



Lansing Community College Board of Trustees

Audit Committee Meeting
March 3, 2025
12:00 pm

Lansing Community College Board of Trustees **AUDIT COMMITTEE**



Trustee Robert Proctor
Committee Chair



Trustee LaShunda Thomas
Committee Member



Trustee Hope Lovell
Committee Member

*Minutes of meetings and all proceedings of the Board may be obtained from the Board's Executive Assistant & Liaison
3rd Floor, Room 307.4, Paula D. Cunningham Administration Building
610 N. Capitol Avenue; Lansing, MI 48933; Phone (517) 483-5252*



AGENDA

LANSING COMMUNITY COLLEGE
BOARD OF TRUSTEES
March 3, 2025

Administration Building Boardroom
12:00 p.m.

Audit Committee Meeting

- I. Call to Order by Committee Chair
- II. Roll Call by Executive Assistant to the Board
- III. Additions/Deletions to the Agenda
- IV. Limited Public Comment Regarding Agenda Items
- V. Approval of Minutes
 - A. October 7, 2025, Audit Committee Meeting Minutes
- VI. President Report
 - A. Internal Audit Review
 1. Review on Title IX Compliance – *Baker Tilly*
- VII. Audit Chair Report
- VIII. Public Comment
- IX. Adjournment

Approval of Minutes



LANSING COMMUNITY COLLEGE
BOARD OF TRUSTEES
Administration Building Room 306
October 7, 2024

Audit Committee Meeting

Unadopted Meeting Minutes

Call to Order

The meeting was called to order at 12:05 p.m.

Roll Call

Present: Proctor, Thomas, Vaive

Absent: Absent

Additions/Deletions to the Agenda

Trustee Proctor added the following to the meeting agenda:

- Request for reimbursement for Trustee Hidalgo's conference travel expenses from the MCCA Summer Conference.

Limited Public Comment Regarding Agenda Items

There were no limited public comments regarding agenda items.

Approval of Minutes

IT WAS MOVED BY Trustee Vaive and seconded by Trustee Proctor that the June 3, 2024, Audit Committee meeting minutes be approved.

ROLL CALL VOTE:

Ayes: Proctor, Thomas, Vaive

Nays: None

Absent: None

The motion carried.

President's Reports

Informational – Annual Financial Audit Report FY Ended June 30, 2024, and June 30, 2023

Michelle Fowler, of Rehmann, presented the Annual Financial Audit Report and the Single Audit Act Compliance Year Ended June 30, 2024. She also reviewed the independent auditors' communication to the Audit Committee and the Board of Trustees. Michelle briefly spoke about new auditing pronouncements. This report will be presented to the full Board at the October 28, 2024, Board of Trustees Meeting.

IT WAS MOVED BY Trustee Vaive and seconded by Trustee Thomas that the Audit Committee accept the reports and recommend its approval to the full Board.

ROLL CALL VOTE:

Ayes: Proctor, Thomas, Vaive

Nays: None

Absent: None

The motion carried.

Committee Chair's Reports

Action – Approval of Trustee Travel and Conference Expense

IT WAS MOVED BY Trustee Thomas and seconded by Trustee Vaive that Trustee Hidalgo's travel reimbursement for his attendance at the MCCA Summer Conference be approved.

ROLL CALL VOTE:

Ayes: Proctor, Thomas, Vaive

Nays: None

Absent: None

The motion carried.


Public Comment

There were no public comments.

Adjournment

Trustee Proctor called adjournment at 1:02 p.m.

Submitted,


Executive Assistant/Liaison to the Board
Benita Duncan

President's Report

**Lansing Community College – Board of Trustees
Audit Committee
March 3, 2025**

Agenda Item: Internal Audit Update – Review on Title IX Audit

Presented for Information

PURPOSE

To receive the Baker Tilly Internal Audit Review on Title IX compliance.

BACKGROUND

At the April 5, 2021, Audit Committee meeting, LCC's Internal Auditors, Baker Tilly, presented an overview of the Enterprise Risk Assessment Refresh as part of the Fiscal year 2021 Internal Audit plan. This summary identified five risk areas, (1) Student Experience, (2) Human Resources, (3) Cybersecurity and Information Privacy, (4) Project Management, and (5) Facilities and Construction Management. The following schedule of audit topics was proposed.

In July 2023, Executive Leadership determined that based on the current environment, the Project Management Structure and Resources Review and the Construction Review would be replaced by internal audits of compliance for (1) the Clery Act, and (2) Family Educational Rights and Privacy Act (FERPA), and (3) Title IX.

Risk Area	Proposed IA Projects Related to Risk Area	Proposed Review		
		FY2022	FY2023	FY2024
Student Experience	<ul style="list-style-type: none"> Student Experience, Success, and Retention Review 	X		
Human Resources	<ul style="list-style-type: none"> Hiring Process Follow-up Audit 	X		
Cybersecurity and Information Privacy	<ul style="list-style-type: none"> Information Security Audit (Including user access processes and procedures) 		X	
Project Management	 <ul style="list-style-type: none"> Project Management Structure and Resources Review 		X	
Facilities and Construction Management	 <ul style="list-style-type: none"> Construction Review 			X
Federal Compliance	<ul style="list-style-type: none"> Clery Act 			X
Federal Compliance	<ul style="list-style-type: none"> FERPA 			X
Federal Compliance	<ul style="list-style-type: none"> Title IX 			X

IMPLICATIONS

Financial:

N/A

Strategic Plan:

This supports the College's goals of Resource Management and Fiscal Responsibility.

Human Resources:

N/A

RISKS

N/A

OTHER OPTIONS/ALTERNATIVES

N/A

RECOMMENDATIONS

ATTACHMENTS:

1. Title IX Audit Review from Baker Tilly



DATE: December 5, 2024

TO: Don Wilske, Chief Financial Officer
Seleana Samuel, Senior Vice President, Business Operations
Sally Welch, Provost and Senior Vice President of Academic Affairs

FROM: Internal Audit, Baker Tilly

SUBJECT: Title IX Policy and Procedure Audit – Phase II: Policy, Procedure, and Process Review

Background and Objectives

Baker Tilly, serving as Lansing Community College's (LCC or the College) Internal Audit (IA) function, completed a two-phased Title IX Policy and Procedure Audit as part of the fiscal year (FY) 2024 IA plan. Baker Tilly completed Phase I in May 2024, providing the College with the LCC Title IX Audit Website and Policy Memo, focused on policies, procedures, and website information as compared to 2020 Final Regulations. Baker Tilly initiated Phase II in August 2024, which focused on the review and evaluation of overall processes, including current Title IX governance and implementation practices, as well as alignment of the College's revised Title IX policies and procedures with 2024 Title IX regulations and other guidance (e.g., court determinations).

The objective of Phase II of the audit was to determine whether processes and procedures in LCC's Title IX policy are in compliance with the new 2024 regulations and reflective of leading practices in Title IX guidance.

Approach

To meet the above objectives, IA performed the following activities:

- Phase II: Policy, Procedure, and Process Review
 - Requested and reviewed the College's revised Title IX policies and procedures, and evaluated updates for alignment with 2024 Title IX guidance (see Appendix A for the initial document request list)
 - Conducted seven individual or group interviews with key stakeholders across LCC who are involved with Title IX administration to understand Title IX operations and evaluate processes in place (see Appendix B for the personnel interviewed list).
 - Evaluated whether the College has the appropriate infrastructure, communication channels, and roles in place to implement the proposed Title IX policy and procedural updates
 - Reviewed training initiatives and programs, including, but not limited to:
 - Content of presentation and its alignment with requirements in current Title IX regulations
 - Participants of the presentation (e.g., faculty, staff, students)
 - Timing (e.g., annual training, as part of new employee orientation)
 - Processes for publishing training materials or making them publicly available
 - Identified any potential gaps and/or opportunities to enhance the College's practices related to Title IX administration
 - Conducted a one-hour facilitated discussion to validate potential observations and opportunities to improve existing processes
 - Delivered one draft and one final deliverable to identified stakeholders, including:
 - Proposed changes to the College's revised Title IX policies and procedures to further align with 2024 Title IX guidance
 - Recommendations to strengthen existing Title IX practices and processes, where applicable

Policy Gap Analysis

Baker Tilly compared Lansing Community College's updated policy to the new 2024 Title IX regulations to identify potential gaps, listed in the chart below. The College's updated Title IX policy and procedures include the major provisions of the 2024 Title IX Regulations, and the identified gaps listed below are relatively minor. The College should consider whether any updates are needed to its policy or procedures to explicitly include the following¹:

Category	New Regulations	Identified Gap	Management Response
Responding to Sex-Based Harassment	<p>§ 106.44(f)–(g)</p> <p>Schools must promptly address sex-based harassment, offer non-punitive supportive measures to all reporters, and prohibit retaliation, including for false statements or consensual conduct based on investigation outcomes.</p>	<p>The policy does not explicitly mention that supportive measures must be non-punitive and not unreasonably burdensome on the respondent, or the specifics of informal resolution processes and retaliation prohibitions.</p>	<p>Section F in the policy addresses and defines retaliation.</p> <p>Section 8.11. (A) of the procedure outlines an overview of all resolution procedures, including informal. There is a subsection that includes supportive measures.</p> <p>Added “non-punitive” to 8.2 of the procedure. As well as a sentence clarifying that measures must not be unreasonably burdensome.</p> <p>Added “non-punitive” and “not unreasonably burdensome on the respondent” in section E of the policy.</p> <p>Added “or retaliatory” to section F.</p> <p>Section E in the policy has been adjusted to include a sentence clarifying that measures are non-punitive and unreasonably burdensome.</p>
Preventing Sex-Based Harassment	<p>§ 106.8(d)</p> <p>Schools must train all employees to report sex discrimination, provide extra training for Title IX officials, prevent recurrence, address reporting barriers, and monitor issues even if complaints are dismissed.</p>	<p>The policy does not explicitly mention the requirement for training all employees to recognize and report sex discrimination or the need to address barriers to reporting and monitor these issues even when complaints are dismissed.</p>	<p>Adjusted section G of the policy to make it clearer that all employees are required to participate in Title IX training. The training at a minimum includes recognizing and reporting sex discrimination.</p>

¹ Example Title IX policy that has been updated per the 2024 regulations for the University of California System: [Sexual Violence and Sexual Harassment \(ucop.edu\)](https://ucop.edu/sexual-violence-and-sexual-harassment/).

Category	New Regulations	Identified Gap	Management Response
Effect of other Requirements	§ 106.6 Clarifies that a recipient must comply with Title IX and the final regulations in the event of a conflict with State law or FERPA, and that Title IX and the final regulations do not override any legal right of a parent, guardian, or other authorized legal representative to act on behalf of a complainant, respondent, or other person.	The policy does not explicitly mention the regulations do not override legal rights of parent, guardians, or representatives. Further, the policy does not mention these regulations take precedence in the event of a conflict with state law or FERPA.	In the policy section H paragraph 2. We have added the following language: "In the event of a conflict with FERPA or State Law at any point in a Title IX process, Title IX regulations will take precedence. A parent or legal guardian of a minor child retains all legal rights to act on behalf of a complainant, respondent, or other person."

Observations and Recommendations

In addition to the above policy analysis, Baker Tilly identified the following recommendations as part of documentation review and interviews. As case and complaint testing was not in-scope for this review, the following have not been independently verified via testing or analysis.

1. Storage of Employee Case Files	
Observation	Employee Title IX files are currently stored in paper format, which increases the risk of sensitive documents related to employee complaints being lost, damaged, or inappropriately accessed. According to the College's records management and information security policies ² , sensitive information should ideally be maintained in an electronic system to ensure better security and accessibility, or strictly follow the paper storage guidelines outlined in LCC Paper Records Storage Guidelines ³ .
Recommendation	The Employee Title IX Coordinator should consider use of a secure, electronic record system (e.g., secure network drive) to document, track, and store employee case files. In cases where paper records are necessary, ensure they are maintained in compliance with the College's Paper Records Storage Guidelines to mitigate the risk of loss or unauthorized access.
Management Response	Action Plan: Documents are currently stored securely on a drive with restricted access. All records are maintained in compliance with the College's record retention schedules. An electronic case management system, Symplicity Advocate, has been purchased and will be used for all employee Title IX cases. This is the same system that is used by our Office of Student

² [Policies, Guidelines & Recommendations - Lansing Community College \(lcc.edu\)](#)

³ [LCC Paper Records Storage Guidelines](#)

1. Storage of Employee Case Files

	<p>Compliance for student Title IX cases. According to the vendor full implementation will take four to six months.</p> <p>Owner: Risk Management and Legal Services (currently serving as Employee Title IX and Title IX oversight)</p> <p>Due Date: June 30, 2025</p>
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2. Documentation of Title IX-Related Interactions

Observation	<p>Interviews noted that some Title IX interactions (e.g., dismissal of case or complaint) may be conducted in-person, and therefore documentation is not maintained to evidence the interaction. Title IX guidance (specifically section (§ 106.8(f)(1) and (2)) Recordkeeping – Documentation Records) requires institutions to document and maintain Title IX records, such as complaints, investigations, grievance procedures, and resolution for at least seven years. Proper documentation practices mitigates risk of noncompliance with Federal regulations as well as mitigates risk of one or both parties misinterpreting or misremembering the verbal discussion (e.g., of case resolution or outcome).</p>
Recommendation	<p>Title IX staff should ensure that all interactions and conversations are documented (e.g., via email follow up, note summary) as part of the case file. This includes maintaining records for the required seven-year period post-resolution, as specified by Title IX guidance. Regular audits should be conducted to ensure compliance with document retention guidance.</p>
Management Response	<p>Action Plan: Employee Title IX responsibilities have shifted to Risk Management and Legal Services, all active investigations and interviews are being documented electronically. Additionally, an electronic case management system, Symplicity Advocate, has been acquired and will be used for used for all employee Title IX cases. According to the vendor full implementation will take four to six months. An electronic case management system, Symplicity Advocate, is currently used for all student Title IX cases. All documentation for Title IX cases is kept in Advocate from initial complaint through case completion, including correspondence and a note log of interactions.</p> <p>Owner: Risk Management and Legal Services</p> <p>Due Date: Complete as of October 22, 2024</p>

3. Support for Accommodations Related to Pregnancy/Related Conditions

Observation	<p>The Student Title IX function is currently managing reasonable modifications requested for students with pregnancy and pregnancy-related conditions, as pregnancy and pregnancy-related conditions are now protected under Title IX as part of the 2024 regulations. These modifications are likely to increase the caseload of the Student Title IX function, which can impact its ability to review and respond to complaints and other Title IX matters timely.</p>
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3. Support for Accommodations Related to Pregnancy/Related Conditions

Recommendation

Other higher education institutions' Title IX functions (e.g., University of Michigan) are coordinating with their accessibility function counterparts to provide reasonable accommodations to students with pregnancy and pregnancy-related conditions, as accessibility functions typically have the expertise in offering and managing accommodations. The College should consider a partnership between the Student Title IX function and the Center for Student Access to review and manage accommodation requests related to pregnancy and pregnancy related conditions (e.g., requests route to the Center for Student Access and complaints route to Title IX).

Management Response

Action Plan: This recommendation is already in action, and began August 1, 2024. The Student Title IX office is currently working with the Center for Student Access in connecting students with modifications and resources. The Student Title IX officers and the Center for Student Access have met together with each student seeking modifications. The Center for Student Access has been working with students and faculty to come to an agreement regarding reasonable modifications. The Student Title IX Office is documenting the interactions in the case management system, and managing student communication.

Owner: Student Title IX, Center for Student Access

Due Date: Completed as of August 1, 2024

4. Student Trainings

Observation

Per the Lansing Student Title IX webpage, all students are required to complete an online Title IX and Sexual Misconduct training within the first two weeks of their first semester and then annually thereafter; however, based on interviews, this is not consistently enforced in practice. Federal Title IX regulations do not require mandatory Title IX training to students; however, without training, students may be unaware of Title IX policies, practices, and resources at the College.

Recommendation

The College should consider implementing one or more of the following to increase Title IX education and outreach to students:

- Mandate completion of Title IX training, including an escalation process for noncompletion of training (e.g., restrictions to email or course registration)
- Publish training materials online so they are publicly available to students
- Provide in-person training as part of other in-person events (e.g., orientation, athletics events, student organization meetings) to increase attendance

Management Response

Action Plan: As Title IX regulations do not require training for students, the College has decided to not mandate student Title IX training. To still provide training above and beyond federal requirements, there is a new student orientation system that will be implemented in the Fall of 2025. This new orientation will include a module on Title IX for all students. The Dean of Student Affairs is the owner of the Title IX element of orientation. The orientation vendor supplies the original content to the Dean annually, which is then reviewed by the Student Title IX team for feedback and content specific to LCC.

Owner: Dean of Student Affairs

Due Date: N/A

Appendix A: Document Request List

The following documentation was requested and reviewed as part of this review:

- ATIXA survey and responses
- ATIXA templates
- Case management system
- Complaint and adjudication templates
- Leave of Absence for Pregnant/Parenting Students Standard Operating Procedure
- Listing of employees with Title IX responsibilities
- Pregnancy and Related Conditions and Parenting Student Procedure
- Prohibited Sex or Gender-Based Discrimination, Harassment, and Sexual Misconduct Policy
- Resolution Process for Alleged Violations of Prohibited Sex and Gender-Based Discrimination, Harassment, and Sexual Misconduct Policy
- Training materials for employees, students, and Title IX personnel

Appendix B: Interview List

The following personnel participated in interviews:

- Lisa Anzicek, Student Title IX Investigator/Conduct Officer
- JR Beauboeuf, Director of Risk Management & Equal Opportunity Office
- Elizabeth Burger, Dean, Health and Human Services
- Bentrelle Carroll, Director of Compliance
- Shon'ta Dwyer, Dean, Technical Careers
- Matt Fall, Executive Director of the Center for Data Science
- Andrea Hoagland, Dean, Arts and Sciences
- Greg Lattig, Athletic Director and Deputy Title IX Coordinator
- Ronda Miller, Dean, Student Affairs
- Christine (Chris) Thompson, Director of Student Compliance / Student Title IX Coordinator
- Sally Welch, Provost, and Senior Vice President of Academic Affairs
- Lori Willett, Human Resources (HR) Director - Labor Relations & Organizational Development

Appendix C: Contact Information

If you have any questions about this memorandum, please contact:



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