

CRITERION 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 fair and ethical behavior on the part of its governing board, administration, faculty and staff.

ARGUMENT

Creighton University, as a private Jesuit, Catholic 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 [Credo of Creighton](#) and [Mission Statement](#), which identify the University's core values, 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. Operating help lines and various resources have been established to communicate expectations, report incidents, protect reporters and address questions regarding compliance and ethical conduct.

The University has an established framework outlined in the [Credo of Creighton](#) and [Mission Statement](#) and its 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

34 and monitoring procedures, are the key activities implemented to mitigate the risk of
35 noncompliance and assure integrity in the financial operations as well as addressing
36 confidentiality, ethical practices and supplier relations, gifts and gratuities, and fair trade.
37 To enhance assurance of campus-wide policy compliance, experienced finance directors
38 are embedded in all areas across campus. Accounting Services, Business Service
39 Center, and Accounts Payable staff have been centralized and, as part of transaction
40 processing, evaluate financial transactions for compliance with University policies and
41 procedures.

42
43 Financial policies are reviewed and revised as required. A recent larger revision of policy
44 was required to address the new federal guidance pertaining to federal award programs.
45 [Eleven policies and four procedural documents](#) were changed and financial monitoring
46 procedures were revised in response.

47
48 The [Internal Audit Department](#) is instrumental in educating, monitoring and reporting
49 policy compliance. They distribute to the BOT and Administration [an Annual Report](#)
50 detailing all activities and findings. During FY16 the department began the process of
51 developing two new programs focusing on education and controls:

- 52 - university-wide internal control self-assessment process to efficiently assess
53 key controls and enhance employees' understanding of risk and internal control
54 matters particular to their areas of responsibility.
- 55 - control review initiative to perform tests of key controls over six major financial
56 transaction cycles on a semiannual basis. As reported to management, for the
57 five completed, no material controls weaknesses were noted.

58
59 A [Financial Code of Ethics Statement](#) is reviewed and signed annually by employees
60 with significant financial responsibilities. There are 5 groups of University employees
61 required to complete the acknowledgement and attestation for the Financial Code of
62 Ethics Statement on an annual basis. For Fall 2016, a compliance rate of 90% was
63 achieved (575 forms completed).

- 64 • Executives and Executive Assistants (President's office, Vice Presidents, Vice
65 Provosts, Provost, Senior Vice President Operations) (41)
- 66 • Finance Division (44)
- 67 • CUBuyplus approvers (102)
- 68 • P-Card holders (351)
- 69 • Officers of Administration (96)

70
71 Creighton University engages an independent certified public accounting firm to conduct
72 annual financial statement and federal financial assistance compliance audits. These
73 audits are conducted in accordance with applicable professional and government
74 accounting and auditing standards. The most [recently completed audit, covering the fiscal
75 year ended June 30, 2016](#), contained an unqualified opinion from KPMG LLP on the
76 University's financial statements. The University has received an unqualified opinion on
77 our external audits each year since our last accreditation. As part of each annual audit,
78 an evaluation of internal controls over financial reporting and compliance is performed.

79 Recommendations regarding opportunities to strengthen controls are considered and
80 implemented by administration as deemed appropriate. No separate management letters
81 are issued.

82
83 **Academic –**

84 Policies and procedures regarding academic standards and regulations for students are
85 contained in the [Creighton University Catalogs](#), publicly available on the university
86 website and within each school and college - undergraduate, graduate, dentistry, law,
87 medicine, and pharmacy and health professions. The Division of Student Life also plays
88 an important role in matters impacting students, with a Center for Student Integrity and
89 various resources available via the web, including a [code of conduct](#), [student credo](#),
90 [student handbook](#), [student conduct policies](#), and frequently asked questions. Guidance
91 for faculty is provided in the form of a [faculty handbook](#) published electronically annually
92 in April.

93
94 The Provost and each respective Dean, assisted by other key offices and functions, have
95 overall responsibility for oversight and monitoring of established academic activities
96 including academic policies and procedures as contained in handbooks. Additional details
97 regarding academic integrity are contained in the response for criteria 2.E.

98
99 **Personnel –**

100 The Human Resources Department is responsible for day-to-day operating personnel
101 matters in conjunction with the various University schools and colleges, divisions,
102 departments and programs. Twenty-five [human resources policies](#) are included in the
103 [Guide to University Policies](#) and are applicable to all employees no matter the location.
104 The Human Resources website is a portal to information regarding careers, benefits,
105 professional development, employee resources, manager resources, and contact
106 information to assist the employee in understanding the expectations and specific policies
107 and procedures relating to employment. In addition, online [Faculty and Employee](#)
108 [Handbooks](#) provide useful information and refer to employment expectations regarding
109 university policies. The importance of employee integrity is paramount and incorporated
110 within the annual [employee performance evaluation](#) process. All supervisors are required
111 to evaluate the employee's integrity and work ethics. Creighton is an equal opportunity
112 employer.

113
114 Policies are in place requiring and allowing an atmosphere of responsibility for all
115 employees, to act and require others to act with integrity.

- 116 • The [Reporting Financial Misconduct \(3.1.16.\)](#) policy requires all
117 employees, students and University contractors to report financial
118 misconduct.
- 119 • The [Mandatory Reporters \(2.1.26.\)](#) policy requires employees to report
120 possible violations to student welfare.

121
122 In turn, reporters are protected through the University's policy [2.2.24, Whistleblower](#)
123 [Protection](#). *"The purpose of this policy is to communicate Creighton University's position*
124 *of zero tolerance for any form of retaliation against any employee, student or University*

125 *contractor who makes a good faith report of financial misconduct by any means. The*
126 *University is committed to high ethical standards in financial practices and believes that*
127 *the good faith reporting of suspected or known financial misconduct is the responsibility*
128 *of all employees, students and contractors with whom the University does business.”*
129 There has been one case of perceived misconduct reported in the last five years, which
130 resulted in Internal Audit investigating according to procedure and reporting the
131 perceived misconduct as unsubstantiated.

132

133 **Auxiliary –**

134 The Department of Residence Life is responsible for the day-to-day operations for student
135 housing and dining. Policies and procedures and other helpful information regarding their
136 programs and services are found on the website. The Student Conduct Policies address
137 expected behavior and types of misconduct, including those related to living on campus.
138 The Department of Residence Life is subject to periodic audits by the Internal Audit
139 Department. A multiple objective assurance [engagement addressing Student Housing](#)
140 [and Dining](#) was included in the FY 2016 Internal Audit Department Service Plan. For a
141 number of reasons, including transition of key personnel, the audit was delayed. The
142 engagement is currently in progress and as of October 19, 2016 fieldwork was
143 approximately 65% complete.

144

145 The Athletics Department is responsible for its athletics programs and the overall
146 wellbeing of student-athletes. A Director of Compliance oversees education, training, and
147 compliance monitoring efforts. Additionally, the Director of Compliance serves as a
148 Deputy Title IX Coordinator, overseeing Title IX compliance for Athletics and working with
149 the Title IX Coordinator in the Office of Equity and Inclusion to resolve
150 complaints. Expectations are established by the [Athletics Department Policies and](#)
151 [Procedures Manual](#), last updated November 24, 2014. A webpage providing compliance
152 resources, including a Student Athlete Handbook, is available to assist prospective and
153 current student athletes with an understanding of NCAA rules and regulations. The
154 Athletics Department is subject to annual compliance audits by the Internal Audit
155 Department. The most recent [Athletics Department Audit Report](#) was issued October 23,
156 2015. The audit report stated no material deficiencies and found the university and its
157 athletic department to be in compliance with NCAA regulations. Other recent audits
158 include:

- 159 • [KPMG NCAA Agreed Upon Procedures Report issued October 26, 2015](#)
- 160 • [NCAA Rules Compliance 1st Year Camps and Clinics, Student Athlete](#)
161 [Matters Report issued June 30, 2016 \(Internal Audit Department\)](#)
- 162 • [KPMG NCAA Agreed Upon Procedures Report to be issued on or just](#)
163 [before November 10, 2016 Board of Trustees Committee meetings.](#)

164

165

166 **Governing Authority**

167 The University's governing authority is vested in a Board of Trustees established by the
168 Bylaws of Creighton University. The Board is granted powers and authority by law and is

169 ultimately responsible for ensuring that policies and procedures are established and
170 promulgated to fulfill the University's mission and purpose in accordance with its values.
171 Requisite authority and responsibility is delegated to Board Committees (via approved
172 charters), the President, and other Officers and Administrators, including the Deans of
173 the colleges and schools. [Presidential Committees](#), standing and advisory, also play an
174 important role in the governance process.

175
176 Key offices are charged with oversight responsibilities to ensure integrity and ethical
177 conduct. These include the Office of the General Counsel, Office of Equity and
178 Inclusion, Center for Student Integrity, Research Compliance Office, Health Sciences
179 Billing Compliance Committee, and the Internal Audit Department.

180
181 The Office of Equity and Inclusion (OEI) was established in 2012, bringing together a
182 number of important university initiatives that were previously housed in different offices
183 or committees. By centralizing these initiatives, the university created a dedicated office
184 to oversee compliance and provide education on a number of federal laws, in addition to
185 providing complaint resolution under university policy. The University's [Harassment,
186 Discrimination, Sexual and Relationship Misconduct Policy](#) incorporates resolution
187 requirements for, but not limited to, [Title IX and the Campus SaVE Act](#), [Title VII](#), and
188 [Section 504 of the Rehabilitation Act](#). This policy was enacted in May 2013 and has
189 been revised twice since that time. The office works to reduce barriers for faculty, staff,
190 and students and strives to provide the Creighton experience that individuals deserve
191 on campus.

192 OEI also oversees the [Mandatory Reporters Policy](#) which requires all staff and faculty
193 with leadership responsibilities or responsibilities related to student welfare to report
194 incidents of harassment, discrimination, sexual and relationship misconduct to the
195 university. In the 2014-2015 academic year, OEI sent out an online training for all
196 mandatory reporters and 2066 faculty and staff completed this training. Currently all
197 new faculty and staff receive online training during their orientation, in addition to an in-
198 person training on Title IX and mandatory reporting.

199 Between May 2013 and June 2016, OEI has provided approximately 70 formal and
200 informal resolutions under the university policy. Additionally, OEI has offered guidance,
201 advocacy, or support in a number of situations that do not result in a resolution. OEI
202 provides additional information on Title IX-related reports through an annual report on
203 their [website](#).

204 Additionally, OEI collaborates with Human Resources to provide oversight of
205 responsibilities related to [Affirmative Action](#) and [Equal Employment Opportunity\(EEO\)](#)
206 and is responsible for implementation of the University's [Children and Vulnerable Adults](#)
207 policy. This policy was adopted in 2013 to ensure that departments, student groups,
208 and outside organizations are adequately prepared for the responsibility of supervising
209 and working with children and vulnerable adults. Since 2013, approximately 5000
210 individuals have taken the online training required under this policy.

211 OEI also houses the [Violence Intervention and Prevention \(VIP\) Center](#), which provides
212 [prevention education](#) and [confidential advocacy](#) for faculty, staff and students. The
213 Center was created in 2011 in the Division of Student Life and moved under the Office
214 of Equity and Inclusion in 2012. The VIP Center implements training and education for
215 campus and in 2015-2016 alone the center provided 96 presentations or events that
216 reached approximately 6500 individuals.

217 The VIP Center is a well-utilized resource on Creighton's campus, as evidenced by the
218 number of individuals served over the last 5 years. In 2011-2012 the center provided
219 advocacy to 28 individuals followed by 32 individuals the following year. In 2013-2014
220 the center served 57 individuals and in 2014-2015 that number rose to 87. This past
221 academic year, the VIP Center worked with 146 individuals.

222 The University has an experienced Internal Audit Department reporting functionally to the
223 BOT's Audit and Compliance Committee and University President. An [annual report is](#)
224 [prepared which contains a summary of all reports and deliverables](#) during the fiscal year.
225 In the performance of its assurance and consulting engagements it adheres to
226 professional standards and is subject to external quality assessments. The annual service
227 plan regularly includes audits of divisions, departments and activities designed to
228 evaluate financial management, accounting, and reporting, as well as adherence to
229 policies and associated compliance requirements. The Department shares an oversight
230 role for the [anonymous hotline \(see report\)](#) with the General Counsel's Office and
231 conducts investigations into alleged compliance violations and ethical misconduct.
232

233 In addition, policies are in place to reinforce the importance of ethical behavior. General
234 ethical behavior and conflict of interest policies exist, which are applicable to all
235 employees and students. All Senior Administrators must disclose to the University, at
236 least on an annual basis, any financial interest of the Senior Administrator or a Family
237 Member that may result in an actual or potential conflict of interest on the "[Conflict of](#)
238 [Interest and Disclosure Policy Annual Statement of Disclosure.](#)" All employees
239 associated with research must complete an annual "[Disclosure of Financial Relationship](#)
240 [for Sponsored Projects.](#)" For the reporting period August 24, 2015-August 23, 2016,
241 2497 disclosures were submitted. All investigators who started a new project or
242 renewed a project in 2015-16 submitted the financial conflict of interest disclosure.
243

244 Members of the greater Creighton community have various avenues to report
245 misconduct of any kind. Research, student, financial and HR reporting processes exist
246 and are formally monitored and reported on by assigned individuals trained to manage
247 the incidents. Over the last five years, a total of [XX incidents have been reported, with](#)
248 [XX% successfully resolved](#). A [summary](#) of the numbers and disposition is included for
249 review. On July 1, 2015, the University implemented an anonymous third-party hotline
250 to enable individuals to report serious misconduct, including noncompliance and
251 unethical conduct, using a web intake form or a dedicated telephone hotline. Any
252 member of the Creighton community may file a report pertaining to allegations or issues
253 of concern relating to academic and student affairs, accounting and financial reporting,
254 healthcare and clinical, human resources, information technology, intercollegiate

255 athletics, research and sponsored programs, and risk and safety matters. Two projects
256 identified during the hotline implementation (Expanded compliance and ethics web
257 resources; and an official document outlining expectations and standards of conduct)
258 are being developed under the direction of the General Counsel's Office with
259 participation from personnel across the University. Since its activation, six hotline
260 reports have been received with investigations initiated (as of November 24, 2015).

261

262 **Policy Making Process**

263 During FY 2015, a committee comprised of senior administrators was established to
264 review, update and categorize all University policies and procedures. Their work resulted
265 in the categorization of policies as posted on the Office of the General Counsel website.

266

267 Any person or committee may advance a proposed policy to the President and Vice
268 Provosts/Presidents for consideration. After properly reviewed and discussed as required
269 by and approval by the President, the University policy is promulgated through the
270 General Counsel's office to the faculty and staff by an announcement via *Creighton Today*
271 and direct emails as appropriate. Prior to final approval of policies by the President, input
272 is gathered from across campus as necessary. Leadership counsel and advisement to
273 the president happens on a regular basis through the President's Cabinet, President's
274 Council, and Academic Council. The President's Cabinet meets the first and second
275 Wednesday of each month, the President's Council meets the third Wednesday and
276 Academic Council meets monthly during the academic year.

277

278 Colleges and Schools have Bylaws that are written in compliance with University Statutes.
279 Executive committees advise Deans on policy matters. Policies and procedures of a
280 particular college or school are found in the Bylaws and respective catalogs.

281

282 **Conclusion**

283 Creighton University is committed to high standards of conduct consistent with its
284 purpose, mission and core values. A pattern of authority and governance has been
285 instituted, with a comprehensive framework of policies and procedures established to
286 ensure that expectations are understood by stakeholders for financial, academic,
287 personnel, and auxiliary functions.

288

289 Oversight, monitoring, and auditing activities further assist the governing board and
290 administration to evaluate the control environment and ensure that policies and
291 procedures are designed well and functioning, resulting in conduct that epitomizes
292 integrity and fairness. The policy-making process is inclusive, robust and relevant, with
293 recent updates and revisions to address the dynamic environment in which the University
294 operates. Finally, a hotline mechanism allowing for anonymity and multiple ways of
295 reporting has been instituted to further encourage transparency and the effective
296 resolution of concerns.

297 2-B CORE COMPONENT 2.B

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

301 ARGUMENT

302 Through [Creighton University's Web site](#) the institution makes a broad and varied set of
303 resources and information publicly available to prospective students and families,
304 current students, alumni, employees and other constituents. The university's homepage
305 (www.creighton.edu) includes direct links to:

- 306
- 307 • About – includes information about our history, mission, identity as a Catholic
- 308 and Jesuit institution, rankings, leadership, and the Creighton experience
- 309 • Admissions
- 310 • Academics (Includes an A-Z index)
- 311 • Student Experience (resources, campus life, clubs and organizations, traditions)
- 312 • In the Community – (community engagement, service, partnerships)
- 313 • Athletics
- 314 • Research
- 315

316 A [University-wide faculty directory](#) is available, In addition to this directory,
317 college/school and departmental websites contain detailed information about faculty and
318 staff. Faculty listings with credentials are also available in each of the school and
319 college [Catalogs](#).

321 Programs offered and degree requirements

322

323 The [Academics portion](#) of the Web site is robust and allows the user to filter by area of
324 interest, degree level, or pathway (on-campus or online). Marketing coordinators
325 embedded in the colleges and schools ensure the academic information presented is
326 accurate and up-to-date. Selecting a program from the alphabetical listing then takes
327 you to the program webpage, where information can be found regarding program goals
328 and outcomes, curriculum, admission requirements and the associated costs.

329

330 The various [Catalogs](#) also provide information regarding the undergraduate, graduate,
331 and professional programs, respectively, as well as requirements, course offerings,
332 academic policies, the academic calendars, military and veteran affairs services,
333 student life, admissions, and financial aid.

334
335
336

337 **Admissions requirements**

338
339 Creighton University is a complex institution with undergraduate and graduate
340 programs, as well as five schools/colleges which offer professional programs.
341 Admission processes are coordinated through the Office of Enrollment Management for
342 undergraduate, graduate and nursing programs, or through offices of admission for the
343 Schools of Law, Medicine, Dentistry, and Pharmacy & Health Professions. Application
344 information for all programs, including admissions requirements and procedures, can be
345 found on the 'Apply' link on the University home page, or in the various Catalogs. The
346 Office of Enrollment Management subscribes to the National Association for Admissions
347 Counseling's [Statement of Principles of Good Practice](#) (SPGP), which is known as the
348 code of ethics in the admission-counseling profession. By accepting the SPGC,
349 counselors agree that they will "accurately represent and promote their schools."

350
351 **Costs to students**

352
353 Comprehensive information on tuition and fees is available on the [Business office](#)
354 [website](#). This includes information for undergraduate, graduate, and professional
355 students, and outlines differential tuition and fee information based on program of study,
356 pathway (e.g. online) or enrollment status (full or part time). Room and board rates are
357 also included in the tuition and fee listing. Information regarding cost of attendance and
358 financial aid is also included on the website for each individual program.

359
360 The [Undergraduate Admissions site](#) contains information for new students, and the
361 [Financial Aid site](#) provides information, organized by school/college and academic
362 program, regarding the total cost of attendance and budget information. Available
363 funding options are disclosed, as are the procedures to follow in order to secure
364 funding. Students are provided access to the University's [Net Price Calculator](#) to help
365 them determine the types of institutional, state, and federal aid for which they may be
366 eligible. The U.S. Department of Education's College [Scorecard](#) also provides
367 information on average annual cost of attendance, debt load, default rates for our
368 students, graduation rates, and salary after attending.

369
370 **Title IV required disclosures**

371
372 As required by Title IV, Creighton makes information available publicly on a broad range
373 of topics of interest to consumers, including graduation rates and information on
374 campus crime. The Campus Security Report is available from the 'About' page on the
375 Creighton website. The Office of Enrollment Management coordinates with the [Office of](#)
376 [Institutional Research](#) (IR) to provide annual update information for survey and ranking
377 agencies, including student enrollment, retention, graduation rates, as well as
378 demographic information. This information is available in the university [Fact Book](#).

379
380 **Control and Accreditations**

381
382 Information regarding university governance is available on the '[Leadership](#)' page,

383 which is found under the 'About' link from the university home page. From the
384 Leadership page, links are provided to the [President's Office](#). From there, additional
385 links lead to information regarding the President's Cabinet and the President's Council.
386 The listing of the Board of Trustees is available in the Creighton University ([Link to the](#)
387 [Catalog](#)). Additional information about the Board of Trustees can be found in 2.C.

388
389 Information regarding Creighton's accreditation status with the [Higher Learning](#)
390 [Commission](#), as well as a list of [specialized accreditations](#) held across academic
391 disciplines/professions and non-academic programs throughout the campus can be
392 found from the [Accreditation](#) link on the 'About' page of the university's home page.
393

394 2- C CORE COMPONENT 2.C

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

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

409 ARGUMENT

410
411 **2C.1. The governing board's deliberations reflect priorities to preserve and**
412 **enhance the institution.**

413
414 Creighton University is one of 28 Catholic, Jesuit institutions of higher learning located

415 in the United States. When founded [and incorporated](#) in 1879, the University was
416 initially organized under the territorial laws of the State of Nebraska. In 1960, Creighton
417 was formally incorporated as a Nebraska nonprofit corporation. Throughout its history,
418 the affairs of the University have been managed by its Board of Trustees. The powers
419 and authority of the Board are derived from the University's Articles of Incorporation and
420 Bylaws. At its inception, Board membership was traditionally limited to members of the
421 Society of Jesus. In 1968, the Bylaws were amended to allow for the inclusion of lay
422 members to the Board. Currently, Creighton's Board of Trustees consists of 28
423 members, seven of whom are members of the Society of Jesus. Trustees are elected
424 to four-year terms and are eligible for re-election to successive terms until reaching the
425 age of 75.

426

427 As defined in Article II Section I of the University's Bylaws, the Board has, subject to the
428 Laws of the State of Nebraska and to the Articles of Incorporation, ultimate
429 responsibility for the stewardship and general welfare of the University.

430

431 The Board has established standing committees that focus on key board
432 responsibilities: Executive Committee; Academic Affairs, Health Sciences and Research
433 Committee; Budget and Finance Committee (with Budget & Finance Infrastructure
434 Subcommittee); Mission, Jesuit Identity, and Student Life Committee; Governance,
435 Nominating and Audit Committee (with Risk Management, Audit and Compliance
436 Subcommittee); and External Relations Committee (with External Relations Investment
437 Subcommittee).

438

439 A new institutional planning cycle began with initial steps in the spring 2016 when the
440 involvement of all those who work at the University was solicited. Utilizing a mission
441 centric method of reflection and prayer known as the Examen, long used by the Society
442 of Jesus and initially created by the order's founder, St. Ignatius Loyola, the campus
443 community including faculty, staff, and students, individually and in conversation with
444 others, reflected on key themes. A distillation of these themes follows: (1) what makes
445 our work distinctive and expressive of our Jesuit, Catholic educational mission, and how
446 do we contribute to it; (2) how do we contribute and celebrate the communal nature of
447 the institution and what are the challenges that we must confront as we move forward;
448 (3) what can we do to enhance our academic excellence, community involvement and
449 stewardship of our resources; (4) how do we provide for and enhance our commitment
450 to sustainability, diversity, shared governance, service learning, and institutional
451 planning; and finally, (5) how can we imagine what would make the University
452 extraordinary?

453 The results of this planning were then synthesized from the hundreds of themes and
454 ideas that were received and were shared with the University as a whole and with the
455 Board of Trustees. The Vice Provost for Enrollment Management had her role
456 broadened to include University Planning. At the direction of the [Board of Trustees](#), the
457 Vice Provost for Enrollment Management and University Planning and the Dean of the
458 School of Law are now leading the process of developing a long range strategic plan.

459

460 **2C.2. The governing board reviews and considers the reasonable and relevant**
461 **interests of the institution’s internal and external constituencies during its**
462 **decision-making deliberations.**

463

464 The Board considers input from external and internal constituents. Every trustee is
465 identified on Creighton’s website (<http://catalog.creighton.edu/administration>) and can
466 be directly contacted by any constituent.

467

468 Each Board committee is encouraged to invite faculty, staff, and student guests to
469 participate in committee meetings. Historically, the University Faculty President and
470 Creighton Student Union President have each presented an [annual report](#) to the full
471 board. ([Need Evidence: committee agendas-](#)) [Committee reports](#) are given to the full
472 Board at each regular meeting.

473

474 All Vice Presidents attend the Board meetings as guests. Beginning in March 2015, the
475 President of the Faculty Council has attended the Board of Trustee’s meetings as a
476 guest at the invitation of the Chair of the Board and the University President.

477

478 The President encourages University administrators and other internal constituents to
479 submit suggestions of relevant topics for consideration and inclusion in Board or
480 Committee meeting agendas. The President collaborates with the Board Chair in
481 drafting Board meeting agendas. Meeting agendas are vetted and approved by the
482 Executive Committee before Board meeting books are prepared and distributed to
483 Trustees in advance of regular Board meetings.

484

485 A similar process is followed to solicit input for preparing Board Committee agendas.
486 Administrators assigned to each Committee as an executive contact collaborate with
487 their Committee Chairs to identify relevant topics to be included in Committee meeting
488 agendas. Committee agendas are submitted to the President for approval and inclusion
489 in the Board book.

490

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

502 background.

503

504 As a Jesuit, Catholic institution of higher education, the University has clarified its
505 relationship with the Society of Jesus in order to preserve and promote the Catholic and
506 Jesuit character of the institution while remaining an independent university.¹

507

508 **2C.3.The governing board preserves its independence from undue influence on**
509 **the part of donors, elected officials, ownership interests, or other external parties**
510 **when such influence would not be in the best interest of the institution.**

511

512 New trustees receive an orientation led by the Chair of the Board and the University
513 President. The primary documents of the University, including the University's mission
514 statement, Bylaws, University Statutes, and the Articles of Incorporation, are distributed.
515 Trustees are provided an overview of the schools, colleges and divisions of the
516 University. A Board of Trustees Handbook, consisting of relevant information about the
517 mission and history of the University and its organizational structure, was prepared and
518 recently distributed to each Trustee.

519

520 A new set of documents related to board restructuring and relevant to new and current
521 trustees was introduced and approved at the June 2015 board meeting. Included was a
522 summary of Expectations of Trustees, Board Calendar of Strategic Issues, Revisions to
523 Bylaws, and Board Committee descriptions. Ten new board members were appointed in
524 May 2016 and attended a [formal orientation](#) on September 13-14, 2016. Trustees
525 complete a [Conflict of Interest](#) statement each year. ([P 38 BOT Handbook](#)).

526

527 **2C.4.The governing board delegates day-to-day management of the institution to**
528 **the administration and expects the faculty to oversee academic matters.**

529

530 As directed by [Article III, Bylaws of Creighton University](#), the President is the Chief
531 Executive and Administrative Officer of the University. The President is responsible for
532 the general and active management, control, and direction of the business operations,
533 educational activities and other affairs of the University. In 2012, the office of Provost
534 was established. The Provost reports directly to the President, and serves as the
535 President's primary liaison with the deans and faculty on academic matters, and is
536 responsible for oversight of faculty development and discipline, academic program
537 development, evaluation and review, and strategic academic planning. In addition, the
538 Provost is responsible for overall academic program management and for support
539 activities most closely tied to academic programs, as well as student life. The Provost
540 provides general supervision over the academic administrators (Deans) of the various

541 colleges and schools of the University. All academic business of the colleges and
542 schools is channeled through the [Provost's Office](#).

543

544 Article II, Section I of the University Bylaws establishes the relationship between
545 University Officers and the Board of Trustees. Officers of the University may be
546 appointed by the Board at any regular or special meeting of the board. Vice Presidents,
547 Vice Provosts, Assistant Secretaries and other assistant officers may be appointed by
548 the President. Each [committee of the Board of Trustees](#) is supported by a member of
549 the University leadership identified as an executive contact. The executive contacts
550 collaborate with the board committee chair to develop agendas, coordinate meetings,
551 and invite participating guests. Each board committee is responsible for addressing
552 issues related to its specific charter, reporting and recommending initiatives to the full
553 board, and providing guidance to university leadership.

554 The [University statutes](#) provide for an Academic Council whose duty is to “advise the
555 President and the Provost in academic matters, and [to] participate in the selection of
556 all-University administrators.” The President regularly meets with the President of the
557 Faculty, and the President of the Faculty Council attends [meetings of the Board of
558 Trustees](#) (see Response 2.C.2) and is a member of the President’s Council, which
559 meets once each month.

560

561 2- D CORE COMPONENT 2.D

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

564 ARGUMENT

565 The University's commitment to freedom of expression and the pursuit of truth for all
566 members of the Creighton University community is additionally espoused in its [Mission
567 Statement](#), which reads: “Creighton faculty members conduct research to enhance
568 teaching, to contribute to the betterment of society, and to discover new knowledge.
569 Faculty and staff stimulate critical and creative thinking and provide ethical perspectives
570 for dealing with an increasingly complex world.” This statement holds true for faculty
571 and students, as well as staff.

572 The [Faculty Handbook](#) describes the academic rights, duties and responsibilities of
573 Creighton's faculty. The handbook contains a statement of academic freedom, which
574 begins: Creighton University recognizes that its faculty is entitled to enjoy and exercise,

575 without penalty or fear of reprisal, all the rights of American citizens, and to seek the
576 truth and to state the truth as the faculty member sees it for the advancement of
577 knowledge and the free pursuit of learning by their students.

578 Faculty [Promotion and Tenure policies](#) are also designed to provide clear guidelines for
579 review processes while allowing for individuality in teaching and scholarship. Faculty
580 members are reviewed by a committee of their peers who make recommendations to
581 the administration for promotion and tenure.

582 Clear grievance policies with regard to academic freedom are in place to ensure fair
583 treatment. The standing committee, [Committee on Academic Freedom and
584 Responsibility](#) is comprised of faculty and hears reports of grievances related to
585 questions of academic freedom and responsibility.

586 The institution has a well-developed [University policy](#) on Speakers and Artistic/Creative
587 Presenters Policy that is grounded in “Fostering intellectual, ethical, social and religious
588 dialogue is fundamental to the development of intellectual exchange and social
589 awareness in Creighton students and is integral to the nature of the university.”

590 2- E CORE COMPONENT 2.E

591 The institution ensures that faculty, students and staff acquire, discover,
592 and apply knowledge responsibly.

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

600 ARGUMENT

601 Creighton University grounds all students across all levels in formal coursework in
602 ethics. All programs are required to have some coursework in ethics. Creighton
603 University’s [Human Research Protections Program](#) is charged with assisting faculty,
604 students and staff with externally and internally funded research, ethical training, and
605 compliance. Support is provided in the HRPP, for example, for clinical research trials,

606 grant administration, student research, protection of human subjects review, and
607 institutional animal care. In addition, administrative offices, processes and professional
608 and support staff are in place to assist faculty with grant administration, compliance, and
609 all pre- and post-award matters. The Research Compliance Office at Creighton
610 oversees six committees and boards that are responsible for research integrity on
611 campus. These include: [Conflict of Interest Review Committee \(CIRC\)](#); [Institutional](#)
612 [Animal Care and Use Committee \(IACUC\)](#); [Institutional Biosafety Committee \(IBC\)](#);
613 [Institutional Review Board \(IRB\)](#); [Radiation Safety Committee \(RSC\)](#); and the [Research](#)
614 [Compliance Committee](#).

615 Creighton University has two [Institutional Review Boards \(IRBs\)](#), which are
616 administrative bodies established by the University to ensure the protection of the rights
617 and welfare of human subjects who are recruited to participate in research activities
618 sponsored by the University. IRB – 01 focuses on biomedical research, and IRB – 02
619 focuses on social and behavioral research providing researchers optimal and
620 appropriate review of studies. Creighton’s federally mandated responsibilities come
621 from the Department of Health and Human Services (DHHS), and are outlined in Title
622 45, Part 46 of the Code of Federal Regulations (45 CFR 46). These regulations
623 mandate that all institutions engaged in research with human subjects provide the dual
624 protections of Institutional Review Board for the Protection of Human Subjects (IRB)
625 review and informed consent.

626 The University also requires training regarding the [Responsible Conduct in Research](#)
627 [and Scholarship](#) policy to ensure all faculty, students, and staff are properly trained in
628 the ethical and responsible conduct of research and scholarly integrity and are held to
629 the highest possible ethical standards. It is required training for all masters and doctoral
630 level students enrolled in thesis-oriented programs. The Research Compliance Office
631 dealt with one misconduct allegation in 2015-16. In addition, faculty and students
632 involved in research, or supervision of research, are required to maintain certification at
633 or above 80% in the [Collaborative Institutional Training Initiative \(CITI\) Program](#), an
634 online training course provided by the University of Miami. In 2015-16 1102 individuals
635 completed one of our CITI Responsible Conduct of Research courses, 1207 people
636 took one of the IRB training courses, 112 took Working with the IACUC or the refresher,
637 and 113 took Initial Biosafety training. In addition, the [Financial Conflict of Interest in](#)
638 [Research](#) policy describes research and scholarship policies and a special policy
639 regarding conflicts of interest in externally funded projects. In 2015-16, 183 people
640 completed the CITI Conflict of Interest training.

641 In addition, individual academic disciplines introduce students to the appropriate citation
642 format and types of scholarly sources. Online students in the College of Professional
643 Studies and the Graduate School, respectively, complete CPS200 or GRD600, an
644 orientation course which includes a module on proper citation style and academic
645 honesty. To reinforce the ethical use of information, faculty may employ [TurnItIn](#), an
646 electronic plagiarism identification tool, which evaluates assignments, as part of the

647 campus learning management system to compare students' papers to a database of
648 web pages, articles, and student papers and highlights content that matches material in
649 their database. Students, faculty and staff are offered guidance in the ethical use of
650 information resources in a variety of ways and numerous venues. The [Fair,
651 Responsible, and Acceptable Use Policy](#) contains policies and guidelines for ethical use
652 of information resources, as well as sanctions and penalties for misuse. The university
653 Information Security Officer consults with both IRBs and with faculty, staff and students
654 to continually update the university community on ethical use and storage of electronic
655 sources of information.

656 All first year undergraduate students are required to enroll in [Ratio Studiorum](#), a
657 semester-long extended orientation that focuses on academic success and the
658 transition to college. The curriculum includes a review of academic policies, including
659 the academic honesty policy. In addition, faculty are required to include the academic
660 honesty policy in their course syllabi and review it with students at the start of each
661 semester. The [Academic Honesty Policy](#) defines plagiarism in its various forms,
662 provides specific examples, and indicates [possible sanctions and appeals process](#) for a
663 violation of this University standard.

664 Similar to faculty, freedom of expression for students confers both rights and
665 expectations for responsible conduct and behavior, as outlined in [Creighton University's
666 Student Handbook](#), as described in [Section II](#), Creighton University Student Credo:
667 "Creighton, a Jesuit University, is convinced that the hope of humanity is the ability of
668 men and women to seek truths and values essential to human life. It aims to lead all its
669 members in discovering and embracing the challenging responsibilities of their
670 intelligence, freedom, and value all persons." All students are also expected to uphold
671 standards for academic integrity, that is, to know, respect and practice personal honesty
672 as members of a learning community. Definitions of plagiarism, its various forms, and
673 possible sanctions are described in the [Student Handbook Section VII](#).

674 Enforcement of the [Code of Conduct](#) resides with the Dean of the student's schools
675 and colleges and followed by the University Committee on Student Discipline as
676 outlined in the [Student Handbook](#). A Disciplinary and Appeals procedure is written into
677 the policy to ensure students are treated ethically and respectfully throughout the
678 process. The Office of Equity and Inclusion handles all complaints or violation under the
679 Sexual Violence, Harassment, Discrimination, and Grievances Policy. In 2015-16, this
680 office investigated 28 complaints (see table in the evidence file for a list of complaints
681 and resulting institutional actions). Residential Life policies are guided by the principle
682 of restorative justice instead of punishment. Detailed policies for student appeals in
683 academic matters are also well-defined in the [Student Handbook](#).