation research.

Instructor Responsibility:

Course Instructors are responsible for submitting (to the IRB) all of the Applications for Human Subjects Research. All applications, along with the class roll, should be submitted at the same time.

1. Instructors are responsible for instructing students in ethical principles for the protection of the human subjects and the relevant institutional policies and procedures.
2. Instructors are also responsible for prior review of the applications before they are sent to the Institutional Research Board.

2.6.1.4 Research Not Subject to IRB Review

Simulations of human experimentation and course-assigned data collection do not constitute human subjects research if:

1. The activities are designed for educational purposes only. However, if the information that is gathered is “Real Data,” not hypothetical, it may often be Research; and
2. The data will not be generalized outside of the classroom (Reporting of data within the class is acceptable because the activities were performed solely for teaching purposes); and
3. The data will not result in an article, master’s thesis, doctoral dissertation, poster session, abstract, or other publication or presentation; and
4. The student volunteers or other participants are clearly informed that the activities are an instructional exercise, not actual research.

Exceptions:

Use of experimental drugs, agents, devices, or medical procedures, even when done by students, always constitutes human subjects research and requires prior Institutional Review Board approval.

The purpose for this process is not only to protect the institution but also those individuals who are participating in this research.

2.6.1.5 Maintenance of IRB Records

In accordance with requirements set forth in the *CFR (Code of Federal Regulations)*, the Chair of the IRB will prepare and maintain adequate documentation of IRB activities including the following:

1. Copies of all research proposals reviewed, scientific evaluations, if any, that accompany the proposals, approved sample consent/assent documents, questionnaires and surveys, progress reports submitted by investigators and reports of injuries to subjects.
2. Minutes of IRB meetings, which will be in sufficient detail to show attendance at the meetings; actions taken by the IRB; the vote on these actions including the number of members voting for, against, and abstaining; the basis for requiring changes in or disapproving research; and a written summary of the discussion of controverted issues and their resolution.
3. Records of continuing review activities.
4. Copies of all correspondence between the IRB and investigators.
5. A list of IRB members as required by *Title 45 CFR 46.103 (b) (3)*.
6. Written procedures for the IRB as required by *Title 45 CFR 46.103 (b) (5)*.

The records require statements of significant, new findings provided to subjects, as required by *Title 45 CFR 46.116 (b) (5)*. The records required to be maintained by the IRB will be retained for at least three (3) years after completion of the research, and the records will be accessible for inspection and copying by authorized representatives of the Department of Health and Human Services at reasonable times and in a reasonable manner as required by *Title 45 CFR 46.115 (b)*.

2.7 Copyright Policies

2.7.1 Copyright Policy

The copyright law of the United States (Title 17 of the United States Code) governs the making of photocopies or other reproductions of copyrighted material. The making of an electronic copy of a copyrighted work by any means constitutes reproduction that is governed by copyright law.

The copyright principles that apply to instructional use of copyrighted works in electronic environments are the same as those that apply to such use in paper environments. For additional information, please refer to the University's Digital Millennium Copyright Act Policy in Subsection 2.7.2 below.

“Fair Use,” in Section 107 of the Copyright Act, recognizes the importance of accessing, using, and building upon copyrighted works in the context of teaching, research, and scholarship. The

law establishes “fair use” protection for copying or disseminating copyrighted works without obtaining permission from the copyright owner under certain circumstances. The analysis of “fair use,” whether in the paper or electronic environment, includes:

1. The purpose and character of the use, including whether the material will be for non-profit, educational or commercial use. (Absence of financial gain is insufficient for finding fair use);
2. The nature of the copyrighted work, with specific consideration given to the distinction between a creative work and informational work;
3. The amount and substantiality of the portion used in relation to the copyrighted work as a whole; and
4. The effect of the use upon the potential market for or value of the copyrighted work.

Permission may be required for the use of copyrighted material such as electronic course content even when such material is:

1. Available elsewhere on the internet;
2. Being used in a course for the first time; or
3. Characterized for purposes of course use as optional, supplemental, or ancillary reading material, rather than as required, assigned, or recommended reading material.

No one shall post course content consisting of copyrighted works or portions of such works in electronic form without first:

1. Obtaining the permission of the copyright owner; or
2. Concluding after reasonable inquiry, with the benefit of resources made available by the University for these purposes, that the use qualifies as a fair use or other exempt or licensed use for which permission is not required.

Copies of copyrighted works, regardless of their format, should include proper attribution and copyright notices.

For more information on Copyright and Fair Use, visit www.copyright.gov.

2.7.1.1 Some Important Guidelines

2.7.1.1.1 Audiovisuals

Legally produced and obtained audiovisual works may be used in non-profit educational institutions under the following conditions:

1. The work must be part of the educational program.
2. A student, instructor, or guest lecturer must show the work.
3. The work must be shown in a classroom or other school location devoted to instruction.
4. The work must be shown only to students in the class, that is, no guest viewing the work for entertainment or enrichment.

2.7.1.1.2 Prohibited Use

Use is prohibited in non-profit educational institutions when:

1. The work is used for entertainment, recreation, or even cultural or intellectual value unrelated to teaching activities.
2. The work is transmitted by radio or television (this includes closed-circuit) from an outside location.
3. The work is shown in an auditorium before an audience not confined to students.

2.7.1.1.3 Off-Air Taping

Off-air taping has specific regulations that permit classroom use:

1. The tape may be retained for 45 days from the airing but then must be erased.
2. The tape may be shown in class only during the first ten days after the broadcast. (Some PBS programs can only be used and retained for seven (7) days).
3. The tape may be shown to students no more than two times during a ten-day period. After the ten-day period, only teachers may view the tape.
4. The tape contents may not be altered or combined to form anthologies, but need not be shown in their entirety.

Rental tapes or tapes borrowed from the library may be shown in class. Libraries have the right to loan, sell, or otherwise dispose of legally obtained tapes. The “for home use only” labels do not prevent library or classroom use of legal tapes.

Back-up tapes are only permitted when the original is deteriorating and is no longer available on the market.

2.7.1.1.4 Photocopying

Researchers or Instructors preparing to teach a class may make or request to have made a single copy of: 1) a book chapter; 2) an article; 3) a short story, essay, or short poem; 4) a chart, graph, diagram, cartoon, drawing, or picture.

Instructors may duplicate enough copies to provide one copy for each student in a course, as long as each copy includes a notice of copyright and as long as they meet the following three tests:

1. **Brevity.** For poetry, the suggested maximum is 250 words. For prose, the guidelines offer two different limitations. Educators may copy any complete story, essay, or article under 2,500 words or excerpts of not more than 1,000 words or 10% of the text. For illustrations, the guidelines suggest no more than one chart, graph, diagram, drawing, cartoon, or picture per book or periodical issue.
2. **Spontaneity.** The “inspiration and decision to use the work” must occur so soon prior to classroom use that it would not be feasible to write for and receive permission from the publisher to duplicate the material. It is also imperative that the copying occur at the

- request of the teacher, not at the directive of an administrator or other “higher authority.”
3. **Cumulative Effort.** Generally, only one copy may be made of a short poem, article, story or essay. No more than three of these items may be from the same collective work or periodical volume during one class term. The most limiting restriction further specifies no more than a total of nine instances of such multiple copying for one course during one class term. Finally, all multiple copying of a particular work is limited to one course; in other words, copying a work to be used in several courses is not likely to be considered a fair use of the material.

2.7.1.1.5 Prohibited Copying

1. Educators are not to create, through photocopying, their own anthologies, compilations or collective works whether brought together in one collection or reproduced and used separately.
2. Copying must not substitute for the purchase of books, periodicals, or reprints; this prohibition especially applies to the duplication of “consumable” materials such as workbooks, test booklets and standardized tests.
3. Students must not be charged more than the actual cost of copying the material.
4. A professor must not duplicate the same item from one term to another.

2.7.2 Digital Millennium Copyright Act Policy

Voorhees University complies with the provisions of the Digital Millennium Copyright Act (DMCA). Pursuant to the DMCA, it is illegal, as described in the federal law (Title 17 of the US Code, and more recently the Digital Millennium Copyright Act, 105 PL 304), to download, upload, or distribute in any fashion, copyrighted material in any form including, but not limited to electronic data, information, voice, video, and software without permission or a license to do so from the copyright holder. Voorhees University neither condones nor supports in any way the use of copyrighted material in ways in which it was not intended. The designated agent for Voorhees University to receive notification of claimed infringement under Title II of the DMCA is the Provost/Vice President for Academic Affairs, or a designee.

2.7.2.1 Procedure to Resolve the Matter

1. If IT is informed about a copyright infringement, IT will send the entire complaint to the Provost/Vice President for Academic Affairs.
2. If the complaint involves faculty, administrators, or staff, the Provost/Vice President for Academic Affairs will send the entire complaint to the person involved, with copies also being sent to the appropriate divisional vice president or unit head, with a request to produce proof that the person(s) had explicit permission or license to use that material in the manner described in the complaint. If the complaint involves a student, the complaint will be sent directly to the Provost/Vice President for Academic Affairs to investigate.

3. If the involved person does not produce the proper documents, the Provost/Vice President for Academic Affairs will ask that the specific material and any other similar material they may have stored be removed. The Provost/Vice President for Academic Affairs also will inform the person that if Voorhees University receives a second complaint related to this incident and the permissions required are not produced, the Provost/Vice President for Academic Affairs will send the complaint to the Director of Human Resources to investigate for an employee and take appropriate disciplinary action up to and including termination. For students, disciplinary consequences will result for inappropriate conduct or actions. If the person involved refuses to comply, the Provost/Vice President for Academic Affairs, after consulting with the appropriate Division Vice President and Human Resources, will ask IT to block access to or from that account or computer, and send a report of this action to the Provost. Lastly, the Provost/Vice President for Academic Affairs will notify the complainant of how the issue was resolved and the procedure that was followed.
4. The Provost/Vice President for Academic Affairs will retain the record for three years from the date of receiving the complaint.

2.7.3 Ownership of Copyright Materials and Patents

The following describes Voorhees University policies and associated administrative procedures for ownership of copyright materials and other intellectual property. Its objectives are:

1. To enable Voorhees University to foster the free and creative expression and exchange of ideas and comments;
2. To establish policies and procedures for sharing income derived from copyright material produced at Voorhees University; and
3. To protect Voorhees University's assets.

2.7.3.1 Copyright Ownership

Copyright is the ownership and control of the intellectual property in original works of authorship that are subject to copyright law. It is the policy of Voorhees University that all rights in copyright will remain with the author or authors of the work, with certain stated exceptions. The exceptions to this policy that will vest ownership of the copyright in a work with Voorhees University, rather than with the author or authors of the work, are:

1. If the work is a work-for-hire as defined by United States copyright law.
2. If the work is defined as an Institutional Work: Institutional works include works that are supported by a specific allocation of Voorhees University funds or that are created at the direction of Voorhees University for a specific Voorhees University purpose. Institutional works also include works whose authorship cannot be attributed to one or a discrete number of authors but rather result from simultaneous or sequential contributions over time by multiple faculty and students. For example, software tools developed and

improved over time by multiple faculty and students where authorship is not appropriately attributed to a single or defined group of authors would constitute an institutional work. The mere fact that multiple individuals have contributed to the creation of a work will not cause the work to constitute an institutional work.

3. If the work is commissioned by Voorhees University.
4. If the work makes significant use of Voorhees University resources or personnel. Voorhees University resources are to be used solely for Voorhees University purposes and not for personal gain or personal commercial advantage, nor for any other non-University purposes. Therefore, if the creator of a copyrightable work makes significant use of the services of Voorhees University non-faculty employees or Voorhees University resources to create the work, the creator shall disclose the work to the Provost/Vice President for Academic Affairs and assign title to Voorhees University. Examples of non-significant use include ordinary use of desktop computers, the Library, and limited secretarial or administrative resources. Questions about what constitutes significant use will be directed to the Provost/Vice President for Academic Affairs.
5. If the work is otherwise subject to contractual obligations.
6. If the work is an audio, video, photographic or any form of digital reproduction of a class, course, or presentation made by Voorhees University faculty, staff, or students. Courses taught and course wares developed for teaching at Voorhees University belong to Voorhees University. Courses, which are videotaped or recorded using any other media, are Voorhees University's property, and may not be further distributed without permission from the Provost/Vice President for Academic Affairs.
7. If the work includes images of Voorhees University-owned facilities, buildings, or property for purposes other than scholarly research and publication.
8. If the work includes the name, seal, logo, insignia, or trademark of Voorhees University as an endorsement, enhancement, or sanction for a product or service.

With respect to the foregoing works, Voorhees University will be the owner of the copyright in the work. As such, the University may decide to assign its copyright to the author or authors of the work on a case-by-case basis.

Contractual Obligations of Voorhees University: This Copyright Ownership Policy will not be interpreted to limit the Voorhees University's ability to meet its obligations for deliverables under any contract, grant, or other arrangement with third parties, including sponsored research agreements, license agreements and the like. Copyrightable works that are subject to sponsored research agreements or other contractual obligations of Voorhees University will be owned by Voorhees University, so that Voorhees University may satisfy its contractual obligations.

Re-conveyance of Copyright to the Creator: When copyright is assigned to Voorhees University because of the provisions of this policy, the creator of the copyrighted material may make a request to the President of the University that ownership be re-conveyed back to the creator. Such a request can, at the discretion of the President, be granted if it does not:

1. Violate any legal obligations of or to Voorhees University;
2. Limit appropriate University uses of the materials;

3. Create a real or potential conflict of interest for the creator; or
4. Otherwise conflict with Voorhees University's goals or principles.

2.7.3.1.1 Administration of Policy

1. Determination of Ownership and Policy: The President will resolve any questions of ownership or other matters pertaining to materials covered by this policy.
2. Licensing and Income Sharing:
 - a. Licensing: Voorhees University seeks the most effective means of technology transfer for public use and benefit and, toward that end, handles the evaluation, marketing, negotiations and licensing of Voorhees University-owned inventions or copyrightable materials with commercial potential. Computer databases, software and firmware, and other copyrightable works owned by Voorhees University, are licensed through the Office of the President. The President must approve in advance exceptions to this procedure.
 - b. Royalty Distribution: The President will allocate royalties assigned to Voorhees University. If copyright protection alone is claimed, royalties normally will be allocated in a similar manner, with the "inventor's share" allocated among individuals identified by the investigator (or department head if not under a sponsored agreement), based on their relative contributions to the work. Where royalty distribution to individuals would be impracticable or inequitable (for example, when the copyrightable material has been developed as a laboratory project, or where individual royalty distribution could distort academic priorities), the "inventor's share" may be allocated to a research or educational account in the laboratory where the copyrightable material was developed.
3. Assignments: No assignment, license or other agreement may be entered into or will be considered valid with respect to copyrighted works owned by Voorhees University except by an official specifically authorized to do so.
4. Use of the Voorhees University Name in Copyright Notices: The following notice should be placed on Voorhees University-owned materials in order to protect the copyright: Copyright © [year]. The Board of Trustees of Voorhees University. All Rights Reserved. No other institutional or departmental name is to be used in the copyright notice, although the name and address of the department to which readers can direct inquiries may be listed below the copyright notice. The date in the notice should be the year in which the work is first published, i.e., distributed to the public or any sizable audience. Additionally, works may be registered with the United States Copyright Office using its official forms.

2.7.3.2 Patents

Voorhees University's Patent Policy applies to all patentable inventions conceived or first reduced to practice by full-time, part-time or visiting faculty, post-doctoral researchers, staff, students, visitors and consultants (whether paid or not), or any other persons performing research or engaging in work at the University where such inventions may be created or

discovered.

2.7.3.2.1 Ownership

Ownership on a worldwide basis in any discovery or inventions conceived or reduced to practice by faculty, staff, students, or any other person performing research or engaging in work, teaching, study, or mentoring of students at the University, where such inventions are created or discovered within the course of their employment or with substantial use of University resources, personnel, or facilities beyond the usual office and library provisions, will reside with Voorhees University. Inventions or discoveries that are made off University premises and that are unrelated to teaching and professional activities are exempt from this policy, except in cases where Voorhees University Funding was used to support the discovery or invention.

Any student invention or discovery will be deemed made under University auspices and therefore the property of the University pursuant to the patent policy, only if it is made in the course of the student's employment by the University for an assigned work project or if the student worked collaboratively with a covered faculty or staff employee covered under this policy. Royalties from the University's licensing of any student invention or discovery will be shared with the student on the same basis that royalties are shared with faculty or staff employees.

When a patentable invention is developed through a sponsored grant or contract, the special provision contained in the grant or contract will prevail. In the absence of such special provisions, the University policy will apply. Generally, while the University is assigned the rights to intellectual property generated during the course of federally sponsored research activities, the government retains the option to claim ownership under certain circumstances. In the event that the government does not exercise its option and regardless of ownership, the government retains a non-exclusive, non-transferable, irrevocable, royalty-free, worldwide license to the invention produced under government sponsorship.

2.7.3.2.2 Procedures for Reporting an Invention

When any person makes a discovery or invention to which this policy applies, a report of the invention should be made promptly to the Provost/Vice President for Academic Affairs. Upon receipt, the Provost/Vice President for Academic Affairs shall immediately notify the President. If the University determines that ownership of the invention or discovery should reside with the University, the inventor(s) shall assign all intellectual property rights of the invention to the University upon the University's request.

The University, through the President, shall have the sole right to determine the disposition of inventions in which the University has a proprietary interest. A decision to exercise this right will be transmitted in writing to the inventor within 60 days of the date of disclosure of the invention. If the University decides to pursue a patent, it may recommend that the University alone, or with the assistance of an external organization such as a technology transfer

company, make applications for letters of patent. The Board of Trustees of Voorhees University will hold title to all such patent applications and resulting patents.

If the University decides not to patent an invention, or not to commercialize a patented invention, the University will release to the inventor its interest in the invention.

2.7.3.2.3 Legal Expenses and Distribution of Income

Where it elects to pursue the commercialization of inventions or discoveries subject to this policy, Voorhees University will negotiate distribution percentages that reflect the relative contributions of the University and the inventor(s) on a case-by-case basis subject to the approval of the President and Board of Trustees.

In the event of multiple inventors, the inventors will be expected to agree among themselves on the fractional distribution of each inventor's share of any royalties. The inventors shall sign a written agreement specifying the fractional distribution of their share of royalties. The inventor's share will continue even if he/she leaves Voorhees University.

2.7.3.2.4 Dispute Resolution

In the event of any dispute regarding a decision of the University under this policy, including, without limitation, the ownership of an invention or the allocation of the inventor's share of royalties, the President shall have the final decision concerning the University's position in the matter.

2.8 Wright-Potts Library

The Library's primary objective is to provide the necessary resources and services to support the University's educational mission. Efforts are made by the library staff to implement the objectives of the university by making books and other relative resources available to supplement and enrich the curriculum, to provide for independent study and research, and to encourage a lifelong habit of reading for cultural enrichment and personal growth.

2.8.1 General Library Policies

2.8.1.1 General Expectations

Students, employees, and guests of the Wright-Potts Library are to conduct themselves in accordance with the University's policies while in the Library.

All public areas of the Library are designated as Quiet Study Areas and the appertaining rules are strictly enforced. No talking, music, or other activities that may disturb others are allowed in these designated areas.

Eating and drinking are not permitted in the Library. Exceptions are special functions approved by the Director.

Cell phones ringers must be silenced upon entry to the Library. Cell phone conversations should take place outside the Library, or in approved private areas of the building.

Violations of these policies will be reported to Campus Safety and Security and may result in corrective discipline in accordance with University policy.

2.8.1.2 Library Computer and Equipment Policy

Computer use in the Library must be in accordance with the University's Information Technology policies as outlined in Section 2.4. Library computers are available on a first-come, first-served basis. Students using computers for non-academic purposes must relinquish their computer to those who are waiting to use a computer for academic purposes.

Students must save documents to their own flash drives or disks. Documents placed on the Library computer hard drives will not be retained.

2.8.1.3 Library Visitors

The Wright-Potts Library exists primarily to meet the needs of the students, faculty, and staff of Voorhees University. Visitors, who are not affiliated with the University, are welcome to use library materials for research and educational purposes, subject to availability.

Visitors, upon entering the Library, should present themselves at the Circulation Desk. Visitors must present a valid U.S. or internationally issued photo I.D. (driver's license, passport, etc.) and sign the visitor's registry each time they use the Library. Persons without a valid I.D. will not be allowed into the Library.

2.8.1.3.1 Children in the Library

Children and other non-student minors may come to the Library only when accompanied by a parent and must adhere to the University's Children on Campus Policy. Parents should be considerate of the rights of other users when there are extreme noise levels and excessive activity expressed by young children and infants.

2.8.2 Circulation Policies

2.8.2.1 Identification Cards

Library cards are required for many of the available services. Library cards may be obtained at the Circulation Desk after presenting a current University ID. Community patrons may obtain a library card by presenting a valid South Carolina driver's license and one other form of

picture ID. The University reserves the right to refuse issuance of cards to community patrons due to insufficient identification and evidence of prior abuses of borrowing privileges.

2.8.2.2 Loan Periods

Voorhees University Students	4 weeks
Voorhees University Faculty/Staff	4 weeks
Special Borrowers	2 weeks

Voorhees University students, faculty, and staff may check out a maximum of five books. Special borrowers may check out a maximum of three books. A book may be renewed as often as necessary, if no one else has requested it.

2.8.2.2.1 Non-circulating Materials
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Reference Books:	In-house
Periodicals:	In-house
Media Resources:	In-house
Microforms	In-house

2.8.2.3 Book Check-out Procedures

Any patron interested in checking out books must possess a current Voorhees University library card or he/she can use his/her driver's license to apply for an official library card. This card must be presented each time a book, or other circulating items are checked out.

2.8.2.4 Return of Books

Books charged out of the Voorhees University library should be deposited either in the outside book-chute or at the Circulation Desk. Reserve and/or overdue books must be returned to the Circulation Desk.

2.8.2.5 Late and Lost Books

The charge for a lost book, still in print, is the list price of the book, plus all incurred shipping, handling, and processing fees. The charge for out-of-print titles will be based on the most recent obtainable price, plus incurred fees. If an in-house lost book is located within 30 days of paid receipt, monies will be refunded, minus late charges. No money will be refunded after a period of one month. Please consult the Circulation Desk and/or Director of Library Services for any necessary explanations, corrections, etc.

2.8.2.5.1 Fines

Late books are assessed a fine of ten (\$0.10) cents per day, payable at the time the book is returned. Persons with unpaid fines will remain on the Library's Delinquent List and all names will be submitted to the Registrar and the Business Office for further action.

2.8.2.6 Overdue Notices

Borrowers are responsible for returning materials on time. Due dates are affixed to the book card, and on the printer receipt that is provided to the borrower, during the check-out transaction. Borrowers will be notified of their overdue status either by regular or electronic mail. Only two notices will be sent.

2.8.2.7 Renewals

Books that are not in 'hold request' status may be renewed for an additional loan period. Renewals are not accepted by telephone. Books must be returned to be renewed.

2.8.2.8 Reserve Books/Materials

Books, and/or other selected materials, may be placed on "reserve" for monitored or limited student use, per faculty request. Reserve materials are maintained at the Circulation Department. To use these materials, one should do the following:

1. Consult the Reserves Tab (on the University website under the Reserves page tab) within the Online Catalog, or the Reserve Catalog, at the Circulation Desk.
2. Look for the Instructor's name to determine available materials.
3. Present request for selected item(s) and Student ID to the desk attendant.

2.8.2.8.1 Reserve Book Fines

Reserve materials must be used in-house during the day, and may circulate overnight, as determined by the Instructor. If overnight use is permissible, the item(s) may be obtained thirty minutes before closing and returned not later than thirty minutes after the opening of the next school day. Books are issued on a "first come/first-served" basis.

Reserve Book Fines

Reserves fines are assessed at twenty-five (\$0.25) cents per hour, cumulative \$2.00 per item, per day. The names of all persons with unpaid fines will be added to the Delinquent List, and will be submitted to the Registrar and Business Office for further action.

Non-Circulating Materials

The following materials are not available for external check-out and must be used in-house:

Media Resources Periodicals
Microforms Reference Books

(Examples of Reference books: Bibliographies; Biographical Sources; Dictionaries; Encyclopedias; Government Documents; Indexes; Vertical Files; Yearbooks, etc.)

2.8.3 Electronic Resources

The Library has extensive collections of electronic resources that include eBooks, e-Journals, e-Newspapers, and Databases Subscriptions. These resources support the current trend for information access, as they are frequently updated, readily accessible, and provide consistent information to all subscribing institutions. Electronic resources are indexed within the Library catalog and are accessible on networked computers throughout the campus, or on many personal devices. A listing of available databases can be found on the Library's homepage. Remote access is available to all Voorhees University constituents through EZProxy, with applicable usernames and passwords. To protect the security of the University's electronic resources, access information frequently changes. Current user-access information is available from any member of the Library staff.

2.8.4 References and Special Services

Reference books are to be consulted or referred to for specific kinds of information and are not usually read from cover-to-cover.

Some examples of reference books are:

Dictionaries - contain definitions of words, spelling and **pronunciations**. Encyclopedias - contain articles on specific subjects.

Bibliographies - provide lists of books and other sources.

Biographical Sources - answers questions about people.

Government Sources - contain information about municipal, county, state or federal governments and their officials.

Indexes - used as a key to a variety of information found in periodicals.

Periodicals - contain articles, stories, etc., published at regular, short intervals.

Vertical Files - contain pamphlets and clippings on a variety of topics.

Yearbooks - answers questions on current trends and events.

2.8.4.1 Locating Reference Materials

For efficiency in locating reference materials, familiarize yourself with the layout and placement

of resources on the first floor. It is important to remember that all reference materials are housed on the first floor. Requests for the use of magazine and newspaper back issues should be made at the Reference Desk.

2.8.4.2 Interlibrary Loan

The process of borrowing books, and exigent lendable materials, from other libraries is referred to as an Interlibrary Loan (ILL). ILLs are extremely helpful in obtaining information that is not available in our collection. Borrowers should be prepared to provide specific details about the information that is being sought, e.g., authors, titles, dates, ISBNs, etc.

The University's participation in the Partnership Among South Carolina Academic Libraries (PASCAL) statewide consortium generally negates the need to borrow materials from libraries outside the state. Membership in this Consortium avails borrowing privileges among all participating academic libraries. There are no costs for PASCAL loans and the materials are expeditiously secured through the Consortium's daily courier service. Patrons must be "in good standing" at their home library (no overdue books or fines) in order to use the service. Through the Visitor Patron service, PASCAL patrons may also borrow items, in person, from other libraries.

2.8.4.3 Procedures for Requesting non PASCAL Interlibrary Loans

1. Consult the staff at the Circulation Desk to request an Interlibrary Loan. Provide specific information about the item (s) you are requesting. Options for renewal are solely at the discretion of the lender.
2. Inquire about any costs that will be incurred for the loan. The lending institution determines cost of interlibrary loan. Patrons will be expected to pay for their borrowed materials.
3. Requests should be made at least three (3) weeks prior to required date of receipt.
4. Books should be used as soon as they arrive. The usual loan period may vary between two (2) and four (4) weeks. Anticipated renewal requests should be made at least one week prior to scheduled date of return.

2.8.4.4 Library Consortia

There are established agreements between the Wright-Potts Library and other statewide academic libraries through the Partnership Among South Carolina Academic Libraries (PASCAL) Consortium.

The PASCAL Delivers catalog is a union (combined) catalog that provides listings of over 12 million items owned by PASCAL member-libraries. The catalog includes books, PASCAL eBooks, journals and periodicals, audiovisual materials, sound recordings, electronic resources, government documents, archives and manuscripts, maps, and music scores. Current students, faculty, and staff at participating libraries have access to PASCAL Delivers through the PASCAL Delivers catalog.

2.8.4.5 Bibliographic Instruction

To promote the efficient and effective use of the library and its resources, instructional assistance is available to all users. Bibliographic instruction will be provided to individuals or groups, upon request.

2.8.4.6 Information Literacy Seminars

Information Literacy seminars are targeted instructional classes that focus on the identification, analysis, synthesis and utilization of requisite information needed to become successful researchers and lifelong learners. Faculty should make requests for these seminars to the Director of Library Services.

2.9 Public and SACSCOC Related Complaints

2.9.1 Public Complaints

Public complaints directed to Voorhees University should follow the procedures outlined below. Voorhees University students and employees desiring to file complaints must follow the University's various Grievance Procedures as outlined in Volumes III, Section 3.12, Volume IV Section 4.13, Volume V Section 5.10 and Volume VI Section 6.9 respectively.

2.9.1.1 Policy and Procedure for Informal Complaints

Informal (verbal) complaints by members of the public shall be submitted to the Vice President supervising the area. If through this process, a mutually satisfactory resolution of the complaint cannot be reached, the complainant may pursue the formal complaint resolution process outlined below.

2.9.1.2 Policy and Procedure for Formal Complaints

1. Formal written complaints by members of the public are to be submitted to and addressed by the responsible Vice President supervising the area at issue.
2. The Vice President addressing the complaint is to gather information relevant to the complaint.
3. A written response is to be sent to the complainant. A copy of the complaint and the written response is to be sent to the President.
4. If the complainant is not satisfied with the response, he/she may file a written complaint to the President. In such cases, the President will gather information and provide a final written response to the complainant.
5. The file of all formal complaints is to be securely housed and maintained in accordance with the University's Record Retention policy.

2.9.2 Complaint Against SACSCOC

Individuals who believe that the Southern Association of Colleges and Schools Commission on Colleges (“SACSCOC”) or Voorhees University is in significant non-compliance with a requirement or standard may file a complaint with the Commission. (See “Complaint Procedures against the Commission or its Accredited Institutions”) at <http://www.sacscoc.org/pdf/081705/complaintpolicy.pdf>.

FOOTNOTES

- ¹ The University considers a minor to be a child under the age of 18, with the exception of properly- enrolled students.
- ² Parents of dependent students as defined earlier in the statement of policy have the right to examine the record of their dependent students. The same procedure and time frames apply to parental requests as to student requests. In both instances of student and parental request for record disclosure, those requesting the record must bear the expenses of reproducing the records. No parent may see a record that his or her dependent child is not entitled to see.
- ³ Date of Birth: It is the practice of the University not to release a student's date of birth except as required by law or as a validation of positive identification of a student when furnished by a person making an inquiry.
- ⁴ For purposes of this policy, a Voorhees University "website" includes the Home Page, pages developed by academic departments, centers, and offices, and administrative divisions or departments as signified by the address "Voorhees.edu."
- ⁵ In order to protect the tax-deductibility of a donor's gift for a given year, it is important that the Voorhees University be able to provide concrete evidence that the donor relinquished possession of the gift before the end of the year. Therefore, it is especially important during the last few days of the year that all gift mail be date-stamped when received. For a gift received after December 31 that was mailed before that date, it is important to retain the envelope bearing the postal cancellation date. It is not necessary that the gift be deposited or accepted on or before December 31. If the donor has taken all steps necessary to irrevocably tender the gift, then upon acceptance by the University, the date of the gift is deemed for tax purposes to be the date of tender.

Appendix 2.2.5.2: Refrigerant Management Plan

The Physical Plant manages and controls the use of refrigerants to conform to the regulatory requirements established by EPA under Section 608 of the Clean Air Act. The Refrigerant Program Manager will implement and administer the requirements of this directive, to include:

1. Developing and maintaining an inventory of equipment using 50 pounds or more of CFC refrigerants. (Chlorofluorocarbon)
2. When refrigerant is added to a unit, the Program Manager will record the date, amount of refrigerant added and reason, coded as either due to a repair (the source of the leak was found and repaired) or a leak (the source of the leak was not found and repaired).
3. When records indicate a unit has or will exceed the EPA authorized yearly leak rate, the Program Manager will ensure that the unit(s) is repaired, replaced, converted or modified as necessary.
4. The Refrigerant Program Manager will ensure that Physical Plant personnel are following EPA regulations concerning the servicing of refrigerant equipment. In general, the regulations require that:
 - a. During the servicing of air conditioning equipment, EPA approved methodology for minimizing loss and maximizing recycling of refrigerants will be used.
 - b. Only EPA certified technicians will be allowed to service or repair refrigeration and air conditioning equipment.
 - c. EPA approved and certified equipment will be used for reclaiming and recycling refrigerants.
 - d. Refrigerant leaks in any piece of equipment that holds 50 pounds or more of CFC refrigerant charge should be repaired within 30 days of discovery if the rate of leakage is such that over a year's time the equipment would lose 15% or more of its total charge.
 - e. Venting of refrigerants to the atmosphere while performing preventive maintenance, servicing, repairing or disposing of air-conditioning and refrigeration equipment will be prohibited.
 - f. Refrigeration and air-conditioning equipment must be evacuated to establish vacuum levels when they are serviced or replaced.
 - g. Refrigerants from all CFC containing equipment regardless of size, such as water coolers, refrigerators, window air-conditioners, and other air-conditioning equipment will be recovered prior to disposal. "Disposal" means sending the unneeded equipment anywhere other than the University's Surplus Sales Division. Therefore, equipment placed in any Dumpster, including the metal recycling container, should have the refrigerant evacuated to the EPA proscribed level. In most instances large pieces of equipment such as building chillers will have the refrigerant evacuated by qualified personnel prior to dismantling, to be reused only in other University-owned equipment. Reclaimed refrigerant will be turned over to the Materials Division for inventory

control. Should a contractor be employed to dismantle the equipment and remove the refrigerant, it is incumbent upon the Program Manager overseeing the work to ensure that the contractor understands and follows the EPA requirements for evacuation of the CFC's and the final disposal of the equipment.

Additional Responsibilities:

1. The Director of the Physical Plant shall ensure that a copy of this directive is provided and orally communicated to affected employees within their department and shall ensure that all journeyman mechanics who perform service work on equipment are certified by an EPA approved certifying organization, that all certifications are kept current, and that a copy of the most recent certification is in the employee's personnel folder in the Department of Human Resources.
2. The Refrigerant Program Manager shall maintain the equipment inventory and a record of refrigerant added. Annually the Refrigerant Program Manager will convene a meeting of the relevant directors to update the inventory, review technician's use of the refrigerant via a tracking form, review plans to repair or replace equipment with a history of high refrigerant use, and other matters related to complying with this plan. The Program Manager will provide a brief report of the results of the meeting to the President's Cabinet.
3. The Refrigerant Program Manager shall be responsible for monitoring changes in regulations concerning refrigerants and alerting the campus to pending changes in program requirements.
4. All employees and vendors using refrigerants are responsible for recording the pounds of refrigerants used (or reclaimed) by completing a recovery log. Completed logs will be returned to the Refrigerant Program Manager within one business day of refrigerant use.