2.A - Core Component 2.A

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

Argument

Faithful pursuit of the institutional mission, compliance with local, state, and federal laws and regulations, and responsiveness to the needs of students, faculty, staff, and other constituents are top priorities for administration, faculty, and staff. The policy manuals of the university and its governing board contain numerous policies that support institutional integrity and ethics. To make university policies for all constituents more accessible, in 2005 ISU developed an online policy library (policy.iastate.edu).

Ethical Conduct by Individuals

The expectation of ethical conduct is present within the policies the Board of Regents in the Iowa Administrative Code <u>Uniform Rules of Personal Conduct</u>, Faculty Conduct Policies contained in <u>chapter 7 of the Faculty Handbook</u>, the <u>Professional and Scientific Staff Statement of Ethics</u>, and the <u>Student Disciplinary Regulations (Code of Conduct)</u>.

Harassment/Discrimination

The University's <u>Discrimination and Harassment Policy</u> states that "the university is committed to assuring that its programs are free from prohibited discrimination and harassment based upon race, ethnicity, sex, pregnancy, color, religion, national origin, physical or mental disability, age, marital status, sexual orientation, gender identity, genetic information, status as a U.S. Veteran, or any other status protected by university policy or local, state, or federal law." The Office of Equal Opportunity (EO) proactively addresses fair and equal treatment of current and potential students, staff, and faculty by monitoring compliance with federal, state, and University guidelines. The director of the office also serves as the University's Title IX /ADA Coordinator and Affirmative Action Officer.

In 2013-14, ISU implemented two new (45-minute) online training courses on Unlawful Harassment Prevention and Title IX, Violence Prevention and Campus Save Act. As of March 1, 2015, 94% of staff and 86% of faculty had completed the Unlawful Harassment Prevention course, and 94% of faculty and staff and 75% of continuing students had completed the appropriate Title IX, Violence Prevention course.

Conflict of Interest

The Board and University both have policies and processes in place to minimize conflicts of interest. Board of Regents Policy requires Board and University employees "to comply with Iowa Code § 68B.2A: Conflicts of Interest." It also requires "that all Regents and institutional officials promote at all times the best interests of the Board and its institutions consistent with policies, rules, regulations, and laws governing the Board, academic institutions, and academic freedom." To support this policy each Regent must sign an annual disclosure statement identifying any potential or perceived conflicts of interest. Management plans are developed to address any issues.

University policy requires the disclosure, review/approval, and management of external activities or financial interests that have the potential to interfere with an individual's performance of duties, objectivity, or appropriate use of state resources. Employees are expected to complete a Conflict of Interest or Commitment <u>survey</u> each year. At the end of 2014, 81% of faculty and 84% of professional and scientific staff had completed the survey for that year. Based on responses, management plans are developed and monitored for individuals with potential or perceived conflicts of interest. In 2014, the University had <u>management plans in place for 66 individuals</u>.

Business and Financial Operations

ISU's creation of and adherence to its Code of Business Ethics and Conduct (Code), its Business Ethics Awareness and Compliance Program (Program) and its accompanying internal control systems help foster an organizational culture that encourages ethical conduct and a commitment to compliance with the law. President Leath sent a letter to all University employees in 2014 to increase awareness of these policies/programs. The Code of Business and Fiduciary Conduct is a Board policy that guides the business and fiduciary responsibilities of the Board, the University and all employees. The policy states that "All employees of the Board of Regents and its institutions play a role in ensuring that the resources entrusted are protected, preserved, and enhanced. This Code sets forth the fundamental expectations relating to all business and fiduciary conduct." The policy outlines expectations in three areas: 1) Fairness, integrity and respect, 2) Accountability, and 3) Compliance with law. ISU's Code of Business and Fiduciary Conduct Policy references the guiding Board policy and provides links to policies on additional topics (such as undue influence) that support ethical financial operations.

Personnel

University Human Resources (UHR) has multiple approaches to promote and ensure an environment of fair employment practices. These actions contribute to an environment of integrity and ethical behavior by leadership, faculty and staff.

UHR maintains accessibility to employment related information on its website and also provides management with a secure web page for additional resources via the "Link to HR" portal. These web based resources promote transparency and accessibility to policies, procedures and announcements that enable employees to understand their rights and responsibilities as members of the ISU community. UHR ensures compliance with various policies through information systems that support these processes.

The <u>Open Search</u> policy sets the standard that all vacancies are posted. EO administers the policy while the UHR applicant tracking system retains the data for each search.

The <u>Performance Management Policy for Professional & Scientific staff</u> sets the standard that supervisors conduct annual performance appraisals for P&S staff. The certification of satisfactory or unsatisfactory performance that are part of the review feeds into the process the University has established for awarding annual merit-based salary increases. Due to the link between pay decisions and the completion of performance appraisals, the University has nearly 100% compliance.

The <u>Faculty Handbook</u> contains numerous chapters that address ethical and responsible conduct (Chapter 3: appointment, termination, Chapter 4: salary, chapter 5: evaluation and review, chapter 7: faculty conduct, and chapter 9: grievance). All faculty members (tenured, tenure-track, non-tenure-eligible, whether fulltime or part-time) are evaluated annually (January 1 to December 31) for performance appraisal and development, based on their position responsibility statement (PRS). This evaluation is based on scholarship and contributions in teaching, research/creative activities,

extension/professional practice, and institutional service as indicated in each individual's PRS. The annual evaluation serves as a basis for determining annual merit salary increases.

In 2011, ISU adopted a <u>Salary Adjustments</u> policy that provides for transparency, consistency, and accountability in the administration of annual salary increases for employees. Each year, the University establishes publicly available salary adjustment parameters, to guide decisions on annual merit salary increases for faculty, post-docs, professional and scientific staff and contract employees. Since ISU is a public institution, the salaries of all employees are a matter of public record.

The Ombuds Office serves as a confidential resource for individuals who think they have been treated unfairly or others have acted in an unethical manner. This office, established in 2008, served 121 individuals in FY14.

Academic policies

The Faculty Handbook, the Catalog, the Graduate Handbook, the College of Veterinary Medicine website, and the ISU Policy Library contain policies that relate to ethics in academics such as academic misconduct and academic dishonesty. Details of these are contained in the response for criteria 2.E.

Reporting of violations

The <u>Reporting of Violations Policy</u> specifies that all students and University employees have the responsibility to bring to the attention of the appropriate office suspected violations of policies, laws, regulations or contractual requirements. Failure to report known or suspected violations and crimes as indicated is itself a breach of University ethical standards and can lead to discipline of employees and students, up to and including separation from the University. The University has a <u>Non-Retaliation Against Persons Reporting Misconduct</u> policy to protect individuals making good faith reports.

The ISU Compliance and Ethics Hotline (www.policy.iastate.edu/ethics-hotline) provides the opportunity for employees, students, and constituents to report issues, in good faith, regarding compliance with laws, regulations, and policies. Individuals can report anonymously. The hotline includes reporting options both by telephone and via an online form.

Auxiliaries

Intercollegiate Athletics

The Department of Intercollegiate Athletics operates with integrity and establishes and follows policies and processes for fair and ethical behavior. The Athletics Department has a direct reporting line to the university president. The Director of Athletics is also a member of the President's Cabinet, allowing for open and frequent access to ISU's leadership team. The Faculty Athletics Representative is highly involved in all eligibility, academic, and NCAA issues.

The NCAA Certification process for ISU concluded in 2011. The NCAA Committee on Athletics Certification rendered a <u>full certification decision</u> after a two-year self-study conducted by individuals external to the athletics department. Post-certification, the <u>Athletics Council</u> monitors "matters relating to intercollegiate athletics." Three committees of the Council are actively engaged in oversight activities to help the Athletics Department comply with policies and standards pertaining to intercollegiate athletics established by the NCAA, Big 12, and Iowa State. The Council submits an <u>annual report</u> to the University President on the state of the Athletics Department on issues related to

academic integrity, inclusion, and the student-athlete experience. Other Athletics Council liaisons to staff/university committees in the areas of fiscal, legislative, and rules compliance provide oral status reports at each bi-monthly meeting. The Department of Intercollegiate Athletics is governed by the NCAA and the Big 12 Conference and undergoes regular compliance and fiscal audits.

Structures that Support Integrity

ISU has a strong culture of shared governance, transparency, and accountability. Together these create an environment that supports ethics and integrity.

Shared governance ensures that, as policies are developed, stakeholders are engaged in the process to build in checks and balances. Policies contained in the ISU Policy Library are vetted through a <u>development process</u> that includes review by a <u>Policy Library Advisory Committee</u> (which includes representation from administration, faculty, staff, and students) and an open comment period for the University community.

Operating with transparency is an expectation of the Board and supports accountability for integrity and ethical conduct. In 2013 the Board's <u>task force on transparency made recommendations</u> for changes to enhance the transparency of the operation of the University and the Board. Recommendations implemented include the <u>creation of a transparency officer</u> to satisfy public information requests.

ISU is subject to audits from both the State Auditor's Office and an Internal Audit unit that reports to the Board. Both of these offices provide <u>regular reports and updates to the Board</u>. In addition, the <u>Single Audit Report of the State of Iowa</u> addresses the disbursement of federal funds by state agencies and includes a review of internal controls and compliance with federal laws and regulations.

Sources

- Annual Conflict Disclosure 2014
- Athletics Council Annual Report 2014-2015
- Athletics Council Constitution and Bylaws
- BOR Transparency Task Force Final Report
- Code of Business and Fiduciary Conduct Board of Regents
- Conflict of Interest and Commitment Disclosure Survey
- Conflict of Interest Policy Board of Regents Policy Manual
- Conflicts of Interest and Commitment Policy
- Discrimination and Harassment Policy
- Faculty Handbook August 2015
- Faculty Handbook Chapter 7 Faculty Conduct Policy
- ISU Code of Business and Fiduciary Conduct Policy
- NCAA Iowa State Letter
- Non-Retaliation Against Persons Reporting Misconduct
- Office of Research Integrity Review Statistics
- Omsbud Annual Report FY14
- Open Search Policy
- Performance Management P&S
- Policy Development and Approval Process

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- Policy Library Advisory Committee Membership
- President Leath's Letter 2014-07-25
- Reporting Responsibility, Violations
- Salary Adjustments Policy
- Single Audit HEOA Compliance Letter June 2014
- State and Internal Audit Reports BOR Meeting Agenda Items September 2015
- Statement on Ethics P&S
- Student Disciplinary Regulations
- Transparency Officers Press Release 8-9-2013
- Uniform Rules of Personal Conduct, IAC 681.9.1