

# Office of Institutional Effectiveness

Compliance Training

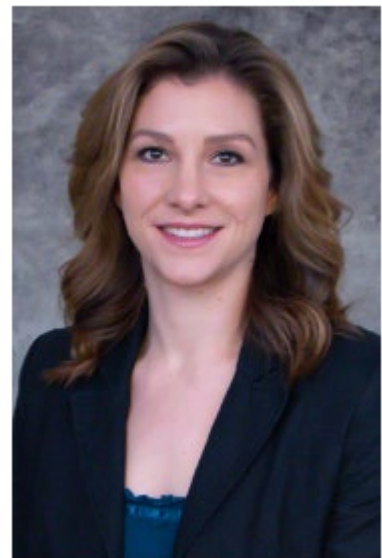




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# ACCREDITATION & COMPLIANCE

- Granted Accreditation with Exceptional Outcome, a ten-year status, by the Commission on Osteopathic College Accreditation (COCA) with a renewal in early 2034.
- Candidacy Status with the Higher Learning Commission with a site visit for consideration of Early Initial Accreditation in October 2024.
- Licensed as an institution of higher learning through the New Mexico Higher Education Department and the Florida Commission for Independent Education.
- Licensed by the State of Texas for clerkship rotations in El Paso.
- Member of NC -SARA
- Policies, College Catalog, Student Handbook, Standard Operating Procedures, NC -SARA, Higher Education Act, Title IV

**Presenter Notes:**

Following a comprehensive site visit in January 2024, the College was granted Accreditation with Exceptional Outcome, a ten-year status by the COCA. More information can be found on our website under the About BCOM Tab.

The College is seeking accreditation from the Higher Learning Commission. Our goal is to transition from the COCA serving as our institutional accreditor to the HLC. HLC accreditation would enable us to evaluate additional programs. The COCA would remain a programmatic accreditor for the DO program.

We have other states in which students attend clinical rotations and the College adheres to regulatory compliance with those states as well.

NC-SARA allows the College to cross state lines with reciprocity to engage in distance education. This includes crossing state lines for clerkship rotation in years three and four.

Our office maintains the College Policies, Standard Operating Procedures, Catalog, and Student Handbook. We also assist with Title IV Compliance.

# COMPLIANCE: HIGHER EDUCATION ACT

- Annual Safety and Security Report (Clery Report) and Fire Safety
  - Campus Emergency Procedures and Timely Notifications/Warnings
- Drug and Alcohol Abuse Prevention
- Missing Person Procedures
- FERPA
- Title IX
- Copyright
- Consumer Information
  - Health and Safety
  - Financial Aid Policies
  - Catalog/Student Handbook
- Voter Registration
- Data
  - IPEDS Reporting
  - Student Outcomes
  - Net Price Calculators
  - Graduation Rates
  - Default Rates

Presenter Notes: The Higher Education Act was first passed in 1965 to ensure that every individual has access to higher education; the HEA also governs student-aid programs and federal aid to colleges. It is generally scheduled for reauthorization by Congress every five years to encourage growth and change. Components of the Higher Education Act are listed in this slide.

# FERPA

- FERPA or the Family Educational Rights and Privacy Act
- What are “education records”?
  - Any record that personally identifies a student and that is maintained by an educational institution or an educational affiliate.
  - Records can be in any media form – handwritten and/or electronic.
- Students have a right to review their education record.
- Students have a right to request an amendment to their record if inaccurate.
- The right to not disclose directory information.
- The right to file a complaint with the US Dept. of Education if the College is not complying with requirements of FERPA.

Presenter Notes: FERPA is a federal law designed to protect the privacy of education records. FERPA also establishes rights for students that allows them to inspect and review their educational record and provides guidelines as to the correction of inaccurate information. This information is outlined in the student handbook and in the standard operating procedure regarding FERPA. Personally identifiable information is information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; or

Personally identifiable information is information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty;  
or

Information that reveals the identity of the student to whom the education record relates

Once a student enrolls in college (please note that FERPA does not apply until a student begins taking classes), he or she can determine what types of information parents and other caregivers can access via FERPA release. This information falls into three basic categories: financial records (i.e. bills and financial aid information), educational records (i.e. grades and class schedules), and student life records (i.e. disciplinary actions). Students can set their own FERPA permissions, and they can change these permissions at any time with the Office of the Registrar.

Directory Information is information contained in an educational record that would not generally be considered harmful or an invasion of privacy if disclosed which includes your name, email address, etc. Directory information can never include a social security number, race, ethnicity, gender, etc. You can opt out of the sharing of directory information with the Office of the Registrar.

Governed under the Department of Education who investigates complaints on non-compliance with FERPA.

# FERPA Best Practices

**Don't leave items with identifiable information exposed.**

**FERPA protected data should not circulate via email or text message unless it is done so in a secured fashion.**

**Don't post grades or evaluations in a way that shows identifiable information.**

**Faculty, staff, including preceptors, can have access to FERPA covered information if they have a legitimate educational interest.**

## **Confidentiality**

Presenter Notes: Just a few tips regarding FERPA and best practices:

Don't complete evaluations in an area where others might have visible access to personally identifiable information.

Keep all student information confidential; Don't discuss a student's education record with others where you might be overheard. Student evaluations are educational records.

Legitimate educational interest is considered necessary for employees to carry out their job responsibilities in support of Burrell's educational mission. Curiosity is not legitimate educational interest and having access to student education records does not equate to license to access them out of curiosity.

Please be careful to ensure the confidentiality of student records.



# TITLE IX

“No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance”.

-Title IX of the Education Amendments of 1972

Presenter Notes: Title IX recently went through negotiated rulemaking and includes updates to its scope (sex characteristics, pregnancy or other related condition), sexual orientation and gender identity), the definition of sexual harassment, and expanded application of Title IX processes and procedures, including increased access to informal resolution processes.

Current procedures are currently posted on the College’s website on its Title IX page. The updated policy and procedures will be published on or just prior to August 1.

# PROHIBITED CONDUCT UNDER TITLE IX

## ➤ Sex Discrimination

➤ Adverse treatment based on sex, including sex stereotypes, sex characteristics, pregnancy or other related condition, sexual orientation and gender identity

## ➤ Sexual Harassment

➤ Unwelcome conduct of a sexual nature including sex stereotypes, sex characteristics, pregnancy or other related condition, sexual orientation, gender identity, sexual assault, dating violence, domestic violence, and stalking

## ➤ Hostile Environment

➤ harassment that is severe, pervasive and objectively offensive enough to effectively deny equal access to education programs and activities.

## ➤ Quid Pro Quo

➤ “this for that”

## ➤ Sexual Exploitation

➤ Bullying, endangerment, hazing in the context of sexual harassment and/or sexual discrimination

## ➤ Retaliation

Presenter Notes: New definitions that go into effect August 1 with the new regs are included below. The following are prohibited and fall under title ix when they occur against a person in the US in an education program or activity.

- Sex discrimination: Any Adverse treatment based on sex, including sex stereotypes, sex characteristics, pregnancy or other related conditions, sexual orientation and gender identity.
- Sexual Harassment: Unwelcome conduct of a sexual nature (unwelcome sexual advances, verbal and physical remarks, action of a sexual nature, solicitation of sexual favors, jokes, comments about a person's sex life, micro-aggressions
  - Hostile environment unwelcome conduct that is severe or pervasive enough to deny equal access to educational programs and activities. quid pro quo or "this for that" could involve things such as the exchange of sexual favors in the workplace or education environment).
  - Gender based Harassment – unwelcome conduct of a nonsexual nature based on a student's actual or perceived sex, including conduct based on gender identity, gender expression, and nonconformity with gender stereotypes.
  - Sexual Assault– severe form of sexual harassment; physical sexual acts perpetrated against a person's will
- Sexual Exploitation – person taking non-consensual or abusive sexual advantage of another (e.g. sexual voyeurism, recording another person in a sexual act, engaging in sexual activity while knowingly infected with HIV/STD/STI)
- Other prohibited conduct that is sexual in nature such as bullying, endangerment, hazing
- Retaliation: it is unlawful for a college to discriminate or intimidate an individual for filing a title ix complaint.

All College employees are mandated reporters by law. Jurisdiction under the new regs – occurred in the US; occurred where the College controls the context of the incident (college property/program); the College has jurisdiction over the respondent as a student/employee; happened to a complainant while the complainant was participating or attempting to participate in the College's program. If not under this jurisdiction, dismissed as Title IX but may be referred to College's formal grievance process.

Colleges are required to address prohibited conduct through an informal resolution process and formal complaint process.

Recent revisions to the law regarding the investigation and resolution processes and Title IX are codified by the College and posted on our website.

# TITLE IX COORDINATOR

- Faculty and staff members are mandated reporters and are required to report any violations to the Title IX Coordinator immediately.
- Visit our website for information regarding our Title IX policy, request for investigation forms, and investigation procedures:

<https://burrell.edu/students/title-ix/>



**Erica Hughey**  
**3501 Arrowhead Dr. 88001**  
[ehughey@burrell.edu](mailto:ehughey@burrell.edu)  
**(575) 674 - 2279**

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Colleges are required to address prohibited conduct through an informal resolution processes and formal complaint process.

Currently, there are procedures posted on our website that related to any Title IX incidents occurring prior to August 1, 2024. In another week or two, a new policy and set of procedures will be posted regarding the procedures for incidents occurring on and after August 1, 2024.

We will also be announcing a new Title IX Coordinator at the end of the month in that communication.

# Complaints: Informal Resolution

**Ombudsman Services :** <https://burrell.edu/GA017/>

- Strategies for remediation
- Sound Board/Listening
- Facilitated Conversation
- Consultation on Policies and Procedures

Presenter Notes: SOP regarding our  
Ombudsman Services:  
<https://burrell.edu/GA017/>

**Erica Hughey, MBA (she/her)**  
**Chief Diversity Officer**  
**Ombudsman**  
**Las Cruces, New Mexico 88001**  
**Office (575) 674-2279**  
[ehughey@burrell.edu](mailto:ehughey@burrell.edu)



# General Feedback & Formal Grievances



## General Feedback and Grievances

[Home / Grievance Form](#)

## General Feedback and Grievances

The General Feedback form is to be used to provide informal feedback to the College. The information is received by the Office of Institutional Effectiveness. The submission will be routed to the appropriate department for awareness purposes only. There is no notification regarding receipt or resolution. The College reserves the right to redirect the general feedback form for review under the College's Grievance Policy, if necessary.

[GENERAL FEEDBACK](#)

The Grievance Form is utilized to report any action that is in violation of written College policies or procedures or constitutes arbitrary, capricious, or unequal application of written College policies or procedures.

[GRIEVANCE FORM](#)

[GRIEVANCE POLICY](#)

Presenter Notes: The College has a form located on its website where it can receive general feedback. Constructive feedback is always appreciated in our continued cycle of improvement.

The College also maintains and publishes procedures necessary for the filing of any formal grievance by any person or organization regarding the conduct of the College's programs or operations or regarding the conduct of its students, faculty or staff.

- Violation of policy or procedure of the College (see the Grievance Policy)
- Informal or Formal resolution
  - Ombuds Service: Erica Hughey

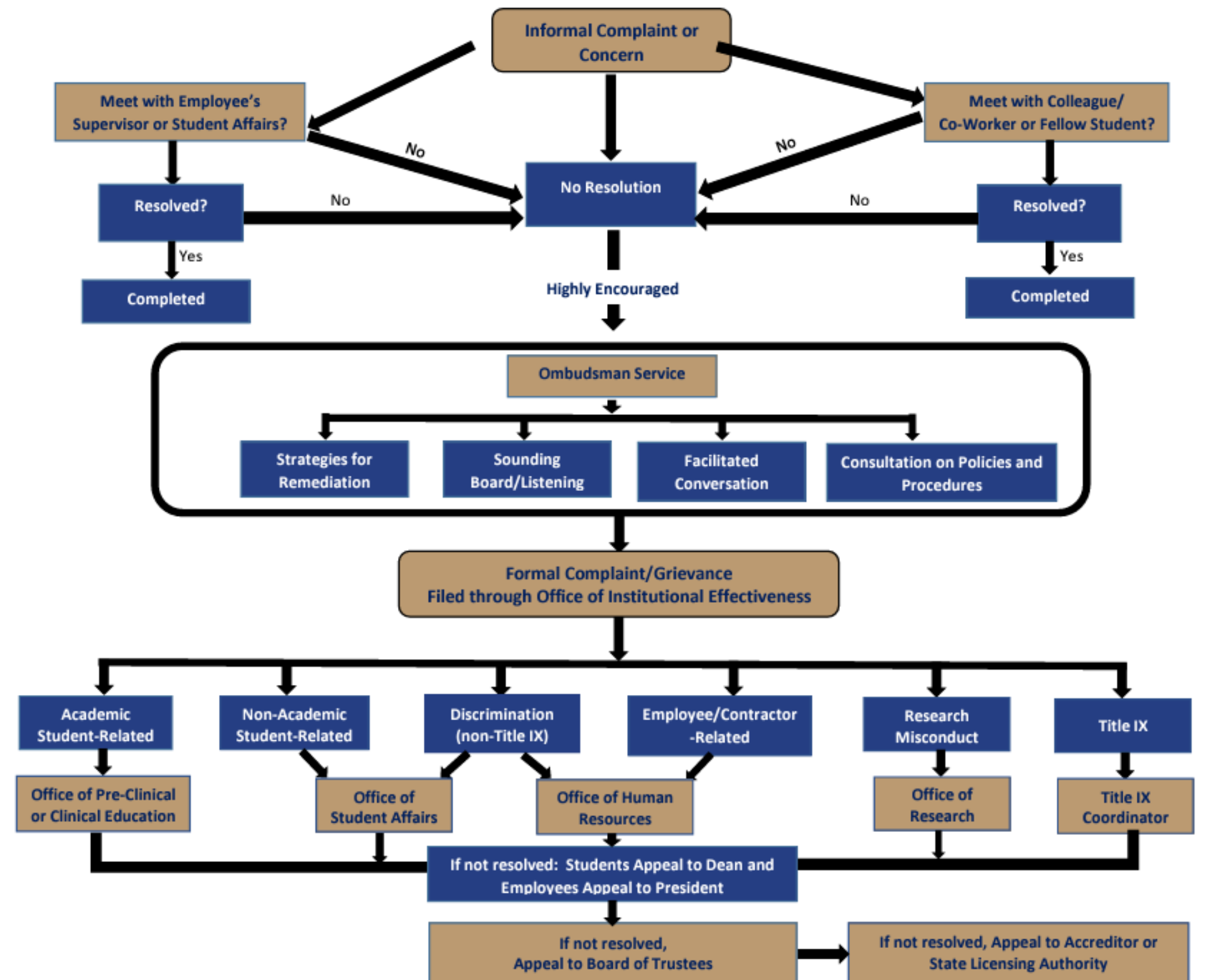
# OMBUDS SERVICE

Erica Hughey, MBA  
[ehughey@burrell.edu](mailto:ehughey@burrell.edu)

575-674-2279

OMBUDS SERVICE SOP:  
<https://burrell.edu/GA017/>

Presenter Notes: For any informal complaint or any complaint that is not a violation of policy or procedure, the College encourages the use of the Ombudsman Service to assist. Erica Hughey provides this service on behalf of the College. We also maintain an Standard Operating Procedure that can be found on our website. The Flowchart provided on this page is helpful in determining how to route a complaint.





## Accreditation Complaint

[Home](#) / [About](#) / [Accreditation and State Authorization](#) / [Accreditation Complaint](#)

Accreditation standards are published on the American Osteopathic Association's (AOA) website.

Any individual who believes Burrell College of Osteopathic Medicine is not in compliance with a Commission on Osteopathic College Accreditation (COCA) standard has a right to address his/her concern. The complaint will be kept on file in a confidential manner. Please see Accreditation Standard Complaint Policy B2030 (Policy B2030) regarding the process for filing a complaint.

The College Catalog provides contact information for anyone wishing to file their complaint directly with the COCA and/or other accreditors.

Presenter Notes: Accreditation Complaint Policy/Form



# COLLEGE WEBSITE

Presenter Notes: Navigation to the Accreditation Information, as well as Policies and Standard Operating Procedures of the College.

**BURRELL COLLEGE**  
*of*  
**OSTEOPATHIC MEDICINE**



[About](#) [Admissions & Aid](#) [Academics](#) [Students](#) [Faculty](#) [Administration](#) [Preceptors](#) [Giving](#) [Communications](#) [Forthcoming Florida Campus](#) 



# COLLEGE WEBSITE

Home / About

Presenter Notes: Navigation to the Accreditation Information, as well as Policies and Standard Operating Procedures of the College.

## Overview and History



The Burrell College of Osteopathic Medicine was envisioned by its Founding Dean George Mychaskiw, D.O., to address the shortage of physicians in the Southwestern United States and its border with Northern Mexico, as well as to diversify the physician workforce. Dr. Mychaskiw reached out to John Hummer, a New Mexico business and healthcare leader, for his assistance in pursuing this vision.

## ABOUT US

- > About Us
  - > Mission, Vision & Guiding Principles
  - > Our History
  - > Leadership
    - > Board of Trustees
    - > Institutional Leadership
  - > Message from the President
  - > Accreditation and Licensure
  - > Governance
    - > Board of Trustees Bylaws
    - > College Bylaws
    - > Strategic Initiatives
    - > Institutional Policies
    - > Standard Operating Procedures
  - > Institutional Snapshot
  - > Code of Professional Conduct
  - > Diversity & Inclusion
  - > Directory



# CAMPUS SAFETY AND SECURITY

## Students

Home / Students

## Office of Student Affairs

- Academic Student Support/Educational Specialists
- Advisory Colleges
- Burrell Cares Links
- Campus Safety and Security
- Care Team
- Career Counseling
- COVID-19 College Information
- Disability Services
- Diversity & Inclusion
- Drug & Alcohol Free Campus
- Event Calendar
- Health
- NMSU Facilities & Services



Presenter Notes: Under the Students tab on our website, you'll see links regarding Campus Safety and Security as well as a link to our Drug & Alcohol Free Campus link.

## STUDENTS

- > Current Students
  - > Student Handbook & Catalog
  - > Student Honor Codes
    - > Student Accounts (Bursar)
  - > Student Forms
  - > Campus Safety and Security
- > Organizations and Outreach
  - > Service Learning
  - > Student Government
  - > Student Organizations
  - > Veteran Programs
  - > TOUCH Program
  - > JEDI Program

# CAMPUS SAFETY AND SECURITY



## ➤ Annual Safety and Security Reports

## ➤ Please report incidents occurring on campus or off campus during education activities.

Presenter Notes: On the Campus Safety and Security page, we house links to the Annual Safety and Security Reports (Clery). For last year's report and the report that will be published on October 1<sup>st</sup> of this year, statistics are combined with NMSU due to our location being on their campus.

Next year, our report will include combined statistics from NMSU and Florida Tech.

The College's biennial review of its drug and alcohol prevention strategies is located under the Drug and Alcohol Free Campus Tab

Incident Reports: any incident that occurs on this campus (falls, needle sticks, the calling of EMS, etc.) please use the incident form to report.

Home / Campus Safety and Security

## Safety Mission

The Burrell College of Osteopathic Medicine is committed to creating a safe and secure environment for the faculty, staff, and students. Burrell College of Osteopathic Medicine maintains a safe environment by providing the necessary resources for all that are a part of it, and encouraging everyone to follow proper safety procedures. A safe and secure environment will allow faculty, staff, and students to focus on learning and growing as a community.

-  [Annual Safety and Security Reports/ Weekly Crime Reports](#)
-  [COVID-19 College Information](#)
-  [Drug and Alcohol Free Campus](#)
-  [Emergency Notifications](#)
-  [Emergency Procedures](#)
-  [Evacuation](#)
-  [Incident Report](#)
-  [MSDS Online](#)
-  [Sexual Assault/Misconduct and Victim of a Crime](#)
-  [Resources & Numbers](#)
-  [Title IX](#)

# ACCEPTABLE USE

## **Protection of Sensitive Electronic Information (SEI) and Personally Identifiable Information (PII)**

The Burrell College of Osteopathic Medicine (BCOM) shall ensure the integrity of information technology resources made available to the College community to prevent disruption to academic and administrative needs. All members of the College community shall promote efficient, ethical and lawful use of BCOM's information technology resources. All information technology resources provided by the College are property of the College.

Acceptable Use Guidelines Published on the College website:

<https://burrell.edu/acceptable-use-guidelines/>

# ACCEPTABLE USE

## **Sensitive Electronic Information (SEI)**

Refers to data that Burrell College of Osteopathic Medicine must protect by law or that Burrell College of Osteopathic Medicine protects to reduce institutional risk. Some important examples of SEI include:

- Protected Health Information, or PHI. Refer to the Uses and Disclosures of Protected Health Information Policy and HIPAA FAQs for more information on identifying and managing PHI.
- Social Security Numbers, or SSNs.
- Credit/debit card numbers and other financial account information.
- Student information, as defined by the Federal Educational Rights and Privacy Act (FERPA)
- Other Personally Identifiable Information, or PII, as may be defined by the New Mexico Statute and Florida Statute.

# ACCEPTABLE USE

- Passwords must comply with the College's Password standard, never be shared with another individual, should not be used on a non-Burrell systems and should not be written on paper. Refer to the password policy: <https://burrell.edu/IT008/>
- Be on the look out for suspicious communications, links and attachments in emails.
- Inspect email addresses for non-College emails, and web site URLs for contents that point to unfamiliar sites. Never open an email attachment if you don't trust the source.
- Be suspicious of requests for Burrell usernames and passwords.

# ACCEPTABLE USE

- Protect Workstation and Laptops by arranging so that they aren't facing outward, and they must be locked when unattended.
- To install or uninstall software on College issued laptops, you must get approval from the IT department.
- Access to VPN and Wi-Fi are only permissible on Burrell-owned laptops and devices.
- Protect data storage, transmission and backups with encryption accordance to Burrell IT standards.
- Secure electronic communications by using a Burrell email account, encrypting SEI and not sharing with outside sources.
- Protect Physical assets with sensitive data and building access from unauthorized people.



# ACCEPTABLE USE

## Recognizing and Reporting Security Incidents

- A security incident is an event that may result in the confidentiality, integrity, or availability of Burrell information systems or data being compromised.
- If you believe that you have observed an information security incident, please take the following steps:
  - Report the incident immediately to the IT Help Desk by calling (575) 674-2390
  - If the incident involves your computer: Discontinue using it until the IT Help Desk has evaluated the situation.
  - If the incident involves the loss or theft of a computer or mobile devices, contact the IT Help Desk, who will assist you in filing a police report.

# INCIDENT REPORT

➤ Please report incidents occurring on campus or off campus during education activities.

Presenter Notes: Please report any type of incidents using this form. This may include accidents, falls, medical emergencies, theft, FERPA violations, etc. Typically students will fill out when they have a needle sticks, or some other type of incidents at the College or while they are participating in clinical rotations.



Home / Campus Safety and Security

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THANK YOU

QUESTIONS?

