



**Jackson College Board of  
Trustees**

**MONITORING REPORT FOR EL – 09  
Organization Culture  
DATE: 1.9.23**

**Board Policy is indicated in bold typeface throughout.**

I present this monitoring report regarding the Board's Executive Limitations Policy: "Organization Culture", according to the schedule previously defined and approved by the Board. I certify that the information contained in herein is true and represents compliance within a reasonable interpretation of the policy, unless specifically stated otherwise. Interpretations are unchanged from the previous report, unless otherwise noted.

1.09.23

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Daniel J. Phelan, Ph.D.  
Chief Executive Officer

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Date

**POLICY STATEMENT: The Chief Executive Officer 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 is reasonable insofar as multiple instruments are used for the verification of the College's culture as being one of high integrity.

**EVIDENCE**

- a) Overall PMI Interviews and Annual Evaluations confirm our institutional culture and values.

- b) The Pace Survey was conducted anonymously in November. Results from our survey, benchmarked against other institutions, are expected in February 2023 and will be part of the next monitoring cycle report.
- c) The Chief Operating Officer confirmed on 12.16.22 that there were no employee complaints left on the anonymous 411 Tip Line during this reporting 12-month period.
- d) The Chief Operating Officer confirmed on 12.16.22 that there were 2 employees who were dismissed for poor behavior/performance during this reporting period.

**Further, without limiting the scope of the above by the following list, the Chief Executive Officer shall not:**

- 1. Operate without an enforced internal Code of Conduct, 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 Conduct and Ethics policy that is current and accessible to anyone, but that all employees have affirmed their compliance with same.
- b) Notices from Safe Colleges, 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 College has a Code of Conduct and Ethical Practices policy on file, as confirmed by the Chief Talent Officer on 12.16.22.
- b) On 12.12.22, the HR Consultant/Title IX Investigator confirmed 97.1% of employees completed the required Code of Conduct and Ethical Practices self-paced training program.

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

INTERPRETATION:

Compliance will be demonstrated when:

- a) There is a mechanism for confidential reporting of incidents that implicate the Chief Executive Officer, or Trustee, to the Board Chair, Vice Chair or to the College Attorney, who reports directly to the Board.
- b) There are 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.
- c) There is a system in place that, for those incidents that do not implicate the Chief Executive Officer, 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.
- d) There is a process 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.
- e) There is a process 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) Our current confidential 411 Tip Line is the mechanism for confidential reporting The College Attorney is prepared to investigate any tip as the contractor/agent of the board. Its functioning was confirmed by the Chief Operational Officer on 12.16.22.
- b) The College has promoted the use of the 411 Tip Line tool to all employees, via the College's web site. The Tip Line is also promoted via the employee newsletter, as confirmed by the Chief Operating Officer on 12.16.22.
- c) The college has trained investigators and would request that legal counsel appoint an external investigator. The College currently has an updated nepotism policy, as verified by the Chief Operating Officer on 12.16.22.
- d) The notification process is under the College's Code of Conduct, Values and Beliefs statement, as confirmed by the Chief Executive Officer on 12.26.22. All College employees will be held accountable under the labor agreement, which is a legal and binding document that includes progressive discipline for actions, including and up to termination.
- e) College has a process in place wherein employees can reach out to their union representative, MEA Representative, or file a complaint with the Federal Whistleblower Hotline, as verified by the Chief Operating Officer on 12.16.22.

**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 given that such practice is consistent with common methods employed in the higher education community.

**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 community.

**EVIDENCE**

The Chief Operating Officer on 12.12.22 confirmed that the College has an Institutional Review Board (IRB) policy for this work.

**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 and that it is used for independent, ethical review of all research work involving humans or animals.

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

**EVIDENCE**

- a) The College has established an Institutional Review Board, as noted previously. The Chief Academic & Student Services Officer confirmed on 12.16.22 that no requests or approvals were given during this reporting period.