# 2 - Integrity: Ethical and Responsible Conduct

The institution acts with integrity; its conduct is ethical and responsible.

# 2.A - Core Component 2.A

The institution operates with integrity in its financial, academic, personnel, and auxiliary functions; it establishes and follows policies and processes for fair and ethical behavior on the part of its governing board, administration, faculty, and staff.

### **Argument**

Creighton University is committed to advancing the highest standards of ethics, integrity, and honesty to ensure compliance with all applicable laws, regulations and policies. As outlined in the <u>Credo of Creighton</u> and <u>Mission Statement</u>, all personnel are expected to represent the University with fairness, integrity and ethical behavior in an environment of trust and accountability. This expectation is introduced during the hiring process and reinforced throughout orientation and annual performance evaluations. Published policies contain general guidelines for conducting University business in accordance with high ethical standards. The University community fulfills their duties with fair and ethical behavior in its financial, academic, personnel, and auxiliary functions. Our commitment to integrity and ethical conduct is dynamic and responsive.

### **Functional Area Analysis**

#### **Financial**

The University has established policies and procedures addressing budgeting, accounting, investing, and purchasing matters. These policies, along with internal controls and monitoring procedures, are the key activities implemented to mitigate the risk of noncompliance and assure integrity in financial operations, as well as addressing confidentiality, ethical practices and supplier relations, gifts and gratuities, and fair trade. To assure campus-wide policy compliance, experienced finance directors are embedded in all areas across campus. Accounting Services, Business Service Center, and Accounts Payable staff have been centralized and, as part of transaction processing, evaluate financial transactions for compliance with University policies and procedures. Financial policies are reviewed and revised as required.

A <u>Financial Code of Ethics Statement</u> is reviewed and signed annually by employees with significant financial responsibilities. There are 5 groups of University employees required to complete the acknowledgement and attestation for the Financial Code of Ethics Statement on an annual basis: Executives and Executive Assistants (President's office, Vice Presidents, Vice Provosts, Provost, Senior Vice President Operations); Finance Division; CUBuyplus approvers; P-Card holders; and Officers of Administration. For Fall 2016, a compliance rate of 99% was achieved (628 of 634 forms completed). Those not completing the financial code of ethics statement had their privileges associated with P-cards and/or approval rights revoked, or suspended until the statement was completed.

Creighton University engages an independent certified public accounting firm to conduct annual financial statement and federal financial assistance compliance audits. These audits are conducted in accordance with applicable professional and government accounting and auditing standards. The most recently completed audit, covering the fiscal year ended June 30, 2016, contained an unqualified opinion from KPMG LLP on the University's financial statements. The University has received an unqualified opinion on our external audits each year since our last accreditation.

#### Academic

Policies and procedures regarding academic standards and regulations for students are contained in the Creighton University <u>Catalogs</u>, publicly available on the university website and within each school and college. In addition to the Undergraduate and <u>Graduate Catalogs</u>, catalogs are published for the Schools of <u>Dentistry</u>, <u>Law</u>, <u>Medicine</u>, and <u>Pharmacy and Health Professions</u>.

The Division of Student Life also plays an important role in matters impacting students, with a Center for Student Integrity and various resources available via the web, including a <u>code of conduct</u>, <u>student credo</u>, <u>Student Handbook</u>, and <u>student conduct policies</u>. Guidance for faculty is provided in the form of a <u>Faculty Handbook</u> published electronically annually in April. Faculty employment agreements specifically reference Articles I-IV of the Faculty Handbook.

The Provost and each respective Dean, assisted by other key offices and functions, have overall responsibility for oversight and monitoring of established academic activities, including academic policies and procedures as contained in handbooks. Additional details regarding academic integrity are discussed in Criterion 2.E.

#### Personnel

The Human Resources Department is responsible for day-to-day operating personnel matters in conjunction with the various University schools and colleges, divisions, departments and programs. Twenty-five <a href="https://human resources.policies">human resources policies</a> are included in the Guide to University Policies and are applicable to all employees. The <a href="https://human Resources website">human Resources website</a> contains information regarding careers, benefits, professional development, employee resources, manager resources, and contact information to assist employees in understanding the expectations and specific policies and procedures relating to employment. In addition, online Faculty and <a href="https://employee.newpower.com/employee-performance-management-process">https://employee-performance-management-process</a>. All supervisors are required to evaluate the employee's integrity and work ethics. Creighton is an Equal Opportunity Employer.

Policies are in place requiring and allowing an atmosphere of responsibility for all employees to act and require others to act with integrity.

- The <u>Reporting Financial Misconduct policy</u> requires all employees, students and University contractors to report financial misconduct.
- The <u>Mandatory Reporters policy</u> requires all faculty and staff with supervisory or leadership responsibilities, or responsibilities related to student welfare, to report concerning and disruptive behaviors, dating/domestic violence, discrimination, discriminatory harassment, sexual harassment, sexual violence, stalking, and other crimes to the University.

Reporters are protected through the University's Whistleblower Protection policy. There has been one case of perceived misconduct reported in the last five years, which resulted in Internal Audit

investigating according to procedure and reporting the perceived misconduct as unsubstantiated.

### **Auxiliary**

The Department of Residential Life is responsible for day-to-day operations for student housing and dining. Policies and procedures and other helpful information regarding their programs and services are found on the website. The Student Conduct Policies address expected behavior and types of misconduct, including those related to living on campus. The Department of Residential Life is subject to periodic audits by the Internal Audit Department. A multiple objective assurance engagement addressing Student Housing and Dining was included in the FY 2016 Internal Audit Department Service Plan. For a number of reasons, including transition of key personnel, the audit was delayed. After consultation with the new Associate Vice Provost for Housing and Auxiliary Services, the objectives and scope were reevaluated and the work plan updated on October 25, 2016. The revised engagement is currently in progress and, as of January 27, 2017, fieldwork is approximately 75% complete.

The Athletics Department is responsible for its athletics programs and the overall wellbeing of student-athletes. A Director of Compliance oversees education, training, and compliance monitoring efforts. Additionally, the Director of Compliance serves as a Deputy Title IX Coordinator, overseeing Title IX compliance for Athletics and working with the Title IX Coordinator in the Office of Equity and Inclusion to resolve complaints. Expectations are established by the <a href="Athletics Department">Athletics Department</a>
<a href="Policies and Procedures Manual">Policies and Procedures Manual</a>, last updated November 24, 2014. A <a href="webpage">webpage</a> providing compliance resources, including a <a href="Student Athlete Handbook">Student Athlete Handbook</a>, is available to assist prospective and current student athletes with an understanding of NCAA rules and regulations. The Athletics Department is subject to annual compliance audits by the Internal Audit Department. The most recent report, <a href="NCAA Rules Compliance 1st Year">NCAA Rules</a>
<a href="Compliance 1st Year">Compliance 1st Year</a>, was issued June 30, 2016. The audit report addressed camps and clinics, student employment and amateurism, and reported no material deficiencies and found the university and its athletic department to be in compliance with NCAA regulations. Other recent audits include:

- <u>KPMG NCAA Agreed Upon Procedures Report</u>, issued prior to the November 10, 2016 Board of Trustees Committee meetings.
- NCAA Rules Compliance 2<sup>nd</sup> Year Recruiting and Eligibility (Internal Audit Department) in the fieldwork phase.

### **Governing Authority**

The University's governing authority is vested in a Board of Trustees established by the <a href="Bylaws">Bylaws</a> of Creighton University. Members of the Board are required to make a full and complete disclosure to the Board of Trustees Governance, Nominating and Audit Committee regarding any potential financial conflict of interest which could be perceived as adversely affecting his/her duties as a Board member. The Board is granted powers and authority by law and is ultimately responsible for ensuring that policies and procedures are established and promulgated to fulfill the University's mission and purpose in accordance with its values. Requisite authority and responsibility is delegated to Board Committees (via approved charters), the President, and other Officers and Administrators, including the Deans of the colleges and schools. <a href="Persidential Committees">Presidential Committees</a>, standing and advisory, also play an important role in the governance process.

Key offices are charged with oversight responsibilities to ensure integrity and ethical conduct. These include the Office of the General Counsel, Office of Equity and Inclusion, Center for Student Integrity, Research Compliance Office, Health Sciences Billing Compliance Committee, and the Internal Audit Department.

The Office of Equity and Inclusion (OEI), established in 2012, brings together a number of important university initiatives previously housed in different offices or committees. By centralizing these initiatives, a dedicated office oversees compliance and provides education on a number of federal laws, in addition to providing complaint resolution under university policy:

- <u>Harassment, Discrimination, Sexual and Relationship Misconduct Policy</u> incorporates resolution requirements for, but not limited to, Title IX and the Campus SaVE Act, Title VII, and Section 504 of the Rehabilitation Act. This policy, enacted in May 2013, has been revised twice since then.
- Mandatory Reporters Policy, mentioned above. In the 2014-2015 academic year, OEI distributed an online training for all mandatory reporters and 2,066 faculty and staff completed this training. Currently all new faculty and staff receive online training during orientation, in addition to an in-person training on Title IX and mandatory reporting.
- Affirmative Action and Equal Employment Opportunity (EEO)
- <u>Children and Vulnerable Adults policy</u>. This policy, adopted in 2013, ensures that departments, student groups, and outside organizations are adequately prepared for the responsibility of supervising and working with children and vulnerable adults. Since 2013, approximately 5,000 individuals have taken the online training required under this policy.
- <u>Violence Intervention and Prevention (VIP) Center</u>, which provides <u>prevention education</u> and <u>confidential advocacy</u> for faculty, staff, and students. The Center was created in 2011 in the Division of Student Life and moved under the Office of Equity and Inclusion in 2012. A well-utilized resource, the Center implements training and education for campus. In 2015-2016 alone the center provided 96 presentations or events that reached approximately 6,500 individuals.

Between May 2013 and June 2016, OEI has provided approximately 70 <u>formal and informal resolutions</u> under the university policy. Additionally, OEI has offered guidance, advocacy, or support in a number of situations that did not result in a resolution. OEI provides additional information on Title IX-related reports through an <u>annual report</u>.

The University has an experienced Internal Audit Department reporting functionally to the BOT through the Risk Management, Audit and Compliance Subcommittee. An <u>annual report</u> contains a summary of all reports and deliverables during the fiscal year. In the performance of its assurance and consulting engagements it adheres to <u>professional standards</u> and is subject to external quality assessments. The <u>annual service plan</u> regularly includes audits of divisions, departments, and activities designed to evaluate financial management, accounting, and reporting, as well as adherence to policies and associated compliance requirements. The Department shares an oversight role for the <u>anonymous hotline</u> with the General Counsel's Office and conducts investigations into alleged compliance violations and ethical misconduct.

Policies are in place to reinforce the importance of ethical behavior. General ethical behavior and conflict of interest policies exist, which are applicable to all employees and students. All Senior Administrators must disclose to the University, at least annually, any financial interest of the Senior Administrator or a Family Member that may result in an actual or potential conflict of interest on the "Conflict of Interest and Disclosure Policy Annual Statement of Disclosure." All employees associated with research must complete an annual "Disclosure of Financial Relationship for Sponsored Projects." For the reporting period August 24, 2015-August 23, 2016, 2,497 disclosures were submitted. All investigators who started a new project or renewed a project in 2015-16 submitted the financial conflict of interest disclosure.

Members of the greater Creighton community have various avenues to report misconduct of any kind.

Research, student, financial, and HR reporting processes exist and are formally monitored and <u>reported</u> on by assigned individuals trained to manage the incidents. On July 1, 2015, the University implemented an anonymous third-party hotline and <u>secure web form</u> to enable individuals to report serious misconduct, including noncompliance and unethical conduct. Any member of the Creighton community may file a report pertaining to allegations or issues of concern relating to academic and student affairs, accounting and financial reporting, healthcare and clinical operations, human resources, information technology, intercollegiate athletics, research and sponsored programs, and risk and safety matters. Two projects identified during the hotline implementation (expanded compliance and ethics web resources; and an official document outlining expectations and standards of conduct) are being developed under the direction of the General Counsel's Office with participation from personnel across the University. Since its activation, 14 hotline reports have been received with investigations initiated (as of December 31, 2016). All have been satisfactorily resolved.

- ATHLET Athletic Dept Policies and Procedures
- ATHLET Athletics Compliance Website
- ATHLET Athletics Department Audit Report NCAA 2016 Rules Compliance 6-30-16
- ATHLET\_NCAA Agreed Upon Procedures\_2016
- ATHLET Student Athlete Handbook 2016-17
- DENT Dentistry Catalog Landing page
- FIN Financial Code of Ethics Statement FY17 2017
- FIN Financial Policies Listing
- FIN FY 2016 KPMG Financial Report 2016
- FIN Internal Audit Annual Report FY 2016 9-8-2016
- FIN Internal Audit Code of Ethics 1-09
- FIN Internal Audit Service Plan 2015-16
- FIN Misconduct Investigations
- GenCo Confidential Advocacy
- GenCo Equity and Inclusion FY16 Complaints Data 2016
- GenCo EthicsPoint Web Intake Form
- GenCo Hotline Compliance and Ethics
- GenCo Title IX and SaVE Act Report 2013-15
- GenCo VIP Center Website
- GenCo VIP Education Website
- GRAD Graduate Catalog Landing page
- HR EEO Statement
- HR Human Resources Website
- HR Performance Management Process
- HR Policies List
- LAW Law Catalog Landing Page
- MED Medicine Catalog Landing Page
- POLICIES Affirmative Action 5-94
- POLICIES Children and Vulnerable Adults 7-23-14
- POLICIES Conflict of Interest and Disclosure Policy for Senior Administrators 7-20-11
- POLICIES Conflict of Interest Policy for All Employees 8-23-00
- POLICIES Harassment Discrimination Sexual Relationship Misconduct 9-21-16
- POLICIES Mandatory Reporters 9-21-16

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- POLICIES\_Purchasing\_6-12
- POLICIES Reporting Financial Misconduct 6-24-06
- POLICIES Whistsleblower Protection 6-24-09
- PRES\_Credo of Creighton\_10-12-93
- PRES MissionStatement 2-8-2017
- PRES University By-laws 5-13-2016
- PROV Academic Website
- RES Disclosure of Financial Relationship for Sponsored Projects
- RESLIFE Residence Life Handbook Montserrat
- RESLIFE Residence Life Website
- SPAHP\_Catalog Landing page
- STANDCOMM Presidential Committees
- STULIFE Code of Conduct
- STULIFE Student Conduct Policies 2016-17
- STULIFE Student Credo
- STULIFE\_Student Life Website

# 2.B - Core Component 2.B

The institution presents itself clearly and completely to its students and to the public with regard to its programs, requirements, faculty and staff, costs to students, control, and accreditation relationships.

### **Argument**

Through Creighton University's website the institution makes a broad and varied set of resources and information publicly available to prospective students and families, current students, alumni, employees and other constituents. The university's homepage includes direct links to:

- Admissions
- Academics (Includes an A-Z index and link to the Faculty directory)
- <u>Student Experience</u> (resources, campus life, clubs and organizations, traditions)
- Athletics
- Research
- <u>About</u> includes information about our history, mission, identity as a Catholic and Jesuit institution, rankings, leadership, and the Creighton experience

A University-wide <u>faculty directory</u> is available on the Academics webpage. In addition to this directory, college/school and departmental websites contain detailed information about faculty and staff. Faculty listings with credentials are also available in each of the school and college <u>Catalogs</u>.

### Programs offered and degree requirements

The Academics portion of the website is robust and allows the user to filter by area of interest, degree level, or pathway (on-campus or online). Communication strategists embedded in the colleges and schools ensure the information presented is accurate and up-to-date. Selecting a program from the alphabetical listing takes you to the program webpage, where information can be found regarding program goals and outcomes, curriculum, admission requirements and associated costs.

The various <u>Catalogs</u> also provide information regarding the undergraduate, graduate, and professional programs, respectively, as well as requirements, course offerings, academic policies, academic calendars, military and veteran affairs services, student life, admissions, and financial aid.

### **Admissions requirements**

Creighton University is a complex institution with undergraduate and graduate programs, as well as five schools/colleges that offer professional programs. Admission processes are coordinated through the Office of Enrollment Management (EM) for undergraduate, graduate and nursing programs, or through offices of admission for the Schools of Law, Medicine, Dentistry, and Pharmacy and Health Professions. Application information for all programs, including admissions requirements and procedures, can be found on the 'Apply' link on the University home page, or in the various Catalogs. The Office of Enrollment Management subscribes to the National Association for College Admissions Counseling's Statement of Principles of Good Practice (SPGP), which is known as the code of ethics in the admission-counseling profession. By accepting the SPGP, counselors agree that they will "accurately represent and promote their schools."

#### **Costs to students**

Comprehensive information on tuition and fees is available on the <u>Financial Aid website</u>. This includes information for undergraduate, graduate, and professional students, and outlines differential tuition and fee information based on program of study, pathway or enrollment status (full- or parttime). Room and board rates are also included in the tuition and fee listing. Information regarding <u>cost of attendance</u> and financial aid is also included on the individual program's website.

The <u>Undergraduate Admissions site</u> contains information for new students, and the Financial Aid site provides information, organized by school/college and academic program, regarding the total cost of attendance and budget information. Available funding options are disclosed, as are the procedures to follow to secure funding. Students are provided access to the University's <u>Net Price Calculator</u> to help them determine the types of institutional, state, and federal aid for which they may be eligible. The <u>U.S. Department of Education's College Scorecard</u> also provides information on average annual cost of attendance, debt load, default rates for our students, graduation rates, and salary after attending.

### Title IV required disclosures

As required by Title IV, Creighton makes information available publicly on a broad range of topics of interest to consumers, including graduation rates and information on campus crime. The <u>Campus Security Report</u> is available from the 'About' page on the Creighton website. The Office of Enrollment Management coordinates with the Office of Institutional Research (IR) to provide annual update information for survey and ranking agencies, including student enrollment, retention, graduation rates, as well as demographic information. This information is available in the university Fact Book.

### **Control and Accreditations**

Information regarding university governance is available on the <u>'Leadership</u>' page, which is found under the 'About' link from the university home page. From the Leadership page, links are provided to the President's Office. From there, additional links lead to information regarding the President's Cabinet and the President's Council. The listing of the Board of Trustees is available in the Creighton University <u>Catalog</u>. Additional information about the Board of Trustees can be found in 2.C.

Information regarding Creighton's accreditation status with the Higher Learning Commission, as well as a list of <u>specialized accreditations</u> held across academic disciplines/professions and non-academic programs throughout the campus can be found from the <u>Accreditation link</u> on the 'About' page of the university's home page.

- AEA AcademicSpecializedAccreditation 3-6-2017
- AEA Accreditation Website
- AEA Fact Book 2015-16
- ATHLET Athletics Website
- EM Enrollment Management Description and Visual 1.24.17
- EM Undergraduate Admissions Website Landing page
- FINAID Financial Aid Website
- FINAID\_Net Price Calculator

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- FINAID Tuition Fees Room and Board Website
- OTHERCONS\_College Scorecard-US Dept of Ed
- OTHERCONS NACAC Statement of Principles of Good Practice
- PRES Board of Trustees Listing
- PRES\_Leadership Website
- PROV\_Academic Website
- PUBSAF\_Campus Security and Fire Safety Report\_2016
- RES Research Website
- STULIFE\_Student Experience Website
- UCOMM University About Website
- UCOMM\_University Main Page

# 2.C - Core Component 2.C

The governing board of the institution is sufficiently autonomous to make decisions in the best interest of the institution and to assure its integrity.

- 1. The governing board's deliberations reflect priorities to preserve and enhance the institution.
- 2. The governing board reviews and considers the reasonable and relevant interests of the institution's internal and external constituencies during its decision-making deliberations.
- 3. The governing board preserves its independence from undue influence on the part of donors, elected officials, ownership interests or other external parties when such influence would not be in the best interest of the institution.
- 4. The governing board delegates day-to-day management of the institution to the administration and expects the faculty to oversee academic matters.

### **Argument**

#### 2.C.1.

Creighton University is one of 28 Catholic, Jesuit institutions of higher learning in the United States. When founded and incorporated in 1879, the University was initially organized under the territorial laws of the State of Nebraska. In 1960, Creighton was formally incorporated as a Nebraska nonprofit corporation. Throughout its history, the affairs of the University have been managed by its Board of Trustees. In 2016, a <u>Declaration of Mutual Purpose</u> was signed, reaffirming the Board's desire to preserve and promote the Catholic and Jesuit character of the institution while remaining an independent university.

The powers and authority of the Board are derived from the University's <u>Articles of Incorporation</u> and <u>Bylaws</u>. At its inception, Board membership was traditionally limited to members of the Society of Jesus. In 1968, the Bylaws were amended to allow for the inclusion of lay members to the Board. Currently, Creighton's <u>Board of Trustees</u> consists of 37 members, seven of whom are members of the Society of Jesus. Trustees are elected to four-year terms and are eligible for re-election to successive terms until reaching the age of 75.

As defined in <u>Article II Section I</u> of the Bylaws, the Board has, subject to the Laws of the State of Nebraska and to the Articles of Incorporation, ultimate responsibility for the stewardship and general welfare of the University.

In 2016 the Board Chair and President restructured the <u>standing committees</u> to allow Board members to focus on the priorities for which they are responsible: Executive Committee; Academic Affairs, Health Sciences and Research Committee; Budget and Finance Committee (with Budget & Finance Infrastructure Subcommittee); Mission, Jesuit Identity, and Student Life Committee; Governance, Nominating and Audit Committee (with Risk Management, Audit and Compliance Subcommittee); and External Relations Committee (with External Relations Investment Subcommittee).

A new institutional planning cycle began with initial steps in spring 2016 when the involvement of all those who work at the University was solicited. In consultation with the Board of Trustees, the President appointed the Vice Provost for Enrollment Management and the Dean of the School of Law as co-chairs to lead the process of shaping the current strategic planning efforts. At its meeting on

<u>September 16, 2016</u>, the Board authorized a comprehensive campaign, currently in its silent phase. While planning is still in progress, identified goals include support for increased endowment, scholarships, capital projects, and emerging operational needs. More information regarding the current planning process can be found in Criterion 5.B.

#### 2.C.2.

The Board considers input from external and internal constituents. Every trustee is identified on Creighton's website and can be directly contacted by any constituent.

Each Board committee routinely invites faculty, staff, and student guests to participate in committee meetings as indicated by the <u>agenda</u>. Historically, the University Faculty President and Creighton Students Union President have each presented an annual report to the full board. Committee reports are given to the full Board at each regular <u>meeting</u>.

Regular attendees at Board of Trustee meetings are the trustees, corporate officers (Provost, Senior Vice President of Operations, General Counsel/Corporate Secretary), vice presidents and vice provosts. The Director of Athletics, and Faculty President attend, by invitation, on a regular basis. Deans are invited guests as dictated by agenda items.

The President collaborates with the Board Chair in drafting Board meeting agendas. Administrators assigned to each Committee collaborate with their Committee Chairs to identify relevant topics to be included in Committee meeting agendas. Meeting agendas are vetted and approved by the Executive Committee before Board meeting books are prepared and distributed to Trustees in advance of regular Board meetings.

Trustees are encouraged to participate in campus events and engage campus constituents as often as is feasible. The September board meeting date is timed to coincide with Homecoming events so as to facilitate trustee participation and involvement with alumni, faculty, staff, and students. Trustees are also invited to the Mass of the Holy Spirit each September. Every November, Creighton hosts a trustee dinner to which approximately 200 students are invited representing all schools and colleges, including both student leaders and relatively uninvolved students for strongest representation of the student experience. A separate reception and dinner is scheduled each year for Trustees to interact with Creighton faculty. Trustees are invited to Commencement every May. There are also many private dinners and events over the year to which some but not all trustees are invited, based upon their interests and background.

#### 2.C.3.

Trustees are required to make a full and complete <u>disclosure</u> to the Board of Trustees Governance, Nominating and Audit Committee regarding any potential financial conflict of interest that could be perceived as adversely affecting his/her duties as a Board member.

A new set of documents related to board restructuring and relevant to new and current trustees was introduced at the June 2015 board meeting. Included was a summary of <u>Principles of Governance for Board of Trustees</u>, Board Calendar of Strategic Issues, Revisions to Bylaws, and Board Committee descriptions. The Expectations of Trustees document was approved at the June meeting, and approval of the remaining documents is pending. Ten new board members were appointed in May 2016 and attended a formal <u>orientation</u> on September 13-14, 2016, during which they received the 2016-17 <u>Board of Trustees Handbook</u>.

### 2.C.4.

As directed by Article III of the University Bylaws, the President is the Chief Executive and Administrative Officer of the University. The President is responsible for the general and active management, control, and direction of the business operations, educational activities and other affairs of the University. In 2012, the office of Provost was established. The Provost reports directly to the President, serves as the President's primary liaison with the deans and faculty on academic matters, and is responsible for oversight of faculty development and discipline, academic program development, evaluation and review, and strategic academic planning. In addition, the Provost is responsible for overall academic program management and for support activities most closely tied to academic programs, as well as student life (Statutes/Section 1).

Article II, Section I of the University Bylaws establishes the relationship between University Officers and the Board of Trustees. Officers of the University may be appointed by the Board at any regular or special meeting of the board. Vice Presidents, Vice Provosts, Assistant Secretaries and other assistant officers may be appointed by the President.

The University Statutes (<u>Article III, Section 2.E.4</u>) provide for an Academic Council whose duty is to "advise the President and the Provost in academic matters, and [to] participate in the selection of all-University administrators." The President of Faculty Council meets monthly individually with the President, regularly attends meetings of the Board of Trustees by invitation, and is a member of the President's Council, which meets once each month.

- ADM Article I Section I University Statutes 9-15-2014
- ADM Article III Section 2E4 University Statutes 9-15-2014
- ADM University Statutes 9-5-2014
- PRES Article II Section 1 University Bylaws
- PRES Article III University Bylaws
- PRES Articles of Incorporation 9-24-82
- PRES Board of Trustees Agendas 2015-16
- PRES Board of Trustees Committee Descriptions 2016-17
- PRES Board of Trustees Disclosure Policy
- PRES Board of Trustees Handbook 2016-17
- PRES Board of Trustees Listing
- PRES Board of Trustees Minutes 2016
- PRES Board of Trustees Minutes 9-16-2016
- PRES Board of Trustees Orientation Schedule 9-14-2016
- PRES BOT Principles of Governance for Board of Trustees
- PRES Declaration of Mutual Purpose 2-8-2017
- PRES Organization Website
- PRES President's Council Agendas 2016-17
- PRES\_University By-laws\_5-13-2016

## 2.D - Core Component 2.D

The institution is committed to freedom of expression and the pursuit of truth in teaching and learning.

### **Argument**

The University's commitment to freedom of expression and the pursuit of truth for all members of the Creighton University community is espoused in its <u>Mission Statement</u>, which reads: "Creighton faculty members conduct research to enhance teaching, to contribute to the betterment of society, and to discover new knowledge. Faculty and staff stimulate critical and creative thinking and provide ethical perspectives for dealing with an increasingly complex world." This statement holds true for faculty and students, as well as staff.

The <u>Faculty Handbook</u> describes the academic rights, duties and responsibilities of Creighton's faculty. Faculty <u>Promotion and Tenure</u> policies are also designed to provide clear guidelines for review processes while allowing for individuality in teaching and scholarship. Faculty members are reviewed by a committee of their peers who make recommendations to the administration for promotion and tenure.

Clear grievance policies with regard to academic freedom are in place to ensure fair treatment. The standing committee, Committee on Academic Freedom and Responsibility, is composed of faculty and hears reports of grievances related to questions of academic freedom and responsibility.

The institution has a well-developed <u>Speakers and Artistic/Creative Presenters Policy</u> that is grounded in the statement that "fostering intellectual, ethical, social and religious dialogue is fundamental to the development of intellectual exchange and social awareness in Creighton students and is integral to the nature of the university."

- ADM University Statutes 9-5-2014
- GENCO Faculty Handbook Grievances 2016
- GENCO Faculty Handbook Promotion and Tenure 2016
- POLICIES Speakers and Artistic-Creative Presenters 10-28-08
- PRES MissionStatement 2-8-2017
- STANDCOMM Presidential Committees

# 2.E - Core Component 2.E

The institution's policies and procedures call for responsible acquisition, discovery and application of knowledge by its faculty, students and staff.

- 1. The institution provides effective oversight and support services to ensure the integrity of research and scholarly practice conducted by its faculty, staff, and students.
- 2. Students are offered guidance in the ethical use of information resources.
- 3. The institution has and enforces policies on academic honesty and integrity.

### **Argument**

#### 2.E.1.

Creighton University prepares all students in formal coursework in ethics; all programs are required to have coursework in ethics. Creighton University's Research Compliance and Sponsored Programs administrative offices are charged with assisting faculty, students and staff with obtaining externally-and internally-funded research, ethical training, and handling issues of research compliance. Support is provided, for example, for clinical research trials, grant administration, student research, protection of human subjects review, and institutional animal care. In addition, administrative offices, processes, and professional and support staff assist faculty with grant administration, compliance, and all preand post-award matters. The Research Compliance Office oversees six committees and boards that are responsible for research integrity on campus.

Creighton University is currently implementing Key Solutions, an all-encompassing electronic database, to enable investigators to submit research protocols and grant proposals. This system will also aid in mandated committee reviews, data management, and track compliance training/requirements.

Creighton University has two <u>Institutional Review Boards</u> (IRBs), administrative bodies established to ensure the protection of the rights and welfare of human subjects recruited to participate in research activities sponsored by the University. IRB – 01 focuses on biomedical research, and IRB – 02 focuses on social and behavioral research, providing researchers optimal and appropriate review of studies. Creighton's federally mandated responsibilities come from the Department of Health and Human Services (DHHS), and are outlined in Title 45, Part 46 of the Code of Federal Regulations (45 CFR 46), which mandate that all institutions engaged in research with human subjects provide the dual protections of Institutional Review Board for the Protection of Human Subjects (IRB) review and informed consent.

The University also requires training regarding the Responsible Conduct of Research policy to ensure all faculty, students, and staff involved in research are properly trained in the ethical and responsible conduct of research and scholarly integrity, and are held to the highest possible ethical standards. It is required training for all master's and doctoral level students enrolled in research-oriented programs. The Research Compliance Office dealt with one misconduct allegation in 2015-16. In addition, faculty and students involved in research, or supervision of research, are required to maintain certification at or above 80% in the Collaborative Institutional Training Initiative (CITI) Program, an online training course provided by BRANY. In 2015-16, 1,102 individuals completed one of the CITI Responsible Conduct of Research courses, 1,207 people took at least one of the IRB training courses,

112 took Working with the IACUC or the refresher, and 113 completed Initial Biosafety training. In addition, the <u>Financial Conflict of Interest in Research policy</u> describes research and scholarship policies and a special policy regarding conflicts of interest in externally funded projects. Training is required every four years of anyone working on a Public Health Service funded project and/or anyone with a management plan from the CIRC committee. In 2015-16, 183 people completed the CITI Conflict of Interest training.

#### 2.E.2.

Individual academic disciplines introduce students to the appropriate citation format and types of scholarly sources. Online students in the College of Professional Studies and the Graduate School, respectively, complete CPS200 or GRD600, orientation courses that include a module on proper citation style and academic honesty. To reinforce the ethical use of information, faculty may employ TurnItIn, an electronic plagiarism identification tool as part of the campus learning management system. Students, faculty and staff are offered guidance in the ethical use of information resources in a variety of ways and numerous venues. The Fair, Responsible, and Acceptable Use Policy contains guidelines for ethical use of information resources, as well as sanctions and penalties for misuse. The university Information Security Officer consults with both IRBs and with faculty, staff and students to continually update the university community on ethical use and storage of electronic sources of information.

#### 2.E.3.

All first-year undergraduate students are required to enroll in <u>Ratio Studiorum</u>, a semester-long extended orientation that focuses on academic success and the transition to college. The curriculum includes a review of academic policies, including the academic honesty policy. Faculty are required to include the academic honesty policy in their course syllabi and review it with students at the start of each semester. The <u>Academic Honesty Policy</u> defines plagiarism in its various forms, provides specific examples, and indicates possible sanctions and appeals process for a violation of this University standard.

Similar to faculty, freedom of expression for students confers both rights and expectations for responsible conduct and behavior, as outlined in the Creighton University <u>Student Credo</u> (Section II, Student Handbook).

Enforcement of the <u>Code of Conduct</u> resides with the Dean of the student's schools and colleges, and followed by the University <u>Committee on Student Discipline</u> as outlined in the Student Handbook. A Disciplinary and Appeals procedure is written into the policy to ensure students are treated ethically and respectfully throughout the process. The Office of Equity and Inclusion handles all complaints or violations under the <u>Harassment, Discrimination, Sexual and Relationship Misconduct Policy</u>. In 2015-16, this office investigated <u>28 complaints</u>. Residential Life policies are guided by the principle of restorative justice instead of punishment. Detailed policies for student appeals in residential life matters are also well-defined in the <u>Student Handbook Section VII. N.</u>

- CAI TurnItIn
- CPS\_CPS 200 Syllabus-Making the Transition to College\_3-10-2017
- EDGE Ratio Studiorum Webpage
- GenCo Equity and Inclusion FY16 Complaints Data 2016

- GRAD GRD 600-Sylabus-GradSchoolOrientation 2-28-2017
- IRB Institutional Review Board
- POLICIES Fair Responsible and Acceptable Use 8-18-04
- POLICIES\_Financial Conflict of Interest in Research\_10-18-12
- POLICIES Harassment Discrimination Sexual Relationship Misconduct 9-21-16
- POLICIES Misconduct in Scholarly Scientific Research 5-15-13
- POLICIES Research Misconduct in Federally Funded Research 4-22-15
- RES CITI rcr 8-7-13
- RES Rearch and Compliance Committees and Boards
- RES\_Research Compliance Landing page
- RES Research Website
- RES Sponsored Programs Landing page
- STULIFE Academic Honesty Policy 2016-17
- STULIFE Code of Conduct
- STULIFE Committee on Student Discipline 2016
- STULIFE\_Student Credo
- STULIFE Student Handbook Credo
- STULIFE\_Student Handbook Section VII N\_2016-17

# 2.S - Criterion 2 - Summary

The institution acts with integrity; its conduct is ethical and responsible.

### **Summary**

Creighton University is committed to high standards of conduct consistent with its purpose, mission and core values, and has a number of policies and procedures in place to ensure that faculty, staff, students, and administrators understand and abide by these standards. Oversight, monitoring, and auditing activities further assist the governing board and administration to evaluate the control environment and ensure that policies and procedures are well-designed and functioning, resulting in conduct that epitomizes integrity and fairness. The policy-making process is inclusive, robust and relevant, with recent updates and revisions to address the dynamic environment in which the University operates. Finally, as all employees are expected to report violations of university policies, a hotline mechanism allowing for anonymity and multiple ways of reporting has been instituted to further encourage transparency and the effective resolution of concerns.

The responsibilities of the Board of Trustees are well defined and in alignment with Creighton's mission and priorities. While the Board has ultimate responsibility for the general welfare of the University, the President is responsible for day-to-day operations. Recently, the Board committees were restructured to better align with University's strategic priorities. This realignment also resulted in increased opportunities for the Board members to interact with members of the campus community.

### Sources

There are no sources.