



# Jackson College Board of Trustees

## Monitoring Report: EL – 09 Organization Culture

[ FULL COMPLIANCE ]

**Note: Board Policy is indicated in bold typeface throughout the report.**

I present this monitoring report to the Jackson College Board of Trustees which addresses the Board's Policy EL-09: "Organization Culture". I certify that the information contained herein is true and represents compliance, within a reasonable interpretation of the established policy, unless specifically stated otherwise below. Please note that all of my interpretations of the policy remain unchanged from the previous report, unless otherwise noted.

01.12.26

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Daniel J. Phelan, Ph.D.  
President and CEO

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Date

### **POLICY STATEMENT:**

**The CEO shall not permit an organizational culture that lacks a high degree of integrity at all levels of the organization.**

**Further, without limiting the scope of the above by the following list, the CEO shall not:**

- 1. Operate without an enforced internal Code of Ethics, of which all employees are made aware, that clearly outlines the rules of expected behavior for employees.**

### INTERPRETATION:

Compliance will be demonstrated when:

- a) There is evidence that the College not only has a Jackson College Code of Ethics policy that is current and accessible to anyone, but that all employees have annually affirmed their compliance with same.
- b) Notices from Vector Solutions, a web-based training tool that includes safety and compliance topics, have been sent to all employees and a minimum of 95%

of employees having completed the training.

This interpretation is reasonable because it follows industry best practices, and further that the Vector Solutions system has built in systems to determine if training is indeed completed.

EVIDENCE:

- a) The Chief Operating Officer (COO) confirmed on 12.01.25 that the [Jackson College Code of Conduct and Ethical Practices](#) is accessible on the College website under Jackson College Policies. All Jackson College employees are required to review the policy annually in the Vector Solutions (i.e., the College's online training-management solutions approach to improve compliance, safety, performance, and preparedness for employees) through training tools with system data revealing the level of participation.
- b) The Director of Compliance/Deputy Title IX Coordinator confirmed on 11.19.25 that 99.6% of employees have completed the annual training for the Jackson College Code of Conduct and Ethical Practice policy within the past year.

**2. Permit employees and others to be without a mechanism for confidential reporting, independent of the College, of alleged or suspected improper activities, without fear of retaliation.**

INTERPRETATION:

Compliance will be demonstrated when:

There are multiple mechanisms for confidential reporting of incidents that implicate the CEO, or Trustee, to the Board Chair, Vice Chair or to the Board Attorney, who reports directly to the Board.

- a) There is a 24/7/365 tool with clear processes in place for employees to register a concern, and for reporting and investigating allegations of suspected improper activities, which include but are not limited to: financial irregularities as well as dishonest, deceitful, fraudulent or criminal acts, and other violations of federal and/or state legislation.
- b) There is a 24/7/365 system in place that, for those incidents that do not implicate the CEO, and in which case there is a conflict, and a direct reporting relationship between the person conducting the investigation, and the person alleged to have engaged in improper activities, for safe reporting.
- c) There is a policy and documentation in place that notifies employees, that if they make false claims or allegations that prove to be unsubstantiated, and which prove to have been made maliciously, or knowingly to be false, these shall be viewed as a serious offence and shall be subject to disciplinary action, including termination from employment.

- d) There is a policy and documentation in place that ensures that no employee will be adversely affected because the employee refuses to carry out a directive which would result in an improper, illegal, immoral, or unethical activity.

This interpretation is reasonable because of verifiable policy and procedural mechanisms in place to ensure employees/others can report confidentially. It is also consistent with higher education practices nationally.

EVIDENCE:

- a) The COO confirmed on 12.01.25 that a [reporting form](#) is accessible on the Board of Trustees webpage to anonymously report allegations of suspected improper activities and that this information is communicated to employees and students. All complaints made via this reporting tool go directly to the college's legal counsel.
- b) The COO confirmed on 12.01.25 that a 24/7/365 reporting tool, [tip 411](#), is accessible on the college's website. In addition, an additional reporting tool, Vector Solutions and LiveSafe App (i.e., a mobile safety platform primarily used to connect students, staff, and faculty with campus security for real-time emergency alerts, anonymous tips, and safety features like virtual escorts (SafeWalk), has been implemented to submit suspicious activity. This information is communicated to students and employees.
- c) The Director of Human Resources confirmed on 12.22.25 that the Jackson College [Code of Conduct and Ethical Practice policy \(#3107\)](#) indicates that the violation of this practice may result in disciplinary action, up to and including suspension without pay or termination of employment.
- d) The Director of Human Resources confirmed on 12.22.25 that the Jackson College Code of Conduct and Ethical Practice policy (#3107) indicates the requirement to comply with legal and regulatory requirements, with many requirements also noted in the College's Values and Beliefs Statement.

**3. Cause or allow research involving either human subjects or animals that does not adhere to generally accepted ethical principles and policy.**

INTERPRETATION:

Compliance will be demonstrated when the College has a published policy and guidelines in place to distribute to individuals wishing to conduct research regarding the use of human cadavers, human subjects or animals.

This interpretation is reasonable because such practice is consistent with common methods employed in the higher education and research community.

EVIDENCE:

On 01.05.26, the Chief Strategy Officer confirmed that the College has an

[Institutional Review Board \(IRB\) policy](#) that addresses this type of research work.

**3.1. Permit potential researchers to be without readily available guidelines for ethical research and assistance in identifying and solving ethical problems.**

INTERPRETATION:

Compliance will be demonstrated when, in such cases that research is conducted at Jackson College, that prior approval by the College's Institutional Review Board (IRB) includes submission of ethical guidelines for all research work.

This interpretation is reasonable given that such practice is consistent with common methods employed in the higher education and research community.

EVIDENCE:

The College has established an Institutional Review Board (IRB), as previously noted, that ensures the use of ethical practices in research requests. The Chief Strategy Officer confirmed on 01.05.26 that one request was made and approved during this reporting period, and that this request did comply with the stated ethical guidelines.

**3.2. Permit research that has not been subject to independent ethical review.**

INTERPRETATION:

Compliance will be demonstrated when the College has an established Institutional Review Board which is used for independent, ethical review of all research work involving humans or animals.

This interpretation is reasonable because it establishes standard higher education and research internal controls to ensure the policy and guidelines are followed.

EVIDENCE:

The College has established an Institutional Review Board, as previously noted. The Chief Strategy Officer confirmed on 01.05.26 that one request was made and approved during this reporting period, which was subject to independent, ethical review via the IRB.

**4. Operate without an annual assessment or methodology of determining organizational cultural health.**

INTERPRETATION:

Compliance will be demonstrated when the College offers an annual assessment or methodology of determining organization cultural health during the regularly

scheduled monitoring of this policy. The findings of this assessment are considered and advanced where appropriate.

This interpretation is reasonable because an annual assessment or methodology of determining organizational cultural health is provided annually as requested.

#### EVIDENCE:

On 12.22.25, the CHRO confirmed that the College has regularly engaged the services of Belk Center for Community College Leadership and Research, based at the University of North Carolina, to benchmark Jackson College against community colleges nationally by learning directly from employees about how they perceive, and experience, their work at the College through an instrument called the PACE Survey. In November 2024 the PACE survey launched again and closed on 12.06.24. Throughout that month, multiple opportunities for employees to step away from their desks and take the survey were organized across campus.

While no formal annual assessment was conducted in 2025, there were various institutional surveys that were deployed to assess institutional health. It was decided in 2025 by the President and supported by Executive Council, that the methodology of determining organization cultural health during the next regularly scheduled monitoring of this policy (Fall 2026) would change.

The College has been in discussion with the Qualtrics organization to use in future annual assessments. Their methodology is trusted by over 1,800 educational institutions to understand what stakeholders are saying with a holistic view of the employee experience and allows the College to pinpoint key drivers of engagement and receive targeted actions to drive meaningful improvement.

This demonstrates compliance because a methodology of determining organizational cultural health is in place and will continue to be provided as requested annually through Qualtrics.

**The Jackson College Board of Trustees assessed this monitoring report and found that it demonstrated full compliance with a reasonable interpretation of the policy at the regular Jackson College Board meeting on January 12, 2026.**