



Washtenaw Community College

COMMUNITY/NON-STUDENTS: Administrative Procedures for Use of College Facilities and/or Grounds & Guidelines for Expressive Conduct Activities

The purpose of these procedures is to ensure that College facilities and the grounds owned by the College are maintained in a safe and orderly manner that supports the basic College functions of teaching and learning, while also protecting and not infringing upon legitimate free speech rights.

The College's mission statement states: "We are in partnership with the community we serve." To help in fulfilling this mission, the College is committed to offer external groups the use of College facilities whenever appropriate. The college will make available designated facilities to external organizations for activities which are primarily charitable or educational and will benefit the college and community. The College reserves the right to accept or reject any request for use of facilities.

These procedures are intended to implement WCC Board of Trustees Policies:

- 6035 - External Use of College Facilities - <http://www.wccnet.edu/trustees/policies/6035/>
- 8018 - Student Speech and Expressive Conduct Policy - <http://www.wccnet.edu/trustees/policies/8018/>

The assigned Designee of the Executive Vice President of Student and Academic Services (EVPSAS) is the Director of Student Development and Activities (SDA.)

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Facilities and/or Ground Rentals

- I. Eligible Users:
 - a. Registered Non-Profit Organizations may rent College facilities and/or grounds for the purpose of training, conferences, community events, music/theater performances, educational lectures, meetings, sporting activities, and more.
 - b. Registered For-Profit Businesses may rent College facilities and/or grounds for the purpose of staff training and testing.
- II. Request Process:
 - a. Eligible users may explore Facilities and/or Grounds rental options by contacting WCC's Conference Services Department:
 - 1. Phone: (734) 677-5034
 - 2. Email: pdowney@wccnet.edu
 - 3. Website: <http://www.wccnet.edu/services/conference-services/>
- III. Location(s):
 - a. Based on availability at the time of proposed event.
- IV. Guidelines:
 - a. Media provisions require an additional charge and must be requested at the time of reservation. See online brochure for complete rental details:
<http://webfiles.wccnet.edu/ecd/web/employer-services/conference-services/Conference%20Services%20Brochure.pdf>
 - b. On-site catering options are available and handled by WCC's Conference Services Department at the time of the facility reservation:
<http://webfiles.wccnet.edu/ecd/web/employer-services/conference-services/Menu%20Information.pdf>
 - c. Rental facilities available as early as 6:00 a.m. and no later than 11:59 p.m.
 - d. Rental facilities are available seven days a week.
 - e. Rental facilities are not available when the College is officially closed.
 - f. Other guidelines and stipulations available within individual rental contracts.

Facilities and/or Ground Sponsorship

I. Eligible Users:

- a. Registered Non-Profit Organizations (in partnership with a WCC Department) may be sponsored to use College facilities and/or grounds at a reduced/removed cost for the purpose of training, conferences, community events, music/theater performances, educational lectures, meetings, sporting activities, and more.

II. Request Process:

- a. Eligible users must work through the sponsoring WCC Division or Department, in coordination with Conference Services.
- b. The sponsoring WCC Department or Division will contact Conference Services:
 - i. Phone: (734) 677-5033
 - ii. Email: pdowney@wccnet.edu
 - iii. Website: <http://www.wccnet.edu/services/conference-services/>
- c. Event details must be arranged 10 days prior to event date with the Office of Conference Services.

III. Location(s):

- a. Based on availability at the time of proposed event.

IV. Guidelines:

- a. Sponsored activity must meet the mission of the College.
- b. Sponsored activity must meet and follow the policy and guidelines set by the Board of Trustees.
- c. No conflict of interest may be present with the sponsoring staff/faculty member.
- d. Sponsoring department/division staff must remain onsite for the entire event (including pre. & post event activities).
- e. Sponsored activity must directly benefit the WCC department, students, or have a benefit/impact to communities we serve.
- f. The Director or higher of the sponsoring area must provide written or email support of sponsorship to Conference Services management.
- g. Sponsored events require approval of the WCC Large-Scale Event Committee and the Executive Leadership Team if the event:
 - i. Exceeds 250 participants.
 - ii. Requires restriction of access to entrances/exits, driveways, parking lots, facilities, or campus grounds.
 - iii. Requires use of multiple locations or public areas across campus.
- h. Final approval of any sponsorship is at the discretion of the Executive Leadership and may be denied for any reason, including but not limited to:
 - i. College event expense of facilities/media/ground support staff.
 - ii. Conflict with a previously scheduled event.
 - iii. Potential loss of rental revenue during peak rental seasons/times.
 - iv. Potential for disruption of the educational process.

Promotional Table for Political Advocacy/Petitions

- I. Eligible Users:
 - a. An external organization or individual officially representing (with expressed permission) a political party, a political candidate or petitioning for a specific cause/position within an official government-sponsored election process.
- II. Request Process:
 - a. Eligible users may request a table to advocate politically or collect petition signatures using the **Table Request Form** within the Campus Connect system: <https://wccnet.campuslabs.com/engage/submitter/form/start/338997>
 - b. Requests must be submitted 10 business days prior to the reservation date.
- III. Location(s):
 - a. External political advocacy and petition collection is limited to the reserved table on the first floor of the Student Center Building, and exact location will be determined by the Department of Student Development and Activities in accordance to the day's scheduled activities.
- IV. Guidelines:
 - a. The individual who reserved the table must:
 - i. Provide student or government I.D. at the Student Activities Office (SC 108) upon arrival.
 - ii. Provide written notice of permission to represent the political party, political candidate, or organization originating a specific petition for a government-sponsored election process.
 - iii. Verify that any petition displays both the purpose and text of the actual legislation (if the petition is related to a proposed ballot measure.)
 - b. Those advocating politically or collecting petition signatures at a table may not approach students physically or obstruct the walkway. Instead, students must approach the table to initiate interaction.
 - c. All activity under this part must comply with applicable law, including Michigan's Campaign Finance Act and Michigan's Election Law.
 - d. Political advocates may reserve a table for up to 2 days per week, within the 30 day period leading up to an official election or petition deadline.
- V. Alternative:
 - a. As an alternative to utilizing the Student Center Promotional Table procedure, all community members (both eligible and non-eligible for Student Center Table Promotion,) may utilize the Community Free Speech Zone designated in the **Expressive Conduct Activity** (Page 9-11) procedure.

Promotional Table Sponsorship

- I. Eligible Users:
 - a. Registered Non-Profit Organizations with sponsorship support of a WCC department or division.
 - b. Registered For-Profit Organizations with sponsorship support of a WCC department or division.
- II. Request Process:
 - a. Eligible users must work through the sponsoring WCC Division or Department, in coordination with Student Development and Activities and Conference Services.
 - b. The sponsoring WCC department or division may request a table using the **Table Request Form** within the Campus Connect system:
<https://wccnet.campuslabs.com/engage/submitter/form/start/338997>
- III. Location(s):
 - a. Table placement is limited to the First Floor of the Student Center Building, and exact location will be determined by the Department of Student Development and Activities in accordance to the day's scheduled activities.
- IV. Guidelines:
 - a. The individual who reserved the table must provide student or government I.D. at the Student Activities Office (SC 108) upon starting the promotion.
 - b. Those staffing a table may not approach students physically or obstruct the walkway. Instead, students must approach the table to initiate interaction.
 - c. Activities at tables are limited to education, promotion of services or recruitment.
 - d. Sponsored activity must meet the mission of the College.
 - e. Sponsored activity must meet and follow the policy and guidelines set by the Board of Trustees.
 - f. No conflict of interest may be present with the sponsoring staff/faculty member.
 - g. Sponsoring department/division staff must remain onsite for the entire event (including pre. & post event activities).
 - h. Sponsored activity must directly benefit the WCC department, students, or have a benefit/impact to communities we serve.
 - i. The Coordinator or higher of the sponsoring area must provide written or email support of sponsorship to the assigned Designee of the Executive Vice President of Student and Academic Services (EVPSAS.)
 - j. Final approval of sponsorship is at the discretion of the assigned Designee of the Executive Vice President of Student and Academic Services (EVPSAS) and may be denied for any reason, including but not limited to:
 - i. College event expense of facilities/media/ground support staff.
 - ii. Conflict with a previously scheduled event.
 - iii. Availability of tables and space during the requested timeframe.
 - iv. Potential for disruption of the educational process.

Participation in Welcome Day Events

I. Eligible Users:

- a. Registered Non-Profit Organizations within Washtenaw County.
- b. Registered For-Profit Organizations within Washtenaw County.

II. Request Process:

- a. Eligible users may request the current Welcome Day Table Request form to be sent to their email by calling Student Activities at (734) 973-3500.
- b. Notification of approval/denial will be completed one week prior to the Welcome Day event.

III. Location:

- a. Fall Welcome Day takes place in Community Park (weather permitting.)
- b. Winter Welcome Day takes place in the Student Center Building.
- c. Table maps will be available to guests on the day of the event and instructions will be delivered within the confirmation email.

IV. Guidelines:

- a. The individual requesting the table must be present for the entire event.
- b. Those staffing the table must provide government I.D. upon request.
- c. Those staffing a table may not approach students physically or obstruct the walkway. Instead, students must approach the table to initiate interaction.
- d. Activities at tables are limited to education, promotion of services or recruitment. Free food/promotional items are encouraged.
- e. Promoted business activity must meet the mission of the College.
- f. Promoted business activity must meet and follow the policy and guidelines set by the Board of Trustees.
- g. Promoted business activity must directly benefit the staff, and/or students, or have a benefit/impact to communities we serve.
- h. There is no potential for private profit at Welcome Day. Products/services may not be sold/contracted. This includes contracts to services such as credit cards, financial accounts, or pay-later product/service subscriptions.
- i. Final approval of Welcome Day table requests are at the discretion of the Student Development and Activities Department and may be denied for any reason, including but not limited to:
 - i. Duplicate or competing promotion of an existing College service (or service of an official partner.)
 - ii. Products/services promoted conflict with the College's educational mission, or campus policies, or general well-being/safety of the student body. Services do not support the students' education.
 - iii. Availability of tables and space during the requested timeframe.
 - iv. Potential for disruption of the educational process.

Posting to Bulletin Boards

I. Eligible Users:

- a. Individual or groups of (non-student) community members.
- a. Registered Non-Profit Organizations within Washtenaw County.
- b. Registered For-Profit Organizations within Washtenaw County.

II. Request Process:

- a. Eligible users may bring their printed posters to the Student Activities Office (SC 108) for approval and posting.
- b. The EVPSAS Designee will review/approve/deny the posters and the Student Activities staff will post the flyers within three business days.

III. Location:

- a. After approval, the Student Activities staff will post up to two copies of a printed poster on the **Student Opportunities Bulletin Board** outside of the Student Activities Office (SC 108.)

IV. Guidelines:

- a. All postings must be less than 11" x 17" to accommodate limited space.
- b. Users may not post over already placed postings.
- c. The two **Student Opportunities Bulletin Boards** are intended for promotion of local businesses, job opportunities, volunteer opportunities, housing opportunities, and promotion of local events/activities.
- d. All campus bulletin boards have specific intended uses as designated above and are not considered designated public forums of expression.
- e. Postings may not contain obscenities, sexually explicit content, or promotion of products/services/opportunities that conflict with College's educational mission or well-being/safety of the student body.

Request for Newsstand Distribution of Publications in Student Center

I. Eligible Users:

- a. Registered Non-Profit Print Publications within Washtenaw County.
- b. Registered For-Profit Print Publications within Washtenaw County.

II. Request Process:

- a. To request on-campus publication distribution, please drop off the latest copy of your publication, along with your full name, title, phone number, and email address to the front desk of Student Activities (SC 108)
- b. A review and a response will be provided within 10 business days.

III. Location:

- a. Approved printed publications may purchase and provide one wireframe newsstand (uniform in appearance to the others) to be placed alongside the non-college sponsored publication newsstands near the south entrance of the First Floor, Student Center Building.
 - i. Notification of a newsstand placement and the owner's contact information must be made to the Student Activities Office (SC 108.)
 - ii. The newsstand must be clearly labeled with the name of the publication, the publication schedule, and the email and phone number of the Editor.
 - iii. The newsstand must be maintained/restocked at least every 14 days.
 - iv. Non-sponsored (any student publication other than the official Washtenaw Community College Student Newspaper (WCCSN) may not maintain a newsstand outside of this designated area.

IV. Guidelines:

- a. Publications distributed on campus must be free to the end-user.
- b. Printed publications are responsible for collecting and cleaning discarded litter resulting from their distribution. This includes restocking newsstands.
- c. Printed publications are responsible for damage resulting from their distribution of materials (i.e. stickers applied to College property.)
- d. Community-provided printed publications distributed at newsstands may not contain excessive obscenities, sexually explicit content, or promotion of products/services/opportunities that conflict with College's educational mission or well-being/safety of the student body. Content should be appropriate to the campus audience, including students of the on-campus high school and youth programs.
- e. As a non-public form to non-students, the College reserves the right to approve or deny community-provided publication distribution within the Student Center Building for any reason.

Expressive Conduct Activities

I. Washtenaw Community College's Board of Trustee Policy #8018 – Student Speech and Expressive Conduct Policy states:

“The Board of Trustees affirms the importance of freedom of speech and artistic expression in the academic setting. Expression of diverse points of view in the course of academic pursuits is of highest importance to the open, lively, challenging spirit of inquiry that is basic to education.

In accordance with the educational mission of the College, the Board intends to provide students enrolled at the College with a forum for free expression. The Board delegates to the Associate Vice President for Student Services the authority to establish means for students to have access to College grounds, facilities, and resources for the purpose of expression, and, consistent with the First Amendment of the United States Constitution, reasonable regulations to preserve safety and orderly conduct and to prevent litter or disruption of College operations.

In promoting freedom of expression among its students, the Board reaffirms its commitment to preserving College property as a nonpublic forum as to non-students. Unlike the public streets, sidewalks, and parks, the property, buildings, or facilities owned or controlled by the College are not open for assembly, speech, or other activities. The Board delegates to the Office of Conference Services the authority, consistent with the First Amendment of the United States Constitution and Board policy, to establish reasonable regulations for the use of campus grounds and facilities by non-students.”

Washtenaw Community College is home to a community made up of college students, high school students, parents, and community organizations/members who support the College. The entire community has a responsibility to maintain a safe, welcoming, and inclusive campus environment. The College strongly advises responsible citizenship in content decisions when exercising individual rights to free speech.

The First Amendment to the Constitution of the United States of America protects all individuals' right to free speech and places overall responsibility for that speech on the individual. Washtenaw Community College does not assume any obligation or responsibility for the content of Expressive Conduct Activities or materials distributed.

Washtenaw Community College does not restrict or approve/deny protected speech on the basis of content or viewpoint, or the possible reaction to the activities. In the event of negative reaction to Expressive Conduct Activities, the College and local authorities will take all necessary measures to ensure public safety, while allowing the free speech activity to continue, until College operations are materially and substantially disrupted.

- II. For the purpose of this procedure, Expressive Conduct Activities include:
 - a. Meetings, gatherings, and group activities.
 - b. Speeches, performances, and events.
 - c. Peaceful forms of assembly such as marches, rallies, protests, and vigils.
 - d. Distribution of literature, printed flyers, or ongoing publications.
 - e. Use of signage carried by individuals.
 - f. Petitioning for any cause or purpose.
 - g. Any other protected free speech or activity.

- III. Eligible Users:
 - a. Individual or groups of (non-student) community members.

- IV. Notification and Reservation Process:
 - a. It is strongly recommended that those planning an Expressive Conduct Activity event visit the Student Activities Office (SC108) and set up a meeting with the Director of Student Development and Activities to explore options and discuss the most effective method of relaying your message to the campus community.
 - b. For large-scale Expressive Conduct Activities that invite or expect participation of 15 or more people, and that have not been reserved through the College in advance, the individual or community group organizing the event should notify the EVPSAS Designee at least five business days in advance using the **Large-Scale Expressive Conduct Activities Notification Form**:
<http://tinyurl.com/wccnotificationcommunity>
 - c. Notifications and reservations allow the college to schedule adequate safety personnel and take necessary precautions to protect the rights and safety of both the participants and community. **Notification is not an approval process or a requirement to peaceful assembly.**

- V. Location:
 - a. Expressive Conduct Activities may be held, without reservation, in the designated **Community Free Speech Zone**, located in WCC's Community Park (and the sidewalks adjacent to the perimeter of the Community Park,) between the Business Education and Gunder Myran Buildings.
 - b. Community members may distribute unlimited flyers or handbills in-person throughout the designated **Community Free Speech Zone** and the sidewalks adjacent to the perimeter of the Community Park. Community members may not distribute materials on the exterior walkways, or in the interior hallways or lobby areas of any other buildings/floors, as they are designated as non-public forums to non-students.
 - c. Expressive Conduct Activities may not conflict or interfere with locations that have been previously reserved by the College or an external organization for specific events. If the Community Park (**Community Free**

Speech Zone) is reserved by the College or external organization for an event, the administration will identify a temporary, reasonable alternative location and communicate with the community member or community organization.

- d. Parking lots, ramps, and garages are not designated or suitable for Expressive Conduct Activities.
- e. Placing flyers on windshield or vehicles is not permitted.

VI. Guidelines:

- a. Expressive Conduct Activities do not include soliciting, selling items, or accepting donations.
- b. Expressive Conduct Activities must meet the **General Guidelines for All Student Use of Campus** (Page 13.)
- c. Expressive Conduct Activities may not violate the Michigan Campaign Finance Act.
- d. Neither the content nor viewpoint of the Expressive Conduct Activity will be considered in applying this policy.
- e. Washtenaw Community College actively provides students with the opportunity to register to vote through WCC's Voter Registration Tool: <https://wcc.turbovote.org/>. The TurboVote voter registration tool ensures that the individual being registered to vote is empowered to personally submit and take responsibility for delivery of their own voter registration form to the appropriate Clerk's Office. Utilization of the TurboVote system is intended to protect the individual(s) being registered, as well as the community members performing registration. As an alternative to utilizing TurboVote, community members may elect to distribute blank voter registration forms in the designated **Community Free Speech Zone**, located in WCC's Community Park between the Business Education and Gunder Myran Buildings.
- f. Community members distributing blank voter registration forms should not physically collect or deliver another person's voter registration form.

Map of the Community Free Speech Zone

The designated **Community Free Speech Zone**, located in WCC's Community Park (and the sidewalks adjacent to the parameter of the Community Park,) between the Business Education and Gunder Myran Buildings:



Note: The Community Free Speech Zone is not applicable to currently registered students – See Administrative Procedures for Student Use of College Facilities: <http://www.wccnet.edu/activities/>

General Guidelines for All Community Use of Campus Facilities

- I. All of the above uses of Campus facilities and grounds are limited to the College's hours of operation: Monday – Saturday, 7:00 a.m. – 11:00 p.m. (with the exception of Facility Rentals.)
- II. Use of amplified sound devices, including bullhorns, are not permitted without prior approval of the College due to the disruption of educational process, and local government regulations.
- III. Use of College facilities or grounds by a particular student, group, or organization is limited to two consecutive days and no more than eight days per month. *(This does not apply to Expressive Conduct Activities or Facilities and/or Grounds Rentals.)*
- IV. Use of College facilities or grounds may not disrupt entry to or exit from a building, structure, or facility; may not interfere with the flow of pedestrians or vehicular traffic on sidewalks, streets, or places of ingress and egress to and from property, buildings, or facilities.
- V. The individual requesting or notifying the college of facility or grounds usage must be at the event for the entire duration, or a substitute must be approved by the College in advance.
- VI. The individual(s) utilizing college facilities or grounds is responsible for ensuring that the facility or grounds in use are left clean, uncluttered, and in good repair. Failure to do so may curtail future use of College facilities or grounds by the community member or organization. Any damage to College property that is caused by the use shall be reimbursed by the community member or organization utilizing college facilities or grounds.
- VII. Individual(s) may not apply sidewalk chalk, stickers, flyers, posters or any other permanent or temporary markings to College property. This is considered defacing College property, and the marking will be removed immediately unrelated to its content.
- VIII. No tables, chairs, tents, signage, or other equipment shall be placed in College facilities or on College grounds without prior approval through the appropriate request processes above.
- IX. Inclusion of animals at events or on campus grounds must be approved in advance.
- X. "Fronting," is not allowed. "Fronting," is defined as permitting a non-College affiliated individual or organization to use College facilities under the guise that the activity is a student group activity, in order to avoid payment for use of the facility. No individual student or student organization may reserve space for the purpose of allowing an outside individual or organization to advertise, hold meetings, and/or sell items within the expressed permission of the EVPSAS (or his/her designee.) At least 75% of participants must be WCC credit students.
- XI. Exercise of individual rights may not materially interfere or substantially disrupt the College's educational mission or activities; does not invade the rights of others; does not threaten or cause harm to any groups or individuals; does not incite (or be likely to invite) imminent lawless action or violence; and does not violate applicable local, state, or federal laws or regulations.
- XII. The College may limit the number of individuals or groups using the facilities or grounds on any given day or at any time during the day in order to protect the safety and property, maintain the normal operations of the College, facilitate campus traffic, and prevent the substantial disruption of or material inference to college operations.
- XIII. College facilities and/or Grounds may not be used for personal or private profit.

Appeal Process:

In the event that a student or student organization disagrees with any decision made by the EVPSAS Designee under this procedure, the community member or external organization may appeal the decision to the Office of the Executive Vice President of Student and Academic Services within five business days of the date of decision provided by the EVPSAS Designee. Within five business days of receiving the notice of the appeal, the Executive Vice President of Student and Academic Services will review the decision made by the EVPSAS Designee, hear any statement, argument, or evidence the community member or external organization wishes to offer in support of the appeal, and issue a determination as to whether the decision made by the EVPSAS Designee will be affirmed or reserved.