



### **Reporting Improper Conduct**

The policies and procedures included in this Handbook and relevant portions of the Employee/Student Handbooks that are applicable are essential for establishing a caring, Christ-inspired community and open inquiry, which integrates faith, learning, and life. Any questions related to policy should be referred to the University Compliance Officer.

Any person having reason to believe or who reasonably suspects that any member of the Ottawa University community is engaged in a conduct contrary to any established University policy and/or procedures set forth herein, should report such conduct as quickly as possible after becoming aware of such conduct to their manager, a local unit Officer, the University Compliance Officer, or if preferred, to a source outside the University by contacting the Compliance Hotline service at 844-719-2846 or on the internet at [www.ottawa.ethicspoint.com](http://www.ottawa.ethicspoint.com), both of which operate 24 hours/day, 7 days a week. (Emergency situations which are an urgent safety or security issue must be made directly to 911.)

If the reported conduct potentially involves management for your location, the disclosure should be made to the University Compliance Officer. The University Compliance Officer will oversee the prompt and thorough investigation of all reports and will make every effort to protect the identity of the person reporting the improper conduct. However, the University cannot guarantee confidentiality if identification of the person is necessary to institutional or law enforcement officials for the purposes of investigating the incident. In accordance with the nature of the complaint and the findings of the investigation, the University will take appropriate, corrective action.

Infractions of any policy or procedure set forth in this Handbook can result in discipline, at the sole discretion of Ottawa University, up to and including unpaid suspension or termination of employment. In addition, any omission or misrepresentation during the course of an individual's employment (including but not limited to the application process, information regarding time worked, information associated with paid or unpaid time off, etc.) may result in discipline, up to and including termination of employment.

### **University Compliance Officer/Title IX Coordinator**

The University Compliance Officer is responsible for overseeing the process by which complaints are investigated within the University. The University Compliance Officer also serves as the Title IX Coordinator and regularly reports to the President and the Chair of the Board of Trustees the categories of complaints brought forth and makes any recommendations for change. This position is appointed by the President. The current appointment is:

Carrie Stevens

Director of University Compliance/Title IX Coordinator

[carrie.stevens@ottawa.edu](mailto:carrie.stevens@ottawa.edu) • 785-248-2326

### **Compliance Hotline**

The Compliance Hotline is an externally managed call center independent of the University, staffed by intake specialist professionals. Individuals calling the hotline are not required to disclose who they are. This information is welcomed, however, only if a person wishes to do so. Calls are not recorded. A person may contact the Compliance Hotline service at 844-719-2846 or on the internet at [www.ottawa.ethicspoint.com](http://www.ottawa.ethicspoint.com). The Intake Specialist takes notes of the conversation, summarizes the call, and forwards it to the University Compliance Officer for investigation. The goal of the hotline, for non-emergency situations, is to have an initial response back from the University in five (5) business days, so that the caller may call the hotline back for an update to the original call. The caller is able to do this anonymously, if they choose, using the case number assigned when he/she first called the hotline. At that time the caller may be asked to provide additional information or to call back at a later date for an update. Emergency situations are expedited and will be addressed as quickly as possible.



### **Student Complaint Policy**

Students may also submit complaints in writing to the Vice President and Provost or other officials of a site or to University level personnel including vice presidents and the President. In compliance with federal regulations as interpreted by the Higher Learning Commission (accrediting agency), the University maintains a record of complaints sent by enrolled students to the president, vice presidents, provosts, and deans or directors of academic programs. The complaints recorded include only complaints submitted in writing and signed by a student.

No information identifying the individual(s) making the complaint is made available to the accrediting association. Students may review a record of anonymously tracked complaints that include academic grievances. The University Registrar maintains the database of formal complaints, and at least once a year, issues a report summarizing the complaints and their status.

The following information is recorded in the complaint database:

- The date the complaint was formally submitted
- The nature of the complaint • The steps taken to resolve the complaint
- The University's final decision regarding the complaint.
- External actions, if known, initiated by the student to resolve the complaint and outcome of such actions.

NOTE: Within 10 days of the final resolution of the grievance, the Academic Dean (or CE) must report the details of the grievance to the University Registrar. The University Registrar will maintain an official record of all grievances filed with the University.

### **Military Students**

Military students have an additional option, as follows:

The Department of Defense provides the Postsecondary Education Complaint System which provides a centralized online reporting system for service members and their families to use in reporting problems with education institutions. Agency partners including the Departments of Veterans Affairs and Education are also launching online feedback tools providing a centralized system for veterans, service members and eligible family members to file student complaints.

Students can submit a complaint if they believe their school is failing to follow the Principles of Excellence through the centralized online reporting system accessed via the Department of Defense website. Examples of education-related issues may include, but are not limited to, misrepresentation or deceptive actions with regards to private or institutional loans, high-pressure recruitment tactics, false representations about degree programs, and misleading statements regarding accreditation.

The complaint system is part of the President's Executive Order establishing Principles of Excellence for educational institutions serving Service Members, Veterans, Spouses, and other Family Members; designed to empower beneficiaries to report experiences related to misleading or unfair acts or practices by educational institutions serving veterans, service members and their families.

Military-connected students using Tuition Assistance (TA) or Military Spouse Career Advancement Accounts (MyCAA) Scholarships can submit feedback at: [http://www.militaryonesource.mil/deployment-and-transition/separating-from-the-military?content\\_id=2879866](http://www.militaryonesource.mil/deployment-and-transition/separating-from-the-military?content_id=2879866). Once a complaint is received, agency staff will contact both the student submitting the complaint as well as the referenced school, working with both parties to fully understand the issue raised and seek resolution.



All verified cases will be submitted to the Federal Trade Commission's Consumer Sentinel Network accessible by over 650 federal, state and local law enforcement agencies for use in enhancing and coordinating law enforcement investigations. Appropriate cases will be referred to the Department of Justice and/or Consumer Financial Protection Bureau.

### **State of Kansas Complaint Procedures**

Should the institution not be able to resolve the student complaint, the student has the right to contact the state of Kansas and its appropriate agency to determine the course of action. Complaints can be filed with the following agencies in Kansas:

- Complaints related to the application of state laws or rules related to approval to operate or licensure of a particular professional program within a postsecondary institution shall be referred to the appropriate State Board (i.e., State Boards of Health, State Board of Education, and so on) within the Kansas State Government and shall be reviewed and handled by that licensing board ([www.kansas.gov/agencies/](http://www.kansas.gov/agencies/) and then search for the appropriate division);
- Complaints related to state consumer protection laws (e.g., laws related to fraud or false advertising) shall be referred to the Consumer Protection Division in the office of the Kansas Attorney General and shall be reviewed and handled by that Unit (<http://ag.ks.gov/in-your-corner-kansas/home>)

### **State of Arizona Complaint Procedures**

If the student complaint cannot be resolved after exhausting the Institution's grievance procedures, the students may file a complaint with the Arizona State Board for Private Post-Secondary Education. The student must contact the State Board for further details. The state Board Address is:

1400 W. Washington, Room 26  
Phoenix, AZ 85007  
Phone: 602-542-5709  
Website: [www.azppse.gov](http://www.azppse.gov)

### **State of Wisconsin Complaint Procedures**

Educational Approval Board  
431 Charmany Drive, Ste. 102  
Madison, WI 53719  
Phone: 608-266-1996

### **State of Indiana Complaint Procedures**

101 West Ohio Street, Ste. 550  
Indianapolis, IN 46204-1984  
Phone: 317-464-4400  
Email: [complaints@che.in.gov](mailto:complaints@che.in.gov)

### **Higher Learning Commission (HLC)**

Allegations regarding noncompliance with accreditation standards, policies, and procedures may be made to:  
HLC 230 South LaSalle Street Suite 7-500  
Chicago, IL 60604

The Commission's complaint policy, procedure and the Complaint form may be found on their website, [www.hlcommission.org/Student-Resources/complaints.html?highlight=WyJib21wb.](http://www.hlcommission.org/Student-Resources/complaints.html?highlight=WyJib21wb.)