



September 8, 2014

Mr. Mark James, Chancellor  
Metropolitan Community College  
3200 Broadway Street  
Kansas City, MO 64111-2408

UPS Tracking # 1Z A87 964 02 9340 3481

RE: Final Program Review Determination  
OPE ID: **00248444**  
PRCN: **201310728113**

Dear Chancellor James:

The U.S. Department of Education's (Department's) School Participation Division—Kansas City issued a program review report on March 15, 2013, covering Metropolitan Community College—Longview's (MCCL) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2011-2012 and 2012-2013 award years. MCCL's final response was received on November 8, 2013. A copy of the program review report (and related attachments) and MCCL's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by MCCL upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

**Purpose:**

Final determinations have been made concerning all of the outstanding findings of the program review report. The purpose of this letter is to: (1) identify liabilities resulting from the findings of this program review report, (2) provide instructions for payment of liabilities to the Department, (3) notify the institution of its right to appeal and (4) notify MCCL of a possible adverse action. Due to the serious nature of one or more of the enclosed findings, this FPRD is being referred to the Department's Administrative Actions and Appeals Service Group (AAASG) for its consideration of possible adverse action. Such action may include a fine, or the limitation, suspension or termination of the eligibility of the institution. Such action may also include the revocation of the institution's program participation agreement (if provisional), or, if the institution has an application pending for renewal of its certification, denial of that application. If AAASG initiates any action, a separate notification will be provided which will include information on institutional appeal rights and procedures to file an appeal.

This FPRD contains one or more findings regarding MCCL's failure to comply with the requirements of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the Clery Act) in Section 485(f) of the HEA, 20 U.S.C. § 1092(f), and the

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Department's regulations in 34 C.F.R. §§ 668.41 and 668.46. Since a Clery Act finding does not result in a financial liability, such a finding may not be appealed.

The total liabilities due from the institution from this program review are **\$36,452.54**.

This final program review determination contains detailed information about the liability determination for all findings.

**Protection of Personally Identifiable Information (PII):**

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the attached report do **not** contain any student PII. Instead, each finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample. In addition, Appendices B and D also contain PII.

**Appeal Procedures:**

This constitutes the Department's FPRD with respect to the liabilities identified from the March 15, 2013 program review report. If MCCL wishes to appeal to the Secretary for a review of financial liabilities established by the FPRD, the institution must file a written request for an administrative hearing. Please note that institutions may appeal financial liabilities only. The Department must receive the request no later than 45 days from the date MCCL receives this FPRD. An original and four copies of the information MCCL submits must be attached to the request. The request for an appeal must be sent to:

Ms. Mary E. Gust, Director  
Administrative Actions and Appeals Service Group  
U.S. Department of Education  
Federal Student Aid/PC  
830 First Street, NE - UCP3, Room 84F2  
Washington, DC 20002-8019

MCCL's appeal request must:

- (1) indicate the findings, issues and facts being disputed;
- (2) state the institution's position, together with pertinent facts and reasons supporting its position;
- (3) include all documentation it believes the Department should consider in support of the appeal. An institution may provide detailed liability information from a complete file review to appeal a projected liability amount. Any documents relative to the appeal that include PII data must be redacted except the student's name and last four digits of his / her social security number (please see the attached document, "Protection of Personally

Identifiable Information,” for instructions on how to mail “hard copy” records containing PII); and

(4) include a copy of the FPRD. The program review control number (PRCN) must also accompany the request for review.

If the appeal request is complete and timely, the Department will schedule an administrative hearing in accordance with § 487(b)(2) of the HEA, 20 U.S.C. § 1094(b)(2). The procedures followed with respect to MCCL’s appeal will be those provided in 34 C.F.R. Part 668, Subpart H. **Interest on the appealed liabilities shall continue to accrue at the applicable value of funds rate, as established by the United States Department of Treasury, or if the liabilities are for refunds, at the interest rate set forth in the loan promissory note(s).**

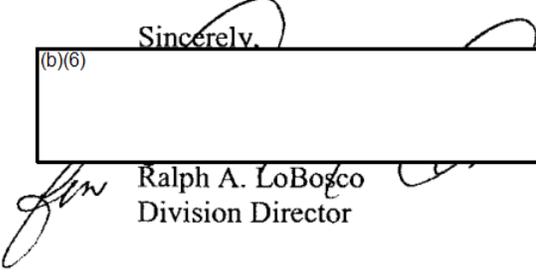
**Record Retention:**

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24(e)(1), (e)(2), and (e)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Kathy Feith at (816) 268-0406. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,

(b)(6)

  
Ralph A. LoBosco  
Division Director

Enclosure:

Protection of Personally Identifiable Information

Program Review Report (and appendices)

Final Program Review Determination Report (and appendices)

cc: Ms. Dena Norris, Director of Student Financial Services  
Missouri Department of Higher Education (MDHE)  
North Central Assoc of Colleges and Schools, the Higher Learning Commission (HLC)

## PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption. Zipped files using WinZip must be saved as Legacy compression (Zip 2.0 compatible).

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.

Prepared for  
Metropolitan Community  
College—Longview

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**OPE ID: 00248444**  
**PRCN: 201310728113**

**Prepared by**  
**U.S. Department of Education**  
**Federal Student Aid**  
**School Participation Division – Kansas City**

## Final Program Review Determination September 8, 2014

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## Table of Contents

	Page
A. Institutional Information.....	2
B. Scope of Review.....	3
C. Findings and Final Determinations.....	4
Resolved Findings.....	4
Resolved Findings with Comments.....	4
Findings with Final Determinations.....	13
Finding #3 Attendance Not Verified Prior to Disbursement.....	13
D. Summary of Liabilities.....	17
E. Payment Instructions.....	18
F. <u>Appendices</u> .....	21
Appendix A: Student Sample.....	22
Appendix B: Student Level Liabilities.....	24
Appendix C: Narrative Program Review Report.....	26
Appendix D: Cost of Funds.....	56
Appendix E: Institution's Response to the Program Review Report ..	58

**A. Institutional Information**

Metropolitan Community College  
3200 Broadway  
Kansas City, MO 64111-2408

Type: Public

Highest Level of Offering: Associate Degree

Accrediting Agency: North Central Association of Colleges and Schools (HLC)

Current Student Enrollment: 8,780 (2012-2013)

% of Students Receiving Title IV: 34% (2012-2013)

Title IV Participation: (G5)

**2010-2011**

Federal Pell Grant Program	\$34,707,903.00
Federal Supplemental Educational Opportunity Grant (FSEOG)	\$ 420,321.00
Federal Work Study Program	\$ 371,953.00
Federal Family Educational Loan (FFEL) Program	\$ 609,099.00
Federal Direct Loan Program	\$20,957,361.00
<b>Total Title IV, HEA Funding</b>	<b>\$57,066,637.00</b>

Default Rate FFEL/DL:	2011	13.3%
	2010	12.7%
	2009	9.3%

## **B. Scope of Review**

- The U.S. Department of Education (the Department) conducted a program review at Metropolitan Community College—Longview (MCCL) from December 3, 2012 to December 6, 2012. The review was conducted by Ms. Kathy Feith, Mr. Christopher Thompson, and Mr. Jim Wyant.

The focus of the review was to determine MCCL's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV, HEA programs. The review consisted of, but was not limited to, an examination of MCCL's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2011-2012 and 2012-2013 (year to date) award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. In addition, 12 files were selected to review Official and Unofficial Return of Title IV calculations, five files were selected to review Dependency Overrides and Professional Judgments, and 10 files were selected to review campus-based awarding practices, including FWS compliance. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review. A program review report was issued on March 15, 2013.

### **Disclaimer:**

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning MCCL's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve MCCL of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

## **C. Findings and Final Determinations**

### **Resolved Findings**

Findings 1, 2, 4, 5, 6, 7, 8, 9, and 10

MCCL has taken the corrective actions necessary to resolve Findings 1, 2, 4, 5, 6, 7, 8, 9, and 10 of the program review report. Therefore, these findings may be considered closed. Findings requiring further action by MCCL are discussed below.

### **Resolved Findings with Comments**

The following program review findings have been resolved by the institution, and may be considered closed. These findings are included solely for the purpose of discussing resolution of the finding.

#### **Finding 11. Crime Awareness Requirements Not Met—Omission of Policy Statements**

*Citation Summary: The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act) and the Department's regulations require that all institutions that receive Title IV, HEA funds must, by October 1 of each year, publish and distribute to its current students and employees, a comprehensive Annual Security Report (ASR) that contains, at a minimum, all of the statistical and policy elements enumerated in 34 C.F.R. § 668.46(b). With the exception of certain drug and alcohol program information, cross referencing to other publications is not sufficient to meet the publication and distribution requirements. § 485(f) of the HEA; 34 C.F.R. § 668.41(e)(1)*

*Acceptable means of distribution include regular U.S. mail, campus mail, hand delivery, or by posting the ASR on the institution's website. If an institution chooses to distribute its report by posting to an internet or intranet site, the institution must, by October 1 of each year, distribute a notice to all students and employees that includes a statement of the report's availability and a link to its exact electronic address, a description of its contents, as well as an advisement that a paper copy will be provided upon request. 34 C.F.R. § 668.41(e)(1). These regulations also require institutions to provide a notice containing this information to all prospective students and employees. All such notices must be conspicuous and inform interested parties about how to obtain a paper copy of the ASR. 34 C.F.R. § 668.41(e)(4)*

*An institution's ASR must include statistics for incidents of crimes reported during the three most recent calendar years. The covered categories include criminal homicide (murder and non-negligent manslaughter), forcible and non-forcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, and arson. Statistics for*

*certain hates crimes as well as arrest and disciplinary referral statistics for violations of certain laws pertaining to illegal drugs, illegal usage of controlled substances, liquor, and weapons also must be disclosed in the ASR. These crime statistics must be published for the following geographical categories: 1) on campus; 2) on-campus student residential facilities (as a subset of category # 1); 3) certain non-campus buildings and property; and, 4) certain adjacent and accessible public property. 34 C.F.R. § 668.46(c)(4)*

*The consumer protection disclosures that are required to be included in the ASR are intended to inform the campus community about the institution's security policies, procedures, programs, and resources as well as channels for victims of crime to seek recourse. In general, these policies include but are not limited to topics such as the law enforcement authority and practices of campus police and security forces, incident reporting procedures for students and employees, and policies that govern the preparation of the ASR itself. Institutions are also required to disclose information about drug and alcohol abuse education and prevention programs. Policies pertaining to sexual assault education, prevention, and adjudication must also be disclosed. Institutions also must provide detailed policies on the issuance of timely warnings, emergency notifications, and evacuation procedures. As noted above, all required statistics and policies must be included in a single comprehensive document. 34 C.F.R. § 668.46(b)*

***Noncompliance Summary:*** *MCCL failed to prepare, publish, and distribute an accurate and complete ASR to all current students and employees. Specifically, MCCL's ASR did not include all required statements of campus security policy and procedure including those that govern the institution's preparation of the ASR and the compilation of its campus crime statistics. In addition, MCCL failed to develop, implement, and publish required information about its campus sexual assault awareness and prevention programs as required by 34 C.F.R. § 668.46 (b)(11). By logical extension, these omissions also result in a corresponding failure to distribute an accurate and complete ASR to all current students and employees.*

*Failure to prepare and publish an accurate and complete ASR and to actively distribute it to current students and employees in accordance with Federal regulations deprives the campus community of important security information.*

***Required Action Summary:*** *As a result of these violations, MCCL was required to develop and implement policies and procedures for preparing, publishing, and distributing an ASR that meets all Federal standards. Using its new policies as a guide, MCCL must prepare and publish an accurate and complete ASR that included all of the statistical disclosures and policy, procedure and programmatic information required under 34 C.F.R. § 668.46(b). A copy of the institution's new policies and procedures and its draft ASR must accompany MCCL's response to this program review report. Once the new ASR is evaluated by the review team for accuracy and completeness, MCCL was*

*required to actively distribute it to all current students and employees in accordance with 34 C.F.R. § 668.41(e). Finally, MCCL must provide documentation to the Department evidencing the distribution as well as a statement of certification attesting to the fact that the materials were distributed in accordance with the Clery Act. This certification must also affirm that MCCL understands its Clery Act obligations and that it will take all necessary corrective actions to ensure that this violation does not recur.*

*As noted above, the exceptions identified in this finding constitute serious violations of the Clery Act that by their nature cannot be cured. MCCL will be given an opportunity to develop and distribute a compliant ASR and in so doing, bring its overall campus security program into compliance with the Clery Act as required by its Program Participation Agreement (PPA). However, MCCL is advised that these remedial measures cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department will impose additional corrective or administrative actions.*

*Based on an evaluation of all available information including MCCL's response, the Department will determine if additional actions will be required and will advise the College accordingly in the FPRD.*

**MCCL's Response:** In its official response, MCCL took the position that the campus safety and crime prevention policy statements included in the ASR adequately addressed each element of the regulations cited in the program review report. Nevertheless, the College conceded that the disclosures could have been stated more clearly and with more detail. In fact, MCCL referenced two required policy statements that were omitted from the 2011 ASR; specifically, the methodology regarding how the ASR is prepared and how the statistics are compiled and information on campus sexual assault awareness and prevention programs. As the Department referenced these in the PRR, MCCL stated that the institution had revised and enhanced all its policies and procedures, including certain disclosures regarding sexual assault awareness, prevention, and adjudication. The College also claimed that it revised its disclosure regarding the preparation of the ASR and compilation of its campus crime statistics. Finally, MCCL represented that the College understands and takes seriously its *Clery Act* obligations and will take action to ensure that violations do not recur.

**Final Determination:** Finding #11 of the program review report cited MCCL for its failure to include accurate and complete campus safety and crime prevention policies and procedures in the 2011 ASR. The Department has determined that MCCL's 2011 ASR did not have a complete statement of policy regarding the institution's campus sexual assault programs to prevent sex offenses, and procedures to follow when a sex offense occurs. The review team found that the 2011 ASR included some sexual assault-related information in its policies and materials available to students and employees; however, that information was incomplete and did not meet the requirements in the Department's regulations. The Department notes that in its response to the program review, MCCL

acknowledged that its 2011 ASR omitted 1) information on a student's option to notify appropriate law enforcement authorities, including on-campus and local police, and a statement that institutional personnel will assist the student in notifying these authorities, if the student requests the assistance of these personnel and 2) notification to students of existing on- and off-campus counseling, mental health, or other student services for victims of sexual assault. As a result of these violations, MCCL was required to review, revise, and enhance its policy and procedural disclosures and include them in the 2012 ASR. In its response, the College challenged the Department's finding and stated that the disclosures in the 2011 ASR were adequate. At the same time, MCCL stated that it revised and enhanced many of these same disclosures in advance of the publication of the 2012 ASR. The College also submitted its 2012 ASR and other documents in support of its claims.

The Department carefully examined MCCL's narrative response and supporting documentation. The review team's examination showed that the identified violations were, for the most part, satisfactorily addressed by the College's response and the 2012 ASR. Based on that review, the Department has determined that, except for the exceptions noted in the PRR, the disclosures in the 2011 ASR were at least minimally adequate. In its response, MCCL conceded that the 2011 ASR did not include the two required statements of policy noted above. Regarding these omissions, the College claimed that the failure to include them in the ASR, "is not a substantive omission." The Department disagrees. As such, the finding is sustained as to these omissions.

The Department also determined that MCCL's corrective action plan meets minimum requirements. For these reasons, the Department has accepted MCCL's response and considers this finding to be closed for the purposes of this program review. Nevertheless, the officials and directors of MCCL are put on notice that they must continue to develop the institution's campus safety program and implement substantive policies and procedures to support that plan. Moreover, the College must take any additional action that may be needed to fully address the deficiencies and weaknesses identified by the Department as well as any other deficiencies that were detected during the preparation of the institution's response to the Department's report and/or as may otherwise be needed to ensure that these violations do not recur.

Although this program review finding is now closed, MCCL is reminded that the exception identified above constitutes a serious violation of the *Clery Act* that by its nature cannot be cured. There is no way to truly "correct" a violation of this type once it occurs. The College was required to initiate appropriate remedial measures and in doing so, has begun to remediate the conditions that led to these violations. MCCL has stated that it has brought its overall campus security program into compliance with the *Clery Act* as required by its Program Participation Agreement (PPA). Nevertheless, the College is advised that such actions cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

Because of the serious consequences of such violations, the Department strongly recommends that MCCL officials re-examine its campus safety and general Title IV, HEA policies and procedures on an annual basis to ensure that they continue to reflect current institutional practices and are compliant with Federal requirements. To that end, MCCL officials are encouraged to consult the Department's "Handbook for Campus Safety and Security Reporting" (2011) as a reference guide on *Clery Act* compliance. The Handbook is online at: [www2.ed.gov/admins/lead/safety/handbook.pdf](http://www2.ed.gov/admins/lead/safety/handbook.pdf). The Department also provides a number of other *Clery Act* training resources. The College can access these materials at: [www2.ed.gov/admins/lead/safety/campus.html](http://www2.ed.gov/admins/lead/safety/campus.html). The regulations governing the *Clery Act* can be found at 34 C.F.R. §§ 668.14, 668.41, 668.46, and 668.49.

### **Finding 12. Failure to Comply with Drug and Alcohol Abuse Education and Prevention Program Requirements**

*Citation Summary: The Drug-Free Schools and Communities Act (DFSCA) and Part 86 of the Department's General Administrative Regulations require each institution of higher education (IHE) to certify that it has developed and implemented a drug and alcohol abuse prevention program (DAAPP). The program must be designed to prevent the unlawful possession, use and distribution of drugs and alcohol on campus and at recognized events and activities.*

*On an annual basis, each IHE must provide the following information in writing to all current students (enrolled for any type of academic credit except for continuing education units) and all current employees:*

- *A written statement about its standards of conduct that prohibits the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees;*
- *A written description of legal sanctions imposed under Federal, state, and local laws and ordinances for unlawful possession or distribution of illicit drugs and alcohol;*
- *A description of the health risks associated with the use of illicit drugs and alcohol abuse;*
- *A description of any drug or alcohol counseling, treatment, and rehabilitation/re-entry programs that are available to students and employees; and,*
- *A statement that the IHE will impose disciplinary sanctions on students and employees for violations of the institution's codes of conduct and a description of such sanctions.*

*The distribution plan must make provisions for providing the DAAPP disclosure annually to students who enroll at a date after the initial distribution and for employees who are hired at different points throughout the year.*

*In addition, each IHE must conduct a biennial review to determine the effectiveness of its DAAPP and to ensure consistent enforcement of applicable drug and alcohol-related statutes, ordinances, and institutional policies against students and employees found to be in violation. The biennial review materials must be maintained by the IHE and made available to the Department upon request. 34 C.F.R. §§ 86.3 and 86.100*

**Noncompliance Summary:** *MCCL violated multiple requirements of the DFSCA. Firstly, the institution failed to develop and implement a compliant DAAPP. For example, MCCL's DAAPP did not include any information about drug or alcohol counseling, treatment or rehabilitation programs or resources that are provided by the College and/or local agencies. Moreover, MCCL failed to distribute its DAAPP disclosure on an annual basis to all employees and all students enrolled for any academic credit. MCCL does not have a written DAAPP distribution policy. As a community college, MCCL enrolls students throughout the year and provides flexible scheduling options including evening, weekend, and summer classes. The College also supplements its full-time faculty and staff with a significant number of adjunct, part-time, and casual faculty and staff members. These facts trigger a special regulatory concern because the College has not made any specific provision to ensure that the DAAPP disclosure is distributed to students who enroll at various points throughout the academic year or to casual workers who are not part of the permanent, full-time faculty and staff.*

*In addition, MCCL failed to conduct a Biennial Review (BR) to evaluate the effectiveness of its DAAPP; identify areas requiring improvement or modification, and assess the consistency of sanctions imposed for violations of its disciplinary standards and codes of conduct. Moreover, MCCL failed to prepare a BR report of findings.*

*Failure to comply with the DFSCA's DAAPP requirements deprives students and employees of important information regarding the educational, disciplinary, health, and legal consequences of illegal drug use and alcohol abuse. Failure to comply with the BR requirements also deprives the institution of important information about the effectiveness of its own drug and alcohol programs. Such failures may contribute to increased drug and alcohol abuse on-campus as well as an increase in drug and alcohol-related violent crime.*

**Required Action Summary:** *MCCL was required to take all necessary corrective actions to resolve these violations. At a minimum, the College must develop and implement a comprehensive DAAPP that includes all of the required elements found in the DFSCA and the Department's Part 86 regulations.*

*Additionally, the College was required to develop policies and procedures to ensure that all subsequent BRs are conducted in a timely manner and are fully documented. Moreover, MCCL also must take all other necessary action to ensure that these violations do not recur. These new policies also must address how MCCL will ensure that the*

*DAAPP disclosure will be distributed annually to every student who is currently enrolled for academic credit and to all employees.*

*MCCL was required to submit a draft copy of its DAAPP and new policies with its response to this program review report. Once the materials are reviewed and approved by the Department, MCCL must distribute them in accordance with the Part 86 regulations, and provide documentation evidencing the distribution as well as a statement of certification attesting to the fact that the materials were distributed in accordance with the DFSCA.*

*Furthermore, MCCL was required to conduct a BR to evaluate the effectiveness of its drug and alcohol programs, to identify necessary improvements, and to assess the consistency of sanctions imposed for violations of its disciplinary standards and codes of conduct and prepare a detailed report of its findings.*

*The BR report must describe the research methods and data analysis tools that will be used to assess the program's effectiveness and the consistency of its enforcement strategy. Additionally, the BR report must identify the responsible official(s) who conducted the BR. Finally, the BR report must be approved by the institution's chief executive. The BR must be completed by April 1, 2013 and be submitted to the Department by April 30, 2013. Because the DFSCA went into effect in 1990, longstanding practice dictates that the BR is normally conducted in even-numbered years and that the BR report is also completed in the same year as well; however, MCCL's current and past failure to conduct a BR necessitates that such a review commence immediately. This will result in this and subsequent BR's and BR reports to be completed in the odd-numbered years going forward.*

*As noted above, violations of the DFSCA are serious and by their nature, cannot be cured. MCCL will be given an opportunity to conduct a meaningful review of its DAAPP and to bring its drug and alcohol programs into compliance with the DFSCA for the first time as required by its PPA. However, the College is advised that these remedial measures cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department will impose additional corrective or administrative actions.*

*Based on an evaluation of all available information, including MCCL's response, the Department will determine if additional action will be required and will advise the College accordingly in the FPRD.*

**MCCL's Response:** In its official response, MCCL concurred with the finding and stated that the College, "has taken the necessary steps to become compliant with the Drug and Alcohol Abuse Education and Prevention Program requirements." MCCL management asserted that in March 2013, "a DAAPP advisory committee was created comprised of cross-functional representatives from all MCC locations to develop and

provide oversight on the DAAPP.” Per the response, “the advisory committee conducted a review of MCC’s current program and completed the Biennial Review Report of the DAAPP” in April 2013. In addition, MCCL claimed that program materials were mailed to all students and employees in July 2013 and also stated that future distributions of the disclosure will be carried out as part of the “enrollment process for students and new employee on-boarding to ensure distribution to all students and employees regardless of the time of entry into the MCC system. Until these system modifications can be completed, MCCL asserted they would continue to distribute the notification via U.S. mail on a bi-monthly basis to new students and employees.” Finally, MCCL submitted documentation in support of its claims that distribution had occurred.

**Final Determination:** Finding #12 of the program review report cited MCCL for multiple violations of the *DFSCA* and Part 86 of the Department’s General Administrative Regulations. Specifically, the College failed to develop and implement a complete DAAPP and as a result was unable to publish an annual disclosure that summarized the program. For example, MCCL’s DAAPP did not include any information about drug or alcohol counseling, treatment or rehabilitation programs or resources that are provided by the College and/or local agencies. As a result of these violations, MCCL also was unable to distribute program information to current employees and all students enrolled for academic credit. In addition, MCCL persistently failed to conduct biennial reviews to assess the plan’s effectiveness. These violations necessarily follow from each other because an institution can only conduct a proper biennial review once a fully-functional DAAPP is in place and students and employees know about it. As a result of these violations, MCCL was required to develop and implement a DAAPP that at least meets minimum standards. The College was also required to produce an annual disclosure and to distribute it in the manner prescribed by Federal regulations. Finally, MCCL was required to conduct an initial biennial review and prepare a report of findings. In its response, MCCL concurred with the findings, stated that remedial action was taken, and submitted documents in support of its claims.

The Department carefully examined MCCL’s narrative response and supporting documentation. The review team’s examination showed that the identified violations were, for the most part, satisfactorily addressed by the College’s response. Based on that review and MCCL’s admission of noncompliance, the violations identified in the finding are sustained. The Department also determined that MCCL’s remedial action plan meets minimum requirements. For these reasons, the Department has accepted the response and considers this finding to be closed for purposes of this program review. Nevertheless, the officials and directors of MCCL are put on notice that the institution must take any additional action that may be needed to address the deficiencies and weaknesses identified by the Department as well as those that were detected during the preparation of the response to the Department’s report and/or as may otherwise be needed to ensure that these violations do not recur. To that end, the College must ensure that it has conducted its 2014 biennial review in a manner that is substantive and well-documented.

Although this program review finding is now closed, MCCL is reminded that the exceptions identified above constitute very serious and persistent violations of the *DFSCA* that by their nature cannot be cured. There is no way to truly "correct" violations of this type once they occur. MCCL was instructed to develop a compliant drug and alcohol program and by doing so, has finally begun to address the conditions that led to these violations. MCCL has stated that it has brought its program and operations into compliance with the *DFSCA* as required by its PPA.

While this is an important first step, MCCL officials must understand that compliance with the *DFSCA* and the *Clery Act* are essential to maintaining a safe and healthy learning environment, especially in light of the fact that more than 90% of all violent campus crimes involve the use of abuse of drugs and/or alcohol. The compliance failures documented by the Department deprived students and employees of important information regarding the educational, financial, health, and legal consequences of alcohol abuse and illicit drug use. The failure to conduct biennial reviews also deprived the College of important information about the effectiveness of any drug and alcohol programs that were in place during the review period. For these reasons, MCCL is advised that its remedial actions cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

Because of the serious consequences of such violations, the Department strongly recommends that MCCL re-examine its drug and alcohol and general Title IV, HEA policies, procedures, and programs on at least an annual basis and revise them as needed to ensure that they continue to reflect current institutional policy and are in full compliance with Federal regulations. To that end, MCCL is reminded that it must take specific steps to document its efforts to comply with the Department's consumer information distribution requirements including those that apply to the annual DAAPP disclosure. Moreover, the College is reminded of its obligation to conduct comprehensive biennial reviews and to prepare substantive reports of findings and recommendations going forward and is specifically advised that its next biennial review report must contain substantially more information about the actual conduct of the review. Moreover, the findings and recommendations must be supported by valid evidentiary data. Please be advised that the Department may request information on a periodic basis to test the effectiveness of MCCL's new DAAPP policies and procedures.

### **Findings with Final Determinations**

The program review report findings requiring further action is summarized below. At the conclusion of each finding is a summary of MCCL's response to the finding, and the Department's final determination for that finding.

#### **Finding 3. Attendance Not Verified Prior to Disbursement**

*Citation Summary: In order to demonstrate to the Secretary the institution is capable of adequately administering the Title IV, HEA programs, it must establish and maintain records required under the individual Title IV, HEA program regulations. 34 C.F.R. § 668.16(d)(1)*

*An institution is required to establish and maintain, on a current basis, program records that document its disbursement and delivery of Title IV, HEA funds. 34 C.F.R. § 668.24(a)(6)*

*If the student doesn't begin attendance in all of his or her classes, resulting in a change in the student's enrollment status, institutions must recalculate the student's award based on the lower enrollment status. A student is considered to have begun attendance in all of his or her classes if the student attends at least one day of class for each course in which that student's enrollment status was determined for Federal Pell Grant eligibility.*

*Schools must have a procedure in place to know whether a student has begun attendance in all classes for purposes of the Federal Pell Grant Program. A student is considered not to have begun attendance in any class in which the school is unable to document that attendance. 2011-2012 & 2012-2013 Federal Student Aid Handbook, Volume 3, Chapter 3; 34 C.F.R. § 690.80(b)(2)(ii)*

*Noncompliance Summary: Program reviewers, in discussions with MCCL's Financial Aid Office staff, were informed MCCL does not transcribe courses which are dropped during the first four weeks of any payment period. When questioned regarding the recordkeeping which is maintained to prove if students attended/began attendance in any courses which were subsequently dropped during the payment period, program reviewers were informed MCCL has three course rosters which are provided to faculty during each semester. Program reviewers requested to see the rosters which were kept to prove students began attendance. When retrieving the rosters, academic staff as well as the Financial Aid staff discovered the institution was unable to obtain the earlier rosters as the rosters override each other in the academic system—thus, the institution only maintained the final roster submitted by faculty which does not reflect whether or not a student attended a course prior to withdrawing. By not having a mechanism in place to accurately document attendance, MCCL was potentially unable to determine with certainty if students who withdrew from single courses actually began attendance in*

*enough hours to support the enrollment status for which Federal Pell Grant funds were disbursed.*

*During the review, program reviewers identified six students who received Federal Pell Grant funds in excess of the enrollment status established on the student's academic transcript and for whom MCCL was unable to provide documentation that reflected the student began attendance in one or more courses prior to withdrawing.*

**Required Action Summary:** *MCCL was required to review the attendance records of all Federal Pell Grant recipients who attended the institution during the 2011-2012 and 2012-2013 (year to date) award years and identify those students whose academic transcript for each payment period did not reflect the enrollment status to support the amount of Title IV, HEA funds disbursed.*

*MCCL was required to review and revise its internal policies and procedures to ensure that the institution has appropriate mechanisms in place to correctly report information regarding students who fail to begin attendance in a course to the Financial Aid Office in a timely fashion and provide a copy of these procedures with MCCL's response to the PRR.*

**MCCL's Response:** MCCL reviewed the financial aid files for the students discussed in the program review report. Upon examination of the students identified in the program review report, MCCL indicated they were able to locate attendance records to support the Title IV, HEA funds disbursed for all students identified in the report with the exception of two: Student #14 and Student #38. In the case of Student #14, MCCL agreed with the Department that the student received funds which should have been reduced to match the confirmed attendance for the student related to the award year in question. In the case of Student #38, the institution concurred with the Department that the student received funds improperly. As a way to resolve the incorrect amounts, the institution indicated they have already returned the funds for the payment period in question for Student #38.

As required in the program review report, the institution reviewed the attendance records for all Federal Pell Grant recipients who attended during the 2011-2012 and 2012-2013 award years to identify any student whose academic transcripts did not reflect the enrollment status of the Title IV, HEA funds disbursed. As part of this review, MCCL identified students whose attendance could not be confirmed to match the amount of funds disbursed to the student's account in all cases due to the instructor failing to submit attendance rosters or the student withdrawing prior to the instructor submitting the attendance roster.

As an additional requirement in the program review report, MCCL indicated they have reviewed policies and procedures in relation to how attendance is confirmed to ensure the institution can be compliant to regulation. As a way to ensure compliance, MCCL indicated they have created an additional step in the process to hold financial aid

disbursement for students who have not had attendance confirmed due to a late roster submission. As an additional tool, MCCL indicated they have provided additional training to instructors to ensure all members of the MCCL academic community understand the impact of failure to submit attendance rosters timely. Finally, MCCL has modified the MetroSoft system to ensure any course(s) dropped after the 100% refund point of the semester is retained on the academic transcript; therefore, aligning with the enrollment status used to award the student's aid.

**Final Determination:** Program reviewers examined the information provided by MCCL in relation to attendance and the institution's ability to substantiate the amount of funds disbursed to students based on confirmed attendance in at least one course in each payment period. In the case of Student #'s 34, 36, 41, and 42, MCCL was able to provide documentation to confirm the amount of Federal Pell Grant funds disbursed to students; consequently, no further action is required for these students. In the case of Student #14, the institution concurred with the Department regarding a lack of documentation to support the amount of Federal Pell Grant funds disbursed. In the case of Student #38, the institution also agreed the funds which were disbursed were not supported based on attendance; however, the institution was able to demonstrate all Title IV, HEA funds had already been returned, leaving no further liability in relation to Student #38.

Program reviewers reviewed the updated policies and procedures which ensure attendance is carefully monitored and substantiated in the future prior to disbursement; based on the documentation provided, the KCSPD is satisfied that no further action is needed to revise or modify the updated procedures placed into effect after the program review was conducted.

Program reviewers examined the results of the file reconstruction which was required as part of Finding 3 to ensure all Title IV, HEA funds which were disbursed to students during the 2011-2012 and 2012-2013 award years mirrored the enrollment asserted by the institution. Using the spreadsheet information, reviewers concur with MCCL's identification of students who received funds improperly. Consequently, MCCL is responsible for the return of **\$36,089.54** to the Federal Pell Grant Program for students who received Title IV, HEA funds without confirmed attendance in enough courses to support the awarded and disbursed funds.

Additionally, MCCL is liable for the cost of funds associated with the improper use of Federal Pell Grant funds. The total cost of funds liability due to the Department as a result of the failure to return Pell Grant funds is **\$363.00** (\$362.80 in Federal Pell Grant interest, *rounded*). The interest charges were computed using the cost of funds for the Pell Grant Program published in the Federal Register by the Department of the Treasury, effective from the date of disbursement to the date of this determination. Detailed information about this cost of funds liability determination may be found in Appendix D.

Metropolitan Community College--Longview

OPE ID: 00248444

PRCN: 201310728113

Page 16

MCCL must notify the students in writing regarding any funds returned to the Department on their behalf. This notification must include the amount and the date of the payment.

**D. Summary of Liabilities**

The total amount calculated as liabilities from the findings in the program review determination is as follows. The payment instructions in Section E reflect unduplicated liabilities.

<b>Established Liabilities</b>	
<b>Liabilities</b>	<b>Pell (Closed Award Year)</b>
Finding 3	\$36,089.54
<b>Subtotal</b>	\$36,089.54
Interest/SA	\$363.00
<b>Subtotal</b>	\$363.00
<b>TOTAL</b>	\$36,452.54
<b>Payable To:</b>	
Department	\$36,452.54

## **E. Payment Instructions**

### **1. Liabilities Owed to the Department**

MCCL owes to the Department **\$36,452.54**. Payment must be made by forwarding a check made payable to the "U.S. Department of Education" to the following address within 45 days of the date of this letter:

U.S. Department of Education  
P.O. Box 979026  
St. Louis, MO 63197-9000

Remit checks only. Do not send correspondence to this address.

Payment must be made via check and sent to the above Post Office Box. Payment and/or adjustments made via G5 will not be accepted as payment of this liability. Instead, the school must first make any required adjustments in COD as required by the applicable finding(s) and Section II – Instructions by Title IV, HEA Program (below), remit payment, and upon receipt of payment the Department will apply the funds to the appropriate G5 award (if necessary).

The following identification data must be provided with the payment:

Amount:       \$36,452.54  
DUNS:         **073072266**  
TIN:          **430813703**  
Program Review Control Number: 201310728113

### **Terms of Payment**

As a result of this final determination, the Department has created a receivable for this liability and payment must be received by the Department within **45 days of the date of this letter**. If payment is not received within the 45-day period, interest will accrue in monthly increments from the date of this determination, on the amounts owed to the Department, at the current value of funds rate in effect as established by the Treasury Department, until the date of receipt of the payment. MCCL is also responsible for repaying any interest that accrues. If you have any questions regarding interest accruals or payment credits, contact the Department's Accounts Receivable Group at (202) 245-8080 and ask to speak to MCCL's account representative.

If full payment cannot be made within **45** days of the date of this letter, contact the Department's Accounts Receivable Group to apply for a payment plan. Interest charges and other conditions apply. Written request may be sent to:

Metropolitan Community College--Longview

OPE ID: 00248444

PRCN: 201310728113

Page 19

U.S. Department of Education  
OCFO Financial  
Management Operations  
Accounts Receivable Group  
550 12th Street, S.W., Room 6114  
Washington, DC 20202-4461

If within 45 days of the date of this letter, MCCL has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the Department, the Department intends to collect the amount due and payable by administrative offset against payments due MCCL from the Federal Government. **MCCL may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt, MCCL must **timely appeal** this determination under the procedures described in the "Appeal Procedures" section of the cover letter. The Department will use those procedures to consider any objection to offset. **No separate appeal opportunity will be provided.** If a timely appeal is filed, the Department will defer offset until completion of the appeal, unless the Department determines that offset is necessary as provided at 34 C.F.R. § 30.28. This debt may also be referred to the Department of the Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

**Federal Pell Grant Funds-- Closed Award Year**

Finding: 3

Appendices: A, B, and D

MCCL must repay:

Pell Grant Funds--Closed Award Year			
Amount (Principal)	Amount (Interest, Rounded)	Title IV Grant	Award Year
\$23,009.96	\$292.00	Pell Grant	2011-2012
\$13,079.58	\$ 71.00	Pell Grant	2012-2013
<b>Total Principal</b>	<b>Total Interest</b>		
<b>\$36,089.54</b>	<b>\$363.00</b>		

The disbursement record for each student identified in the appendix to the applicable findings must be adjusted in the Common Origination and Disbursement (COD) system based on the recalculated amount identified in the appendix.

**Adjustments in COD must be completed prior to remitting payment to the Department. Payment cannot be accepted via G5. Once the Department receives payment via check, the Department will apply the principal payment to the applicable G5 award. The interest will be applied to the general program account.**

A copy of the adjustment to each student's COD record must be sent to Kathy Feith **within 45 days of the date of this letter.**

Metropolitan Community College--Longview

OPE ID: 00248444

PRCN: 201310728113

Page 21

## **Appendices**

**Appendix A - Student Sample**

	Award Year	Last Name	First Name	Partial SSN
1	2011-2012	(b)(6)		
2	2011-2012			
3	2011-2012			
4	2011-2012			
5	2011-2012			
6	2011-2012			
7	2011-2012			
8	2011-2012			
9	2011-2012			
10	2011-2012			
11	2011-2012			
12	2011-2012			
13	2011-2012			
14	2011-2012			
15	2011-2012			
16	2012-2013	(b)(6)		
17	2012-2013			
18	2012-2013			
19	2012-2013			
20	2012-2013			
21	2012-2013			
22	2012-2013			
23	2012-2013			
24	2012-2013			
25	2012-2013			
26	2012-2013			
27	2012-2013			
28	2012-2013			
29	2012-2013			
30	2012-2013			

**Return of Title IV Sample**

31	2011-2012	(b)(6)		
32	2011-2012			
33	2011-2012			
34	2012-2013			
35	2012-2013			

36 2012-2013  
37 2012-2013  
38 2012-2013  
39 2011-2012  
40 2011-2012  
41 2011-2012  
42 2011-2012

(b)(6)

**Professional Judgment/Dependency Override Sample**

43 2011-2012  
44 2011-2012  
45 2012-2013  
46 2011-2012  
47 2011-2012

(b)(6)

**Campus Based Sample**

48 2011-2012  
49 2012-2013  
50 2011-2012  
51 2012-2013  
52 2011-2012  
  
53 2012-2013  
54 2011-2012  
55 2012-2013  
56 2011-2012  
57 2011-2012

(b)(6)

**Appendix B****Student Liabilities—Finding 3: Attendance Not Verified Prior to Disbursement**

## Federal Pell Grant Funds

Award Year	Student Name	Student SSN	Program	Date of Disbursement	Amount
2011-2012	(b)(6)		Pell Grant	01/06/2012	\$693.00
2011-2012			Pell Grant	05/21/2012	\$500.00
2011-2012			Pell Grant	08/08/2011	\$1,116.80
2011-2012			Pell Grant	08/08/2011	\$693.00
2011-2012			Pell Grant	01/03/2012	\$450.70
2011-2012			Pell Grant	01/03/2012	\$694.00
2011-2012			Pell Grant	05/21/2012	\$23.46
2011-2012			Pell Grant	08/08/2011	\$513.00
2011-2012			Pell Grant	08/08/2011	\$666.19
2011-2012			Pell Grant	05/21/2012	\$144.56
2011-2012			Pell Grant	08/08/2011	\$625.00
2011-2012			Pell Grant	01/31/2012	\$450.64
2011-2012			Pell Grant	05/21/2012	\$313.00
2011-2012			Pell Grant	08/08/2011	\$693.00
2011-2012			Pell Grant	08/17/2011	\$694.00
2011-2012			Pell Grant	08/08/2011	\$1,388.00
2011-2012			Pell Grant	05/21/2012	\$612.00
2011-2012			Pell Grant	08/08/2011	\$575.00
2011-2012			Pell Grant	08/08/2011	\$693.00
2011-2012			Pell Grant	01/18/2012	\$694.00
2011-2012			Pell Grant	05/21/2012	\$477.31
2011-2012			Pell Grant	09/13/2011	\$587.00
2011-2012			Pell Grant	01/03/2012	\$300.61
2011-2012			Pell Grant	05/21/2012	\$694.00
2011-2012			Pell Grant	05/21/2012	\$34.00
2011-2012			Pell Grant	08/23/2011	\$693.00
2011-2012			Pell Grant	08/22/2011	\$187.00
2011-2012			Pell Grant	01/03/2012	\$694.00
2011-2012			Pell Grant	08/24/2011	\$693.00
2011-2012			Pell Grant	01/03/2012	\$693.00
2011-2012			Pell Grant	01/03/2012	\$1,300.00
2011-2012			Pell Grant	05/21/2012	\$418.89
2011-2012			Pell Grant	05/23/2012	\$363.11
2011-2012			Pell Grant	08/08/2011	\$462.00
2011-2012			Pell Grant	05/21/2012	\$694.00
2011-2012			Pell Grant	05/21/2012	\$694.00

Award Year	Student Name	Student SSN	Program	Date of Disbursement	Amount		
2011-2012	(b)(6)		Pell Grant	01/03/2012	\$693.00		
2011-2012			Pell Grant	05/21/2012	\$694.00		
2011-2012			Pell Grant	05/21/2012	\$405.69		
2012-2013			Pell Grant	08/02/2012	\$693.00		
2012-2013			Pell Grant	08/07/2012	\$478.27		
2012-2013			Pell Grant	08/02/2012	\$693.00		
2012-2013			Pell Grant	08/02/2012	\$693.00		
2012-2013			Pell Grant	08/02/2012	\$693.00		
2012-2013			Pell Grant	08/21/2012	\$826.84		
2012-2013			Pell Grant	01/23/2013	\$500.00		
2012-2013			Pell Grant	08/02/2012	\$693.00		
2012-2013			Pell Grant	09/06/2012	\$626.14		
2012-2013			Pell Grant	01/02/2013	\$694.00		
2012-2013			Pell Grant	08/02/2012	\$694.00		
2012-2013			Pell Grant	08/02/2012	\$694.00		
2012-2013			Pell Grant	08/08/2012	\$440.33		
2012-2013			Pell Grant	01/02/2013	\$694.00		
2012-2013			Pell Grant	08/02/2012	\$693.00		
2012-2013			Pell Grant	08/02/2012	\$693.00		
2012-2013			Pell Grant	09/04/2012	\$500.00		
2012-2013			Pell Grant	08/02/2012	\$694.00		
2012-2013			Pell Grant	08/02/2012	\$694.00		
2012-2013			Pell Grant	08/02/2012	\$693.00		
<b>Total Pell Grant Funds Liability for Finding 3:</b>					<b>\$36,089.54</b>		

Metropolitan Community College--Longview

OPE ID: 00248444

PRCN: 201310728113

Page 26

**Final Program Review Determination**

**PRCN # 201310728113**

**Appendix C**

**Narrative Program Review Report**

Metropolitan Community College--Longview

OPE ID: 00248444

PRCN: 201310728113

Page 27

## Metropolitan Community College-Longview

OPE ID: 00248444

PRCN: 201310728113

Prepared by

U.S. Department of Education

Federal Student Aid

School Participation Division-Kansas City

# **Program Review Report**

March 15, 2013

8930 Ward Parkway, Suite 2028, Kansas City, MO 64114  
StudentAid.gov

<b>Table of Contents</b>		<b>Page</b>
<b>A. Institutional Information.....</b>		2
<b>B. Scope of Review.....</b>		3
<b>C. Findings .....</b>		4
Finding 1 Return of Title IV Funds Calculation Errors .....		4
Finding 2 Late Return of Title IV Funds .....		6
Finding 3 Attendance Not Verified Prior to Disbursement .....		7
Finding 4 Verification Incomplete/Incorrect.....		10
Finding 5 Failure to Accurately Determine Direct Loan Eligibility.....		11
Finding 6 Failure to Maintain Back-Up Documentation for Fiscal Operations Report and Application to Participate (FISAP) for Campus Based Reporting.....		15
Finding 7 Failure to Maintain Off-Campus Community Service Contracts Which Meet Department Guidelines.....		18
Finding 8 Improper FWS Payments.....		19
Finding 9 National Student Loan Data System (NSLDS) Reporting Incorrect/Untimely.....		21
Finding 10 Consumer Information Requirements Not Met.....		22
Finding 11 Crime Awareness Requirements Not Met--Omission of Policy Statements.....		25
Finding 12 Failure to Comply with Drug and Alcohol Abuse Education and Prevention Program Requirements.....		26
<b>D. Appendices.</b>		
Appendix A: Student Sample.....		29

**A. Institutional Information**

Metropolitan Community College  
3200 Broadway  
Kansas City, MO 64111-2408

Type: Public

Highest Level of Offering: Associate Degree

Accrediting Agency: North Central Association of Colleges and Schools (HLC)

Current Student Enrollment: 8,780 (2012-2013)

% of Students Receiving Title IV: 34% (2012-2013)

Title IV Participation: (G5)

	<b>2010-2011</b>
Federal Pell Grant Program	\$34,707,903.00
Federal Supplemental Educational Opportunity Grant (FSEOG)	\$ 420,321.00
Federal Work Study Program	\$ 371,953.00
Federal Family Educational Loan (FFEL) Program	\$ 609,099.00
Federal Direct Loan Program	\$20,957,361.00
<b>Total Title IV, HEA Funding</b>	<b>\$57,066,637.00</b>

Default Rate FFEL/DL:	2010	12.7%
	2009	9.3%
	2008	7.4%

## **B. Scope of Review**

The U.S. Department of Education (the Department) conducted a program review at Metropolitan Community College—Longview (MCCL) from December 3, 2012 to December 6, 2012. The review was conducted by Ms. Kathy Feith, Mr. Christopher Thompson, and Mr. Jim Wyant.

The focus of the review was to determine MCCL's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV, HEA programs. The review consisted of, but was not limited to, an examination of MCCL's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2011-2012 and 2012-2013 (year to date) award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. In addition, 12 files were selected to review Official and Unofficial Return of Title IV calculations, five files were selected to review Dependency Overrides and Professional Judgments, and 10 files were selected to review campus-based awarding practices, including FWS compliance. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review.

### **Disclaimer:**

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning MCCL's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve MCCL of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination (FPRD) letter.

### C. Findings

During the review, several areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by MCCL to bring operations of the financial aid programs into compliance with the statutes and regulations.

#### **Finding 1. Return of Title IV Funds Calculation Errors**

**Citation:** Federal regulations state that when a recipient of Title IV, HEA funds withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must perform a Return of Title IV Funds (Return) calculation to determine the amount of Title IV, HEA grant or loan assistance the student earned as of the student's withdrawal date. The calculation should incorporate all of the elements of a Return calculation identified in pertinent Federal regulations. [34 C.F.R. § 668.22]. Regulations additionally define "institutional charges" as tuition, fees, room and board (if the student contracts with the institution for the room and board) and other educationally-related expenses assessed by the institution. 34 C.F.R. § 668.22(g)(2)

At an institution such as MCCL which is not required to take attendance, a student's withdrawal date is: (1) the date that the student began the withdrawal process; (2) the date the student provided official notification to the institution of his or her intent to withdraw; (3) if the student withdraws without providing official notification to the institution of his or her intent to withdraw, the midpoint of the payment period; (4) the date related to a student's circumstances beyond his or her control that did not allow the student to provide official notification to the institution; or (5) the date the student began a leave of absence if he or she fails to return from the leave of absence or if the leave of absence does not meet legal requirements.  
34 C.F.R. § 668.22 (c)(1)

The percentage of Title IV, HEA funds earned by the student is equal to the percentage of the payment period completed by the student's withdrawal date if this date occurs on or before the completion of 60 percent of the payment period; or 100 percent if the student's withdrawal date occurs after completion of 60 percent of the payment period. 34 C.F.R. § 668.22(e)(2). The percentage of unearned Title IV, HEA funds is the complement of the percentage earned. The amount of Title IV, HEA funds to be returned is determined by subtracting the amount of Title IV, HEA funds earned by the student from the amount that was disbursed to the student as of the date of the institution's determination that the student withdrew. 34 C.F.R. § 668.22(e)(3) and (4)

The percentage of the payment period completed is determined at an institution such as MCCL, where programs are measured in credit hours, by dividing the total number of calendar days in the payment period into the number of calendar days completed in that period as of the student's withdrawal date. 34 C.F.R. § 668.22(f)(1). As described in 34 C.F.R. § 668.22(f)(2)(i), the total number of calendar days in a payment period includes all days within the period, except that

scheduled breaks of at least five consecutive days are excluded from the total number of calendar days in a payment period and the number of days completed in that period.

An institution must return as soon as possible the unearned Title IV, HEA funds for which it is responsible for returning but, as of July 1, 2007, no later than 45 days after the institution's determination that the student withdrew. 34 C.F.R. § 668.22(j)(1)

Federal regulations stipulate the institution shall recalculate the student's enrollment status to reflect only those classes for which the student actually began attendance if a student's projected enrollment status changes prior to beginning attendance in all of his or her classes for that payment period. 34 C.F.R. § 690.80(b)(2)(ii)

**Noncompliance:** MCCL systemically utilized an incorrect number of days in the payment period for the fall and spring semesters, routinely failing to remove the scheduled breaks each semester. For example, MCCL's fall 2011 semester operates from 08/23/2011 through 12/20/2011 with a scheduled break of five days for the Thanksgiving break; with the removal of the break, there should be 115 days in the payment period; the spring 2012 semester operates with a scheduled break of nine days; with the removal of the break MCCL should be utilizing 111 days in the payment period. The fall 2012 semester operates from 08/21/2012 to 12/18/2012 with a scheduled break of five days for the Thanksgiving break as with the previous academic year. However, MCCL failed to remove the break from the payment period for each semester, causing MCCL to return excess funds for students who withdrew during these payment periods in both award years. For all students included in the Return sample (Students #31-#42), MCCL incorrectly processed Return calculations utilizing inappropriate payment periods. In the files reviewed, MCCL returned excess funds to the Department, returning amounts ranging from \$3.26 to \$45.07 more than required. For Student 42, if MCCL had utilized a correct payment period, the student would have earned 100% of Title IV, HEA funds; thus, the student would have been able to retain the \$519.28 in Federal Pell Grant funds returned to the Department.

In discussions with the Financial Aid staff, the program review team was informed one academic calendar is used for all campuses considered part of the Metropolitan Community College system, even though individual campuses may have different class starts/stops and/or scheduled break dates. The MCCL Central Financial Aid Office implemented standardized payment periods for all campuses to simplify the processing of Return calculations. As students are able to enroll in any Metropolitan-affiliated campus, MCCL must be able to document withdrawn students who consider MCCL "home" are in a program which falls within the applicable calendar, which cannot be done in all instances when a standard calendar is utilized as other campuses within the Metropolitan system operate with Non-Term and/or Non-Standard term programs. By utilizing standardized calendars for all campuses, even though the situations are not all considered in the same "home program" situation, MCCL improperly returned funds which could have been retained by students who withdrew to defray costs.

**Required Action:** MCCL must review the policies and procedures in place to ensure the policies and procedures are compliant with Department regulations regarding the appropriate

processing of Returns; specifically, MCCL must ensure provisions are in place to account for students who are taking courses at any of the locations associated with MCCL who withdraw. MCCL must be able to interpret the student's coursework to determine if the student is in a Standard, Non-Term, or Non-Standard term program and complete the Return calculation according to the guidelines applicable to each type of program. A copy of these revised policies and procedures must accompany MCCL's response to the PRR.

## **Finding 2. Late Return of Title IV Funds**

**Citation:** Federal regulations state that when a recipient of Title IV, HEA grant or loan assistance withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must determine the amount of Title IV, HEA grant or loan assistance (not including FWS or the non-Federal share of FSEOG awards if an institution meets its FSEOG matching share by the individual recipient method or the aggregate method) the student earned as of the student's withdrawal date.

If the total amount of Title IV, HEA grant or loan assistance, or both, that the student earned is less than the amount of Title IV, HEA grant or loan assistance that was disbursed to the student or on behalf of the student in the case of a PLUS loan, as of the date of the institution's determination the student withdrew, the difference between these amounts must be returned to the Title IV, HEA programs. If the total amount of Title IV, HEA grant or loan assistance, or both, that the student earned is greater than the total amount of Title IV, HEA grant or loan assistance, or both, that was disbursed to the student or on behalf of the student in the case of a PLUS loan, as of the date of the institution's determination that the student withdrew, the difference between these amounts must be treated as a post-withdrawal disbursement. 34 C.F.R. § 668.22(a)

Federal regulations require an institution to calculate and return Title IV, HEA funds no later than 45 days after the date of the institution's determination that the student withdrew. 34 C.F.R. § 668.22(j)

The school must return the unearned Title IV, HEA funds for which the school is responsible by repaying funds up to the total net amount disbursed from each source. *2011-2012 & 2012-2013 Federal Student Aid Handbook, Volume 5, Chapter 2*

**Noncompliance:** In one of 12 Return calculations reviewed, MCCL failed to make the necessary Return within the required time frame.

**Student #31:** The student officially withdrew from the fall 2011 semester on 09/16/2011. MCCL performed a Return calculation on 11/07/2011—22 days late, that identified a required Return of \$868.03 in Federal Pell Grant funds. Based on the Department's COD records, MCCL returned these funds on 11/04/2011 (prior to the Return calculation being performed according to the student file)—five days late. It should be noted MCCL used an incorrect number of days in

the payment period as discussed in Finding 1, returning \$9.86 in excess to the Pell Grant program.

**Required Action:** MCCL must review its policies and procedures to ensure Return calculations are completed and processed in a timely manner and make any necessary revisions; additionally, MCCL must provide a copy of its policies and procedures, including any revisions, to the Department in its response to the PRR.

### **Finding 3. Attendance Not Verified Prior to Disbursement**

**Citation:** In order to demonstrate to the Secretary the institution is capable of adequately administering the Title IV, HEA programs, it must establish and maintain records required under the individual Title IV, HEA program regulations. 34 C.F.R. §668.16(d)(1)

An institution is required to establish and maintain, on a current basis, program records that document its disbursement and delivery of Title IV, HEA funds. 34 C.F.R. § 668.24(a)(6)

If the student doesn't begin attendance in all of his or her classes, resulting in a change in the student's enrollment status, institutions must recalculate the student's award based on the lower enrollment status. A student is considered to have begun attendance in all of his or her classes if the student attends at least one day of class for each course in which that student's enrollment status was determined for Federal Pell Grant eligibility. Schools must have a procedure in place to know whether a student has begun attendance in all classes for purposes of the Federal Pell Grant Program. A student is considered not to have begun attendance in any class in which the school is unable to document that attendance. *2011-2012 & 2012-2013 Federal Student Aid Handbook, Volume 3, Chapter 3*; 34 C.F.R. § 690.80(b)(2)(ii)

**Noncompliance:** Program reviewers, in discussions with MCCL's Financial Aid Office staff, were informed MCCL does not transcribe courses which are dropped during the first four weeks of any payment period. When questioned regarding the recordkeeping which is maintained to prove if students attended/began attendance in any courses which were subsequently dropped during the payment period, program reviewers were informed MCCL has three course rosters which are provided to faculty during each semester. Program reviewers requested to see the rosters which were kept to prove students began attendance. When retrieving the rosters, academic staff as well as the Financial Aid staff discovered the institution was unable to obtain the earlier rosters as the rosters override each other in the academic system—thus, the institution only maintained the final roster submitted by faculty which does not reflect whether or not a student attended a course prior to withdrawing. By not having a mechanism in place to accurately document attendance, MCCL is potentially unable to determine with certainty if students who withdrew from single courses actually began attendance in enough hours to support the enrollment status for which Federal Pell Grant funds were disbursed.

During the review, program reviewers identified **six** students who received Federal Pell Grant funds in excess of the enrollment status established on the student's academic transcript and for whom MCCL was unable to provide documentation that reflected the student began attendance in one or more courses prior to withdrawing.

**Student #14:** The student received a Federal Pell Grant award based on a three-quarter time enrollment status of 9-11 credit hours in the amount of \$1,950.00 for the spring 2012 semester. The student was initially scheduled to begin nine hours; however, a review of the student's transcript indicates the student only began attendance in one four hour course (AUTO 170), dropping the student's enrollment status to less-than-half-time. At a less-than-half-time enrollment status which is indicative of the information in the file, the student was only eligible for a Federal Pell Grant award of \$650.00.

**Student #34:** The student received a Federal Pell Grant award based on a full-time enrollment status of 12 credit hours in the amount of \$2,300.00 during the fall 2012 semester. The student was initially scheduled to begin 12 hours; however, a review of the student's academic transcript indicates no evidence the student began one course, READ 108, which would warrant the full-time enrollment status. At a three-quarter time enrollment status which is indicative of the information in the file, the student was only eligible for a Federal Pell Grant award of \$1,725.00.

**Student #36:** The student received a Federal Pell Grant award based on a half-time enrollment status of 6-8 credit hours in the amount of \$1,388.00 during the fall 2012 semester. The student was initially scheduled to begin seven hours; however, a review of the student's academic transcript indicates no evidence the student began one course, ENG 101, which would warrant the half-time enrollment status. At a less-than-half-time enrollment status which is indicative of the information in the file, the student was only eligible for a Federal Pell Grant award of \$694.00.

**Student #38:** The student received a Federal Pell Grant award based on a half-time enrollment status of 6-8 credit hours in the amount of \$1,388.00 during the fall 2012 semester. The student was initially scheduled to begin seven hours; however, a review of the student's academic transcript indicates no evidence the student began two courses, READ 11 and COLL 100, which would warrant the half-time enrollment status. At a less-than-half-time enrollment status which is indicative of the information in the file, the student was only eligible for a Federal Pell Grant award of \$694.00.

**Student #41:** The student received a Federal Pell Grant award based on a full-time enrollment status of 12 credit hours in the amount of \$2,775.00 during the fall 2011 semester. The student was initially scheduled to begin 12 hours; however, a review of the student's academic transcript indicates no evidence the student began one course, BSAD 204, which would warrant the full-time enrollment status. At a three-quarter time enrollment status which is indicative of the information in the file, the student was only eligible for a Federal Pell Grant award of \$2,082.00.

**Student #42:** The student received a Federal Pell Grant award based on a three-quarter-time enrollment status of 9-11 credit hours in the amount of \$2,081.00 during the spring 2012 semester. The student was initially scheduled to begin nine hours; however, a review of the student's academic transcript indicates no evidence the student began one course, ENGL 101, which would warrant the three-quarter time enrollment status. At a half-time enrollment status, which is indicative of the information in the file, the student was only eligible for a Federal Pell Grant award of \$1,388.00. This student is also cited in Finding 1.

**Required Action:** MCCL must review the attendance records of all Federal Pell Grant recipients who attended the institution during the 2011-2012 and 2012-2013 (year to date) award years and identify those students whose academic transcript for each payment period does not reflect the enrollment status to support the amount of Title IV, HEA funds disbursed.

For each student identified, MCCL must provide the following information in a spreadsheet format:

- (1) Student's name;
- (2) Last four digits of the student's Social Security Number (SSN);
- (3) Award year;
- (4) Semester (fall, spring, summer);
- (5) Number of hours student enrolled in and received Federal Pell Grant funds;
- (6) Number of hours that student began attendance in;
- (7) Amount of Federal Pell Grant funds disbursed;
- (8) Date of disbursement;
- (9) Recalculated amount of Federal Pell Grant funds student should have received based on hours student began attendance in; and
- (10) Difference between recalculated award and amount disbursed.

MCCL must provide legible copies of the following documents:

- (1) Student account card;
- (2) Academic transcript;
- (3) Copies of all pertinent attendance records supporting MCCL's determination of the student's enrollment status; and
- (4) Pertinent screen shots from the Common Origination and Disbursement System (COD) indicating amounts and dates of disbursements and returns.

The spreadsheet discussed above must be compiled in an Excel spreadsheet program and submitted in the following manner:

Student	SSN	Award year	Semester	Number of Hours Student Enrolled In	Number of Hours for Which Student Began Attendance	Amount of Federal Pell Grant funds disbursed	Date of Disbursement	Recalculated Title IV HEA funds that should have been disbursed	Difference
***	****	2010/11	Fall	12	9	\$2,775	09/27/2010	\$2,081	\$694
***	****	2010/11	Fall	6	0	\$2,000	09/27/2010	\$0	\$2,000

MCCL must additionally review and revise its internal policies and procedures to ensure that the institution has appropriate mechanisms in place to correctly report information regarding students who fail to begin attendance in a course to the Financial Aid Office in a timely fashion. A copy of these procedures must accompany MCCL's response to this report.

Instructions for repayment of any liabilities will be provided in the FPRD letter. The institution must not repay any funds owed to the Department until the FPRD is issued.

Hard copy and electronic files containing PII must be safeguarded as described in the enclosure to the cover letter of this report.

#### **Finding 4. Verification Incomplete/Incorrect**

**Citation:** The purpose of verification is to ensure accuracy in determining a student's eligibility for Title IV, HEA program funds. If a student is selected for verification, an institution is responsible for confirming information reported on the student's application for Federal student aid, as well as resolving any conflicting information that presents itself regarding the application. The five required data elements that must be verified are: (1) household size; (2) number enrolled in college; (3) adjusted gross income (AGI); (4) U.S. income tax paid; and (5) other untaxed income and benefits. Supporting documentation collected from the student or parents is compared to the information that was reported on the student's Institutional Student Information Record (ISIR). An institution must retain in the student's file any verification documentation it collects to serve as evidence that it completed the verification process. 34 C.F.R. §§ 668.16(f), 668.24(c)(1)(i), and 668.56; *2011-2012 Application and Verification Guide, Chapter 4*

For non-tax filers institutions must receive a W-2 form for each source of employment income and also get a signed statement, providing the sources and amounts of the person's income earned from work not on W-2s and certifying that the person has not filed and is not required to file a tax return. The signed statement can be a completed verification worksheet. *2012-2013 Application and Verification Guide, Federal Student Aid Handbook.*

**Noncompliance:** MCCL did not correctly complete the verification process for one student selected for review for the 2011-2012 award year and two students selected for verification for the 2012-2013 award year.

**Student #7:** The student was selected for verification and was disbursed Title IV, HEA funds based on completed verification of Transaction 01 (924 EFC) of the student's 2011-2012 ISIR. The student's household size, number in college, AGI, and taxes paid information was properly verified. However, a review of the 1040 tax return collected as part of the verification process indicates the parent received \$1,491.00 in an Education Credit on Line 49 of the 1040 tax return as well as a \$400.00 in Making Work Pay tax credit that was not included as other untaxed income on the student's ISIR.

**Student #26:** The student was selected for verification and was disbursed Title IV, HEA funds based on completed verification of Transaction 04 (2004 EFC) of the student's 2012-2013 ISIR. The student's household size, number in college, AGI, and taxes paid were properly verified. The student's verification worksheet indicates \$3,840.00 in child support received; however, these funds were not included as other untaxed income on the student's ISIR.

**Student #30:** The student was selected for verification and was disbursed Title IV, HEA funds based on completed verification of Transaction 01 (4146 EFC) of the student's 2012-2013 ISIR. The parent's utilized the IRS Data Retrieval Tool to supply tax information as part of the process. The student indicated on the FAFSA as well as on the Institutional Verification Form (IVF) he did work although he did not file taxes. MCCL did not obtain a copy of the student's W2, a requirement for completing the verification process for the 2012-2013 award year.

**Required Action:** In response to this report, MCCL must resolve the verification deficiencies for the above-referenced students obtaining the documentation necessary to complete the verification process. If the resolution of the issue involves changes to the student's income, or the addition of parental income not previously reported, MCCL must attempt to collect the required tax returns or other income-related information and recalculate the student's Title IV, HEA eligibility accordingly. If MCCL is unable to properly complete the verification process for any or all of the students, the institution may be held liable for all Title IV, HEA funds disbursed to those students in the relevant award years.

MCCL must additionally review its policies and procedures in relation to the verification process and provide copies to the Department as part of its response to the PRR.

Instructions for repayment of any liabilities will be provided in the FPRD letter. The institution must not repay any funds owed to the Department until the FPRD is issued.

Hard copy and electronic files containing PII must be safeguarded as described in the enclosure to the cover letter of this report.

#### **Finding 5. Failure to Accurately Determine Direct Loan Eligibility**

**Citation:** Federal regulations state that to qualify for a Subsidized Stafford Loan, a student must have financial need. A borrower unable to qualify based on need for a Subsidized loan may apply for an Unsubsidized Stafford Loan, which is not based on need. Additionally, a student able to qualify for only a part of the Subsidized Stafford Loan limit may apply for an Unsubsidized Stafford Loan to cover the EFC and any unmet financial need (up to the annual loan limit). 34 C.F.R. § 685.200

For all Title IV, HEA loans, institutions must document the student's cost of attendance (COA), Expected Family Contribution (EFC), and estimated financial assistance in the student's

file. Additionally, the institution must determine the student's Federal Pell Grant eligibility and, if eligible, include the grant in the student's aid package:

- 1) For a Direct Unsubsidized Loan, first determine the student's eligibility for a Direct Subsidized Loan;
- 2) Ensure that the amount of the loan will not exceed the student's annual or aggregate loan limit; and
- 3) Prorate the annual loan limit for an undergraduate enrolled in a program or remaining period of study that is shorter than an academic year. *2011-2012 & 2012-2013 Federal Student Aid Handbook, Volume 3.*

An institution must disburse the loan proceeds on a payment period basis in accordance with 34 C.F.R. §668.164(b). If a loan period is more than one payment period, the school must disburse loan proceeds at least once in each payment period. If a loan period is one payment period, the school must make at least two disbursements during that payment period. The school must disburse loan proceeds in substantially equal installments, and no installment may exceed one-half of the loan. 34 C.F.R. § 685.301(b)(2), (3), and (5)

Pursuant to HEA Sec. 479(A)(c), 34 C.F.R. §685.301(a)(8), and DCL GEN-11-07, on a case-by-case basis, an institution may refuse to originate a loan for an individual borrower or originate a loan for an amount less than the borrower's maximum eligibility. An institution may NOT limit borrowing by students or parents on an across-the-board or categorical basis. *2011-2012 & 2012-2013 Federal Student Aid Handbook, Volume 3*

**Noncompliance:** MCCL requires all student loan borrowers to complete an institutional "Loan Intake Sheet" each year which indicates the semesters of enrollment the student plans to attend as well as the amount of Direct Loan funds the student would like to borrow. Information disclosed by MCCL on the "Loan Intake Sheet" indicates that student loan maximum award amounts are reserved for students planning to attend two or more consecutive semesters and that students are not allowed to increase the amount of loan funds needed or modify the student's loan period once a loan request has been submitted.

When certifying Direct Loan eligibility, MCCL schedules Direct Loan disbursements based on a fixed disbursement schedule of 40% of the approved award amount for the fall and spring semesters and 20% for summer for those students planning to attend a full academic year which encompasses all three semesters. For those students who plan to attend only the summer semester, MCCL certifies Direct Loan funds for no more than 20% of the maximum loan amount, even if the student's COA would support additional funds being awarded.

After receiving the application back from students, MCCL completes a Federal Student Loan Budget Worksheet which details the student's loan eligibility. In instances where students have indicated they will be attending fall/spring/summer, MCCL allocates the loan in increments of 40% for fall, 40% for spring, and 20% for summer. In discussion with the Financial Aid Administrator as well as the Loan Coordinator regarding this practice, reviewers were informed

students who only attended for any combination of two terms which involved the summer were packaged for 40% of the maximum annual award for the fall or spring and for 20% of the maximum annual award for the summer.

In reviewing the origination records for students who attend MCCL during periods other than the "traditional" fall and spring, MCCL originates each loan by semester; however, when completing the needs analysis, MCCL combines the individual semesters together and utilizes the combined COA. This practice is not allowed when originating loans by payment period; rather, MCCL must utilize the COA and EFC associated with the loan period. For example, students who attend during the spring and summer must have their COA and EFC evaluated based on each single semester if the loans are originated in single payment periods; for the spring semester, MCCL, using this guidance, should use a four month EFC while using a two month EFC for the summer. MCCL appeared to be combining the semesters into one period of enrollment, which is improper and potentially could cause students to be over-awarded.

Program reviewers identified **four** examples in the student file sample in which students were not awarded or disbursed the maximum amount of loan funds requested which they were eligible to receive based on the COA utilized by MCCL.

**Student #9:** A review of the student's 2011-2012 Loan Intake Sheet indicates the student wanted to receive student loans for the spring 2012 and summer 2012 semesters. The student requested the maximum amount allowed for a freshman (\$9,500.00). MCCL utilized a six month cost of attendance (COA) for the student for the period of enrollment; the COA was \$11,711.00; the student's EFC was 0, making the student eligible for \$11,711.00 in Title IV, HEA funds for the period of enrollment. Since the student was not attending all three semesters during the 2011-2012 award year, MCCL originated the spring 2012 and summer 2012 loans in individual loan periods. A review of the spring 2012 disbursement indicates MCCL originated a loan for \$1,750.00 in Subsidized Stafford Loan funds and \$3,000.00 in Unsubsidized Stafford Loans, providing 50% of the available loan funds to the student. In reviewing the summer 2012 loan amounts, MCCL only originated 20% of the student's grade level loan allowance for the summer 2012 semester, originating \$700.00 in Subsidized Stafford Loan funds and \$1,200.00 in Unsubsidized Stafford Loan funds. Overall, the student received \$10,119.00 in Title IV, HEA funds for the academic year in question: \$3,469.00 in Federal Pell Grant funds, \$2,450.00 in Subsidized Stafford Loan Funds, and \$4,200.00 in Unsubsidized Stafford Loan funds. The student was eligible to have received \$3,500.00 in Subsidized Stafford Loan funds and \$4,742.00 in Unsubsidized Stafford Loan funds overall based on the COA utilized by MCCL.

**Student #13:** A review of the student's 2011-2012 Loan Intake Sheet indicates the student wanted to receive student loans for the spring 2012 and summer 2012 semesters. The student requested the maximum amount allowed for a freshman (\$9,500.00). MCCL utilized a six month cost of attendance (COA) for the student for the period of enrollment; the COA was \$11,127.00; the student's EFC was 863, making the student eligible for \$10,264.00 in need-based Title IV, HEA funds for the period of enrollment. As the student was not attending all three semesters, MCCL originated the spring 2012 and summer 2012 loans in individual loan

periods. A review of the spring 2012 disbursement indicates MCCL originated a loan for \$1,750.00 in Subsidized Stafford Loan funds and \$3,000.00 in Unsubsidized Stafford Loan funds, providing 50% of the available loan funds to the student. In reviewing the summer 2012 loan amounts, MCCL only originated 20% of the student's grade level loan allowance for the summer 2012 semester, originating \$700.00 in Subsidized Stafford Loan funds and \$1,200.00 in Unsubsidized Stafford Loan funds. Overall, the student received \$10,175.00 in Title IV, HEA funds for the academic year in question: \$3,525.00 in Federal Pell Grant funds, \$2,450.00 in Subsidized Stafford Loan Funds, and \$4,200.00 in Unsubsidized Stafford Loan funds. The student was eligible to have received \$3,500.00 in Subsidized Stafford Loan funds and \$4,102.00 in Unsubsidized Stafford Loan funds overall based on the COA utilized by MCCL.

**Student #18:** A review of the student's 2012-2013 Loan Intake Sheet indicates the student requested student loans for the fall 2012, spring 2013 and summer 2013 semesters. The student requested the maximum amount allowed for a sophomore (\$10,500.00); however, MCCL determined the student was still a freshman at the time the loans were originated. MCCL utilized an eleven month cost of attendance (COA) for the student for the three semesters of the award year, assigning a COA of \$3,685.00 for the summer 2013 semester and \$15,598.00 for the COA for the fall 2012 and spring 2013 semesters. A review of the ISIR indicates the student's EFC was 7,652. Utilizing the COA and the EFC, the student was eligible for \$7,946.00 in need-based Title IV, HEA funds for the fall 2012 and spring 2013 semesters. In comparison, the student's EFC for the summer payment period, based on a two-month EFC, was 1,700. Utilizing the COA and the EFC for this period, the student was eligible to receive \$1,985.00 in need-based Title IV, HEA funds for the summer payment period. MCCL originated fall 2012 and spring 2013 semesters as one loan period and created a separate loan record for the summer 2013 loans. Additionally, MCCL applied its loan processing formula, allotting 40% of the loan funds for the fall payment period, 40% of the loan funds for the spring payment period, and the remaining 20% of the loan funds for the summer payment period.

A review of the fall and spring disbursements indicates MCCL originated a loan for \$2,800.00 in Subsidized Stafford Loan funds and \$4,800.00 in Unsubsidized Stafford Loans. In reviewing the summer 2013 loan amounts, MCCL originated the remaining \$700.00 in Subsidized Stafford Loan funds and \$1,200.00 in Unsubsidized Stafford Loan funds. Overall, the student received \$9,500.00 in Title IV, HEA funds for the academic year in question: \$3,500.00 in Subsidized Stafford Loan Funds, and \$6,000.00 in Unsubsidized Stafford Loan funds. As loan disbursements are to be substantially equal when possible, MCCL should have divided the Subsidized Stafford Loan funds into equal disbursements of \$1,166.00 and the Unsubsidized Stafford Loan funds into equal disbursements of \$2,000.00 rather than applying its origination philosophy as discussed above. Although the student was not over-awarded or under-awarded based on the COA utilized by MCCL, Title IV, HEA funds should have been equitably distributed as directed in Department guidelines.

**Student #20:** A review of the student's 2012-2013 Loan Intake Sheet indicates the student wanted to receive student loans for the fall 2012, spring 2013 and summer 2013 semesters. The student requested the maximum amount allowed for a sophomore (\$9,500.00); MCCL utilized an

eleven month cost of attendance (COA) for the student for the three semesters of the award year, assigning a COA of \$19,283.00 for the entire period in question. A review of the ISIR indicates the student's EFC was 2,779, making the student eligible for \$16,504.00 in need-based Title IV, HEA funds for the fall 2012, spring 2013, and summer 2013 semesters. MCCL originated fall 2012 and spring 2013 semesters as one loan period and created a separate loan record for the summer 2013 loans. Additionally, MCCL applied its loan processing formula, allotting 40% of the loan funds for the fall payment period, 40% of the loan funds for the spring payment period, and the remaining 20% of the loan funds for the summer payment period.

A review of the fall/spring disbursement indicates MCCL originated a loan for \$2,800.00 in Subsidized Stafford Loan funds and \$4,800.00 in Unsubsidized Stafford Loan funds. In reviewing the summer 2013 loan amounts, MCCL originated the remaining \$700.00 in Subsidized Stafford Loan funds and \$1,200.00 in Unsubsidized Stafford Loan funds. Overall, the student received \$9,500.00 in Title IV, HEA funds for the academic year in question: \$3,500.00 in Subsidized Stafford Loan Funds, and \$6,000.00 in Unsubsidized Stafford Loan funds. As loan disbursements are to be substantially equal when possible, MCCL should have divided the Subsidized Stafford Loan funds into equal disbursements of \$1,166.00 and the Unsubsidized Stafford Loan funds into equal disbursements of \$2,000.00 rather than applying its origination philosophy as discussed above. Although the student was not over-awarded or under-awarded based on the COA utilized by MCCL, Title IV, HEA funds should have been equitably distributed as directed in Department guidelines.

**Required Action:** MCCL must review its policies and procedures in relation to the awarding and disbursement of Title IV, HEA funds to ensure they are in compliance with Department guidelines. As part of its response, MCCL is required to make revisions to its loan awarding policies and procedures to ensure proper alignment with Department guidelines as they relate to Direct Loan origination and processing. A copy of the revised policies and procedures must accompany MCCL's response to the PRR.

MCCL must ensure any pending disbursements for the 2012-2013 award year are in compliance with Department guidelines. If MCCL determines revisions must be made to pending disbursements, MCCL must make the appropriate notifications and ensure students are awarded all funds to which they are eligible.

**Finding 6. Failure to Maintain Back-Up Documentation for Fiscal Operations Report and Application to Participate (FISAP) for Campus Based Reporting**

**Citation:** An institution shall establish and maintain, on a current basis, any application for Title IV, HEA program funds and program records that document its eligibility to participate in the Title IV, HEA programs; the eligibility of its educational programs for Title IV, HEA program funds; its administration of the Title IV, HEA programs in accordance with all applicable requirements; its financial responsibility, as specified in this part; information included in any

application for Title IV, HEA program funds; and its disbursement and delivery of Title IV, HEA program funds.

An institution shall account for the receipt and expenditure of Title IV, HEA program funds in accordance with generally accepted accounting principles and shall establish and maintain on a current basis financial records that reflect each Title IV, HEA program transaction; and general ledger control accounts and related subsidiary accounts that identify each Title IV, HEA program transaction and separate those transactions from all other institutional financial activity.

The records that an institution must maintain in order to comply with the provisions of this section include but are not limited to records relating to its administration of the Federal Perkins Loan, FWS, FSEOG, Federal Pell Grant, ACG, National SMART Grant, or TEACH Grant Program for three years after the end of the award year for which the aid was awarded and disbursed under those programs, provided that an institution shall keep. Additionally, an institution must maintain the Fiscal Operations Report and Application to Participate in the Federal Perkins Loan, FSEOG, and FWS Programs (FISAP), and any records necessary to support the data contained in the FISAP, including "income grid information," for three years after the end of the award year in which the FISAP is submitted. 34 C.F.R. §668.24(a)-(c)

For program review and audit purposes, you must retain accurate and verifiable records for three years following the end of the award year in which the FISAP is submitted. For example, the award year in which you will submit the FISAP due on September 30, 2013 ends on June 30, 2013 (Award year = July 1, 2012 – June 30, 2013). You must retain all records used in the creation of the FISAP due on September 30, 2013 until June 30, 2016 (three years from June 30, 2013 – the end of the award year in which the FISAP is submitted). The Blue Book, *Volume 7, 2013*.

**Noncompliance:** While on-site, program reviewers requested MCCL staff to provide a copy of the FISAP backup documentation which was utilized to prepare the July 1, 2012 to June 30, 2013 application award year (to document Title IV, HEA recipients during the 2010-2011 award year) and July 1, 2013 to June 30, 2014 application award year (to document Title IV, HEA recipients during the 2011-2012 award year). However, reviewers were informed the backup documentation was not maintained by MCCL. It should be noted program review staff inquired if the FISAP documentation was provided to its auditors and were informed the auditors did not request to see that information during the institution's last audit. Accounting staff at MCCL indicated they would re-create the backup to satisfy the request as well as to ensure the data was available in the future. However, upon review of the re-created backup data provided, it was noted there were discrepancies between the data provided on the FISAP to Campus Based and the information which was available on the back-up documentation.

For example, the chart below illustrates discrepancies in Section F for both award years:

Question Number	Award Year (Report Year)	Back-Up Information	FISAP Information
25 (c)	2010-2011	4,826	4,828
27 (c)	2010-2011	147	146
31 (c)	2010-2011	127	128
34 (c)	2010-2011	231	232
35 (c)	2010-2011	201	204
39 (c)	2010-2011	3,678	3,680
40 (c)	2010-2011	11,772	11,780

Question Number	Award Year (Report Year)	Back-Up Information	FISAP Information
25 (c)	2011-2012	4,947	4,952
26 (a)	2011-2012	38	37
26 (c)	2011-2012	1,121	1,120
30 (c)	2011-2012	116	117
33 (a)	2011-2012	162	163
34 (a)	2011-2012	284	285
35 (a)	2011-2012	408	406
36 (a)	2011-2012	405	406
37 (a)	2011-2012	391	390
39 (a)	2011-2012	3,819	3,817
39 (c)	2011-2012	3,421	3,418
40 (a)	2011-2012	8,480	8,477
40 (c)	2011-2012	11,666	11,668

**Required Action:** MCCL must review all portions of its Fiscal Operations Report and Application to Participate (FISAP) for the 2009-2010, 2010-2011, and 2011-2012 reporting award years to ensure the information accurately reflects the institution's recipient and fiscal activity for all portions, with additional attention paid to Section F. If MCCL identifies discrepant information, the institution must submit a corrected FISAP report to the Department's Campus-Based Operations office. A copy of the corrected FISAP as well as the subsequent documentation should also be included in MCCL's response to this PRR.

To make changes to an existing FISAP for recent award years, MCCL must report the corrected FISAP information through the Department's eCB system. Changes must be made to the working copy of the FISAP for the applicable award year. At the time of submission, the institution will be asked to provide an explanation of why changes are being made. Detailed instructions for submitting FISAP corrections can be obtained by contacting the eCB Call Center at (877) 801-7168.

Additionally, MCCL must review and revise its internal policies and procedures to ensure FISAP materials required to be maintained as part of the FISAP backup, is properly retained for the

required record retention period in the future. A detailed discussion of these policies and procedures must accompany MCCL's response to this report.

**Finding 7: Failure to Maintain Off-Campus Community Service Contracts Which Meet Department Guidelines**

**Citation:** A student may be employed under the Federal Work Study (FWS) program by the institution in which the student is enrolled; (2) A Federal, State, or local public agency; (3) A private nonprofit organization; or (4) A private for-profit organization. If an institution wishes to have its students employed under this part by a Federal, State or local public agency, or a private nonprofit or for-profit organization, it shall enter into a written agreement with that agency or organization. The agreement must set forth the FWS work conditions. The agreement must indicate whether the institution or the agency or organization shall pay the students employed, except that the agreement between an institution and a for-profit organization must require the employer to pay the non-Federal share of the student earnings. The institution may enter into an agreement with an agency or organization that has professional direction and staff. The institution is responsible for ensuring that payment for work performed under each agreement is properly documented; and each student's work is properly supervised. The agreement between the institution and the employing agency or nonprofit organization may require the employer to pay the non-Federal share of the student earnings; and required employer costs such as the employer's share of Social Security or Workers' Compensation. Regardless of the student's employer, the student's work must be governed by employment conditions, including pay, that are appropriate and reasonable in terms of type of work; geographical region; employee proficiency; and any applicable Federal, State, or local law. 34 C.F.R. § 675.20 (a) through (c)

**Noncompliance:** MCCL, as well as the other schools within The Kansas City Metropolitan Community College system, works with many outside agencies in fulfilling the Department guidelines for FWS Community Service, including Mid-Continent Public Library, St. Vincent Day Care, Westport Roanoke Community Center, and Synergy Services. In the case of two of the entities, the federal wage to be paid to the student for hours worked does not correlate to the Federal Minimum Wage rate of \$7.25. For example, the wage rate reflected in the contract for students working at St. Vincent Day Care and Westport Roanoke Community Center indicates student workers were to be paid \$6.50 per hour. A review of the Synergy Services contract indicates students were to be paid \$7.00 per hour. As FWS students are required to be paid at the prevailing Federal minimum wage rate, the agreements in effect are not compliant with Federal regulations.

Additionally, a review of the wages to be paid for students working at the Mid-Continent Public Library under the FWS Community Services Program Off-Campus Agreement does not correlate with wages being paid to students employed at this location. For example, Student #53 is employed at the Library during the current 2012-2013 award year. A review of the Agreement currently in place between the institution and the location indicates students are to be paid \$8.05 per hour. However, a review of the FWS Student Employment Application indicates the student

is to be paid (and has been paid) \$8.25 per hour. Although the wages are in compliance with Fair Labor Standards, the wage rate currently enforced should match the agreed upon wages which are discussed in the contract.

**Required Action:** MCCL must review the Off-Campus Community Service Agreements currently active to ensure federal employment regulations are being enforced and the contract terms and conditions mirror information presented to students by MCCL. If MCCL determines in its review that any students were not paid under the Fair Labor Standards, MCCL must make whole the students in question, paying the additional wages from the institutional payroll, and provide copies to the Department of its method of curing the pay related issues. If amended agreements are necessary, MCCL must obtain updated documentation and provide copies to the Department with its response to the PRR.

Additionally, MCCL must review its policies and procedures in relation to the maintenance of FWS documentation to ensure updates are performed timely and as needed and provide copies of the policies and procedures to the Department as part of its response to the PRR.

#### **Finding 8. Improper FWS Payments**

**Citation:** Institutions participating in the FWS program must establish and maintain records that include a time record that shows the hours each student worked, either in clock-time sequence or the total hours worked per day. 34 C.F.R. § 675.19(b)(2)(i)

**Noncompliance:** While reviewing the FWS data provided by MCCL, program reviewers documented four instances of students working during scheduled class time or periods which cannot be correlated.

**Student #50:** During the 2011-2012 and 2012-2013 award years, the student was employed in an FWS job in the Library as well as in the role of Gallery Assistant in the Cultural Arts Center Gallery. A review of the student's monthly timesheet indicated the student was routinely working during scheduled class time. For example, during the 09/04/2011 pay period, the student worked on Tuesdays from 12 to 3 PM; however, the student was scheduled to be in class until 12:15 during these days. The student was also working on Tuesdays from 12 to 4 PM during the 10/30/2011 pay period. During the 09/18/2011 pay period, the student worked on multiple days during scheduled class times, including Tuesday, September 20 from 12 to 3 PM, Tuesday, September 27 from 12 to 4 PM, and Friday from 12 PM to 4 PM, even though the student was supposed to be in class on Friday from 12 PM to 12:50 PM. During the spring 2012 semester, the student only worked during one pay period when scheduled to be in class. A review of the student's enrollment compared to worked hours indicates the student worked from 12 PM to 4 PM on Thursdays during the pay period of 02/05/2012, even though the student was scheduled to be in class from 12 PM to 4 PM on Thursdays.

**Student #52:** During the 2011-2012 award year, the student was employed in an FWS job as a Custodian. In reviewing the student's paperwork regarding employment, the FWS application as well as the FWS Student Employment Handbook indicates the student is allowed to work 19.5 maximum hours per week. However, a review of student's timesheet for six pay periods, including Pay Period 07/24/2011, Pay Period 08/07/2011, Pay Period 08/21/2011, Pay Period 09/04/2011, Pay Period 09/18/2011, and Pay Period 10/02/2011, indicates the student worked over the amount allowed. Although this is not a violation of FWS guidelines, it violates the policies and procedures in place at MCCL which govern its administration of the FWS program.

**Student #54:** During the 2011-2012 award year, the student was employed in the Biology Department as a Student Assistant. A review of the student's timesheets indicates the student did not separate his time to indicate "time in" and "time out" so any review of his timesheets could assure the student was not working during improper times. MCCL allowed students to work 39 hours each pay period. In reviewing the student's timesheets, the student worked exact amounts each pay period, even though the times worked were not documented; instead, it appeared the student was completing the timesheets in advance, assuming the maximum hours would be worked each pay period.

**Student #56:** During the 2011-2012 and 2012-2013 award year, the student was employed in an FWS job in the Financial Aid Office. In reviewing the student's paperwork regarding employment, the FWS application indicates the student is allowed to work 19.5 maximum hours per week. However, a review of student's timesheet for the pay period 01/08/2012 indicates the student worked 40 hours in one week of the pay period and 13 in the subsequent week—working 14 hours over the amount allowed. Although this is not a violation of FWS guidelines, it violates the policies and procedures in place at MCCL which govern its administration of the FWS program.

**Required Action:** MCCL must review the time records for the students discussed above to determine the reason for the timesheet discrepancies as well as to discuss students who worked in violation of MCCL time policies. For those students who were paid incorrectly, MCCL must resolve the payroll issues by making corrections as necessary to any records which were improperly paid and provide documentation of this to the Department in its response to the PRR. In the case of **Student 54**, MCCL must review the student's work schedule with the student's supervisor, in comparison with the student's class schedule, to ensure the student was not working when scheduled to be in class as well as to ensure the times worked by the student during the periods in question.

MCCL must provide assurances that the hours worked by students receiving FWS wages will be carefully monitored in the future to ensure students are properly paid only for hours they work and in compliance with MCCL guidelines. Moreover, MCCL must monitor student course schedules and employment commitments made to on-campus departments to ensure students are working during available time, not during scheduled class time.

As part of its response to the PRR, MCCL must review its policies and procedures in relation to FWS to ensure its policies are in compliance with Department as well as Federal guidelines and make any revisions accordingly. A copy of these policies and procedures must accompany MCCL's response to the PRR.

### **Finding 9. National Student Loan Data System (NSLDS) Reporting Incorrect/Untimely**

**Citation:** Federal regulations state that a school shall—

- (1) Upon receipt of a Student Status Confirmation Report from the Secretary, complete and return that report to the Secretary within 30 days of receipt; and
- (2) Unless it expects to submit its next Student Status Confirmation Report to the Secretary within the next 60 days, notify the Secretary within 30 days if it discovers that a Direct or FFEL Subsidized, Unsubsidized, or PLUS Loan has been made to or on behalf of a student who—
  - (a) Enrolled at that school but has ceased to be enrolled on at least a half-time basis;
  - (b) Has been accepted for enrollment at that school but failed to enroll on at least a half-time basis for the period for which the loan was intended; or
  - (c) Has changed his or her permanent address.
- (3) The Secretary provides Student Status Confirmation Reports to a school at least semi-annually.
- (4) The Secretary may provide the Student Status Confirmation Report in either paper or electronic format. 34 CFR §§ 682.610; 685.309

The Secretary provides Student Status Confirmation Reports to a school at least semi-annually. At scheduled times during the year, not less than semiannually, NSLDS sends Roster files electronically to the institution (or its designated servicer) through its SAIG mailbox. The file includes all of the institution's students who are identified in NSLDS as Direct Loan borrowers (or the beneficiaries of a PLUS Loan). The file is not necessarily connected to loans made at the institution—the institution must also report information for students who received some or all of their Title IV, HEA loans at other schools but are currently attending the reporting institution.

The institution (or servicer) must certify the information and return the Roster file within 30 days of receiving it. The institution may also go to [www.nslsdfap.ed.gov](http://www.nslsdfap.ed.gov) and update information for students online. The institution is required to report changes in the student's enrollment status, the effective date of the status and an anticipated completion date. Changes in enrollment to less than half time, graduated, or withdrawn must be reported within 30 days. However, if a Roster file is expected within 60 days, the institution may provide the data on that roster file. *2011-2012 & 2012-2013 Federal Student Aid Handbook, Volume 2, Chapter 3*

Student enrollment information is extremely important, because it is used to determine if the student is still considered in school, must be moved into repayment, or is eligible for an in-school

deferment. For students moving into repayment, the out of school status effective date determines when the grace period begins and how soon a student must begin repaying loan funds. *2011-2012 & 2012-2013 Federal Student Aid Handbook, Volume 2, Chapter 3*

**Noncompliance:** In three instances, MCCL failed to report correct enrollment status information.

**Student #10:** The student began coursework at MCCL in spring 2006 and continued in coursework at a half-time student status or greater through the fall 2011 semester. In spring 2012, the student dropped to a less-than-half-time status; however, a review of the NSLDS data reported by MCCL indicates the student was considered "withdrawn" as of 12/16/2008. In addition, the student's enrollment reporting history has not been updated by MCCL to reflect enrollment after 06/19/2009, even though the student received Title IV, HEA funds during the 2010-2011 and 2011-2012 award years.

**Student #16:** The student began coursework at MCCL in fall 2012 and enrolled in nine hours (considered half-time for NSLDS reporting purposes). Although the semester began on August 21, 2012, MCCL indicated the student's status was effective on August 23, 2012—a day which does not correlate to the academic calendar.

**Student #22:** The student began coursework at MCCL in fall 2011 as a full-time student and continued in this status until the fall 2012 semester began. For the fall 2012 semester, the student was enrolled in nine hours (considered half-time for NSLDS reporting purposes). Although the semester began on August 21, 2012, MCCL indicated the student's status was effective on September 12, 2012—a day which does not correlate to the academic calendar.

**Required Action:** MCCL must review the enrollment status of all students who were enrolled at the institution in the 2011-2012 and 2012-2013 (year to date) award years who withdrew or graduated or any students currently enrolled at the institution and verify the enrollment status is current, or update the enrollment status to bring it current. MCCL is also required to review its procedures for reporting enrollment status changes to NSLDS and, as necessary, revise them. A discussion of the results of MCCL's review of its 2011-2012 and 2012-2013 enrollment status reporting and a copy of its NSLDS reporting policies and procedures should accompany MCCL's response to this PRR.

#### **Finding 10. Consumer Information Requirements Not Met**

**Citation:** As outlined in 34 C.F.R. § 668.41, an institution must, on an annual basis, provide direct individual notice to each currently enrolled student about various consumer information items. Such notices may be provided to each student via the U.S. Postal Service, direct mail, or directly to student e-mail addresses. This notice must summarize the information required to be disclosed, provide an electronic Web address where the information can be found, inform a student that he or she is entitled to a paper copy of the information, and inform the student how

to request a paper copy. In addition, the notice must be sufficiently detailed to allow students to understand the nature of the disclosures and make an informed decision whether to request the full reports.

These disclosures include information on financial assistance available to students, as described in 34 C.F.R. § 668.42, and information about the school, as described in 34 C.F.R. § 668.43. Consumer information disclosures also require the release of information regarding the institution's completion or graduation rate, under 34 C.F.R. § 668.45.

Other consumer information disclosures are required by the Higher Education Opportunity Act (Public Law 110-315) (HEOA), reauthorizing the Higher Education Act of 1965, as amended (the HEA). The provisions of the HEOA were effective upon enactment, August 14, 2008, unless otherwise noted in law.

**Noncompliance:** MCCL failed to provide, or make readily available, consumer information to the campus community and the public in the following six categories:

- 1) Information disclosed to students/parents of Title IV, HEA loan data submitted to NSLDS and accessible to authorized agencies;
- 2) Return to Title IV Information for Current and Prospective Students
- 3) Right to Know Act Data Disaggregated Based on HEOA Guidance;
- 4) Coeducational Equity in Athletics Report;
- 5) Drug and Alcohol Abuse Prevention Program; and
- 6) Student Body Diversity

Specific requirements related to each missing disclosure are cited below by topic:

**Information Disclosed to Students/Parents of Title IV, HEA Loan Data Submitted to NSLDS and Accessible to Authorized Agencies**

All institutions participating in Title IV, HEA student financial aid programs who enter into an agreement with a potential student, currently enrolled student, or parent of student regarding a Title IV, HEA loan are required to inform the student or parent that the loan will be submitted to the National Student Loan Data System (NSLDS) and will be accessible by guaranty agencies, lenders, and institutions determined to be authorized users of the data system. HEOA Sec. 489 amended HEA Sec. 485B(d)(4) (20 U. S. C. 1092B)

**Return to Title IV Information for Current and Prospective Students**

All institutions participating in Title IV, HEA student financial aid programs must provide in written format for current and prospective students information regarding the refund policy which the institution is required to comply for return of unearned tuition and fees or other refundable portions of costs paid to the institution, requirements and procedures for officially withdrawing. Additionally, institutions must provide a summary of requirements related to the Return of Title IV funds, including a sample example of how much aid students could potentially

earn and the order in which funds are earned/returned to the Department in instances of student withdrawals which then require the return of funds. 34 C.F.R. § 668.43(a)(2)

### **Right to Know Act Data Disaggregated based on HEOA Guidance**

All institutions participating in Title IV, HEA student financial aid programs must report completion or graduation rate information disaggregated by gender, by each major racial and ethnic subgroup (as defined in IPEDS), by recipients of a Federal Pell Grant, by recipients of a Direct Subsidized Loan who did not receive a Federal Pell Grant, and by recipients of no form of Title IV, HEA funds if the number of students in such group or with such status is sufficient to yield statistically reliable information and reporting will not reveal personally identifiable information about an individual student. 34 C.F.R. §668.45

### **Coeducational Equity in Athletics Report**

For coeducational institutions with intercollegiate athletic programs, an *Equity in Athletics Report*:

- Notice provided at least once per year to all students and prospective students of a summary of the report and their right to request a full report
- Report compiled and made available to students, prospective students and the public by October 15 and submitted to the Department annually within 15 days of making the report available to students 34 C.F.R. § 668.41(g), 668.47

### **Drug and Alcohol Abuse Prevention Program**

Each institution, that receives any federal funds, must annually distribute in writing to each student and each employee, the following information regarding drugs and alcohol:

- standards of conduct that clearly prohibit the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on the institution's property or as part of any of the institution's activities;
- description of applicable legal sanctions under state, local, and federal law
- description of health risks;
- description of available counseling, treatment, rehabilitation, or re-entry programs; and
- a clear statement that the institution will impose sanctions for violation of standards of conduct and a description of the sanctions.

HEOA Sec. 107: amended HEA Sec. 120; new HEA Sec. 120(a)(B)-(C); 34 C.F.R. §86

### **Student Body Diversity**

Institutions must make available to current and prospective students information about student body diversity, including the percentage of enrolled full-time students based on gender, race/ethnicity based on self-identification (as collected in the IPEDS enrollment survey), and Federal Pell Grant recipients. HEOA Sec. 488(a)(1)(E) amended HEA Sec. 485(a)(1) 20 USC 1092(a)(1)

**Required Action:** MCCL must revise policies and procedures for preparing and disseminating consumer information disclosures in compliance with federal regulations. Additionally, MCCL must immediately make missing information available to students and employees online. Written explanation of the online updates along with a copy of MCCL's revised policies and procedures should accompany its response to this report.

### **Finding 11: Crime Awareness Requirements Not Met--Omission of Policy Statements**

**Citation:** The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (*Clery Act*) and the Department's regulations require that all institutions that receive Title IV, HEA funds must, by October 1 of each year, publish and distribute to its current students and employees, a comprehensive Annual Security Report (ASR) that contains, at a minimum, all of the statistical and policy elements enumerated in 34 C.F.R. § 668.46(b). With the exception of certain drug and alcohol program information, cross referencing to other publications is not sufficient to meet the publication and distribution requirements. § 485(f) of the HEA; 34 C.F.R. § 668.41 (e)(1)

The consumer protection disclosures that are required to be included in the ASR are intended to inform the campus community about the institution's security policies, procedures, programs, and resources as well as channels for victims of crime to seek recourse. In general, these policies include but are not limited to topics such as the law enforcement authority and practices of campus police and security forces, incident reporting procedures for students and employees, and policies that govern the preparation of the ASR itself. Institutions are also required to disclose information about drug and alcohol abuse education and prevention programs. Policies pertaining to sexual assault education, prevention, and adjudication must also be disclosed. Institutions also must provide detailed policies on the issuance of timely warnings, emergency notifications, and evacuation procedures. As noted above, all required statistics and policies must be included in a single comprehensive document. 34 C.F.R. § 668.46 (b)

**Noncompliance:** MCCL failed to prepare, publish, and distribute an accurate and complete ASR to all current students and employees. Specifically, MCCL's ASR did not include all required statements of campus security policy and procedure including those that govern the institution's preparation of the ASR and the compilation of its campus crime statistics. In addition, MCCL failed to develop, implement, and publish required information about its campus sexual assault awareness and prevention programs as required by 34 C.F.R. § 668.46 (b)(11). By logical extension, these omissions also result in a corresponding failure to distribute an accurate and complete ASR to all current students and employees.

Failure to prepare and publish an accurate and complete ASR and to actively distribute it to current students and employees in accordance with Federal regulations deprives the campus community of important security information.

**Required Action:** As a result of these violations, MCCL must develop and implement policies and procedures for preparing, publishing, and distributing an ASR that meets all Federal standards. Using its new policies as a guide, MCCL must prepare and publish an accurate and complete ASR that includes all of the statistical disclosures and policy, procedure and programmatic information required under 34 C.F.R. § 668.46(b). A copy of the institution's new policies and procedures and its draft ASR must accompany MCCL's response to this program review report. Once the new ASR is evaluated by the review team for accuracy and completeness, MCCL must actively distribute it to all current students and employees in accordance with 34 C.F.R. § 668.41(e). Finally, MCCL must provide documentation to the Department evidencing the distribution as well as a statement of certification attesting to the fact that the materials were distributed in accordance with the *Clery Act*. This certification must also affirm that MCCL understands its *Clery Act* obligations and that it will take all necessary corrective actions to ensure that this violation does not recur.

As noted above, the exceptions identified in this finding constitute serious violations of the *Clery Act* that by their nature cannot be cured. MCCL will be given an opportunity to develop and distribute a compliant ASR and in so doing, bring its overall campus security program into compliance with the *Clery Act* as required by its Program Participation Agreement (PPA). However, MCCL is advised that these remedial measures cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department will impose additional corrective or administrative actions.

Based on an evaluation of all available information including MCCL's response, the Department will determine if additional actions will be required and will advise the College accordingly in the FPRD.

#### **Finding 12: Failure to Comply with Drug and Alcohol Abuse Education and Prevention Program Requirements**

**Citation:** The Drug-Free Schools and Communities Act (DFSCA) and Part 86 of the Department's General Administrative Regulations require each institution of higher education (IHE) to certify that it has developed and implemented a drug and alcohol abuse prevention program (DAAPP). The program must be designed to prevent the unlawful possession, use, and distribution of drugs and alcohol on campus and at recognized events and activities.

On an annual basis, each IHE must provide the following information in writing to all current students (enrolled for any type of academic credit except for continuing education units) and all current employees:

- 1) A written statement about its standards of conduct that prohibits the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees;

- 2) A written description of legal sanctions imposed under Federal, state, and local laws and ordinances for unlawful possession or distribution of illicit drugs and alcohol;
- 3) A description of the health risks associated with the use of illicit drugs and alcohol abuse;
- 4) A description of any drug or alcohol counseling, treatment, and rehabilitation/re-entry programs that are available to students and employees; and,
- 5) A statement that the IHE will impose disciplinary sanctions on students and employees for violations of the institution's codes of conduct and a description of such sanctions.

The distribution plan must make provisions for providing the DAAPP disclosure annually to students who enroll at a date after the initial distribution and for employees who are hired at different points throughout the year.

In addition, each IHE must conduct a biennial review to determine the effectiveness of its DAAPP and to ensure consistent enforcement of applicable drug and alcohol-related statutes, ordinances, and institutional policies against students and employees found to be in violation. The biennial review materials must be maintained by the IHE and made available to the Department upon request. 34 C.F.R. §§ 86.3 and 86.100

**Noncompliance:** MCCL violated multiple requirements of the DFSCA. Firstly, the institution failed to develop and implement a compliant DAAPP. For example, MCCL's DAAPP did not include any information about drug or alcohol counseling, treatment or rehabilitation programs or resources that are provided by the College and/or local agencies. Moreover, MCCL failed to distribute its DAAPP disclosure on an annual basis to all employees and all students enrolled for any academic credit. MCCL does not have a written DAAPP distribution policy. As a community college, MCCL enrolls students throughout the year and provides flexible scheduling options including evening, weekend, and summer classes. The College also supplements its full-time faculty and staff with a significant number of adjunct, part-time, and casual faculty and staff members. These facts trigger a special regulatory concern because the College has not made any specific provision to ensure that the DAAPP disclosure is distributed to students who enroll at various points throughout the academic year or to casual workers who are not part of the permanent, full-time faculty and staff.

In addition, MCCL failed to conduct a Biennial Review (BR) to: 1) evaluate the effectiveness of its DAAPP, 2) identify areas requiring improvement or modification, and 3) assess the consistency of sanctions imposed for violations of its disciplinary standards and codes of conduct. Moreover, MCCL failed to prepare a BR report of findings.

Failure to comply with the DFSCA's DAAPP requirements deprives students and employees of important information regarding the educational, disciplinary, health, and legal consequences of illegal drug use and alcohol abuse. Failure to comply with the BR requirements also deprives the institution of important information about the effectiveness of its own drug and alcohol programs. Such failures may contribute to increased drug and alcohol abuse on-campus as well as an increase in drug and alcohol-related violent crime.

**Required Action:** MCCL is required to take all necessary corrective actions to resolve these violations. At a minimum, the College must develop and implement a comprehensive DAAPP that includes all of the required elements found in the DFSCA and the Department's Part 86 regulations.

Additionally, the College must develop policies and procedures to ensure that all subsequent BRs are conducted in a timely manner and are fully documented. Moreover, MCCL also must take all other necessary action to ensure that these violations do not recur. These new policies also must address how MCCL will ensure that the DAAPP disclosure will be distributed annually to every student who is currently enrolled for academic credit and to all employees.

MCCL must submit a draft copy of its DAAPP and new policies with its response to this program review report. Once the materials are reviewed and approved by the Department, MCCL must distribute them in accordance with the Part 86 regulations, and provide documentation evidencing the distribution as well as a statement of certification attesting to the fact that the materials were distributed in accordance with the DFSCA.

Furthermore, MCCL must: 1) conduct a BR to evaluate the effectiveness of its drug and alcohol programs, to identify necessary improvements, and to assess the consistency of sanctions imposed for violations of its disciplinary standards and codes of conduct and 2) prepare a detailed report of its findings.

The BR report must describe the research methods and data analysis tools that will be used to assess the program's effectiveness and the consistency of its enforcement strategy. Additionally, the BR report must identify the responsible official(s) who conducted the BR. Finally, the BR report must be approved by the institution's chief executive. The BR must be completed by April 1, 2013 and be submitted to the Department by April 30, 2013. Because the DFSCA went into effect in 1990, longstanding practice dictates that the BR is normally conducted in even-numbered years and that the BR report is also completed in the same year as well; however, MCCL's current and past failure to conduct a BR necessitates that such a review commence immediately. This will result in this and subsequent BR's and BR reports to be completed in the odd-numbered years going forward.

As noted above, violations of the DFSCA are serious and by their nature, cannot be cured. MCCL will be given an opportunity to conduct a meaningful review of its DAAPP and to bring its drug and alcohol programs into compliance with the DFSCA for the first time as required by its PPA. However, the College is advised that these remedial measures cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department will impose additional corrective or administrative actions.

Based on an evaluation of all available information, including MCCL's response, the Department will determine if additional action will be required and will advise the College accordingly in the FPRD.

Metropolitan Community College--Longview

OPE ID: 00248444

PRCN: 201310728113

Page 56

Appendix D: Cost of Funds

Metropolitan Community College--Longview

OPE ID: 00248444

PRCN: 201310728113

Page 57

Ineligible Disbursements (Non-Loan) - Cost of Funds and Administrative Cost Allowance

Name of Institution: Metropolitan Community College-Longview  
 Finding 3: Attendance Not Verified Prior to Disbursement

No.	Description/Name	Ineligible Disbursement	Program	Disbursement Date	Return Paid Date	No. of Days	Imputed CVFR	Federal Share	To ED
3-58	(b)(6)	\$693.00	Pell Grant	1/6/2012	3/15/2013	434	1.00%	\$ 693.00	\$ 8.24
3-59		\$500.00	Pell Grant	5/21/2012	3/15/2013	298	1.00%	\$ 500.00	\$ 4.08
3-60		\$1,116.80	Pell Grant	8/8/2011	3/15/2013	585	1.00%	\$ 1,116.80	\$ 17.90
3-61		\$693.00	Pell Grant	8/8/2011	3/15/2013	585	1.00%	\$ 693.00	\$ 11.11
3-62		\$450.70	Pell Grant	1/3/2012	3/15/2013	437	1.00%	\$ 450.70	\$ 5.40
3-63		\$694.00	Pell Grant	1/3/2012	3/15/2013	437	1.00%	\$ 694.00	\$ 8.31
3-64		\$23.46	Pell Grant	5/21/2012	3/15/2013	298	1.00%	\$ 23.46	\$ 0.19
3-65		\$513.00	Pell Grant	8/8/2011	3/15/2013	585	1.00%	\$ 513.00	\$ 8.22
3-66		\$666.19	Pell Grant	8/8/2011	3/15/2013	585	1.00%	\$ 666.19	\$ 10.68
3-67		\$144.56	Pell Grant	5/21/2012	3/15/2013	298	1.00%	\$ 144.56	\$ 1.18
3-68		\$625.00	Pell Grant	8/8/2011	3/15/2013	585	1.00%	\$ 625.00	\$ 10.02
3-69		\$450.64	Pell Grant	1/31/2012	3/15/2013	409	1.00%	\$ 450.64	\$ 5.05
3-70		\$313.00	Pell Grant	5/21/2012	3/15/2013	298	1.00%	\$ 313.00	\$ 2.56
3-71		\$693.00	Pell Grant	8/8/2011	3/15/2013	585	1.00%	\$ 693.00	\$ 11.11
3-72		\$694.00	Pell Grant	8/17/2011	3/15/2013	576	1.00%	\$ 694.00	\$ 10.95
3-73		\$1,388.00	Pell Grant	8/8/2011	3/15/2013	585	1.00%	\$ 1,388.00	\$ 22.25
3-74		\$612.00	Pell Grant	5/21/2012	3/15/2013	298	1.00%	\$ 612.00	\$ 5.00
3-75		\$575.00	Pell Grant	8/8/2011	3/15/2013	585	1.00%	\$ 575.00	\$ 9.22
3-76		\$693.00	Pell Grant	8/8/2011	3/15/2013	585	1.00%	\$ 693.00	\$ 11.11
3-77		\$694.00	Pell Grant	1/18/2012	3/15/2013	422	1.00%	\$ 694.00	\$ 8.02
3-78		\$477.31	Pell Grant	5/21/2012	3/15/2013	298	1.00%	\$ 477.31	\$ 3.90
3-79		\$587.00	Pell Grant	9/13/2011	3/15/2013	549	1.00%	\$ 587.00	\$ 8.83
3-80		\$300.61	Pell Grant	1/3/2012	3/15/2013	437	1.00%	\$ 300.61	\$ 3.60
3-81		\$694.00	Pell Grant	5/21/2012	3/15/2013	298	1.00%	\$ 694.00	\$ 5.67
3-82		\$34.00	Pell Grant	5/21/2012	3/15/2013	298	1.00%	\$ 34.00	\$ 0.28
3-83		\$693.00	Pell Grant	8/23/2011	3/15/2013	570	1.00%	\$ 693.00	\$ 10.82
3-84		\$187.00	Pell Grant	8/22/2011	3/15/2013	571	1.00%	\$ 187.00	\$ 2.93
3-85		\$694.00	Pell Grant	1/3/2012	3/15/2013	437	1.00%	\$ 694.00	\$ 8.31
3-86		\$693.00	Pell Grant	8/24/2011	3/15/2013	569	1.00%	\$ 693.00	\$ 10.80
3-87		\$693.00	Pell Grant	1/3/2012	3/15/2013	437	1.00%	\$ 693.00	\$ 8.30
14		\$1,300.00	Pell Grant	1/3/2012	3/15/2013	437	1.00%	\$ 1,300.00	\$ 15.57
3-88		\$418.89	Pell Grant	5/21/2012	3/15/2013	298	1.00%	\$ 418.89	\$ 3.42
3-89		\$363.11	Pell Grant	5/23/2012	3/15/2013	296	1.00%	\$ 363.11	\$ 2.94
3-90		\$462.00	Pell Grant	8/8/2011	3/15/2013	585	1.00%	\$ 462.00	\$ 7.41
3-91		\$694.00	Pell Grant	5/21/2012	3/15/2013	298	1.00%	\$ 694.00	\$ 5.67
3-92		\$694.00	Pell Grant	5/21/2012	3/15/2013	298	1.00%	\$ 694.00	\$ 5.67
3-93		\$693.00	Pell Grant	1/3/2012	3/15/2013	437	1.00%	\$ 693.00	\$ 8.30
3-94		\$694.00	Pell Grant	5/21/2012	3/15/2013	298	1.00%	\$ 694.00	\$ 5.67
3-95		\$405.69	Pell Grant	5/21/2012	3/15/2013	298	1.00%	\$ 405.69	\$ 3.31
3-96		\$693.00	Pell Grant	8/2/2012	3/15/2013	225	1.00%	\$ 693.00	\$ 4.27
3-97		\$478.27	Pell Grant	8/7/2012	3/15/2013	220	1.00%	\$ 478.27	\$ 2.88
3-98		\$693.00	Pell Grant	8/2/2012	3/15/2013	225	1.00%	\$ 693.00	\$ 4.27
3-99		\$693.00	Pell Grant	8/2/2012	3/15/2013	225	1.00%	\$ 693.00	\$ 4.27
3-100		\$693.00	Pell Grant	8/2/2012	3/15/2013	225	1.00%	\$ 693.00	\$ 4.27
3-101		\$826.84	Pell Grant	8/21/2012	3/15/2013	206	1.00%	\$ 826.84	\$ 4.67
3-102		\$500.00	Pell Grant	1/23/2013	3/15/2013	51	1.00%	\$ 500.00	\$ 0.70
3-103		\$693.00	Pell Grant	8/2/2012	3/15/2013	225	1.00%	\$ 693.00	\$ 4.27
3-104		\$626.14	Pell Grant	9/6/2012	3/15/2013	190	1.00%	\$ 626.14	\$ 3.26
3-105		\$694.00	Pell Grant	1/2/2013	3/15/2013	72	1.00%	\$ 694.00	\$ 1.37
3-106		\$694.00	Pell Grant	8/2/2012	3/15/2013	225	1.00%	\$ 694.00	\$ 4.28
3-107		\$694.00	Pell Grant	8/2/2012	3/15/2013	225	1.00%	\$ 694.00	\$ 4.28
3-108		\$440.33	Pell Grant	8/8/2012	3/15/2013	219	1.00%	\$ 440.33	\$ 2.64
3-109		\$694.00	Pell Grant	1/2/2013	3/15/2013	72	1.00%	\$ 694.00	\$ 1.37
3-110		\$693.00	Pell Grant	8/2/2012	3/15/2013	225	1.00%	\$ 693.00	\$ 4.27
3-111		\$693.00	Pell Grant	8/2/2012	3/15/2013	225	1.00%	\$ 693.00	\$ 4.27
3-112		\$500.00	Pell Grant	9/4/2012	3/15/2013	192	1.00%	\$ 500.00	\$ 2.63
3-113		\$694.00	Pell Grant	8/2/2012	3/15/2013	225	1.00%	\$ 694.00	\$ 4.28
3-114		\$694.00	Pell Grant	8/2/2012	3/15/2013	225	1.00%	\$ 694.00	\$ 4.28
3-115		\$693.00	Pell Grant	8/2/2012	3/15/2013	225	1.00%	\$ 693.00	\$ 4.27

Total Ineligible	\$36,089.54	Totals	\$ 362.80
Pell	\$ 36,089.54	Interest Breakdown	
	\$ 36,089.54	Pell Grants	\$ 362.80

Metropolitan Community College--Longview

OPE ID: 00248444

PRCN: 201310728113

Page 58

Final Program Review Determination

PRCN #: 201310728113

## Appendix E

### MCCL's Response to the Program Review Report



**Metropolitan  
Community College**

Blue River | Business & Technology | Longview | Maple Woods | Penn Valley

**Metropolitan Community College – Longview**

**OPE ID: 00248444  
PRCN: 20130728113**

**MCC Response to Federal Student Aid's  
Program Review Report  
July 2013**

## **Finding 1. Return of Title IV Funds Calculation Errors**

MCC uses a standard calendar for all students enrolled in the regular session, 8 week 1 session, and 8 week 2 sessions. MCC has setup a School Calendar Profile for these three sessions on the Department of Education software FAA Access to CPS Online – Return of Title IV Funds on the Web. In addition to the Department of Education’s software, MCC also uses MetroSoft’s Create Worksheet (Return of TIV Worksheet HERA) panel and a preliminary worksheet created by the Sponsored Programs Fiscal Office.

Students enrolled in classes that fall outside the three sessions listed above are treated as non-standard term. The district processing specialist use queries to identify these students and award them correctly according to the formula three guidelines provided by the Department of Education (Vol. 3, Ch. 3 of the FSA Handbook). If a return of Title IV fund calculation is needed for a student awarded as a non-standard award, the Sponsored Programs Fiscal Office will calculate the return using the preliminary worksheet and MetroSoft’s Create Worksheet. MetroSoft’s Create Worksheet allows the office to change the start and end dates of the payment period, as for Department of Education’s software does not allow a change and population of students needing a Return to Title IV funds in the modular courses are too few to create a School Calendar Profile.

For all students enrolled in classes that fall outside of the three sessions listed prior, those students are reviewed on an individual bases as non-standard classes.

MCC has reviewed it’s procedures for calculating break days for the fall semester, and has determined the Thanksgiving break should be removed due to the 5 day break. For the fall 2012 semester, MCC’s Sponsored Programs Fiscal Office reviewed all Return to Title IV calculations and recalculated them with exclusion of the 5 day break, making the payment period 115 days instead of the original 120. For upcoming fall semesters, the Thanksgiving break will be taken into consideration when calculating the payment period.

MCC holds classes during the Saturday and Sunday prior to the start of the spring break. These classes are held at all MCC campuses, including online classes. Per the FSA Handbook (2011/2012 pg. 5-103 and 2012/2013 pg. 5-72) ‘[i]f a community college offers regular classes on Saturday and Sunday and its academic calendar says that a scheduled break starts on a Monday and resumes with classes the following Monday, that break is seven days long.’ After close review, MCC has determined that their calculation of the spring 2012 semester operates with a scheduled break of seven days, and no changes should be needed to their procedure.

## **Finding 2. Late Return of Title IV Funds**

### **Response to Student #31**

Sponsored Programs Fiscal Office became aware of the student’s ceased enrollment on 11/3/11. The instructor reported the student as a never attend on 11/2/11. A recalculation was performed on the students for the never attend on 11/3/11. On 11/4/11 the preliminary worksheet and MetroSoft Create Worksheet were used to calculate the student’s Return to Title IV, and on this date the funds were returned. After

the fact, on 11/7/11 the FAA Access to CPS Online – Return of Title IV Funds on the Web was performed to verify the amount. This was ultimately a human error, as MCC's procedure is to use all three forms to verify the Return to Title IV calculation for students in a regular session.

In a review of MCC's policies and procedures to ensure Return to Title IV calculations are completed and processed in a timely manner, MCC has determined that their policy and procedures are in line with the Department of Education's regulations. The Sponsored Programs Fiscal Office has recently hired an additional full-time employee to help with the demanding workload.

### **Finding 3. Attendance Not Verified Prior to Disbursement**

As noted in the Department's Program Review Report, MCC is not required to take attendance but MCC does collect three point in time attendance rosters from faculty to monitor students who have not attended class. Before the first attendance roster is due MCC adjusts financial aid accordingly. Once the first attendance roster is submitted, current enrollment status is confirmed for students without exceptions noted and refunds are issued accordingly. MCC records exceptions to class attendance at each time an instructor submits an online attendance roster in the MetroSoft system as well as a roster submission date. Students attending class is evidenced by confirming a roster was submitted and no exceptions were noted on the student's account. MCC complies with the federal regulations and will make adjustments to Title IV awards when a student does not begin attendance. MCC instructors will report a student as a not yet attend (NYA) if the student does not begin attendance. This action places a prevent refund on the students account to stop any FSA credits from being disbursed to the student until the student has provided the financial aid office with written confirmation from the instructor that the student has started attending. Instructors will also report students at never attends (NVAT) if the student does not begin attendance. A student's financial aid is adjusted to reflect the adjusted enrollment status for NYAs that are not confirmed by instructors and NVATs reported.

Federal Pell awards are made according to the confirmed enrollment status at the end of the 100% refund period. The initial award will normally not be revised or recalculated unless there is a cancelled class, a complete withdrawal from school, evidence that the student never attended a class, the student dropped during the 100% refund period or the EFC changes due to professional judgment. If student drops a class, or classes, during the 100% refund period their financial aid is adjusted accordingly. After the 100% refund period no adjustments are made to awards unless the student never attends or completely withdrawals from all classes.

#### **Response to Student #14**

After reviewing this student, it was determined that the instructor submitted the attendance roster late for the AUTO 150 course and the student had already withdrawn

themselves from the class. MCC did contact the instructor to retrieve any documentation proving the student had begun attending the course but was unsuccessful in the request. Therefore, MCC acknowledges that this student's financial aid should have been reduced. MCC will begin placing holds on student's accounts when for all classes where the instructor has not turned in their roster on time to prevent this situation from happening again in the future.

**Response to Student #34**

After reviewing this student, it was determined that MCC did receive a submitted roster from all instructors proving the student had begun attending all courses justifying a full-time enrollment status and financial aid award. For the class in question, READ 108, the instructor submitted their attendance roster on 8/29/2012 and reported the student as withdrawn with a last date of attendance of 8/28/2012 thus indicating that the student had attended class on 8/21/2012, 8/23/2012 and 8/28/2012.

Empl ID: 1142637

Granger, Erica J

Institution: MCCKC

Term: 1128 Career: Credit

Class Hbr	Subject Area	Credits	Action	Action Reason	Grade Input	Last Date of Attendance
1	42498 SOCI	160	Drop	SRO		08/23/2012
2	42504 SOCI	160	Drop	TWD	W	08/28/2012
3	42689 PSYC	160	Drop	TWD	W	08/28/2012
4	43696 ENGL	30	Drop	TWD	W	09/05/2012
5	45770 READ	108	Drop	TWD	W	08/28/2012

**Response to Student #36**

After review this student, it was determined that MCC did receive a submitted roster from all instructors proving the student had begun attending all courses justifying a half-time enrollment status and financial aid award. For the class in question, ENGL 101, the instructor submitted their online attendance roster on 8/29/2012 and reported the student as withdrawn with a last date of attendance of 8/22/2012.

Empl ID: 1361506

O'Dell, Lucas Hallie

Institution: MCCKC

Term: 1128 Career: Credit

Class Hbr	Subject Area	Credits	Action	Action Reason	Grade Input	Last Date of Attendance
1	45634 MATH	20	Drop	TWD	W	08/30/2012
2	46066 ENGL	101	Drop	TWD	W	08/22/2012
3	50492 COLL	100	Drop	TWD	W	08/30/2012

**Response to Student #38**

This student was initially enrolled in four classes, READ 11, COLL 100, ENGL 28 and MATH 20. The instructors for the COLL 100 and MATH 20 classes reported the student

as Never Attended (NVAT) and the student's aid was reduced to a half-time status award. The instructors for the READ 11 and ENGL 28 classes did submit their attendance rosters which MCC used as verification for the justification of the half-time award. However, the instructors for the READ 11 class reported her as NVAT on a subsequent roster. MCC then contacted the instructor for the ENGL 28 course to verify the attendance even though she had assigned the student a final F grade. At the time of this inquiry, the instructor was no longer employed with MCC and the Division Chair of the department determined that the student had not attended that course either. All Title IV aid for this student was removed.

#### Response to Student #41

After reviewing this student, it was determined that MCC did receive a submitted roster from all instructors proving the student had begun attending all courses justifying a full-time enrollment status and financial aid award. For the class in question, BSAD 204, the instructor submitted their online attendance roster on 8/31/2011 with no exceptions noted therefore indicating the student had been attending class. The student withdrew themselves from the class on 9/7/2011.

#### Response to Student #42

After reviewing this student, it was determined that MCC did receive a submitted roster from all instructors proving the student had begun attending all courses justifying a three-quarter-time enrollment status and financial aid award. For the class in question, ENGL 101, the instructor submitted their online attendance roster on 1/26/2012 with no exceptions noted therefore indicating the student had been attending class. The student withdrew themselves from the class on 2/7/2012.

MCC is confident in the point in time roster process to provide the necessary documentation to prove the student has begun attending their courses. MCCL has reviewed the attendance records of all Federal Pell Grant recipients who attended the institution during the 2011-2012 and 2012-2013 award years to identify those students whose academic transcripts for each payment period do not reflect the enrollment status of the funds disbursed; however, you will find in the enclosed documentation the majority of these students did have attendance verified by instructors submitting their first rosters. During our review MCC did discover some instructors who failed to submit their attendance roster and/or the student had withdrawn themselves prior to the instructor submitting a late attendance roster. Therefore, MCC has created a new step in the process to hold financial aid disbursement for students who have not yet had attendance confirmed due to a late roster submission. The MCC instructors have been trained to understand the impact of their failure to submit a roster on-time. During the Department's visit, MCC was unable to retrieve the historical roster data from our live system due to the roster overwrite process. However, the data is stored in tables that our IT department was able to extract from for the purpose of proving attendance as you will find in the enclosed spreadsheet showing the first roster data for dropped courses for the students requested by the Department. MCC has modified our MetroSoft system to ensure historical records of each point in time roster are more easily retrievable beginning with the Fall 2013 term. Additionally, starting with the Summer 2013 term, MCC has removed the policy and modified the MetroSoft system to ensure all courses dropped after the 100% refund period are

retained on the academic transcript therefore aligning with the enrollment status used to award the student's aid.

#### **Finding 4. Verification Incomplete/Incorrect**

##### **Response to Student #7**

After reviewing this student it has been determined that there was a human error on not including the \$1491 in Education Credits from line 49 of the parent's 1040 tax return. The verification specialist did include the \$400 Making Work Pay tax credit and it was included on the Verification Worksheet, but with only this being reported as a change, it passed through verification within tolerance (2011-2012 FSA Handbook, AVG 91). Attached to the response is a hand calculation of Student #7's EFC including the \$400 Making Work Pay tax credit and the \$1491 Education Credit; since the Education Credits is a debit from the total income, the students EFC decreased from 924 to 694. According to this the student was not in an overpayment. MCC has seen an increase in students and parents using the IRS Data Retrieval which eliminates the risk for human error.

##### **Response to Student #26**

Per the Program Review Report on page 11, it states "The student's verification worksheet indicates \$3,840 in child support received; however, these funds were not included as other untaxed income on the student's ISIR." After reviewing Student #26's Verification Worksheet and ISIR transaction 04, it has been discovered that the \$3,840 was reported as child support received on the parent's section of the ISIR, which is included in the parent's untaxed income total, and not on the Verification Worksheet. Reporting for child support received on the Verification Worksheet is not required, as it is no longer a required item for verification (DCL GEN-11-13 and Federal Register).

##### **Response to Student #30**

Per the Federal Register and 2012-2013 FSA Handbook, "If an individual who is required to submit an IRS Form W-2 is unable to obtain one in a timely manner, the institution may permit that individual to provide a signed statement that includes the amount of income earned from work, the source of that income, and the reason that the IRS Form W-2 is not available in a timely manner." Student #30 indicated on his signed Verification Worksheet MCC – Longview as his source of income received in 2011 with the amount and he did not mark that he attached a W-2. Also a statement provided on his Financial Aid Checklist/File Completion Requirements (enclosed to response) indicates "Student worked for Access Office for a one-time job of note taking no W-2 or 1099 issued per Margaret in Access."

Each of the MCC campuses has an Access Office that provides assistance for eligible students who have a documented disability as defined by the Americans with Disabilities Act. All services provided by the Access Offices are individualized based on each student's documentation and specific needs. One of the accommodations that the Access Office often uses is note taking in a classroom. Students, who are note takers,

are actually enrolled and attending the class that needs notes to be taken for a student with a disability. Note takers are paid a stipend that is paid from the Access Offices department budget. These stipends are not paid through payroll and students do not receive a W-2.

#### **Finding 5. Failure to Accurately Determine Direct Loan Eligibility**

MCC has reviewed and revised its loan awarding policies and procedures which included the removal of the 40/40/20 disbursement aspect of the policy to ensure proper alignment with Department guidelines as they relate to Direct Loan origination and processing. A copy of the revised policies and procedures accompany this response. Additionally, MCC reviewed and revised all pending Direct Loan disbursements for the 2012-2013 award year to ensure students were awarded all funds to which they were eligible.

#### **Finding 6. Failure to Maintain Back-Up Documentation for Fiscal Operations Report and Application to Participate (FISAP) for Campus Based Reporting**

MCC uses a delivered function from PeopleSoft to generate data for the FISAP. MCC has always run this report into a PDF format. The FISAP PDF backup of aid year 2011-2012 was presented to the Department of Education during their Program Review in December 2012, but it was difficult to follow since names are not included on the report, just their MCC student ID's along with their dependency status, FISAP total income, bachelor degree or no bachelor degree and if the student had an automatic zero EFC. After meeting with the modular leader from the financial aid office, we discovered that the report could also be generated in a CVS format, which could be saved in an excel spreadsheet. Although the names still were not included on the report, the computer service department was able to add names to the list. Regenerating the reports at a later date caused some issue due to date sensitive information in PeopleSoft. After receiving the Program Review Report in March, and realized the difference in the FISAP information and the backup information queries were created to find the data to a certain date.

The FISAP for aid year 2012-2013, and all subsequent years, will use the PeopleSoft generated FISAP using the CVS format. Also the following queries have been created to verify all backup information:

FISAP\_BACKUP  
FISAP\_ELIG\_APP\_UGRD\_DEP\_DEG  
FISAP\_ELIG\_APP\_UGRD\_DEP\_NO\_DEG  
FISAP\_ELIG\_APP\_UGRD\_IND\_DEG  
FISAP\_ELIG\_APP\_UGRD\_IND\_NO\_DEG

#### **Finding 7. Failure to Maintain Off-Campus Community Service Contracts Which Meet Department Guidelines**

MCC has determined that amending agreements is necessary, enclosed with the response is an updated agreement. On Schedule A MCC has added under hourly rate of pay 'at least

minimum wage'. Participants in the Off-Campus Community Services have been advised to indicate at least minimum wage in the column for hourly rate of pay. Federal Work Study Off-Campus Community Service students are paid a dollar above the minimum wage rate for travel expenses.

#### Response to Student #53

The Mid-Continent Public Library Federal Work Study Community Services Program Off-Campus Agreement that was reviewed was completed in 2009. In 2009, Missouri minimum wage rate was \$7.05, since MCC pays Off-Campus Community Service students a dollar above the minimum wage rate, the hourly pay rate at the time the agreement was created would have been \$8.05. Although the agreement had \$8.05, MCC was in compliance with the Fair Labor Standards. The student's actual hourly rate was the minimum wage rate for Missouri plus an additional dollar, equaling \$8.25.

### **Finding 8. Improper FWS Payments**

In July 2013, MCC implemented a new online time and labor system to record and approve time worked for all employees, including Federal Work Study students. All students and supervisors have gone through extensive training to ensure all FWS students are recording hours worked for each day showing exact times of shifts and unpaid breaks. MCC has also provided extensive training with supervisors to help them understand the Federal requirements of the FWS program. Additionally, MCC has implemented a bi-weekly review process of submitted and approved time to ensure compliance and monitor hours worked to ensure students are not working during class time and are following guidelines.

#### Response to Student #50

Enclosed please find a spreadsheet of the findings related to this student. As you will see, we have discussed these issues with the student asking for an explanation as to why he was not in class but rather working during the noted times. The student indicated that during these times his class had ended earlier than required and/or was canceled and he was allowed to begin work immediately.

#### Response to Student #52 & Student #56

MCC employs worker who are classified as part-time 1000 hours employees meaning workers may work an average of 19.5 hours per week during the course of a fiscal year. FWS employees fall under these 1000 hour guidelines. MCC's Human Resources has allowed employees in this classification to work over the 19.5 hours each week not to exceed 40 hours in any work week and not more than the 1000 hours during any fiscal year. While MCC explains to students that they are to work no more than 19.5 hours a week, it was frequently allowed as long as the student was not exceeding the fiscal total. The FWS Student Employment Handbook should have indicated "an average of 19.5 hours per week". MCC has revised the Handbook and policies to indicate the average and copies accompany this response.

#### Response to Student #54

Enclosed please find a spreadsheet of the time records for this student. After discussion with the student's supervisor, it was explained that she and the student did sit down each semester to review the student's course schedule and the student provided the supervisor with a list of the times he was not available to work due to class. The supervisor indicated that she was diligent in making sure to schedule his work time around the student's schedule and verified each timesheet that the total hours worked was accurate for the pay period. She understands that future FWS students must indicate "time in" and "time out" for their hours worked.

MCC has reviewed all-time records for the students and verified that the students were paid correctly for the hours they worked. As indicated above, MCC has put in place a bi-weekly monitoring process to review student's time worked and resolve discrepancies with the supervisor and MCC Payroll immediately. Students and supervisors have been trained that they are not allowed to work during class times even if the student's class ends early and/or is canceled. MCC will strictly enforce this requirement. If an exception is discovered, the financial aid office will require the student to provide a signed statement as to why they were not in class for audit purposes.

#### **Finding 9. National student Loan Data System (NSLDS) reporting Incorrect/Untimely**

MCCL has reviewed the enrollment status of all students who were enrolled at the institution in the 2011-2012 and 2012-2013 award years to verify the enrollment status was correct for students. MCC utilizes a third-party servicer, The National Student Clearinghouse, to fulfill and manage our enrollment reporting requirements. MCC reports enrollment to the NSC six times per semester and has NSLDS scheduled to retrieve data monthly from NSC. Cooperatively, both MCC and The National Student Clearinghouse believe the schedule of reporting has met the regulation requirements.

The Federal Regulation 682.610/685.309 states the following:

"c) Student status confirmation reports.

A school shall—

(2) Unless it expects to submit its next student status confirmation report to the Secretary or the guaranty agency within the next 60 days, notify the guaranty agency or lender within 30 days—

(i) If it discovers that a **Stafford, SLS, or PLUS** loan has been made to or on behalf of a student who enrolled at that school, but who has ceased to be enrolled on at least a half-time basis;"

These regulations indicate that reporting is required for students who cease to be enrolled at least half-time **and** have Stafford, PLUS or Direct Loans and that the school has satisfied the reporting requirement if the status report was submitted to the Secretary or the guaranty agency.

The 2012-2013 FSA Handbook further states, "You're required to report changes in the student's enrollment status, the effective date of the status, and an anticipated completion

date. Changes in enrollment to less than half-time, graduated, or withdrawn must be reported within 30 days. However, if a roster file is expected within 60 days, you may provide the data on that roster file." (Vol. 2, pg. 46)

**Response to Student #10**

After reviewing this student it was determined that the compliance reporting requirement has been fulfilled. According to federal regulation 682.610 (c)(2)(i), the school is considered to have completed the compliance reporting once the information has been sent to the guaranty agency or the Secretary. MCC did provide the National Student Clearinghouse with the appropriate enrollment status information; however, this student was not pulled with the SSCR data to NSLDS but was reported to the guaranty agencies. Upon further review of the student's NSLDS Enrollment Detail, if the defaults are changed to include all reporting sources, you will see that the GA 729 did report the student as attending MCC from 2007 – 2011. Enclosed with this response is a copy of the submitted enrollment information.

**Response to Student #16**

After reviewing this student it was determined that the student did begin the Fall 2012 semester as a Full-time student on 8/21/2012, however, she dropped to half-time on 8/23/2012. The NSLDS SSCR report pulled the data from the NSC on 9/20/2012 taking the most recent data available. This student is a Pell only student and does not have any loans. MCC did submit an early registration enrollment report to the NSC on 8/16/2012 which did indicate the student was enrolled full-time with an effective date of 8/21/2012. This early registration report is sent to guarantors and lenders but do not complete SSCR rosters. If this student had loans, the guarantor would have received notice that the student was full-time on 8/21/2012. Per regulations, MCC via NSC did report the student's enrollment status, the effective date of the status and anticipated completion date. Enclosed with this response is a copy of the submitted enrollment information.

**Response to Student #22**

After reviewing this student it was determined that the student did begin the Fall 2012 semester as a full-time student on 8/21/2012. Upon changing the defaults on NSLDS to show all reporting entities, it does show ED Servicing reported the student as full-time with an effective date of 8/21/2012. On 9/12/2012, the student dropped to half-time status. This student was a Pell only student until after her loan was processed in October 2012. As you will see on the enclosed enrollment information, the student's data started being pulled on the NSLDS SSCR starting in November 2012. Prior to the student showing on the SSCR roster, the student's enrollment information was reported to the guaranty agencies.

MCC has determined that their policy and procedures are in line with the Department of Education's regulations.

## Finding 10. Consumer Information Requirement Not Met

MCC has reviewed its policies and procedures regarding providing on an annual basis the various consumer information items required by Federal Regulations. MCC has corrected any deficiencies noted in the Program Review report and will review the information on an annual basis.

(1) Information Disclosed to Students/Parents of Title IV, HEA Loan Data Submitted to NSLDS and Accessible to Authorized Agencies

MCC has added this information to the consumer information and disclosure information found on our public website under the financial aid section. Screenshot of change is included with this response.

(2) Return to Title IV Information for Current and Prospective Students

MCC has added this information to the consumer information and disclosure information found on our public website under the R2T4 section. Screenshot of the change is included with this response.

(3) Right to Know Act Data Disaggregated Based on HEOA Guidance

MCC is aware that we are missing this reported information, however due to staff retirements; we have been unable to compile the necessary data in time for this response. MCC is in the process of correcting this compliance issue and will make the information available to students and the public and forward the completed report to the Department upon its completion.

(4) Coeducational Equity in Athletics Report

Upon review of MCC's consumer information and disclosures found on our public website, the information regarding the Equity in Athletics report is available. MCC will ensure that an email notification goes out to all current and prospective students in October of each year letting them know the report is available for their viewing.

**Intercollegiate Athletic Program Participation Rates and Financial Support Data (Equity in Athletics Disclosure Act)**

In compliance with the Equity in Athletics Disclosure Act, information on men's and women's athletic programs at MCC is available at <http://www.ope.ed.gov/athletics>. This report includes the number of participants by gender for each team, operating and recruiting expenses, coaches' salaries, revenues, and athletically related student aid.

(5) Drug and Alcohol Abuse Prevention Program

MCC distributed via U.S. Mail a notification to all students and employees regarding MCC's Drug and Alcohol Abuse Prevention Program information in July 2013. A copy of this notification accompanies this response. MCC is currently in the process of incorporating the distribution of this disclosure within the enrollment process for students and new employee on-boarding to ensure

distribution to all students and employees regardless of the time of entry into the MCC system.

(6) Student Body Diversity

Upon review of MCC's consumer information and disclosures found on our public website, the information regarding student body diversity is available and may have been overlooked during the Program Review. The MCC research department has been given a copy of the Program Review findings to ensure the MCC Fact Books contain all the required data elements.

**Student Body Diversity**

This information can be found on the Research Department website at: <http://mcckc.edu/services/research/researchoutlook/researchenrollfactbooks.asp>. Information is available for each term the college offers courses: Fall, Spring and Summer. Each section of the factbook contains 5 years of data which is available by district or college. Information available: headcount, credit hours, average load, gender, race/ethnicity, age, student classification, time of course attendance, grade distribution and multiple campus attendance.

**Finding 11. Crime Awareness Requirement Not Met—Omission of Policy Statements**

Please see the enclosed response.

**Finding 12. Failure to Comply with Drug and Alcohol Abuse Education and Prevention program Requirements**

MCC has taken the necessary steps to become compliant with the Drug and Alcohol Abuse Education and Prevention Program requirements. In March of 2013, a DAAPP advisory committee was created comprised of cross-functional representatives from all MCC locations to develop and provide oversight on the DAAPP. This advisory committee and program compliance is the responsibility of MCC's Director of Student Success. In April 2013, the advisory committee conducted a review of MCC's current program and completed the Biennial Review Report of the DAAPP which accompanies this response. MCC will conduct a Biennial Review of the DAAPP in April of each of the odd years going forward.

In July 2013, MCC distributed via U.S. Mail a notification to all students and employees regarding MCC's Drug and Alcohol Abuse Prevention Program information. A copy of this notification accompanies this response. MCC is currently in the process of incorporating the distribution of this disclosure within the enrollment process for students and new employee onboarding to ensure distribution to all students and employees regardless of the time of entry into the MCC system. Until these system modifications can be completed, MCC will continue to distribute via U.S. Mail the notification on a bi-monthly basis to new students and employees.

2012-2013 ASR

There are two aspects to Finding #11's statement of non-compliance. The first states that "MCC's ASR did not include all required statements of campus security policy and procedure including those that govern the institution's preparation of the ASR and the compilation of its campus crime statistics." MCC submits that this statement is incorrect except for one minor item. The *Handbook for Campus Safety and Security Reporting (Handbook)* published by the US Department of Education (USDE) describes this requirement on page 122 and states: "Include a brief description explaining the purpose of the report, who prepares it and how and from what sources the statistics are collected" (emphasis added). Although there is not a single statement or paragraph in the report that contains this description in its entirety, most of that information is in the ASR:

1. The first page of the ASR gives the purpose. It states that the report:
  - [I]s published on an annual basis as required under the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act ... and includes statistical, policy and procedural information as required by law" and
  - "[P]rovides information on crime awareness and statistics to current students, prospective students, and employees of [MCC]."
  - It also lists in bullet fashion a description of the various substantive sections contained in the report.

These statements clearly address the purpose of the ASR. If something more is required to explain purpose, then the *Handbook* does not specifically state what additional language is required.

2. The explanation of how and from what sources the statistics are collected, although not stated at the beginning of the ASR, is contained in the paragraph captioned "Crime statistics" and states that:

*The statistics in this report are gathered by the Campus Police Captains. A daily crime log is maintained on each campus. Campus Police Captains work collaboratively with local police departments and Campus Police authorities to collect crime statistics in a timely manner. Anyone who may become aware of criminal offenses is encouraged to report these offenses to Campus Police Department authorities.*

Again, the USDE guidelines say to "briefly describe" the content responsive to this requirement. The above statement "briefly" states how and from whom the statistics are collected. If more is required, then the *Handbook* does not state specifically what more should be provided in that regard.

3. As to who prepares the report, that particular item of information is not in the report and therefore MCC acknowledges that technical deficiency. However, that omission is not a substantive one that deprives students or employees of the necessary information the Clery Act intends be made available to them so that they be aware of the relative safety and security of their learning/working environment and make appropriate decisions to protect themselves if necessary. Moreover, the frequent references to the Campus Police Department throughout the report give students a clear idea about whom they can go to if they have questions about the report.

In summary, although MCC acknowledges that there is not a single paragraph in the report that addresses the three elements of the requirement cited, information regarding the two most important and substantive of them is in the Report. Moreover, the reader of the Report has a clear idea that any questions could be addressed to the Campus Police for clarification or additional information. MCC will nevertheless combine the existing information in the Report into a clear statement to be put at the beginning of the ASR along with the identification of the official responsible for preparing the ASR.

The second aspect of Finding #11 states that "MCC failed to develop, implement and publish required information about its campus sexual assault awareness and prevention programs as required by 34 C.F.R. § 668.46(b)(11)." That regulatory provision states in its entirety:

*(11) A statement of policy regarding the institution's campus sexual assault programs to prevent sex offenses, and procedures to follow when a sex offense occurs. The statement must include—*

*(i) A description of educational programs to promote the awareness of rape, acquaintance rape, and other forcible and non-forcible sex offenses;*

*(ii) Procedures students should follow if a sex offense occurs, including procedures concerning who should be contacted, the importance of preserving evidence for the proof of a criminal offense, and to whom the alleged offense should be reported;*

*(iii) Information on a student's option to notify appropriate law enforcement authorities, including on-campus and local police, and a statement that institutional personnel will assist the student in notifying these authorities, if the student requests the assistance of these personnel;*

*(iv) Notification to students of existing on- and off-campus counseling, mental health, or other student services for victims of sex offenses;*

*(v) Notification to students that the institution will change a victim's academic and living situations after an alleged sex offense and of the options for those changes, if those changes are requested by the victim and are reasonably available;*

*(vi) Procedures for campus disciplinary action in cases of an alleged sex offense, including a clear statement that—*

*(A) The accuser and the accused are entitled to the same opportunities to have others present during a disciplinary proceeding; and*

*(B) Both the accuser and the accused must be informed of the outcome of any institutional disciplinary proceeding brought alleging a sex offense. Compliance with this paragraph does not constitute a violation of the Family Educational Rights and Privacy Act (20 U.S.C. 1232g). For the purpose of this paragraph, the outcome of a disciplinary proceeding means only the institution's final determination with respect to the alleged sex offense and any sanction that is imposed against the accused; and*

*(vii) Sanctions the institution may impose following a final determination of an institutional disciplinary proceeding regarding rape, acquaintance rape, or other forcible or non-forcible sex offenses.*

Finding #11 does not specify which of these items of information is missing and the basis for concluding that MCC is not in compliance.

Chapter 8 of the *Handbook* states that the institution "for the most part [has] discretion in [its] statement wording" (See page 141). MCC contends that using that standard it has addressed all the items listed above. Specifically, as to each of the enumerated items in the order listed:

- i. Program descriptions: Under the heading "Sexual assault" the ASR states "The Campus Police Department offers sexual assault education and information programs to MCC students and employees upon request. Literature on date rape education, risk reduction, and MCC's responses are available at the Campus Police Department."
- ii. Procedures to follow if a victim, including preservation of evidence: See the second, third and fourth paragraphs under "Sexual assault" heading.
- iii. Option to notify law enforcement and assistance in doing so: See third paragraph under the "Sexual assault" heading.
- iv. Notification of counseling services: See the first paragraph after the listing of hospitals under the "Sexual assault" heading.
- v. Notification that institution will make changes to academic and living situation, if requested and available: See the last sentence in the last paragraph under the "Sexual assault" heading.
- vi. Procedures for campus disciplinary actions for sex offenses: See the last paragraph under the "Sexual assault" heading. It references the procedures of the Code of Student Conduct, but does specifically include the statements required by Section 668.46(b)(11)(vi)(A) and (B).
- vii. Sanctions that can be imposed: See the penultimate sentence in the last paragraph under the "Sexual assault" heading.

In summary, MCC contends that each of the required elements of the cited regulatory provision is addressed in the ASR. If more detail is required, the *Handbook* does not specifically indicate what further clarity is required in that regard. Nevertheless, in revising the ASR, MCC will add any additional information that may be pertinent to that topic.

## 2011-2012

As to the 2011-2012 Report, it essentially is the same as the 2012-2013 report regarding the brief description of the purpose, etc. of the report, but not in exactly the same manner. There is a small variation in how the purpose requirement is met. Specifically, the first substantive page (page 2) states that the report "is published on an annual basis and includes information of interest to current and prospective students and employees of [MCC]." While it does not list a description of the major issues addressed, it does on page three have the large, bold heading "**CRIME AWARENESS REPORT,**" and its first two paragraphs state:

*You should know how safe your college is. That's why the "Crime Awareness and Campus Security Act of 1990 and its subsequent amendments were enacted.*

*One of the provisions of the act requires institutions of higher learning to provide a security report, which contains information identifying the occurrence of criminal offenses and number of arrests for crimes occurring on campus and adjacent public property. The report also contains information on the number of arrests and disciplinary referrals for liquor law violations, drug abuse violations, and weapons possessions. This report provides that information for the last three calendar years for the [MCC] District as well as for each individual campus. It also provides information for prevention and reporting of crimes.*

So, although again not one cohesive statement as to purpose, how and from what sources the statistics are gathered, and who prepares the report, it covers the first two items. As to who prepares the report, that particular item of information is not in the report and therefore MCC acknowledges that technical deficiency. However, that omission is not a substantive one that deprives students or employees of the necessary information the Clery Act intends be made available to them so that they be aware of the

relative safety and security of their learning/working environment and make appropriate decisions to protect themselves if necessary. Moreover, the frequent references to the Campus Police Department throughout the report give students a clear idea about whom they can go to if they have questions about the report.

In summary, although MCC acknowledges that there is not a single paragraph in the report that addresses the three elements of the requirement cited, information regarding the two most important and substantive of them is in the Report. Moreover, the reader of the Report has a clear idea that any questions could be addressed to the Campus Police for clarification or additional information. MCC will nevertheless combine the existing information in the Report into a clear statement to be put at the beginning of the ASR along with the identification of the official responsible for preparing the ASR.

As to the 2011-2012 report's compliance with the requirement to provide details of the campus sexual assault awareness and prevention programs, it is not as fully compliant as the 2012-2013 report is. Specifically, it does not:

- Notify students of the option to notify local law enforcement and state that institutional personnel will assist the student in notifying either those authorities or MCC police; or
- Notify the students of specific counseling service available for victims of sexual assault. Rather, it just says that filing a report will ensure the victim has access to such counselors.

MCC acknowledges that this section could be more clearly articulated, which it did in the 2012-2013 Report. However, MCC asserts that this is not a substantive omission that deprives students or employees of the necessary information the Clery Act intends be made available to them so that they be aware of the relative safety and security of their learning/working environment and make appropriate decisions to protect themselves if necessary. Moreover, reference to the Campus Police Department ensuring such a victim has access to such counseling services communicates from whom information about those services may be obtained.

The second aspect of Finding #11 states that "MCC failed to develop, implement and publish required information about its campus sexual assault awareness and prevention programs as required by 34 C.F.R. § 668.46(b)(11)." That regulatory provision states in its entirety:

*(11) A statement of policy regarding the institution's campus sexual assault programs to prevent sex offenses, and procedures to follow when a sex offense occurs. The statement must include—*

*(i) A description of educational programs to promote the awareness of rape, acquaintance rape, and other forcible and non-forcible sex offenses;*

*(ii) Procedures students should follow if a sex offense occurs, including procedures concerning who should be contacted, the importance of preserving evidence for the proof of a criminal offense, and to whom the alleged offense should be reported;*

*(iii) Information on a student's option to notify appropriate law enforcement authorities, including on-campus and local police, and a statement that institutional personnel will assist the student in notifying these authorities, if the student requests the assistance of these personnel;*

*(iv) Notification to students of existing on- and off-campus counseling, mental health, or other student services for victims of sex offenses;*

(v) Notification to students that the institution will change a victim's academic and living situations after an alleged sex offense and of the options for those changes, if those changes are requested by the victim and are reasonably available;

(vi) Procedures for campus disciplinary action in cases of an alleged sex offense, including a clear statement that—

(A) The accuser and the accused are entitled to the same opportunities to have others present during a disciplinary proceeding; and

(B) Both the accuser and the accused must be informed of the outcome of any institutional disciplinary proceeding brought alleging a sex offense. Compliance with this paragraph does not constitute a violation of the Family Educational Rights and Privacy Act (20 U.S.C. 1232g). For the purpose of this paragraph, the outcome of a disciplinary proceeding means only the institution's final determination with respect to the alleged sex offense and any sanction that is imposed against the accused; and

(vii) Sanctions the institution may impose following a final determination of an institutional disciplinary proceeding regarding rape, acquaintance rape, or other forcible or non-forcible sex offenses.

Finding #11 does not specify which of these items of information is missing and the basis for concluding that MCC is not in compliance.

Chapter 8 of the *Handbook* states that the institution "for the most part [has] discretion in [its] statement wording" (See page 141). MCC contends that using that standard it has addressed all the items listed above. Specifically, as to each of the enumerated items in the order listed:

- viii. Program descriptions: Under the heading "Sexual assault" the ASR states "The Campus Police Department offers sexual assault education and information programs to MCC students and employees upon request. Literature on date rape education, risk reduction, and MCC's responses are available at the Campus Police Department."
- ix. Procedures to follow if a victim, including preservation of evidence: See the second, third and fourth paragraphs under "Sexual assault" heading.
- x. Option to notify law enforcement and assistance in doing so: See third paragraph under the "Sexual assault" heading.
- xi. Notification of counseling services: See the first paragraph after the listing of hospitals under the "Sexual assault" heading.
- xii. Notification that institution will make changes to academic and living situation, if requested and available: See the last sentence in the last paragraph under the "Sexual assault" heading.
- xiii. Procedures for campus disciplinary actions for sex offenses: See the last paragraph under the "Sexual assault" heading. It references the procedures of the Code of Student Conduct, but does specifically include the statements required by Section 668.46(b)(11)(vi) (A) and (B).
- xiv. Sanctions that can be imposed: See the penultimate sentence in the last paragraph under the "Sexual assault" heading.

In summary, MCC contends that each of the required elements of the cited regulatory provision is addressed in the ASR. If more detail is required, the *Handbook* does not specifically indicate what further clarity is required in that regard. Nevertheless, in revising the ASR, MCC will add any additional information that may be deemed required by the Department.

## Revisions

Included below are the revised policies and procedures for, preparing, publishing and distributing the ASR and the revised procedures regarding the College's sexual assault awareness and prevention programs. It is MCC's understanding that once the revised ASR is approved MCC will promptly distribute it to students and employees electronically and post it on our website. MCC will then forward to the Department of Education documentation evidencing distribution of the revised ASR and a statement of certification attesting that the materials were distributed in accordance with the Clery Act. MCC does understand and take seriously its Clery Act obligations, and will take all necessary corrective actions to ensure violations do not recur.

## CRIME AWARENESS REPORT

### **You have the right to know.**

You should know how safe your college is. That's why the Clery Act was enacted.

The MCC Police Department prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. The full text of this report can be located on our website at [www.mcckc.edu/crimereport](http://www.mcckc.edu/crimereport). This report is prepared in cooperation with the local law enforcement agencies and other college departments. Each entity provides updated information on their educational efforts and programs to comply with the Act.

Campus crime, arrest and referral statistics include those reported to the MCC Police, designated campus officials, including but not limited to directors, deans, department heads, designated college officials and local law enforcement agencies.

Each year an email notification is made to all enrolled students that provides website access to this report. Faculty and staff receive similar notification. Copies of this report can be obtained by contacting MCC police at 604-1200.

### **Sexual assault.**

The Campus Police Department offers sexual assault education and information programs to MCC students and employees upon request. Literature on date rape education, risk reduction, and MCC's responses are available at the Campus Police Department. MCC does not provide any on-campus counseling or mental health student services for victims of sex offenses.

If you are a victim of sexual assault at MCC, your first priority should be to get to a place of safety. You should then obtain necessary medical treatment. The Campus Police Department strongly advocates that victims of a sexual assault report the incident in a timely manner, as time is a critical factor for evidence collection and preservation.

If you are a victim of a sexual assault you should call the Campus Police Department or 911. The Campus Police Department can assist you with notifying the Kansas City Police Department Sex Crimes Unit or other local police authority. If you choose to call the Campus Police Department, an officer will contact you at the scene of the attack, the hospital, or another location. If requested, other MCC personnel will assist you in notifying the Campus Police Department, the Kansas City Police Department Sex Crimes Unit or other local police authority as necessary.

Filing a report with the Campus Police Department will not obligate you to prosecute nor will it subject you to scrutiny or judgmental opinions from the officer. Filing a report will ensure that you receive necessary medical treatment and tests, at no expense to you; will provide the opportunity for collection of

evidence through a medical/legal examination, which will be helpful in the prosecution of the accused, which cannot be obtained later (you should not wash, use the toilet or change clothing prior to the medical/legal examination); and will ensure you have access to free, confidential counseling from counselors specifically trained in the area of sexual assault crisis intervention.

You should seek medical attention in an emergency room or other medical provider that performs legal rape exams. Some resources, in no particular order, are:

St. Luke's Northland	5830 NW Barry Rd, Kansas City, MO, 64154	(816) 891-6010
University of Kansas Medical Center	3901 Rainbow Blvd, Kansas City, KS, 66160	(913) 588-5000
COVERSA at NKC Hospital	2800 Clay Edwards Dr., NKC, MO, 64166	(816) 717-1136
Shawnee Mission Medical Center	9100 W 74th St., Shawnee Mission, KS, 66204	(913) 676-2218
St. Luke's Hospital - Plaza	4401 Wornall Rd, Kansas City, MO, 64111	(816) 932-2171
St. Luke's East	100 NW St. Luke's Blvd, Lee's Summit, MO, 64086	(816) 347-4400
Centerpoint Medical Center	19600 E. 39th St., Independence, MO, 64057	(816) 698-7000
Truman Medical Center - Lakewood	7900 Lee's Summit Rd., Kansas City, MO, 64139	(816) 404-7000
COVERSA at Cass Regional Medical Center	2800 Rock Haven Rd, Harrisonville, MO, 64701	(816) 380-3474
St. Joseph Medical Center	1000 Carondelet Dr. Kansas City, MO	(816) 942-4400

A local service resource providing counseling, mental health, referrals and other services serving Jackson, Clay, Cass, and Platte counties is MOCSA (Metropolitan Organization to Counter Sexual Assault), 3100 Broadway, Suite 400, Kansas City, MO 64111-2591, telephone (816) 931-4527. MOCSA's 24-hour crisis hotline numbers are (816) 531-0233 and (913) 642-0233. Relay services are available by dialing 711. <http://www.mocsa.org/>. You may also seek support and assistance from a private physician, friend, relative, or other service resources. A national service resource is RAINN (Rape, Abuse & Incest National Network), and its 24-hour phone hotline number is (800) 656-HOPE (4673). RAINN's 24-hour online hotline is <http://apps.rainn.org/ohl-bridge/>.

MCC's disciplinary action proceedings are detailed in the Code of Student Conduct. This policy provides that the accused and the victim will each be entitled to have an advisor or counselor accompany them throughout the hearing proceeding. Both the victim and the accused will be informed of the outcome of the hearing. Any student who is determined to have committed a sexual assault could be criminally prosecuted in state or federal court and may be suspended or expelled from MCC. MCC is obligated to comply with a student victim's request to change their academic situation after an alleged sexual assault, if such change is reasonably available.

*A draft revised ASR can be found below.*

## Draft Revised Annual Security Report

### STUDENT RIGHT TO KNOW, CAMPUS SECURITY, AND COMPLIANCE REPORT

The Student Right to Know, Campus Security, and Compliance Report is published on an annual basis as required under the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, 20 U.S.C. § 1092(f) ("Clery Act") and includes statistical, policy and procedural information as required by law.

This report provides information on crime awareness and statistics to current students, prospective students, and employees of the Metropolitan Community College District ("MCC"). Information is provided for the last three (3) calendar years for each campus and for MCC overall. The full text of this report is accessible from the MCC website at [www.mcckc.edu/crimereport](http://www.mcckc.edu/crimereport).

This report includes the following sections:

#### Crime Awareness Report

- You have the right to know.
- How to report a crime - locations, office hours, and phone number for the Campus Police Department as well as information on crime reporting.
- Timely warning policy - how and when Timely Warning Alerts are issued.
- Emergency notification policy – how and when Emergency Alerts are issued.
- Emergency response and evacuation procedures (includes emergency notification) – how to respond and/or evacuate in response to significant emergencies or dangerous situations.
- About public safety - information about the Campus Police Department.
- Access to buildings - hours of access to MCC buildings.
- Security of campus facilities - description of MCC's maintenance of the safety and security of buildings and grounds.
- Security services - special safety and security services provided by the Campus Police Department.
- Education and awareness - description of MCC's crime prevention and awareness programs and procedures.
- Victims of violent crimes.
- Sexual assault - information about sexual assault as detailed in the Code of Student Conduct.
- Registered sex offenders information - where to obtain lists of registered sex offenders.
- Relationship with local law enforcement - information on MCC's relationship with state and local law enforcement agencies.
- Definitions of crimes - definitions MCC uses to classify reported crimes.
- Crime statistics - information identifying the occurrence of criminal offenses and number of arrests for crimes occurring on campus and adjacent public property over the last three (3)

calendar years. The section also includes the number of arrests and disciplinary referrals for liquor law violations, drug abuse violations, and weapons possessions. Information is available for the following locations: MCC District-wide, MCC-Blue River, MCC-Business & Technology, MCC-Longview, MCC-Maple Woods, MCC-Penn Valley, and MCC-Penn Valley - Pioneer Campus.

#### **Safety Tips**

- Provides important information regarding personal safety.

#### **Compliance Information**

- Contains MCC's Notice of Non-discrimination, College Non-discrimination Statement, Federal Citations, notice for students with disabilities, information on policies regarding discrimination and harassment (including sexual harassment), student rights under the Family Educational Rights and Privacy Act (FERPA), copyright infringement, and Tobacco-Free MCC. It also contains information on how to obtain MCC graduation, transfer, and retention rates, the complaint notification process, Equity in Athletics Disclosure Act (EADA) data, graduate placement information, and student consumer information.

#### **Drug-Free Workplace, Campus and Community**

- Contains information on MCC's policy regarding the possession, use, and sale of alcoholic beverages and illegal drugs, the enforcement of federal and state drug laws, and the enforcement of state underage drinking laws. It contains information on the uses and effects of drugs of abuse, federal drug trafficking penalties, and federal penalties and sanctions for illegal possession of a controlled substance. Information on MCC's educational program on drug and alcohol abuse is described.

### **CRIME AWARENESS REPORT**

#### **You have the right to know.**

#### **You should know how safe your college is. That's why the Cley Act was enacted.**

**The MCC Police Department prepares this report to comply with the Jeanne Cley Disclosure of Campus Security Policy and Crime Statistics Act. The full text of this report can be located on our website at [www.mccc.edu/crimereport](http://www.mccc.edu/crimereport). This report is prepared in cooperation with the local law enforcement agencies and other college departments. Each entity provides updated information on their educational efforts and programs to comply with the Act.**

**Campus crime, arrest and referral statistics include those reported to the MCC Police, designated campus officials, including, but not limited to, directors, deans, department heads, designated college officials and local law enforcement agencies.**

**Each year an email notification is made to all enrolled students that provides website access to this report. Faculty and staff receive similar notification. Copies of this report can be obtained by contacting MCC police at 604-1200.**

The Cley Act requires institutions of higher learning to produce and distribute an annual security report which contains information identifying the occurrence of criminal offenses and number of arrests for crimes occurring on campus and adjacent public property. The report must also contain information on the number of arrests and disciplinary referrals for liquor law violations, drug abuse violations, and weapons possessions. MCC's report provides that information for the last three (3) calendar years for each campus and for MCC overall. It also provides information for the prevention and reporting of crimes.

Every year MCC reports these crime statistics to the Office of Postsecondary Education of the U.S. Department of Education. Reported criminal offenses for over 6,000 colleges and universities in the United States are reported to the Office of Postsecondary Education of the U.S. Department of Education Campus Security Statistics and are available at <http://ope.ed.gov/security>.

**How to report a crime.**

Crimes, including sex offenses, which occur on any MCC campus should be reported to your Campus Police Department as soon as possible. The term "campus" as used in this report means any MCC building or facility located on MCC property.

You may contact the Campus Police Department or the MCC-Control Center twenty-four (24) hours a day, seven (7) days a week at (816) 604-1200.

MCC's Campus Police Department is comprised of commissioned law enforcement personnel with arrest authority.

The locations, hours of operation, and phone number for the MCC Campus Police Department offices are:

MCC-Control Center 1601 Prospect Ave. Kansas City, MO 64127-2504	Staffed 24 hours a day Monday through Sunday	(816) 604-1200
MCC-Blue River Campus Center, Room 118 20301 E. 78 Highway Independence, MO 64057-2053	Staffed 7:00 a.m. to 9:30 p.m. Monday through Thursday, 7:00 a.m. to 4:30 p.m. Friday, and 8:00 a.m. to 1:00 p.m. Saturday	(816) 604-1200
MCC-Business & Technology Room TC104 1775 Universal Avenue Kansas City, MO 64120-1318	Staffed 6:00 a.m. to 11:00 p.m. Monday through Friday	(816) 604-1200
MCC-Longview Business Building, Room 111 500 SW Longview Road Lee's Summit, MO 64081-2015	Staffed 24 hours a day Monday through Sunday	(816) 604-1200
MCC-Maple Woods Administrative Building, Room 103 2601 NE Barry Road Kansas City, MO 64156-1299	Staffed 24 hours a day Monday through Sunday	(816) 604-1200
MCC-Penn Valley Campus Center Building, Room 102 3201 Southwest Trafficway Kansas City, Missouri 64111-2764	Staffed 24 hours a day Monday through Sunday	(816) 604-1200
MCC-Penn Valley - Pioneer Second Floor, Room 239A 2700 East Eighteenth Street Kansas City, Missouri 64127-2602	Staffed 7:00 a.m. to 8:00 p.m. Monday through Thursday, 7:00 a.m. to 6:00 p.m. Friday, and 8:00 a.m. to 4:00 p.m. Saturday	(816) 604-1200
Chief of Campus Police MCC-Control Center 1601 Prospect Ave. Kansas City, MO 64127-2504	Staffed 8:00 a.m. to 4:30 p.m. Monday through Friday	(816) 604-1200
Associate Director of Campus Police	Staffed 8:00 a.m. to 4:30 p.m. Monday through Friday	(816) 604-1200

MCC–Control Center 1601 Prospect Ave. Kansas City, MO 64127-2504		
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Report any crime to the Campus Police Department officer on duty.

If there is no Campus Police Department officer available, report the crime to the following college officials:

MCC District	Carolyn Baskett Associate Vice Chancellor of Human Resources 3217 Broadway Kansas City, MO 64111-2429	(816) 604-1166
MCC-Blue River	Jon Burke Dean of Student Development 20301 E. 78 Highway Independence, MO 64057-2053	(816) 604-6620
MCC-Business & Technology	Karen Moore Dean of Student Development 1775 Universal Avenue Kansas City, MO 64120-1318	(816) 604-5229
MCC-Longview	Karen Goos Dean of Student Development 500 SW Longview Road Lee's Summit, MO 64081-2015	(816) 604-2326
MCC-Maple Woods	Shelli Allen Dean of Student Development 2601 NE Barry Road Kansas City, MO 64156-1299	(816) 604-3175
MCC-Penn Valley	Lisa Minis Dean of Student Services 3201 Southwest Trafficway Kansas City, Missouri 64111-2764	(816) 604-4114

If you do not wish to come to the Campus Police Department to make a report, you may contact the MCC Police via telephone. The Campus Police Department officer will assess the situation to determine if there is a need to contact emergency medical personnel or the local police authorities.

MCC does not maintain any Campus Police Departments on "satellite campuses." These facilities are protected by local law enforcement agencies. In the event of a crime or emergency, contact the local police authorities, then report the crime to the Campus Police Department. The Campus Police Department will prepare a MCC report even if a separate report is taken by local police authorities.

**Your report is vital.**

Reporting all crimes and public safety related incidents promptly to the Campus Police Department and local police authorities is very important to MCC students, faculty, visitors, and employees.

It helps the Campus Police Department and local police authorities apprehend those responsible. It helps MCC determine if disciplinary action is required. It assists the Campus Police Department in the maintenance of accurate crime incident records with respect to the campuses. This information helps keep the campuses safer by providing the most accurate information on criminal activity to members of

the MCC community. Finally, the information reported may be crucial for timely emergency procedures such as the evacuation of buildings (emergency procedures are outlined in student and employee handbooks).

MCC does not have a policy or procedure in place to allow for voluntary, confidential crime reporting. Accordingly, neither MCC nor the Campus Police Department has a policy or procedure in place to encourage professional counselors, at their discretion, to inform those they counsel of any procedure for reporting crimes voluntarily and confidentially for inclusion in the annual security report. MCC does not maintain any residential facilities, or off campus locations for student organizations, and therefore no provisions in that regard are contained in this report.

#### **Timely warning policy – Timely Warning Alert.**

MCC's Timely Warning Policy provides for notification to MCC students, faculty, employees and visitors (the "MCC Community") in the event that a crime, as defined under the Clery Act guidelines, has been reported to the Campus Police Department or local law enforcement agencies, and which has occurred and which may continue to represent, in the opinion of the Chief of Police and/or the Chancellor, a serious or continuing threat to the safety and well-being of the MCC Community either on campus or off campus. In such event, a Timely Warning Alert will be disseminated to the MCC Community.

The Clery Act defines crimes that may warrant the issuance of a Timely Warning Alert as the following: criminal homicide, sex offenses, aggravated assault, robbery, burglary, motor vehicle theft, arson, hate crimes, persons with weapons with intent to use, threat of violent crimes, and situations where the suspect is not known.

The Chancellor and the Chief of Police, or their designee, will direct the preparation and issuance of a Timely Warning Alert which will be disseminated to the MCC Community via various communication methods which may include text messages, email messages, computer messages, voicemail, posts to the MCC website in multiple areas (MCC Newsroom, MCC Students Online, MCC Insider, Blackboard, and myMCCKC portal), MCC's Facebook pages (campus, location, or departmental), flyers, public address systems and/or other methods as may be deemed appropriate. In an extreme emergency, the issuance of a Timely Warning Alert may be implemented at the sole direction of the Chief of Police.

If there is a potential that the crime or other incident may have an effect on the community outside MCC, the Chief of Police, Chancellor, Associate Vice Chancellor of College and Community Relations and/or campus president will determine if it is necessary and appropriate to disseminate the Timely Warning Alert to the community outside MCC, determine the content of such Timely Warning Alert, determine the communication dissemination methods to be utilized, and cause the issuance of the Timely Warning Alert without delay. The Timely Warning Alert will be disseminated to the community outside MCC via various communication methods which may include press releases, radio alerts, television alerts, sirens/public address systems and/or other methods as may be deemed appropriate.

After the initial Timely Warning Alert, the Associate Vice Chancellor of College and Community Relations or his designee, after consultation with the Chief of Police, the Chancellor and/or campus president, will initiate a communication chain of command, which will include the appointment of a communications spokesperson, an individual responsible for issuing the Emergency Alert update messages, if necessary, and a media communications spokesperson. Timely Warning Alert updates, if necessary, will be issued in twenty (20) minute intervals until the situation is resolved.

In the event local police authorities issue a news release or other alert about an off-campus crime that represents a potential threat to the safety of the MCC Community in the opinion of the Chief of Police and the Chancellor, a Timely Warning Alert will be issued as described above.

As noted above, MCC will issue Timely Warning Alerts via text to those employees and students who are registered with the MCC Notify Me text messaging system. The Timely Warning Alert will be sent directly to the mobile phones of those employees and students who have registered with MCC Notify Me. Non-registered employees and students are encouraged to sign up for this service, and sign up information is located at <http://mcckc.edu/services/mccalert/mccalerthome/alert.asp>.

Anyone with information warranting a Timely Warning Alert should immediately report the circumstances to the MCC police department at (816) 604-1200.

#### **Emergency notification policy – Emergency Alert.**

MCC's Emergency Notification Policy provides for the issuance of an Emergency Alert to the MCC Community if a significant emergency or dangerous situation has arisen and it has been confirmed by campus officials with local law enforcement authorities, governmental authorities, and/or by other methods deemed valid, that the same involves an immediate, impending, or imminent threat to the health or safety of the MCC Community, either on or off campus. In such event, an Emergency Alert will be immediately disseminated to the MCC Community.

The Clery Act defines significant emergencies or dangerous situations that may warrant the issuance of an Emergency Alert as the following: extreme weather conditions, such as an approaching tornado, earthquake, gas leak, terrorist incident, armed intruder, bomb threat, civil unrest or rioting, explosion, nearby chemical or hazardous waste spill, or outbreak of meningitis, norovirus, or other serious illness. MCC may also elect to issue an Emergency Alert in the event of a power outage, snow closure, or minor crimes.

MCC will, without delay, and taking into account the safety of the MCC community, determine the content of the notification and initiate the notification system.

The Chancellor and the Chief of Police, or their designee, will direct the preparation and issuance of an Emergency Alert which will be disseminated to the MCC Community (unless issuing an Emergency Alert will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency) via various communication methods which may include text messages, email messages, computer messages, voicemail, posts to the MCC website in multiple areas (MCC Newsroom, MCC Students Online, MCC Insider, Blackboard, and myMCCKC portal), MCC's Facebook pages (campus, location, or departmental), flyers, sirens/public address systems and/or other methods as may be deemed appropriate. In an extreme emergency, the Emergency Alert issuance may be implemented at the sole direction of the Chief of Police.

If there is a potential that the significant emergency or dangerous situation may have an effect on the community outside MCC, the Chief of Police, Chancellor, Associate Vice Chancellor of College and Community Relations and/or campus president will determine if it is necessary and appropriate to disseminate the Emergency Alert to the community outside MCC, determine the content of such Emergency Alert, determine the communication dissemination methods to be utilized, and cause the issuance of the Emergency Alert without delay. The Emergency Alert will be disseminated to the community outside MCC via various communication methods which may include press releases, radio alerts, television alerts, and/or other methods as may be deemed appropriate.

After the initial Emergency Alert, the Associate Vice Chancellor of College and Community Relations or his designee, after consultation with the Chief of Police, the Chancellor and/or campus president, will initiate a communication chain of command, which will include the appointment of a communications spokesperson, an individual responsible for issuing the Emergency Alert update messages, if necessary, and a media communications spokesperson. Emergency Alert updates, if necessary, will be issued in twenty (20) minute intervals until the situation is resolved.

In the event local police authorities issue a news release or other alert about a significant emergency or dangerous situation that has arisen which could involve an immediate threat to the health or safety of the MCC Community, the Chief of Police and the Chancellor will determine if an Emergency Alert will be issued as described above.

As noted above, in all significant emergencies or dangerous situations, MCC will convey information regarding extreme weather, emergencies, or campus closures via text to those employees and students who are registered with the MCC Notify Me emergency text messaging system. The Emergency Alert will be sent directly to the mobile phones of those employees and students who have registered with MCC Notify Me. Employees and students are encouraged to register for this service. For sign up information, see <http://mccckc.edu/services/mccalert/mccalerthome/alert.asp>.

Anyone with information warranting an Emergency Alert should immediately report the circumstances to the MCC police department at (816) 604-1200.

#### **Emergency response and evacuation procedures (includes emergency notification).**

MCC has established an Emergency Response Plan to provide the MCC Community with information about MCC's Timely Warning Policy, Emergency Notification, Emergency Response Plan (including evacuation procedures), and to provide other general safety guidelines to the MCC Community. The information in this plan will help each individual in the MCC Community determine their best response to certain emergency situations, whether on, adjacent, or near a MCC campus. Every emergency situation is unique and in all cases, individuals in the MCC Community assume responsibility for their own safety and security and should use their own best individual judgment in deciding their actions. MCC's Emergency Response Plan incorporates generally accepted and recognized best practices of public safety standards and complies with the Clery Act.

MCC will follow the National Response Framework (NRF) guidelines and use the National Incident Management System (NIMS) for emergencies exceeding the capacity of the college and requiring external public safety assistance. All MCC staff, faculty and administrators should familiarize themselves with NRF and NIMS guidelines and concepts which are located at <http://training.fema.gov/IS/NIMS.asp>. Extensive on-line instruction is also available at this website.

In major emergency incidents, MCC will use a unified command structure consisting of the police chief, campus police officers, and the director of campus facilities, with the Chancellor serving as overall incident commander. At the campus level, a unified command structure consisting of the appropriate members of the president's leadership team, the campus police captain and the facilities superintendent will be used, with each president serving as incident commander for their campus.

For major protracted emergencies or situations impacting the Administrative Center, the Chancellor may activate the unified command structure in the emergency operation center located at the MCC police department. Every campus president will establish an alternate emergency command post from which to conduct the campus unified command structure in instances when the president's office or campus administrative center is inoperable.

In all cases, the primary public information officer for MCC will be the Associate Vice Chancellor of College and Community Relations, who may, in consultation with the Chancellor or the Chancellor's unified command structure, delegate this responsibility to campus presidents or other personnel on a case-by-case basis.

MCC's integrated fire alarm system includes an intelligent notification system. It provides a means for pre-recorded messages to be announced at a single building, the entire MCC District, or at specific

campuses during fire, storm, or lockdown or other emergency situations. The messages can either be initiated at an individual campus or at the Campus Police Department Control Center.

Located throughout each campus facility are evacuation maps showing the location and the routes to use in the event of a fire or tornado. The evacuation maps include contact numbers for the Campus Police Department at each campus.

Each campus conducts annual emergency tests of the integrated fire alarm system along with other drills, exercises, appropriate follow-through activities, and/or information sessions in order to assess and evaluate its emergency plans and capabilities regarding the emergency response and evacuation procedures. Each test conducted will be documented with a description of the test, the date held, the beginning and ending time, and whether it was an announced or unannounced test. All documentation regarding emergency tests is kept and maintained for a period of seven (7) years.

The full text of MCC's Emergency Response Plan document can be accessed from the MCC website at <http://mcckc.edu/services/mccalert/mccalerthome/erplan.asp>.

### **About public safety.**

Campus Police Department Officers are sworn law enforcement officers who are professionally trained and licensed by the Missouri Department of Public Safety's Peace Officers Standards and Training (POST) Program. They possess the same authority as any police officer within the state of Missouri and have the right to arrest any person for violation of state law or applicable county or city ordinances when such violations occur on or adjacent to any MCC District property. If minor offenses involving MCC rules and regulations are committed by MCC students, the Campus Police Department may also refer the individual for disciplinary action consistent with the Code of Student Conduct.

The Campus Police Department accesses the National Crime Information computer system through an NLETS (National Law Enforcement Telecommunications Network) terminal. The Campus Police Department utilizes this computer system to access criminal history and data, including driver and vehicle identification information.

Students, faculty, staff, and visitors are strongly encouraged to report all crimes and public safety related incidents promptly to the Campus Police Department to ensure a safe and secure campus environment. MCC does not have a policy or procedure in place to allow voluntary, confidential, crime reporting.

### **Access to buildings.**

One of the most important methods to control crime is to control building access. For that reason, access to campus buildings is limited to certain hours and all facilities are monitored. In the event students, faculty, or staff need access to a campus building after normal hours, they should contact the Campus Police Department for assistance.

MCC campuses do not have any student residential facilities.

### **MCC campus building hours are as follows:**

MCC-Blue River	7:00 a.m. to 9:30 p.m., Monday through Thursday, 7:00 a.m. to 4:30 p.m. on Friday, and 8:00 a.m. to 1:00 p.m. Saturday
MCC-Business & Technology	7:00 a.m. to 10:00 p.m., Monday through Thursday, and 7:00 a.m. to 6:30 p.m. on Friday
MCC – Facility Services Building	8:00 a.m. to 4:30 p.m., Monday through Friday
MCC-Longview	7:00 a.m. to 10:00 p.m., Monday through Thursday, 7:00 a.m. to

	6:00 p.m. on Friday, and 7:30 a.m. to 3:00 p.m. on Saturday
MCC-Maple Woods	7:00 a.m. to 10:00 p.m., Monday through Thursday, and 7:00 a.m. to 5:00 p.m. on Friday and Saturday
MCC-Penn Valley	6:30 a.m. to 10:30 p.m., Monday through Friday, and 6:30 a.m. to 5:00 p.m. on Saturday
MCC-Penn Valley - Pioneer	7:00 a.m. to 8:00 p.m., Monday through Thursday, 7:00 a.m. to 6:00 p.m. on Friday, and 8:00 a.m. to 4:00 p.m. on Saturday

### **Security of campus facilities.**

MCC is committed to campus safety and security. Exterior lighting and landscape control is a critical part of that commitment. Campus Police Department officers conduct routine checks of lighting on campus during regular patrol duties. If lights are out or dim, they will initiate an immediate work request. The MCC community is encouraged to report any deficiency in lighting to the Campus Police Department at (816) 604-1200. Any concerns about physical security, particularly any locking mechanism deficiency, should be reported to the Campus Police Department immediately. The Campus Police and Facility Service Departments are available to respond to calls for service regarding unsafe facility conditions or for personal safety and property protection. These conditions may include unsafe steps or handrails, unsafe roadways on campus, and unsecured equipment.

### **Security services.**

The Campus Police Department's efforts to provide a safe campus environment include the following services:

- **Emergency Blue Light Phones** - Two-way call boxes are located strategically around each campus. They allow an individual in need of assistance to speak directly with the Campus Police Department or the local 911 dispatch center. Please visit [www.mcckc.edu/publicsafety](http://www.mcckc.edu/publicsafety) and click on the maps for all box locations.
- **Campus Escort Program** - the Campus Police Department will provide an escort to your vehicle if requested. To request an escort please contact your Campus Police office and an officer will respond to your location.
- **AEDs** - An automated external defibrillator (AED) is used to treat victims of sudden cardiac arrest (SCA). MCC makes defibrillators available on its premises so victims can receive early defibrillation, increasing the likelihood of recovery. Since numbers of persons gather at MCC facilities, some undergoing physical exertion such as athletic or recreation center activities, there is a possibility that an individual will experience SCA. MCC serves its community by installing an AED in each of its buildings in the district.

### **Education and awareness.**

MCC has an ongoing program to provide crime-detering information to students and employees.

Students and employees are reminded to be vigilant and cautious and to exercise common sense not only to protect themselves but also to protect others! **REPORT ANY CRIME YOU OBSERVE IMMEDIATELY.**

Students will be advised of new security procedures as well as crime and sex offense prevention programs through materials distributed during registration and enrollment, bulletin boards placed in buildings throughout the campuses, and student print and electronic newspapers. Employees will be advised during orientation, the MCC newsletter, memoranda, or email.

The Campus Police Department publishes general crime prevention flyers that outline many crime prevention tips and strategies. In addition, the department periodically highlights a special topic on its website. Programs regarding crime prevention on campus are scheduled through the campus life and leadership offices.

MCC has no officially recognized student organizations with off-campus locations. As such, it does not have a policy or procedure concerning the monitoring and recording, through local police agencies, of criminal activity in which students may be engaged at off-campus locations of student organizations officially recognized by the institution, including any student organizations with off-campus housing facilities.

### Victims of violent crimes.

MCC will, upon written request, disclose to the alleged victim of a crime of violence, or a non-forcible sex offense, the results of any disciplinary proceeding conducted by MCC against the alleged perpetrator of the crime or offense. Should the alleged victim be deceased as a result of the crime or offense, the victim's next of kin will be treated as the alleged victim and may submit to MCC a written request for the results of any disciplinary proceeding conducted by MCC against the alleged perpetrator of the crime or offense.

### Sexual assault

The Campus Police Department offers sexual assault education and information programs to MCC students and employees upon request. Literature on date rape education, risk reduction, and MCC's responses are available at the Campus Police Department. MCC does not provide any on-campus counseling or mental health student services for victims of sex offenses.

If you are a victim of sexual assault at MCC, your first priority should be to get to a place of safety. You should then obtain necessary medical treatment. The Campus Police Department strongly advocates that victims of a sexual assault report the incident in a timely manner, as time is a critical factor for evidence collection and preservation.

If you are a victim of a sexual assault, you should call the Campus Police Department or 911. The Campus Police Department can assist you with notifying the Kansas City Police Department Sex Crimes Unit or other local police authority. If you choose to call the Campus Police Department, an officer will contact you at the scene of the attack, the hospital, or another location. Other MCC personnel will assist you in notifying the Campus Police Department, the Kansas City Police Department, Sex Crimes Unit or other local police authority, as necessary.

Filing a report with the Campus Police Department will not obligate you to prosecute nor will it subject you to scrutiny or judgmental opinions from the officer. Filing a report will ensure that you receive necessary medical treatment and tests, at no expense to you; will provide the opportunity for collection of evidence through a medical/legal examination, which will be helpful in the prosecution of the accused (which cannot be obtained later (you should not wash, use the toilet or change clothing prior to the medical/legal examination); and will ensure you have access to free, confidential counseling from counselors specifically trained in the area of sexual assault crisis intervention.

You should seek medical attention in an emergency room or other medical provider that performs legal rape exams. Some resources, in no particular order, are:

St. Luke's Northland	5830 NW Barry Rd, Kansas City, MO 64154	(816) 891-6010
University of Kansas Medical	8901 Rainbow Blvd, Kansas City, KS	(913) 588-5000

Center	66160	
COVERSA at NKCC Hospital	2800 Clay Edwards Dr. NKCC MO 64166	(816) 717-5136
Shawnee Mission Medical Center	9100 W 74th St. Shawnee Mission KS 66204	(913) 676-2218
St. Luke's Hospital Plaza	2401 Womall Rd. Kansas City MO 64111	(816) 932-2171
St. Luke's East	100 NW St. Luke's Blvd. Lee's Summit MO 64086	(816) 847-4400
Centerpoint Medical Center	19600 E. 89th St. Independence MO 64057	(816) 698-7000
Iruman Medical Center Lakewood	7900 Lee's Summit Rd. Kansas City MO 64139	(816) 404-7000
COVERSA at Cass Regional Medical Center	2800 Rock Haven Rd. Harrisonville MO 64701	(816) 380-3474
St. Joseph Medical Center	1000 Carondelet Dr. Kansas City MO	(816) 942-4400

A local service resource providing counseling, mental health, referrals, and other services serving Jackson, Clay, Cass, and Platte counties is MOCSA (Metropolitan Organization to Counter Sexual Assault), 3100 Broadway, Suite 400, Kansas City, MO 64111-2591, telephone: (816) 931-4527. MOCSA's 24-hour crisis hotline numbers are (816) 534-0233 and (913) 642-0233. Relay services are available by dialing 711. <http://www.mocsa.org/>. You may also seek support and assistance from a private physician, friend, relative, or other service resources. A national service resource is RAINN (Rape Abuse & Incest National Network), and its 24-hour phone hotline number is: (800) 656-HOPE (4673). RAINN's 24-hour online hotline is <http://apps.rainn.org/oh hotline/>.

MCC's disciplinary action proceedings are detailed in the Code of Student Conduct. This policy provides that the accused and the victim will each be entitled to have an advisor or counselor accompany them throughout the hearing proceeding. Both the victim and the accused will be informed of the outcome of the hearing. Any student who is determined to have committed a sexual assault could be criminally prosecuted in state or federal court and may be suspended or expelled from MCC. MCC is obligated to comply with a student victim's request to change their academic situation after an alleged sexual assault, if such change is reasonably available.

**Registered sex offenders information.**

The Federal Campus Sex Crimes Prevention Act, enacted on October 28, 2000, placed in effect October 28, 2002, requires institutions of higher education to issue a statement advising the campus community where law enforcement agency information provided by a State concerning registered sex offenders may be obtained. It also requires sex offenders already required to register in a State to provide notice, as required under State law, of each institution of higher education in that State at which the person is employed, carries on a vocation, volunteers services, or is a student.

MCC District campuses are located in Jackson, Clay, Cass and Platte counties in Missouri. A list of the currently registered sex offenders in these counties may be obtained by contacting the respective sheriff's departments or by accessing the available sheriff's department websites at:

Jackson County Sheriff's Office 3310 NE Rennau Dr. Lee's Summit, Missouri 64064 (816) 524-4302 <a href="http://www.jacksongov.org/JCSOR">www.jacksongov.org/JCSOR</a>	Clay County Sheriff's Office 12 S. Water St. Liberty, Missouri 64068 (816) 407-3750 <a href="http://www.claycountymmo.gov/offenders">www.claycountymmo.gov/offenders</a>
Cass County Sheriff's Office 2501 West Mechanic Street, Suite 100	Platte County Sheriff's Office 415 Third St., Suite 10

Harrisonville, MO 64701  
(816) 380-5200

Platte City, Missouri 64079  
(816) 858-2424

<http://plattesheriff.org/registered-offenders/offender-list>

The State of Missouri maintains a website listing registered sex offenders. The information can be viewed at <http://www.mshp.dps.mo.gov/MSHPWeb/PatrolDivisions/CRID/SOR/SORPage.html>. The United States Department of Justice also maintains a website listing registered sex offenders at <http://www.nsopr.gov>.

#### **Relationship with local law enforcement.**

The Campus Police Department will provide the best possible atmosphere of collaborative public safety on and around the campuses of MCC and throughout the entire cities of Independence, Missouri, Kansas City, Missouri and Lee's Summit, Missouri. The Campus Police Department has established a working relationship with the Independence, Missouri Police Department, the Kansas City, Missouri Police Department, the Lee's Summit, Missouri Police Department, and the Missouri Highway Patrol with the goal of increased public safety in mind.

- Calls for police service – All calls for police services which are received by the Campus Police Department and concern incidents which have occurred off the property of MCC and in the jurisdiction of Independence, Missouri, Kansas City, Missouri or Lee's Summit, Missouri will be referred to the appropriate jurisdiction if required without unnecessary delay.
- Investigation – It will be the policy of the Campus Police Department, when appropriate, to notify the Independence, Missouri Police Department, Kansas City, Missouri Police Department, Lee's Summit, Missouri Police Department, or Missouri Highway Patrol when officers are conducting an investigation, and to request that an officer from the relevant jurisdiction assist the investigating officer if such assistance is appropriate. MCC and the Campus Police Department have entered into mutual aid agreements regarding their interactions in investigations and emergencies.
- Information exchange – Contemporary law enforcement relies heavily on information. The Campus Police Department recognizes the need for accurate, timely information and the mutual benefits derived from the exchange of such information. The Campus Police Department will provide the Independence, Missouri Police Department, Kansas City, Missouri Police Department, Lee's Summit, Missouri Police Department or the Missouri Highway Patrol with information that may reasonably be expected to impact their city or state.

#### **Definitions of crimes.**

Following are the definitions of crimes used in this report, as stated in the F.B.I.'s Uniform Crime Reporting Program:

- Murder/Non-negligent Manslaughter: Willful (non-negligent) killing of one human being by another.
- Negligent Manslaughter: The killing of another person through gross negligence.
- Sex offenses: A forcible sex offense is any sexual act directed against another person, forcibly and/or against the person's will; or not forcibly or against the person's will where the victim is incapable of giving consent. This includes forcible rape, sodomy, and fondling and sexual assault with an object. A non-forcible sex offense is unlawful, non-forcible sexual intercourse and includes incest and statutory rape.

- **Robbery:** Taking or attempted taking of anything of value under confrontational circumstances from the control, custody, or care of another person or persons by force or threat of force or violence and/or by putting the victim in fear of immediate harm.
- **Aggravated assault:** An attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.
- **Burglary (breaking and entering):** Unlawful entry into a building or other structure with the intent to commit a felony or a theft. Note: Forced entry is not a required element of the offense so long as the entry is unlawful (trespassing).
- **Motor vehicle theft:** Theft or attempted theft of a motor vehicle.
- **Arson:** Any willful or malicious burning or attempt to burn with or without intent to defraud, a dwelling house, public building, motor vehicle, or aircraft, personal property of another, etc.
- **Hate Crime:** Any crime listed above, and any other crime involving bodily injury, which manifests evidence that the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability.
- **Larceny-Theft:** The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another.
- **Simple Assault:** An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.
- **Intimidation:** To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.
- **Vandalism:** To willfully or maliciously destroy, injure, disfigure, or deface any public or private property, real or personal, without the consent of the owner or person having custody or control by cutting, tearing, breaking, marking, painting, drawing, covering with filth, or any other such means as may be specified by local law.

### **Crime statistics.**

The following charts list crimes which occurred on MCC campuses or adjacent public property. They also show arrests and disciplinary referrals for liquor law, drug abuse, and weapons possession violations. If any of the reported crimes in the "All Crimes" section is considered to be a hate crime, that information is also reported under the "All Hate Crimes" heading. The "Hate Crimes (by Prejudice)" section further describes reported hate crimes by category of prejudice.

The statistics in this report are gathered by the Campus Police Captains. A daily crime log is maintained on each campus. Campus Police Captains work collaboratively with local police departments and Campus Police authorities to collect crime statistics in a timely manner. Anyone who may become aware of criminal offenses is encouraged to report these offenses to Campus Police Department authorities.

### **SAFETY TIPS**

Following these tips can help prevent you from becoming a victim.

- Stay in well-lit areas. Plan your route and use public sidewalks or walk midway between curbs and buildings away from alleys, entries and bushes. Avoid shortcuts through parks, vacant lots and other deserted places.
- When possible, walk in groups – there is safety in numbers.
- Scan the area as you approach or leave buildings or parking lots.
- Consider carrying a personal safety alarm device.
- When approaching your vehicle, scan the immediate area.
- Have your keys in hand and scan the inside of your car before entering.
- Always lock your car doors upon entering or leaving your vehicle.
- Never leave your windows down (even a crack) in your parked car.
- Never leave your keys in an unattended car.
- Always keep your keys in your possession.
- Report missing keys immediately.
- Do not hide a key on or in your car.
- Never attach a tag with your name and address to a key ring.
- If you carry a handbag, keep it close to your body. If your bag is snatched, don't fight.
- Make sure valuables are out of sight or locked in the trunk.
- Don't leave vital information in your car - it provides personal information to a criminal.
- Report anyone who behaves suspiciously to the Campus Police Department.
- Advise the Campus Police or physical plant personnel of any hazards or security concerns.
- Follow your instincts – if your intuition tells you there is a risk, act accordingly.
- If you believe you are being followed, cross the street, change direction or vary your pace. This might discourage the follower.
- As a rule, do not stop to give direction or other information to strangers.
- If you feel uncomfortable in an elevator, leave at the first chance you have. Don't feel embarrassed or guilty for protecting yourself.
- While in class or office, keep personal belongings in view. Keep your purse either with you or in a locked location.
- Do not remove rings to wash your hands – they can be forgotten and/or stolen.
- Carry only necessary credit cards and money.
- To access the 9-1-1 emergency number from a campus non-pay phone dial 8-911.

COMPLIANCE INFORMATION

**Certification of accuracy.**

I certify that the statements in this report are true and accurate representations of the policies of Metropolitan Community College.

Mark S. James  
Chancellor

### MCC Districtwide

All Crimes									
Crimes Reported To MCC Public Safety (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible	1	2	0	0	0	1	1	2	1
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	1	2	0	1	2
Aggravated Assault	1	1	1	2	2	1	3	3	2
Burglary	12	1	7	0	0	0	12	1	7
Motor Vehicle Theft	1	3	6	0	0	4	1	3	10
Arson	2	0	0	0	0	0	2	0	0
<b>Arrests and Referrals</b>									
<b>Liquor Law Violations</b>									
Arrest	0	0	0	0	0	0	0	0	0
Referral	0	0	0	0	0	0	0	0	0
<b>Drug Law Violations</b>									
Arrest	0	0	1	0	0	0	0	0	1
Referral	0	1	0	0	0	0	0	1	0
<b>Weapons Law Violations</b>									
Arrest	1	0	0	0	0	0	1	0	0
Referral	0	0	0	0	0	0	0	0	0
<b>All Hate Crimes (by prejudice as next column)</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	1	0	0	0	0	0	1
<b>Hate Crimes (By Prejudice)</b>									
Crimes Reported To MCC Public Safety (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Race</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	1	0	0	0	0	0	1
<b>Gender</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible Sex	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	1	0	0	0	0	0	1

Hate Crimes (By Prejudice continued)									
Crimes Reported To MCC Public Safety (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Religion</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible Sex	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Sexual Orientation</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible Sex	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Ethnicity</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible Sex	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Disability</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible Sex	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0

**NOTES:**

- There may be a duplication of crime as listed in each part and public crime statistics due to crime being reported to both MCC and local police departments.
- The Adjacent Public Property crime for which crime statistics are provided are described on the individual incident reports.
- For purposes of classification, a hate crime is any crime listed above, or any other crime involving bodily injury that is defined and where the victim was chosen solely because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability. Please note that if a hate crime is listed, it is also listed under "All Crimes".

MCC- Blue River

All Crimes									
Crimes Reported To (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Felony	0	0	0	0	0	0	0	0	0
Non-Felony	0	0	0	0	0	0	0	0	0
<b>Robbery</b>	0	0	0	0	0	0	0	0	0
<b>Aggravated Assault</b>	0	0	0	0	0	0	0	0	0
<b>Burglary</b>	0	0	0	0	0	0	0	0	0
<b>Motor Vehicle Theft</b>	0	0	0	0	0	0	0	0	0
<b>Arms</b>	0	0	0	0	0	0	0	0	0
<b>Arrests and Referrals</b>									
<b>Liquor Law Violations</b>									
Arrest	0	0	0	0	0	0	0	0	0
Referral	0	0	0	0	0	0	0	0	0
<b>Drug Law Violations</b>									
Arrest	0	0	0	0	0	0	0	0	0
Referral	0	0	0	0	0	0	0	0	0
<b>Weapons Law Violations</b>									
Arrest	0	0	0	0	0	0	0	0	0
Referral	0	0	0	0	0	0	0	0	0
<b>All Hate Crimes (by prejudice on next column)</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Felony	0	0	0	0	0	0	0	0	0
Non-Felony	0	0	0	0	0	0	0	0	0
<b>Robbery</b>	0	0	0	0	0	0	0	0	0
<b>Aggravated Assault</b>	0	0	0	0	0	0	0	0	0
<b>Burglary</b>	0	0	0	0	0	0	0	0	0
<b>Motor Vehicle Theft</b>	0	0	0	0	0	0	0	0	0
<b>Arms</b>	0	0	0	0	0	0	0	0	0
<b>Larceny-Theft</b>	0	0	0	0	0	0	0	0	0
<b>Simple Assault</b>	0	0	0	0	0	0	0	0	0
<b>Intimidation</b>	0	0	0	0	0	0	0	0	0
<b>Vandalism</b>	0	0	0	0	0	0	0	0	0
<b>Hate Crimes (By Prejudice)</b>									
Crimes Reported To (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Race</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Felony	0	0	0	0	0	0	0	0	0
Non-Felony	0	0	0	0	0	0	0	0	0
<b>Robbery</b>	0	0	0	0	0	0	0	0	0
<b>Aggravated Assault</b>	0	0	0	0	0	0	0	0	0
<b>Burglary</b>	0	0	0	0	0	0	0	0	0
<b>Motor Vehicle Theft</b>	0	0	0	0	0	0	0	0	0
<b>Arms</b>	0	0	0	0	0	0	0	0	0
<b>Larceny-Theft</b>	0	0	0	0	0	0	0	0	0
<b>Simple Assault</b>	0	0	0	0	0	0	0	0	0
<b>Intimidation</b>	0	0	0	0	0	0	0	0	0
<b>Vandalism</b>	0	0	0	0	0	0	0	0	0
<b>Gender</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Felony Sex	0	0	0	0	0	0	0	0	0
Non-Felony	0	0	0	0	0	0	0	0	0
<b>Robbery</b>	0	0	0	0	0	0	0	0	0
<b>Aggravated Assault</b>	0	0	0	0	0	0	0	0	0
<b>Burglary</b>	0	0	0	0	0	0	0	0	0
<b>Motor Vehicle Theft</b>	0	0	0	0	0	0	0	0	0
<b>Arms</b>	0	0	0	0	0	0	0	0	0
<b>Larceny-Theft</b>	0	0	0	0	0	0	0	0	0
<b>Simple Assault</b>	0	0	0	0	0	0	0	0	0
<b>Intimidation</b>	0	0	0	0	0	0	0	0	0
<b>Vandalism</b>	0	0	0	0	0	0	0	0	0

Hate Crimes (By Prejudice continued)									
Crimes Reported To (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Religion</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Felony	0	0	0	0	0	0	0	0	0
Non-Felony	0	0	0	0	0	0	0	0	0
<b>Robbery</b>	0	0	0	0	0	0	0	0	0
<b>Aggravated Assault</b>	0	0	0	0	0	0	0	0	0
<b>Burglary</b>	0	0	0	0	0	0	0	0	0
<b>Motor Vehicle Theft</b>	0	0	0	0	0	0	0	0	0
<b>Arms</b>	0	0	0	0	0	0	0	0	0
<b>Larceny-Theft</b>	0	0	0	0	0	0	0	0	0
<b>Simple Assault</b>	0	0	0	0	0	0	0	0	0
<b>Intimidation</b>	0	0	0	0	0	0	0	0	0
<b>Vandalism</b>	0	0	0	0	0	0	0	0	0
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Felony	0	0	0	0	0	0	0	0	0
Non-Felony	0	0	0	0	0	0	0	0	0
<b>Robbery</b>	0	0	0	0	0	0	0	0	0
<b>Aggravated Assault</b>	0	0	0	0	0	0	0	0	0
<b>Burglary</b>	0	0	0	0	0	0	0	0	0
<b>Motor Vehicle Theft</b>	0	0	0	0	0	0	0	0	0
<b>Arms</b>	0	0	0	0	0	0	0	0	0
<b>Larceny-Theft</b>	0	0	0	0	0	0	0	0	0
<b>Simple Assault</b>	0	0	0	0	0	0	0	0	0
<b>Intimidation</b>	0	0	0	0	0	0	0	0	0
<b>Vandalism</b>	0	0	0	0	0	0	0	0	0
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Felony	0	0	0	0	0	0	0	0	0
Non-Felony	0	0	0	0	0	0	0	0	0
<b>Robbery</b>	0	0	0	0	0	0	0	0	0
<b>Aggravated Assault</b>	0	0	0	0	0	0	0	0	0
<b>Burglary</b>	0	0	0	0	0	0	0	0	0
<b>Motor Vehicle Theft</b>	0	0	0	0	0	0	0	0	0
<b>Arms</b>	0	0	0	0	0	0	0	0	0
<b>Larceny-Theft</b>	0	0	0	0	0	0	0	0	0
<b>Simple Assault</b>	0	0	0	0	0	0	0	0	0
<b>Intimidation</b>	0	0	0	0	0	0	0	0	0
<b>Vandalism</b>	0	0	0	0	0	0	0	0	0

**NOTES:**  
 1. There may be a duplication of crimes listed in campus and public crime statistics due to crimes being reported to both Blue River and the Independence MO Police Department.  
 2. The Adjacent Public Property area for which crime statistics are provided is that area bounded by 74 Highway to the north, E Success Road to the south, Hanks Road to the west, and I.5 miles from Hanks to the east.  
 3. For the purposes of clarification, a hate crime is any crime listed above, or any other crime involving bodily members evidence that the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability. Please note that if a hate crime is listed, it is also listed under "All Cr."

## MCC-Business & Technology Campus

All Crimes									
Crimes Reported To BTC Public Safety (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Felony	0	0	0	0	0	0	0	0	0
Non-Felony	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	2	0	0	0	0	0	2	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
<b>Arrests and Referrals</b>									
<b>Liquor Law Violations</b>									
Arrest	0	0	0	0	0	0	0	0	0
Referral	0	0	0	0	0	0	0	0	0
<b>Drug Law Violations</b>									
Arrest	0	0	0	0	0	0	0	0	0
Referral	0	0	0	0	0	0	0	0	0
<b>Weapons Law Violations</b>									
Arrest	0	0	0	0	0	0	0	0	0
Referral	0	0	0	0	0	0	0	0	0
<b>All Hate Crimes (by prejudice on next column)</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Felony	0	0	0	0	0	0	0	0	0
Non-Felony	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Hate Crimes (By Prejudice)</b>									
Crimes Reported To BTC Public Safety (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Race</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Felony	0	0	0	0	0	0	0	0	0
Non-Felony	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Gender</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Felony Sex	0	0	0	0	0	0	0	0	0
Non-Felony	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0

Hate Crimes (By Prejudice continued)									
Crimes Reported To BTC Public Safety (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Religion</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Felony Sex	0	0	0	0	0	0	0	0	0
Non-Felony	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Sexual Orientation</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Felony Sex	0	0	0	0	0	0	0	0	0
Non-Felony	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Ethnicity</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Felony Sex	0	0	0	0	0	0	0	0	0
Non-Felony	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Disability</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Felony Sex	0	0	0	0	0	0	0	0	0
Non-Felony	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0

- NOTES:
- There may be a duplication of crimes listed in campus and public crime statistics due to crimes being reported to both the BTC and the Kansas City, MO Police Dept.
  - The Adjacent Public Property area for which crime statistics are provided is that area bounded by Executive Drive to the north, Carpenter Drive to the south, N. Universal Ave to the west, and I-435 to the east.
  - For purposes of clarification, a hate crime is any crime listed above, or any other crime involving bodily injury that manifests evidence that the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability. Please note that if a hate crime is listed, it is also listed under "All Crimes."

\* Information not available from the Kansas City Missouri Police Department.

MCC LONGVIEW

All Crimes									
Crimes Reported To Longview Public Safety (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Crimes Reported To Longview Public Safety (by type)</b>									
Criminal Homicide	0	0	0	0	0	0	0	0	0
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Sex Offenses	0	1	0	0	0	0	0	1	0
Forcible	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	2	0	4	0	0	0	2	0	4
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arms	0	0	0	0	0	0	0	0	0
<b>Arrests and Referrals</b>									
<b>Lawyer Law Violations</b>									
Arrest	0	0	0	0	0	0	0	0	0
Referral	0	0	0	0	0	0	0	0	0
<b>Drug Law Violations</b>									
Arrest	0	0	0	0	0	0	0	0	0
Referral	0	1	0	0	0	0	0	1	0
<b>Weapons Law Violations</b>									
Arrest	0	0	0	0	0	0	0	0	0
Referral	0	0	0	0	0	0	0	0	0
<b>All Hate Crimes (by prejudice not released)</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Sex Offenses	0	0	0	0	0	0	0	0	0
Forcible	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arms	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Hate Crimes (By Prejudice)</b>									
Crimes Reported To Longview Public Safety (by type)	On Campus			Adjacent Public Property			Total		
(by type)	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Race</b>									
Criminal Homicide	0	0	0	0	0	0	0	0	0
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Sex Offenses	0	0	0	0	0	0	0	0	0
Forcible	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arms	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Gender</b>									
Criminal Homicide	0	0	0	0	0	0	0	0	0
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Sex Offenses	0	0	0	0	0	0	0	0	0
Forcible Sex	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arms	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0

Hate Crimes (By Prejudice continued)									
Crimes Reported To Longview Public Safety (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Race</b>									
Criminal Homicide	0	0	0	0	0	0	0	0	0
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Sex Offenses	0	0	0	0	0	0	0	0	0
Forcible Sex	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arms	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Sexual Orientation</b>									
Criminal Homicide	0	0	0	0	0	0	0	0	0
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Sex Offenses	0	0	0	0	0	0	0	0	0
Forcible Sex	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arms	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Ethnicity</b>									
Criminal Homicide	0	0	0	0	0	0	0	0	0
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Sex Offenses	0	0	0	0	0	0	0	0	0
Forcible Sex	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arms	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Disability</b>									
Criminal Homicide	0	0	0	0	0	0	0	0	0
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Sex Offenses	0	0	0	0	0	0	0	0	0
Forcible Sex	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arms	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0

- NOTES
- There may be a duplication of crimes listed in campus and public crime statistics due to crimes being reported to both Longview and the Lee's Summit, MO Police Dept.
  - The Public Property area for which crime statistics are provided is that area bounded by Longview Road to the north, Longview Road to the east, Longview Chapel and Longview Park maintenance road to the south, and Frank White Sorball Complex to the west.
  - For purposes of clarification, a hate crime is any crime listed above, or any other crime involving bodily injury that manifests evidence that the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability. Please note that if a hate crime is listed, it is also listed under "All Crimes."

### MCC - Maple Woods

All Crimes									
Crimes Reported To (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible	1	1	0	0	0	0	1	1	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	7	0	1	0	0	0	7	0	1
Motor Vehicle Theft	0	2	1	0	0	0	0	2	1
Arson	2	0	0	0	0	0	2	0	0
<b>Arrests and Referrals</b>									
<b>Liquor Law Violations</b>									
Arrest	0	0	0	0	0	0	0	0	0
Referral	0	0	0	0	0	0	0	0	0
<b>Drug Law Violations</b>									
Arrest	0	0	1	0	0	0	0	0	1
Referral	0	0	0	0	0	0	0	0	0
<b>Weapons Law Violations</b>									
Arrest	0	0	0	0	0	0	0	0	0
Referral	0	0	0	0	0	0	0	0	0
<b>All Hate Crimes (by prejudice on next column)</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	1	0	0	0	0	0	1
<b>Hate Crimes (By Prejudice)</b>									
Crimes Reported To (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Race</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	1	0	0	0	0	0	1
<b>Gender</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible Sex	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	1	0	0	0	0	0	1

\* Information not available from the Kansas City Missouri Police Department

Hate Crimes (By Prejudice continued)									
Crimes Reported To (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Religion</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Sexual Orientation</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Ethnicity</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Disability</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Forcible	0	0	0	0	0	0	0	0	0
Non-Forcible	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0

**NOTES:**

1. There may be a duplication of crimes listed in campus and public crime statistics due to crimes being reported to both Maple Woods and the Kansas City, MO Police Department.

2. The Adjacent Public Property area for which crime statistics are provided is that area bounded by Dairy Road to the north, NE 80th Street to the south, Big Shoal Creek to the west and Arloch to the east.

3. For purposes of clarification, a hate crime is any crime listed above, or any other crime involving bodily injury that manifests evidence that the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability. Please note that if a hate crime is listed, it is also listed under "ALL CRIMES."

### MCC-Penn Valley

All Crimes									
Crimes Reported To (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Fornication	0	0	0	0	0	1	0	0	1
Non-Fornication	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	1	0	0	1
Aggravated Assault	1	1	0	0	0	1	1	1	1
Burglary	1	1	0	0	0	0	1	1	0
Motor Vehicle Theft	1	1	5	0	0	2	1	1	7
Arson	0	0	0	0	0	0	0	0	0
<b>Arrests and Referrals</b>									
<b>Alcohol Law Violations</b>									
Arrest	0	0	0	0	0	0	0	0	0
Referral	0	0	0	0	0	0	0	0	0
<b>Drug Law Violations</b>									
Arrest	0	0	0	0	0	0	0	0	0
Referral	0	0	0	0	0	0	0	0	0
<b>Weapons Law Violations</b>									
Arrest	1	0	0	0	0	0	1	0	0
Referral	0	0	0	0	0	0	0	0	0
<b>All Hate Crimes (by prejudice on next column)</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Fornication	0	0	0	0	0	0	0	0	0
Non-Fornication	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Hate Crimes (By Prejudice)</b>									
Crimes Reported To (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Race</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Fornication	0	0	0	0	0	0	0	0	0
Non-Fornication	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Gender</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Fornication	0	0	0	0	0	0	0	0	0
Non-Fornication	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0

Hate Crimes (By Prejudice continued)									
Crimes Reported To (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Religion</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Fornication	0	0	0	0	0	0	0	0	0
Non-Fornication	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Sexual Orientation</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Fornication	0	0	0	0	0	0	0	0	0
Non-Fornication	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Ethnicity</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Fornication	0	0	0	0	0	0	0	0	0
Non-Fornication	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0

NOTES:  
 1. There may be a duplication of crimes listed in campus and public crime statistics due to crimes being reported to both Penn Valley and the Kansas City MO Police Department.  
 2. On Campus, the Adjacent Public Property are areas for which crime statistics are that area bounded by 31st Street to the north, 33rd Street to the south, Southwest Trafficway to the west, and Broadway to the east. Health Services Institute (HSI) that Adjacent Property is that area that is bounded by 34th Terrace to the north, 35th Street to the south, Pennsylvania to the west and Broadway to the east.  
 3. For purpose of classification, a hate crime is any crime listed above, or any other crime involving bodily injury that manifests evidence that the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability. Please note that if a hate crime is listed, it is also listed under "All Crimes."

\* Information not available from the Kansas City MO Police Department.

## MCC-Penn Valley - Pioneer Campus

All Crimes									
Crimes Reported To Pioneer Public Safety (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Fornication	0	0	0	0	0	0	0	0	0
Non-Fornication	0	0	0	*	*	*	0	0	0
Robbery	0	0	0	1	1	0	1	1	1
Aggravated Assault	0	0	1	2	2	1	2	2	2
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	2	0	0	2
Arson	0	0	0	0	0	0	0	0	0
<b>Arrests and Referrals</b>									
<b> liquor Law Violations</b>									
Arrest	0	0	0	*	*	*	0	0	0
Referral	0	0	0	*	*	*	0	0	0
<b>Drug Law Violations</b>									
Arrest	0	0	0	*	*	*	0	0	0
Referral	0	0	0	*	*	*	0	0	0
<b>Weapons Law Violations</b>									
Arrest	0	0	0	*	*	*	0	0	0
Referral	0	0	0	*	*	*	0	0	0
<b>All Hate Crimes (by prejudice on next column)</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Fornication	0	0	0	0	0	0	0	0	0
Non-Fornication	0	0	0	*	*	*	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Hate Crimes (By Prejudice)</b>									
Crimes Reported To Pioneer Public Safety (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Race</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Fornication	0	0	0	0	0	0	0	0	0
Non-Fornication	0	0	0	*	*	*	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Gender</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Fornication	0	0	0	0	0	0	0	0	0
Non-Fornication	0	0	0	*	*	*	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0

Hate Crimes (By Prejudice continued)									
Crimes Reported To Pioneer Public Safety (by type)	On Campus			Adjacent Public Property			Total		
	2009	2010	2011	2009	2010	2011	2009	2010	2011
<b>Religion</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Fornication	0	0	0	0	0	0	0	0	0
Non-Fornication	0	0	0	*	*	*	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Sexual Orientation</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Fornication	0	0	0	0	0	0	0	0	0
Non-Fornication	0	0	0	*	*	*	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Ethnicity</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Fornication	0	0	0	0	0	0	0	0	0
Non-Fornication	0	0	0	*	*	*	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
<b>Disability</b>									
<b>Criminal Homicide</b>									
Murder	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
<b>Sex Offenses</b>									
Fornication	0	0	0	0	0	0	0	0	0
Non-Fornication	0	0	0	*	*	*	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0

**NOTES:**

- There may be a duplication of crimes listed in campus and public crime statistics due to crimes being reported to both Pioneer and the Kansas City, MO Police Dept.
- The Adjacent Public Property area for which crime statistics are provided is that area bounded by Truman Road to the north, 18th Street to the south, Pioneer to the west and Barton Boulevard to the east.
- For purposes of clarification, a hate crime is any crime listed above, or any other crime involving bodily injury that manifests evidence that the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability. Please note that if a hate crime is listed, it is also listed under "All Crimes".

\* Information not available from the Kansas City Missouri Police Department.

## **PART 86 Notification**

### **The Metropolitan Community College District of Kansas City**

Under Federal legislation known as The Drug Free Workplace of 1988, and The Drug Free Schools and Communities Act of 1989, no institution of higher education shall be eligible to receive funds or any other form of financial assistance under any federal program, including the federal student loan program, without participating in programs to prevent the use of illegal drugs and the abuse of alcohol by students and employees. The prevention program must include annual notification of policies, sanctions, health risks, and resources available to students and employees (See 34 C.F.R. Part 86).

#### MCC Illegal Drug and Alcohol Policy

The Metropolitan Community College prohibits the use, possession, or distribution of alcoholic beverages and/or illegal drugs and controlled substances on college premises or at any college sponsored activity, including appearing on college premises while under the influence of alcohol or drugs/controlled substances. Consistent with local, state and federal law, the College will refer for prosecution any violations of this policy committed by either students or employees. In addition to such referral, the College may impose its own disciplinary sanctions. The range of institutional and legal sanctions are set forth below.

#### MCC Sanctions for Student Violations

- A. Warning: Oral notification from the appropriate dean explaining the violation of the code and that repeated infractions could result in more severe action. The office of the dean will maintain documentation of the warning.
- B. Reprimand: Written notification from the appropriate dean of an alleged violation of the code warning the student that repeated infractions could result in more severe action. A copy of this notification will be maintained in the dean's office.
- C. Disciplinary Probation: A period, up to one semester, during which a student who has violated the code may demonstrate responsibility as a member of the college community by meeting certain conditions. During this period, the student may not represent MCC in any sponsored activity.
- D. Disciplinary Suspension: Administrative withdrawal from current enrollment, denial of further enrollment, and prohibition from participating in any MCC sponsored activity for a period of up to one year.

E. Expulsion: Disciplinary suspension for a period of at least two years. This action will be recorded on the student's permanent record. The student may not request readmission until two years after the expulsion date. Only the chancellor may approve this request.

F. Restitution: In addition to other disciplinary action, payment for damages caused by the violation may be assessed.

**MCC Sanctions for Employee Violations:**

Sanctions may include, written reprimand, suspension and other discipline up to and including termination.

Legal Sanctions

Local, State, and Federal laws prohibit the unlawful possession, use, and distribution and sale of alcohol and illegal drugs. Criminal penalties for violations range from fines to life imprisonment.

Health Risks

Drug or Alcohol	Health Risks
Alcohol	Short term: Impaired judgment, thinking, and physical coordination. Long term: Liver disease, hypertension, heart disease, gastric disorders, brain damage, birth defects.
Depressants (barbiturates, sedatives, tranquilizers)	Short term: Impaired judgment, thinking, and physical coordination. Long term: Liver disease, hypertension, heart disease, gastric disorders, brain damage, birth defects.
Stimulants (Cocaine, amphetamines)	Short Term: irregular heartbeat, sleeplessness, paranoia, psychosis. Long Term: Lung disease, destruction of nasal membranes, heart attack, seizures, severe depression.
Nicotine	Short term: Increased heart and respiration rates, increased blood pressure and adrenaline production. Long Term: Lung cancer, COPD, heart disease, high blood pressure, etc.
Marijuana	Short term: impaired memory, judgment, thinking,

	and physical movement. Long term: lung disease, cancer, brain damage, and damage to the reproductive system.
LSD, PCP, MDMA, and other hallucinogens	Short Term: Hallucinations, unpredictable behavior, emotional instability, violent behavior, flashbacks. Long Term: Brain damage, birth defects, seizures, coma
Narcotics	Short Term: Gastric disorders, lethargy, confusion. Long Term: Seizures, birth defects, gastric disorders, severe addiction, accidental overdose
Inhalants	Short term: Muscle weakness, hallucinations, loss of consciousness, impaired judgment, nausea, nosebleeds. Long Term: anemia/bone marrow damage, brain damage, sudden death, suffocation, coma, death.

MCC Resources

MCC Counseling Services are located at Blue River, Longview, Maple Woods, and Penn Valley. Counselors can be contacted by calling 816.604.1000.

Local Mental Health Services and Information

**Mental Health Crisis Line:** 1.888.279.8188

**Hearing/Speech Impaired Mental Health Crisis Line:** 1.888.955.8339

**Mental Help Line (non-crisis):** 913.281.1234

**ReDiscover:** A nonprofit community mental health agency offering a full spectrum of programs and services for people whose lives have been affected by serious mental illness and/or substance abuse. ReDiscover helps men, women, and children who have limited income, no insurance, or who are under-insured. Call 816.966.0900 or visit their web site at <http://www.rediscovermh.org/programs.html>.

## Metropolitan Community College Biennial Review of the Drug and Alcohol Abuse Program

In the Spring Semester of 2013, the Metropolitan Community College convened a committee with district-wide representation to review and recommend policies, procedures, and events as they pertain to the prevention of alcohol and drug abuse. A program inventory was initiated in mid-March of 2013. The programs and policies were reviewed and recommendations were made at the end of March. Implementation of recommendations started in May 2013 and will be reviewed prior to the close of 2014.

### Objectives:

- 1) To determine the effectiveness of and to implement any needed changes to the alcohol and drug (AOD) prevention program.
- 2) To determine the number of AOD-related violations and fatalities that occurred on MCC campuses or as part of any MCC activities and that were reported to campus officials.
- 3) To determine the number and type of sanctions that were imposed for the AOD-related violations and fatalities.
- 4) To ensure that sanctions for violating standards of conduct are consistently enforced.

### Part I: Program Effectiveness.

#### Policy Statement:

The Metropolitan Community College District is committed itself to being a drug free workplace, campus, and community and expects that its students, faculty, and staff will adhere to the appropriate expectations. These expectations are prescribed in District Regulation 3.30060, which details both the standards of conduct expected of employees and students with regard to alcohol and drugs and the sanctions and consequences for violations of those standards. Any employee or student who violates the provisions of this regulation is subject to disciplinary action, which may include termination or expulsion, depending upon the circumstances of the individual case and the judgment of appropriate college officials. Please see Appendix A for further information.

#### Program Inventory:

During the academic years of 2011-2012 and 2012-2013, Metropolitan Community College (MCC) recognized that it has not had a district-wide AOD prevention program. However, during this time, individual campuses did participate in a variety of activities. The programs are categorized by campus in the below chart:

#### For Students:

Campus	Program/Activity	Semester Dates	Program Goal	Outcome	Effectiveness
Penn Valley	Information Display on Drugs and Alcohol	FS 2011 FS2012	To inform students, faculty, and staff of the	Not measured	Not measured

			dangers of alcohol and drug use		
Maple Woods	Alcohol 101 Fliers	FS2011 FS2012	To inform students of the physical effects and consequences of binge drinking.	Distributed 125 fliers to students	Not measured
Maple Woods	Name that Tune: New Student Orientation	FS2011 SS2012 FS2012	Students who attended Spring Orientation participated in an interactive game focused on student conduct regard drugs and alcohol	Approximately 130 students participated in the interactive game	Not measured
Maple Woods	Campus Safety Awareness Event	FS2011 SS2012 FS2012	To inform students about the Student Code of Conduct and the Drug and Alcohol Free Policy	Campus Police handed out 15 copies of the Student Conduct Code	Not measured
Maple Woods	Avengers Be A HERO Day	SS2012	Students would address various social challenges to Alcohol and Drug Abuse.	Students signed pledges stating that they would not abuse alcohol or drugs as well as received information regarding alcohol and other drugs. Two hundred and fifteen students attended.	Not measured
Maple Woods	Drunk Driving Campaign	TBD	Students will host an event educating their fellow students on the dangers of drunk driving.	Scheduled April 2013	
Blue River	Drive By Example	Ongoing	To educate students, faculty, and staff about the dangers of distracted and drunk driving.	Not measured	Not measured
Blue River	Drunk Driving Simulator		To educate students about the dangers of	Not measured	Not measured

			driving drunk.		
Blue River	Information Display researched and created by a class each semester	Ongoing	To inform students about the consequences of alcohol and drug use.	For students in class, this is measured through the curriculum objectives.	Not measured
Blue River	Student Athlete Honor Code	Ongoing	Student Athletes learn about the dangers of alcohol and pledge to not drink alcohol.	Not measured	Not measured
Blue River	Laura's Run	Once per year	Blue River sponsors the 5K in memory of Laura Beth Reynolds. At the 5K, drunk driving simulators and information is provided to the students and community.	Not measured	Not measured
District-wide	College 100 and PHED 165 (Blue River)	First course: FS 2012	Students are informed about the student code of conduct and educated in regards to the role that alcohol and drugs play in one's overall well-being.	Students are assessed within the course on their knowledge of the course objectives.	To be determined.
District-wide	EMT/Fire/Police Curriculum	Ongoing	Inform students in these programs about the dangers of drugs and alcohol as well as how they relate to one's overall wellbeing	Students are assessed on course objectives within the curriculum.	Not measured
District-Wide: Blue River	EMT/Fire/Police Curriculum	Every semester	To inform family and support system of those is the aforementioned programs of the professional concerns of stress, drugs, and	Not measured	Not measured

			alcohol, the dangers, and the signs of use.		
District-wide	Counselor referrals to outside agencies	Ongoing	Students dealing with alcohol and drug related issues are referred to outside agencies by MCC's professional counselors.	Not measured	Not measure

For Faculty/Staff:

Human Resources Program	Goal	Outcome	Effectiveness
New Employee Benefit Orientation	To provide new employees with information regarding benefits, including information about MCC's Employee Assistance Program (EAP)	New employees receive information about workplace safety, stress management, and substance abuse as well as resources.	Not measured
MCC Drug Free Workplace	Information about MCC being a drug free workplace is provided through MCC Info Exchange	Not measured	Not measured
Balanced Living Newsletter	MCC's EAP sends a newsletter to inform employees about well-being	Not measured	Not measured

**AOD Program Goals and Discussion of Goal Achievement:**

The Metropolitan Community College District of Kansas City has not had a formalized or centralized Alcohol and Drug Program. As a result, although events and programs were planned with good intentions and executed well, they lacked identified learning objectives and measureable outcomes. Therefore, there is no certainty regarding goal achievement.

It is worth noting, however, that throughout the District the Campus Life and Leadership offices are doing an exemplary job in providing alternative programming. These are safe, student-friendly activities that occur on each campus after approximately 4:00 p.m. and extend into the evening and that promote a productive learning environment. They serve as alternatives to various "nightlife" activities that could take place in close proximity to many of the MCC campuses. In a commuter-based community college atmosphere this is an important aspect of accomplishing a drug and alcohol free

environment. The alternative programming over the past two years has been as follows: Blue River, No additional programs; Business and Technology Center, 37 (scheduled from August 2011 through May 2013); Longview, 20 (scheduled from August 2011 through May 2013); and Maple Woods, 34 (scheduled August 2011 through May 2013).

The review of the alcohol and drug program at MCC has allowed for the task force to define a mission and goals, which will guide the District's Drug and Alcohol programming from this point forward. Additionally, all programs will have measurable objectives and learning outcomes that will be assessed through observational techniques by staff members or survey instruments.

#### **Recommended Standards of Practice:**

The Council for the Advancement of Standards (CAS) in Higher Education recommends that an Alcohol and Drug Program (AOD) "develop, disseminate, implement, and regularly review a mission that is consistent with the institutional mission," (2009, pp.66). Further, an AOD Program should consist of "formal education of students both in the curriculum and co-curriculum that will promote student learning and development outcomes that are purposeful and holistic and that prepare students for satisfying and productive lifestyles, work, and civic participation" (2009, pp.66). An AOD Program must [be]:

- Integrated into the life of the institution
- Intentional and coherent
- Guided by theories and knowledge of learning and development
- Reflective of developmental and demographic profiles of the student population
- Responsive to the needs of individuals, diverse and special populations, and relevant constituencies.
- Include students, faculty members, staff, and community constituencies
- Develop and provide education on policies, laws, prevention, intervention, and treatment resources, and training for students and student organizations
- Provide access to support services for students with alcohol or other drug-related concerns
- Systematically assess attitudes, beliefs, and behaviors regarding alcohol and other drug abuse or dependency, consequences of alcohol abuse or dependency, perceptions of campus alcohol and other drug use norms, and other features of the environment that abet high-risk alcohol use or other drug use.
- Regularly evaluated as to how well the AOD program and services accomplish the mission of the AOD Program.

#### **Strengths and Weaknesses of Current MCC Program:**

As previously mentioned, prior to this review MCC did not have a centralized or formalized Drug and Alcohol Program. Each campus programmed events focused on their own population. While this provides the opportunity for targeted programs, a decentralized approach does not allow for a common

mission or common goals. Additionally, MCC was failing to seize an opportunity to create a college culture of healthy habits and behavior.

Moving forward, MCC will address the deficits of a decentralized approach by uniting under one mission all programming and consistently evaluating the program.

**Procedures for Distributing Annual AOD Notification to Students and Employees:**

The procedure for Annual AOD Notification to students and employees will take place in two phases. First, to correct the failure of MCC to properly notify all enrolled students for the past year, MCC will follow the guidelines of best practice set forth by U.S. Department of Education, and will mail a notification to all enrolled students and current employees.

The future procedure will include two separate processes: one for students and one for employees. The process for students will include a notification and a check for understanding delivered electronically during a student's preparation for enrollment. Because this process may involve a modification to our student information system, the goal is to implement it prior to enrollment for the Spring semester 2014. Until then, MCC will continue the process of informing enrolled students via mail.

For employees, future notification will take place at the same time as the annual enrollment for benefits for benefit eligible employees. This process will also be electronic and will provide information on the Employee Assistance Program (EAP). EAP refresher informational meetings are being held at all MCC campuses for all employees. These began the second week of April 2013 and will be held annually to ensure consistent availability of this information.

**Recommendations for the Future:**

As previously mentioned, the process of this review allowed a common mission and common goals to be established for the MCC District. The mission of MCC's Drug and Alcohol program is to provide an environment that is conducive for learning by all people through the development of programming that will promote healthy choices, a safe environment, and education on the dangers of alcohol and drug use, the campus regulations, local/state/federal laws, and the support resources available. The goals of MCC's Drug and Alcohol program are to develop programming that provides information on alcohol and drug use, promotes healthy and alternative choices, and educates students on the consequences of alcohol and drug use. MCC's campus-based drug and alcohol programs will be created around the aforementioned goals and mission and will contain assessable learning outcomes and methods. Each campus will be responsible for holding at least two programs per semester and will solicit student and administrator input to create the event if needed.

**II. Drug and Alcohol Violations and Enforcement of Sanctions**

The chart below contains information on the number of drug and alcohol-related violations and fatalities that occurred on MCC campuses or as part of any MCC activities along with the sanctions that were imposed. Finally, it contains a conclusion as to consistency of enforcement.

**Student Violations of Policy and Sanctions:**

Case (can use an arbitrary number)	Offense	Circumstances/Details	Outcome (disciplinary sanctions, counseling, etc.)	Level of Effort (let's use a 1-5 scale, 1=minimum, 5= a great amount of effort)
1	Under the influence of alcohol	Instructor accused student of coming to class under the influence of alcohol. Student admitted to drinking until the early morning hours. He was under the influence because he was "still drunk."	Verbal warning, Counseling	1
2	Possession of marijuana	Instructor accused student of using marijuana in her vehicle before class. There was no finding of the veracity of the accusation.	Verbal warning, Counseling	1
3	Under the influence of Ecstasy	A student, who admitted to being under the influence of Ecstasy, vandalized several cars on campus by smashing in windshields with a crowbar.	Expulsion, arrested by campus police	1

**Evaluation of Consistency in Enforcement and Sanctions:**

As can be observed, MCC experiences a fairly low volume of drug and alcohol violations. When violations do occur, the sanctions are consistently enforced.

**Part II: Conclusion.**

**Recommendations for Policy Revision:**

The Procedures for Distributing the Annual Alcohol and Drug Program Notification to Students and Employees should be incorporated into MCC District Procedure 3.30060.

**Overall Summary for Implementation of MCC AOD Program:**

Although the biennial review of MCC's Drug and Alcohol Program revealed many deficiencies, it has provided the opportunity to revise the program according to the CAS Professional Standards for Higher Education. MCC is confident that the implementation of a newly designed Alcohol and Drug Program be centered on assessable learning outcomes, goals, and mission will result in its increased effectiveness to the benefit of the entire College community.

**Program Update:**

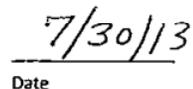
As of July 25, 2013, all currently enrolled students have been sent notification consistent with the standards outlined by the Department of Education for compliance with EDGAR 86 (please reference Appendix A). Additionally, campus programming centered on drug and alcohol prevention has been planned for the 2013-2014 academic year. MCC looks forward to building and improving the Drug and Alcohol Prevention Program.

This Biennial Review Report was completed in April of 2013 and therefore will be conducted and made available in April of all odd years.

Report Completed By: Sydney Beeler, MCC Director of Student Success

Report Reviewed and Approved By: Mark James, MCC Chancellor

  
Signature

  
Date