



Jackson College Board of Trustees

Monitoring Report: EL – 09 Organization Culture

Report Date: 01.08.24

Report Status: Fully Compliant

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 Executive Limitations Policy: "Communication & Support to the Board". 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.

01.08.24

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

Date

POLICY STATEMENT:

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

INTERPRETATION:

Compliance will be demonstrated when the majority of Personal Management Interviews (PMIs), as well as PACE surveys affirm our institutional values and the integrity of the culture of a Total Commitment to Student Success (TCS2), given to the love care and service of others. Lagging indicators include the absence of whistle-blower reporting, as well as terminations related to poor employee behavior. Beyond this, the following items and related interpretations work to assure solid staff behaviors that indicate a strong level of integrity at the personal and organizational levels.

This interpretation is reasonable because multiple instruments are used for the verification of the College's culture as being one of high integrity.

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 Safe College's system has built in systems to determine if training is indeed completed.

EVIDENCE:

- a) The Chief Operating Officer confirmed on 12.20.23 that the Jackson College Code of Conduct and Ethical Practices is accessible on the College website under the President's landing page and is also searchable as a current College Policy. All Jackson College employees are required to review the policy annually in the Vector Solutions on-line training tool with system data revealing the level of participation.
- b) The Director of Human Resources confirmed on 01.04/24 that 96.8% 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 is a mechanism 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.

EVIDENCE:

- a) The Chief Operating Officer confirmed that the current anonymous tip line “411” is used by students and employees to anonymously report allegations of suspected improper activities and that accessing same is communicated to employees and students.
- b) The Chief Operating Officer confirmed on 01.05.23 that we are currently under contract and in the process of implementing a new 24/7/365 reporting tool with Vector Solutions where the complaint would go directly to the office of the College’s attorney (i.e., independent of the College).
- c) The Director of Human Resources confirmed on 01.05.24 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 01.05.24 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:

The Interim Chief Student Services Officer on 01.05.24 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 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. The Interim Chief Student Services Officer confirmed on 01.05.24 that one request was made and approved during this reporting period, and that this request did comply with the College's 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 (IRB), as previously noted. The Interim Chief Student Services Officer confirmed on 01.05.24 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.

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

EVIDENCE:

The College has historically engaged the services of Belk Center for Community College Leadership and Research, based at the University of North Carolina, every two years, to benchmark Jackson College against community colleges nationally by hearing directly from employees about how they perceive, and experience, their work at the College (called the PACE Survey). The survey was conducted last in the Fall 2022 and results were shared with the College. More specifically, the results were presented first to the Leadership Council and also the Workforce Focus Committee (which includes representation from faculty, staff and administration, including both union presidents and the Chief Diversity Officer). The Workforce Focus Committee discussed the results at length at both the March '23 and April '23 meetings. The Workforce Focus Committee focused on communications and information which was shared out to employees on 03.27.23. Under the topic of Diversity, Equity and Belonging and potential next steps, the CDO stated she was going to review the information.

The Chief Operating Officer confirmed on 01.05.24 that the Leadership Council, at the direction of the President, began more deeply reviewing the outcomes of the PACE Survey in Fall '23 based upon comments made by College employees, with additional actions taken in recognition of employee comments. Additionally, the President confirmed on 01.05.24 that he had established a team through the Workforce Focus Committee in Fall '23 to further examine and develop those survey recommendations for consideration by the Leadership Council in an effort to build the College's organizational health. Multiple meetings have been conducted by that team since then, leading to the additional deployment of employee recommendations, where appropriate. On 01.09.24 a breakout session during the Spring Convocation will be held to bring all employees up to date on work accomplished based upon PACE Survey findings. The Leadership Council will receive an update on the PACE Survey recommendations and status on 01.17.24.

Finally, the PACE survey will be deployed annually, beginning in calendar 2024.

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 8, 2024.