

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

and monitoring procedures, are the key activities implemented to mitigate the risk of noncompliance and assure integrity in the financial operations as well as addressing confidentiality, ethical practices and supplier relations, gifts and gratuities, and fair trade. To enhance assurance of 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 recent larger revision of policy was required to address the new federal guidance pertaining to federal award programs. [Eleven policies and four procedural documents](#) were changed and financial monitoring procedures were revised in response.

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

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

A [Financial Code of Ethics Statement](#) 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. For Fall 2016, a compliance rate of 90% was achieved (575 forms completed).

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

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. As part of each annual audit, an evaluation of internal controls over financial reporting and compliance is performed.

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

Academic –

Policies and procedures regarding academic standards and regulations for students are contained in the [Creighton University Catalogs](#), publicly available on the university website and within each school and college - undergraduate, graduate, dentistry, law, medicine, and pharmacy and health professions. 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 [code of conduct](#), [student credo](#), [student handbook](#), [student conduct policies](#), and frequently asked questions. Guidance for faculty is provided in the form of a [faculty handbook](#) published electronically annually in April.

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 contained in the response for criteria 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 [human resources policies](#) are included in the [Guide to University Policies](#) and are applicable to all employees no matter the location. The Human Resources website is a portal to information regarding careers, benefits, professional development, employee resources, manager resources, and contact information to assist the employee in understanding the expectations and specific policies and procedures relating to employment. In addition, online [Faculty and Employee Handbooks](#) provide useful information and refer to employment expectations regarding university policies. The importance of employee integrity is paramount and incorporated within the annual [employee performance evaluation](#) process. 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 [Reporting Financial Misconduct \(3.1.16.\)](#) policy requires all employees, students and University contractors to report financial misconduct.
- The [Mandatory Reporters \(2.1.26.\)](#) policy requires employees to report possible violations to student welfare.

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

contractor who makes a good faith report of financial misconduct by any means. The University is committed to high ethical standards in financial practices and believes that the good faith reporting of suspected or known financial misconduct is the responsibility of all employees, students and contractors with whom the University does business.”

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 Residence Life is responsible for the 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 Residence 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. The engagement is currently in progress and as of October 19, 2016 fieldwork was approximately 65% 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 [Athletics Department Policies and Procedures Manual](#), last updated November 24, 2014. A webpage providing compliance resources, including a Student Athlete Handbook, 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 [Athletics Department Audit Report](#) was issued October 23, 2015. The audit report stated no material deficiencies and found the university and its athletic department to be in compliance with NCAA regulations. Other recent audits include:

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

Governing Authority

The University's governing authority is vested in a Board of Trustees established by the Bylaws of Creighton University. 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. [Presidential Committees](#), 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) was established in 2012, bringing together a number of important university initiatives that were previously housed in different offices or committees. By centralizing these initiatives, the university created a dedicated office to oversee compliance and provide education on a number of federal laws, in addition to providing complaint resolution under university policy. The University's [Harassment, Discrimination, Sexual and Relationship Misconduct Policy](#) 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 was enacted in May 2013 and has been revised twice since that time. The office works to reduce barriers for faculty, staff, and students and strives to provide the Creighton experience that individuals deserve on campus.

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

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

Additionally, OEI collaborates with Human Resources to provide oversight of responsibilities related to [Affirmative Action](#) and [Equal Employment Opportunity\(EEO\)](#) and is responsible for implementation of the University's [Children and Vulnerable Adults](#) policy. This policy was adopted in 2013 to ensure 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 5000 individuals have taken the online training required under this policy.

OEI also houses the [Violence Intervention and Prevention \(VIP\) Center](#), which provides [prevention education](#) and [confidential advocacy](#) 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. The VIP Center implements training and education for campus and in 2015-2016 alone the center provided 96 presentations or events that reached approximately 6500 individuals.

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

The University has an experienced Internal Audit Department reporting functionally to the BOT's Audit and Compliance Committee and University President. An [annual report is prepared which contains a summary of all reports and deliverables](#) during the fiscal year. In the performance of its assurance and consulting engagements it adheres to professional standards and is subject to external quality assessments. The annual service plan 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 [anonymous hotline \(see report\)](#) with the General Counsel's Office and conducts investigations into alleged compliance violations and ethical misconduct.

In addition, 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 on an annual basis, 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, 2497 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 reported on by assigned individuals trained to manage the incidents. Over the last five years, a total of [XX incidents have been reported, with XX% successfully resolved](#). A [summary](#) of the numbers and disposition is included for review. On July 1, 2015, the University implemented an anonymous third-party hotline to enable individuals to report serious misconduct, including noncompliance and unethical conduct, using a web intake form or a dedicated telephone hotline. 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, 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, six hotline reports have been received with investigations initiated (as of November 24, 2015).

Policy Making Process

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

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

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

Conclusion

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

Oversight, monitoring, and auditing activities further assist the governing board and administration to evaluate the control environment and ensure that policies and procedures are designed well 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, a hotline mechanism allowing for anonymity and multiple ways of reporting has been instituted to further encourage transparency and the effective resolution of concerns.

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 Web site](#) 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 (www.creighton.edu) includes direct links to:

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

A [University-wide faculty directory](#) is available, 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 [Catalogs](#).

Programs offered and degree requirements

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

The various [Catalogs](#) also provide information regarding the undergraduate, graduate, and professional programs, respectively, as well as requirements, course offerings, academic policies, the 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 which offer professional programs. Admission processes are coordinated through the Office of Enrollment Management for undergraduate, graduate and nursing programs, or through offices of admission for the Schools of Law, Medicine, Dentistry, and Pharmacy & 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 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 SPGC, counselors agree that they will "accurately represent and promote their schools."

Costs to students

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

The [Undergraduate Admissions site](#) 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 in order to secure funding. Students are provided access to the University's [Net Price Calculator](#) to help them determine the types of institutional, state, and federal aid for which they may be eligible. The U.S. Department of Education's College [Scorecard](#) 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 Campus Security Report 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 '[Leadership](#)' 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 ([Link to the Catalog](#)). 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 [specialized accreditations](#) held across academic disciplines/professions and non-academic programs throughout the campus can be found from the [Accreditation](#) link on the 'About' page of the university's home page.

2- C CORE COMPONENT 2.C

The governing board of the institution is sufficiently autonomous to make decision 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 interest 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

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

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

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. The powers and authority of the Board are derived from the University's Articles of Incorporation and Bylaws. 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 Board of Trustees consists of 28 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 Article II Section I of the University's 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.

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

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

2C.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.

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

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

All Vice Presidents attend the Board meetings as guests. Beginning in March 2015, the President of the Faculty Council has attended the Board of Trustees' meetings as a guest at the invitation of the Chair of the Board and the University President.

The President encourages University administrators and other internal constituents to submit suggestions of relevant topics for consideration and inclusion in Board or Committee meeting agendas. The President collaborates with the Board Chair in drafting Board 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.

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

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 levels of 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.

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

2C.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.

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

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

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

As directed by [Article III, Bylaws of Creighton University](#), 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, and 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. The Provost provides general supervision over the academic administrators (Deans) of the various

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

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. Each [committee of the Board of Trustees](#) is supported by a member of the University leadership identified as an executive contact. The executive contacts collaborate with the board committee chair to develop agendas, coordinate meetings, and invite participating guests. Each board committee is responsible for addressing issues related to its specific charter, reporting and recommending initiatives to the full board, and providing guidance to university leadership.

The [University statutes](#) 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 regularly meets with the President of the Faculty, and the President of the Faculty Council attends [meetings of the Board of Trustees](#) (see Response 2.C.2) and is a member of the President’s Council, which meets once each month.

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

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

Faculty [Promotion and Tenure 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 comprised of faculty and hears reports of grievances related to questions of academic freedom and responsibility.

The institution has a well-developed [University policy](#) on Speakers and Artistic/Creative Presenters Policy that is grounded in “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.”

2- E CORE COMPONENT 2.E

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

1. The institution provides effective oversight and support services to ensure the integrity of research and scholarly practice 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

Creighton University grounds all students across all levels in formal coursework in ethics. All programs are required to have some coursework in ethics. Creighton University’s [Human Research Protections Program](#) is charged with assisting faculty, students and staff with externally and internally funded research, ethical training, and compliance. Support is provided in the HRPP, 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 are in place to assist faculty with grant administration, compliance, and all pre- and post-award matters. The Research Compliance Office at Creighton oversees six committees and boards that are responsible for research integrity on campus. These include: [Conflict of Interest Review Committee \(CIRC\)](#); [Institutional Animal Care and Use Committee \(IACUC\)](#); [Institutional Biosafety Committee \(IBC\)](#); [Institutional Review Board \(IRB\)](#); [Radiation Safety Committee \(RSC\)](#); and the [Research Compliance Committee](#).

Creighton University has two [Institutional Review Boards \(IRBs\)](#), which are administrative bodies established by the University to ensure the protection of the rights and welfare of human subjects who are 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). These regulations 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 in Research and Scholarship](#) policy to ensure all faculty, students, and staff 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 masters and doctoral level students enrolled in thesis-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 the University of Miami. In 2015-16 1102 individuals completed one of our CITI Responsible Conduct of Research courses, 1207 people took one of the IRB training courses, 112 took Working with the IACUC or the refresher, and 113 took Initial Biosafety training. In addition, the [Financial Conflict of Interest in Research](#) policy describes research and scholarship policies and a special policy regarding conflicts of interest in externally funded projects. In 2015-16, 183 people completed the CITI Conflict of Interest training.

In addition, 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, an orientation course which includes 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, which evaluates assignments, as part of the

campus learning management system to compare students' papers to a database of web pages, articles, and student papers and highlights content that matches material in their database. 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 policies and 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.

All first year undergraduate students are required to enroll in [Ratio Studiorum](#), 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. In addition, 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 [Academic Honesty Policy](#) 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 [Creighton University's Student Handbook](#), as described in [Section II](#), Creighton University Student Credo: "Creighton, a Jesuit University, is convinced that the hope of humanity is the ability of men and women to seek truths and values essential to human life. It aims to lead all its members in discovering and embracing the challenging responsibilities of their intelligence, freedom, and value all persons." All students are also expected to uphold standards for academic integrity, that is, to know, respect and practice personal honesty as members of a learning community. Definitions of plagiarism, its various forms, and possible sanctions are described in the [Student Handbook Section VII](#).

Enforcement of the [Code of Conduct](#) resides with the Dean of the student's schools and colleges and followed by the University Committee on Student Discipline 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 violation under the Sexual Violence, Harassment, Discrimination, and Grievances Policy. In 2015-16, this office investigated 28 complaints (see table in the evidence file for a list of complaints and resulting institutional actions). Residential Life policies are guided by the principle of restorative justice instead of punishment. Detailed policies for student appeals in academic matters are also well-defined in the [Student Handbook](#).