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## **Criterion 2. Integrity: Ethical and Responsible Conduct**

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The institution acts with integrity; its conduct is ethical and responsible.

### **2.A - Core Component**

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The institution establishes and follows policies and processes to ensure fair and ethical behavior on the part of its governing board, administration, faculty, and staff.

1. The institution develops and the governing board adopts the mission.
2. The institution operates with integrity in its financial, academic, human resources, and auxiliary functions.

### **Argument**

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#### **2.A.1 – The institution develops and the governing board adopts the mission.**

As discussed in Criterion 1.A., the University of Denver (DU) developed the current mission statement in 2006, with review and ratification by the governing and advisory bodies of the University, including the [Faculty Senate](#), [the Staff Advisory Council](#), [the Undergraduate Student Government](#) (USG), [the Graduate Student Government](#) (GSG), [the Deans' Council](#), [the Administrative Council](#) (now called the University Council), the Senior Staff (now called the Chancellor's Cabinet), and ultimately the [Board of Trustees \(BOT\)](#). The strategic plan, DU IMPACT 2025, makes evident the university's continuing commitment to the mission.

#### **2.A.2 - The institution operates with integrity in its financial, academic, human resources and auxiliary functions.**

##### **Financial Integrity:**

To operate with integrity in all financial matters, DU follows processes for fair and ethical behavior and policies.

DU is audited annually by an external firm and has been audited by Clifton Allen Larsen (CLA) since 2014. The University also houses the [Office of Internal Audit](#) which independently and objectively examines and evaluates financial and operational activities. Internal Audit identifies opportunities to improve operations and reduce risk, ultimately to increase the chances of meeting strategic goals and provide assurance of the University's financial integrity. The Director of Internal Audit reports functionally to the BOT Audit Committee and administratively (i.e. day-to-day operations) to the Vice Chancellor of Legal Affairs [[Org Chart](#)].

Internal Audit selects areas of focus based on an organization-wide risk assessment that provides an objective evaluation as to whether current procedures reasonably achieve the goals of key processes. In the past 10 years, DU has audited 60 areas on campus. Internal Audit, with University Counsel and Enterprise Risk Management (ERM), manages the anonymous [hotline reporting system](#) to ensure DU's compliance with state and federal laws.

Internal Audit also manages the [Conflict of Commitment and Interest Policy](#). DU expects the highest standards of conduct and university representatives must fulfill their institutional responsibilities with loyalty and must avoid involvement in activities that conflict with, or appear to conflict with, those responsibilities.

The BOT and senior leadership approve and promulgate [policies](#) related to Business Operations, Fiscal and Business Affairs, and Funds and Accounts [Examples: [Budgetary Responsibility and Structure](#), [Consolidated Endowment Fund: Management and Distribution](#), and [Business Expense Policy](#)]. For example, the policy regarding [Limits of Authority](#) clearly defines the roles and responsibilities of contractual authority for University positions. The resolution is updated annually upon approval by the Finance and Budget (F&B) Committee of the BOT.

Three BOT committees meet regularly to ensure financial integrity of the institution through governance and oversight of University operations:

**[F&B Committee](#):** This committee is responsible for the financial governance of the University, to include adoption of the annual budget, review of budget variance to actual performance, and oversight of capital project planning and execution [[December 2019 Agenda](#)].

**[Investment Committee](#):** This committee's responsibilities include overseeing the endowment and policy development. The Investment Committee has authority to act on endowment matters, including selection of investment managers, specific investment decisions, spending distribution rate, and determining the asset allocation of the University's financial assets.

**[Audit Committee](#):** This committee is responsible for ensuring a sound internal control environment through consultation primarily with the Chancellor and Senior Vice Chancellor for Business Affairs and University Treasurer. The committee reviews the development and implementation of the ERM framework, assists in the selection and retention of external auditors, regularly reviews audit documents and accounting changes, and examines internal audit results [[January 2020 Agenda](#)].

To demonstrate financial soundness, discussed further in Criterion 5, Moody's and Fitch, bond rating agencies, have recently rated the University of Denver A and AA, respectively.

DU is committed to transparency and engaged collaboration. With that guiding principle, the Office of the Provost annually provides access to the University's Budget Transmittal to all DU employees and welcomes questions from the community [Pre-Coronavirus [2019-2020 Budget Transmittal](#), [Updated 2019-2020 Budget Transmittal](#)]. During the COVID-19 pandemic, the university engaged the community again in a budget process in light of the changing financial

situation. This is all discussed in depth in Criterion 5 and in the Coronavirus appendix (forthcoming).

In addition, the Office of University Budget, Planning, and Administration works in concert with the Controller's Office and Shared Services to provide planning tools and training on the University's budget, finance, and human resource systems and processes. The office provides information, training documents, and professional development resources for business officers through an online [course](#) and resources such as the [Business Officer Training Schedule](#) and [Location of Key Systems and Processes](#).

Policies and procedures, published on PioneerWeb, (the University's intranet) and on the [Business and Financial Affairs website](#), set forth community expectations, such as [purchasing card policies and procedures](#). The [Code of Business Conduct](#) is a guide for appropriate business behavior for the BOT, employees, and contractors doing business with DU, in addition to students and other individuals providing services as volunteers [[Supplier Code of Conduct](#)]. The University also utilizes software such [Pioneer Travel and Expense](#), for business-related travel to help ensure accountability and precision in faculty and staff travel expenditures.

In addition, the [intellectual property \(IP\) policy](#) and support available via the tech transfer office provide transparency and certainty on the ownership and disposition of IP created using University resources to allow commercialization and transfer of such IP to the public good through economic development. The policy also seeks to protect the traditional rights of scholars and the products of their intellectual endeavors.

### **Academic Integrity:**

DU promotes an environment of shared responsibility, advancing a community of critical, ethical, and civically engaged thinkers. DU approaches academic integrity realistically, inclusively, and pedagogically for all its members: BOT, administration, faculty, students, and staff. The University [Honor Code](#) establishes the ethical foundation for all community members to support intellectual inquiry in pursuit of the public good. The BOT has one committee dedicated to ensuring academic integrity that meets regularly:

[Faculty and Educational Affairs \(FEAC\) Committee](#): This committee is responsible for reviewing the composition and quality of academic programs, approving new or modified academic programs, assessing programs relative to other comparable institutions, and considering enrollment goals [[June 2019 Agenda](#)].

Preventing academic misconduct is a responsibility of all University community members. Policies and procedures are applied with understanding and intentionality, including attention to student identities (learning, cognitive, gender, race, socio-political, socioeconomic, cultural, physical, etc.). The [Academic Misconduct Process Flow Chart](#) outlines the process. CLIE lists the [types of academic misconduct violations](#). As appropriate, a developmental [restorative justice approach](#) is taken for students who violate the Honor Code. The institution has several resources for understanding and responding to academic misconduct. If any individual wishes to report violations of the honor code, they are invited to fill out the [University Academic Misconduct](#)

[Students Right and Responsibilities Incident Form](#). Criterion 2.E.4. details how the University enforces academic dishonesty.

Some of the professional schools have additional codes of conduct for their students. For example, Sturm College of Law (SCOL) has a separate Code of Academic Conduct and students in the Graduate School of Professional Psychology (GSPP) sign an honor code that is in line with the American Psychological Association [ [Guidelines for Ethical Behavior](#)].

Active students may appeal academic and student status related decisions and/or seek resolution of complaints or grievances through the [Academic Grievance and Appeal Procedure](#). The Academic Exceptions Committee considers student requests for exceptions to University-wide academic policies [[Academic Exceptions Policy](#)]. As warranted, employees are able to file grievances [[Employee Grievance Process](#)].

DU is firmly committed to the safeguarding and accurate maintenance of student records. Students can access information on their rights regarding educational records as outlined from the Family Educational Rights and Privacy Act (FERPA) of 1974 through the [Office of the Registrar](#). General questions, concerns, or informal complaints are also directed to the Office of the Registrar.

DU is dedicated to integrity in its academic research activities. [ORIE](#) supports the efforts of the DU research community in their research endeavors to ensure active adherence to the ethical principles and professional standards essential for the responsible practice of research. ORIE works closely with ORSP and the Office of the Provost to encourage faculty, students, and staff to conduct research activities with the highest ethical standards. The [Misconduct in Research Policy](#), covered in depth in Criterion 2.E., requires each member of the university community take responsibility for intellectual honesty and the highest ethical standards in research.

### **Human Resources Integrity:**

In order to operate with integrity in all personnel matters, DU establishes and follows policies and processes for fair and ethical behavior on the part of the BOT and employees. The BOT have approved numerous [policies](#) for benefits, employee relations, equal opportunity, faculty personnel guidelines, leave, separation and rehire, and enterprise risk management [Examples: [Benefits Eligibility Criteria](#), [Affirmative Action](#), [Workers Compensation Policy](#)].

The [Employee Handbook](#) outlines expectations for University community members. All employees receive instructions on how to access the electronic handbook during orientation. [Faculty appointment, tenure, and promotion](#) guidelines are published through the Faculty Senate. Information on the various appeal processes at each level are included in the guidelines.

To promote a fair, consistent and equitable hiring process at DU, both a [staff hiring guide](#) and a [faculty hiring guide](#) were developed and implemented to promote best practices for hiring supervisors in 2017. The Manager of Recruiting Services partners with the Office of Equal Opportunity to provide quarterly trainings for all hiring supervisors and staff search committee members.

The [Office of Equal Opportunity](#) and Title IX is responsible for ensuring compliance with the University's anti-discrimination policies. In 2014, DU approved a [Discrimination and Equal](#)

[Opportunity Policy](#) that outlines how DU strives to create and maintain a community in which people are treated with dignity, decency, and respect.

In terms of performance management, DU provides clear policies regarding the [employee evaluation process](#) in the Employee Handbook. Employees can also find more specific information regarding [performance management](#) on the [People Development](#) section of the [Human Resources and Inclusive Community](#) (HRIC) website.

The University also has policies that outline clear expectations for employee behavior, including rights and responsibilities [Examples: [Alcohol](#), [Employee Political Involvement](#), [Social Media Use](#) and [Freedom of Expression](#)]. The IT department also outlines several policies around acceptable use, email, software and more [Examples: [Secure Computing](#), [Email as Official University Communication](#), [Computer and Network Acceptable Use Policy](#).]

In 2016, DU completed a [Staff Compensation Study](#) that covered approximately 1,500 benefited staff employees [[Purpose and Outcomes](#)]. The study created consistent job descriptions, titles, and salary grades and ranges for benefited staff employees. This study also established the framework for how the University views all elements of employee compensation as well as a foundational set of approaches and tools to ensure consistent practices. On the [HRIC website](#), employees can find general job descriptions and career ladders for some of the staff positions on campus [example: [Business Officer, I, II, III, IV](#)].

In 2019, DU conducted a voluntary [Pay Equity Study](#) to determine whether systemic inequities impact our non-union benefited faculty and staff salaries based on gender and under-represented minority status. The University hired a third-party vendor, Gallagher, to conduct the study, guided by an administrative team with input from a University Advisory Committee.

Additionally, there is an annual analysis of DU's tenure-line faculty salaries by discipline and rank compared to peer institutions. The results are distributed to deans and used to assist with distribution of additional funds for market-based adjustments. The average salary deficit for University faculty members was \$3,652 in FY2017, compared to a deficit of \$5,405 in FY2015, and a deficit of \$9,235 in FY2013 [[Faculty Salary Study Fall 2018](#)].

### **Integrity in Auxiliary Functions:**

DU manages auxiliary enterprises through third-party vendors, primarily bookstore operations with Follett Corporation, food services with Sodexo America, and custodial management with Aramark. In order to operate with integrity in all auxiliary matters, the University contractually requires that these third-party vendors meet financial and service expectations, including regular updates. Annual planning meetings are set with each vendor and routine meetings provide timely updates and allow both the University and the vendor to address service concerns.

The University also has processes in place to ensure that our third-party subcontractors or subrecipients on contracts and grants operate with integrity. The University abides by federal code 2 CFR 200, which defines the requirements for sub-recipients. As a result, the University performs a risk assessment both before a grant is awarded and once the agreement is issued. For risk assessment, the University uses a [score sheet](#) developed by the Federal Demonstration Partnership to rate the sub-award as low, medium or high risk and establish the appropriate subrecipient

monitoring requirements systems. All principal investigators must submit a Subrecipient Monitoring Record for the subaward that document any issues and resolution [[Subrecipient Certification Form](#), [Monitoring Notice Template](#), and [Monitoring Notice Sample](#)]. These sub-recipient monitoring records must be current before any future year's funding is released.

## **2.B - Core Component**

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The institution presents itself clearly and completely to its students and to the public.

1. The institution ensures the accuracy of any representations it makes regarding academic offerings, requirements, faculty and staff, costs to students, governance structure, and accreditation relationships.
2. The institution ensures evidence is available to support any claims it makes regarding its contributions to the educational experience through research, community engagement, experiential learning, religious or spiritual purpose, and economic development.

## **Argument**

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### **2.B.1 – The institution ensures the accuracy of any representations it makes regarding academic offerings, requirements, faculty and staff, costs to students, governance structure, and accreditation relationships.**

DU utilizes a variety of processes to ensure the quality and accuracy of data used for internal decision-making and external communications. The Board of Trustees (BOT) and Senior Leadership [[Provost](#), [Chancellor's Cabinet](#), [Deans](#)] institutionalize data integrity through transparency with the University community and a shared governance model. The shared governance structure serves as a checks and balances system for decision-making while supporting accurate data usage and dissemination. Furthermore, including the student voice on campus through student governance and associations, such as Undergraduate Student Government (USG), Graduate Student Government (GSG), and other student associations, ensures the quality of the information through accountability to student audiences.

Administratively, units work together to ensure data used for decision-making and information communicated is consistent and accurately portrays the institution. Key data stewards across campus, such as the Office of the Registrar, Human Resources and Inclusive Community (HRIC), Controller's Office, Office of Admission, [Office of Financial Aid](#), [Student Financial Services](#), Office of University Advancement, and Office of Research and Sponsored Programs (ORSP), work to ensure that data are entered correctly through department audits and trainings. Data shared between units for institutional operations and analysis are examined for accuracy and consistency during each endeavor. Additionally, [Enterprise Application Services of Information Technology](#) and the [Office of Institutional Research and Analysis \(IR\)](#) collaborate with University data stewards to ensure appropriate data usage. Particular working groups and committees, such as the [Registration and Billing Committee](#), [Registrar's annual Bulletin review](#), [Information Measurement](#)



[& Analysis Council](#), and the [Data Cleanup Project](#), promote data cleaning and accuracy. In addition, as discussed in Criterion 2.A.1., the function of the [Office of Internal Audit](#) is to examine University processes and procedures as determined by the administration, including data usage and/or misrepresentation.

IR delivers objective, systematic research and analysis to inform strategic planning, decision-making, and policy development. The complex interactions between academic and business systems and processes require the expertise of dedicated IR professionals to provide information and insight that promotes the strategic and appropriate use of data across campus. IR is the clearinghouse for official University data and responds to external requests for information [[Factbook](#), [Consumer Disclosures](#), [Common Data Set](#), [National Center for Education Statistics](#)]. Students, faculty, staff, and the public are aware of [accreditation relationships](#) with the institution, all of which can be found on the IR website.

Requirements for degree and certificate programs, admission standards, enrollment policies, the list of [major and minor requirements](#) and course descriptions are published in the [Undergraduate](#) and [Graduate](#) bulletins). [Academic Requirements, Policies and Procedures](#) are also listed for graduate students, including [Masters Degree Requirements](#), [Graduation Requirements](#), and [Doctoral Degree Requirements and Standards](#). The University publishes information outlined in [Higher Education Opportunity Act of 2008 online](#) to help students make informed decisions about achieving their educational goals.

Additionally, academic units publish unit-specific policies and requirements on their websites, including handbooks and coursework plans [[Josef Korbel School of International Studies \(JKSIS\) 2019-2020 Handbook](#), [Graduate School of Social Work \(GSSW\) Advanced Standing Course Planning Worksheet 2020](#), [Two Year Course Planning Worksheet 2021](#)].

The [Office of the Registrar](#) maintains degree requirements in an electronic degree audit system. The degree audit system is updated through the same curriculum administration workflow used for approvals and Bulletin editing. For undergraduate degrees, degree evaluators in the Registrar's office use the degree audit system as the primary tool to perform the degree clearance function. The same degree audit tools are used by the [Office of Graduate Education](#) (OGE) and the graduate schools for performing the degree clearance function.

The University's website is managed by the Office of Marketing and Communication (MarComm). While individual departments have the responsibility to edit their respective websites, MarComm maintains the ultimate approval on all published content [[Academic Programs Content Governance](#) and [Academic Programs Maintenance Plan](#)]. In 2017, the university went live with DU's [website](#) overhaul. With the new design, the University has made information more accessible and easier to navigate. For example, with the new architecture, the [student resources](#) page is now located centrally and updated in partnership with the Office of Graduate Education and the Campus Life and Inclusive Excellence division. This structure helps the University to ensure the accuracy of the information it presents.

Within the [main Undergraduate Admission webpage](#), [financial aid and scholarship information](#), including the cost of attendance for [undergraduate students](#) and [graduate students](#), is readily

available. Also, from the [main admissions page](#), individuals can search and find a listing of [degree programs](#) with application instructions and [requirements](#). All recruitment materials accurately reflect the institutional mission [Examples: [College of Natural Sciences and Mathematics Recruitment Email](#), [Undergraduate Student Customized Viewbook](#), [Information Session Presentation for Undergraduate Students](#), Admitted Student Brochure [2017](#) and [2020](#).]

The [DU directory](#) pulls information from the Banner system to ensure that faculty and staff directory information is accurate. Faculty and staff members are responsible for updating their personal information. Faculty also are responsible for updating their biography in Academic Insights. Academic unit websites also feature a list of current faculty and staff [[College of Natural Sciences and Mathematics faculty directory](#), [Graduate School of Social Work faculty](#), [Graduate School of Professional Psychology](#)]

**2.B.2. The institution ensures evidence is available to support any claims it makes regarding its contributions to the educational experience through research, community engagement, experiential learning, religious or spiritual purpose and economic development.**

The Office of Institutional Research (IR) maintains [multiple data dashboards](#) available to the community including but not limited to: [general facts](#), [degrees awarded](#), [graduation rates](#), [financial aid](#) and [study abroad](#). In addition, *Data Insights* is a secure access reporting tool that provides operational and historical data for strategic planning at the University [[Dashboard Home Page](#), [Example Report 1](#) and [Example 2](#)].

In early 2017, DU launched a [Diversity and Inclusive Excellence website](#) designed to improve communication about diversity efforts and to consolidate the many resources available to our community. In partnership with IR, ODEI created the [Diversity Dashboard](#), which provides a snapshot of [student demographic composition](#), [campus climate](#), [student engagement benchmarks](#), and [student outcomes](#).

Many departments, centers, and units produce annual reports that provide evidence of their impact. For example, the Center for Community Engagement to advance Scholarship and Learning (CCESL) produces publicly accessible [end-of-the-year reports](#) that detail the impact of programming such as the community-engaged learning mini grants and community-engaged fellows [[2018-2019 Report](#)]. The [Interdisciplinary Research Institute for the Study of \(in\)Equity](#) (IRISE) also produced [an annual report](#) in 2018-2019 in which they highlighted the work of their faculty fellows, post-doctoral students, and more. The Office of International Education (OIE) also produces an annual report that details the activities of study abroad and Cherrington Global Scholars [[2018-2019 Report](#)]. DU is currently [ranked third in the nation](#), according to Open Doors, in leading institutions for study abroad at 77.4% of our students. The [Cherrington Global Scholars initiative](#) is the main driver in the institution's ability to send so many students abroad. In the academic year 2018-2019, 86.59% of students who studied abroad were Cherrington Global Scholars [[Cherrington Data](#)].

The Office of Career and Professional Development issues a First-Destination Outcomes Report annually that details undergraduate and graduate student employment, internship, and salary outcomes [[Class of 2018 Report](#)]. These outcomes are discussed in depth in Criterion 4.A.



ORSP also produces an annual report that covers topics such as research performance, faculty and student reports, research integrity, and education and award abstracts [[2018-2019 Annual Report](#)]. The Senior Vice Provost for Research produces an [annual report](#) and quarterly newsletters that provide reflections and quantitative data on the number of students and faculty supported as well as institutional resources expended to support research [[Fall 2019](#), [Spring 2017](#), [Fall 2015](#)].

## 2.C - Core Component

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The governing board of the institution is autonomous to make decisions in the best interest of the institution in compliance with board policies and to ensure the institution's integrity.

1. The governing board is trained and knowledgeable so that it makes informed decisions with respect to the institution's financial and academic policies and practices; the board meets its legal and fiduciary responsibilities.
2. The governing board's deliberations reflect priorities to preserve and enhance the institution.
3. The governing board reviews the reasonable and relevant interests of the institution's internal and external constituencies during its decision-making deliberations.
4. The governing board preserves its independence from undue influence on the part of donors, elected officials, ownership interests, or other external parties.
5. The governing board delegates day-to-day management of the institution to the institution's administration and expects the institution's faculty to oversee academic matters.

### Argument

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#### **2.C.1. The governing board is trained and knowledgeable so that it makes informed decisions with respect to the institution's financial and academic policies and practices; the board meets its legal and fiduciary responsibilities.**

The [University of Denver Board of Trustees](#) (BOT) consists of [28 voting board members](#), divided into four classes of seven members each, all elected and appointed for four-year terms. Its primary roles include selection and performance assessment of the Chancellor, management of the endowment and investments of the University, oversight of financial and other controls, legal and other compliance, and approval of strategic plans and annual budgets. The Board operates in significant measure through its nine [committees](#): *Advancement, Athletic Affairs, Audit, Executive, Faculty and Educational Affairs, Finance and Budget, Investment, Nominating and Governance, and Campus Life and Student Success*. Chairs and members of these committees are appointed annually by the Chair of the BOT, with the Chancellor's advice and counsel. Except where indicated, the Chair may appoint non-trustee members of committees to bring additional skills, expertise and/or perspectives.

The onboarding process for new members ensures that the Board is trained and knowledgeable in order to meet its legal and fiduciary responsibilities. The Nominating and Governance Committee makes nominations for officers and vacancies in the BOT and presents its nominations at the annual meeting [[Nominating and Governance Committee Charter](#)]. Each Trustee receives an orientation briefing and a campus tour as soon after election as feasible [[Section 4 Bylaws](#)]. At or prior to such briefing, each new Trustee shall also receive Trustees' Orientation materials important to service as a Trustee, including but not limited to the Charter, Bylaws, copies of minutes of Trustees' meetings of recent years, most recent annual audit report, most recent budget, University catalogs, and similar materials. The committee is also responsible for the evaluation of

Trustees' performance in trusteeship and of Trustee attendance at meetings of the Board and, if necessary, for providing recommendations concerning removal of any Trustee [[Considerations for Appointment of Trustees](#).] In addition, the Nominating and Governance committee provides oversight and recommendations to the Board on the selection of the chair-elect [[Chair Position Description](#)].

The Board Chair is elected at the annual meeting or any other meeting having such action within its purpose. The Chair serves in that position for a term of four years and until the Chair's successor has been elected; or until the Chair's inability to serve, disqualification, resignation, or removal [[Article 3, Section 2 Bylaws](#)].

Trustees may serve no more than three consecutive full terms; however, a Trustee is eligible for re-election to the Board following one year's absence from Board service.

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

The BOT abides by the [BOT bylaws](#) to make decisions in the best interest of the institution and to assure its integrity. For example, the September 2019 board meeting included a discussion about operating margin and enrollment, which included an update from the Vice Chancellor of Enrollment on the fact that DU did not achieve its undergraduate enrollment goal. This information was essential as the community deliberated on the plan how to make up that loss. Most significantly, working with the Board of Trustees throughout the COVID response has been essential as we protect the core academic function of the institution amid financial crisis while making key budgetary decisions.

Throughout the DU IMPACT 2025 planning process, ongoing consultation with the BOT occurred in meetings of the full board as well as executive committee meetings. In addition, the Strategy Committee of the Board engaged in the process, and two committees (CLASS and FEAC) contributed in their regular meetings [[Strategic Planning Process](#)].

The BOT has made two significant decisions regarding Chancellorship over the last ten years. In January 2014, former Chancellor Coombe announced his planned retirement. Through an established relationship with a search firm, DU was able to ensure candidate deliberations reflected the priorities that preserved and enhanced institutional values. Douglas Scrivner, then Chair-Elect of the BOT, a DU alumnus, and an adjunct faculty member at Sturm College of Law, chaired the search committee. The committee was diverse and represented DU's constituencies. Throughout the process, smaller representative groups of faculty, staff, students, and administration also met with the candidates. In June 2014, the BOT announced the [hiring of Chancellor Rebecca Chopp](#).

In April 2019, in an executive session of the BOT, Dr. Chopp [announced her decision](#) to step down as Chancellor due to a serious health condition. When Chancellor Chopp initially announced her decision to step down, the BOT executive committee worked with the Faculty Senate, campus leadership, several affinity groups, the broader community, and national experts in higher education to explore the qualifications DU might need and want in its 19th chancellor. Chair of

the Board, Denise O’Leary, sought feedback from the campus community via email as well, reviewing all (46) emails that were sent between May 9<sup>th</sup> and June 4<sup>th</sup>, 2019. After multiple campus conversations, the Board convened and evaluated the highly competitive nature of the current and future higher education landscape. The Board considered the importance of sustaining the focus and momentum our community has invested in DU IMPACT 2025. Upon reflection, the Board concluded with confidence that Jeremy Haefner, a national thought leader in student and faculty success and a champion of university goals, would chart a successful future for the University. On Friday, June 7, 2019, the BOT [voted to appoint](#) Jeremy Haefner, the sitting Provost, as the 19th chancellor, effective July 15, 2019.

As part of this process, on July 13, 2019, the Faculty Senate Executive Committee sent a [letter to BOT Chair Denise O’Leary](#) to state that while it recognized the Board’s reasoning and respected the qualifications of Provost Haefner, there were concerns that the appointment did not comply with the [Chancellor Search Guidelines](#) that had been approved by the BOT in 2003. The guidelines, which were shared with the BOT by the Faculty Senate president in May 2019, recommends a Chancellor search process that had not been followed. To address this concern, the Senate’s letter enumerated five measures to improve shared governance moving forward. On August 28, Chair O’Leary responded to the Senate letter agreeing to those requests in principle and as of March 2020, three of the five recommendations have been implemented [[Provost Search Leadership](#), [Establishing R1 Discussion Processes](#), and [Shared Governance Understanding Process](#)].

Chair O’Leary and Chancellor Haefner spent the next several months meeting with campus groups to communicate the decision-making process to the campus community because the appointment process deviated from past practice. For example, in August 2019, the DU Women’s Coalition [invited campus](#) to join Chair O’Leary and Chancellor Haefner in conversation to share their perspectives on the recent changes in leadership. Over 100 people attended the event. Chancellor Haefner and/or Chair O’Leary met with Alumni of Action, Faculty of Color Association (FOCA), Staff of Color Association (SOCA), every academic and cabinet unit, the Staff Advisory Council (SAC), new faculty reception, DU IMPACT 2025 Steering Committee, Writing Program, Pioneer Leadership Program, English Language Center, HERS Institute, Queer Staff Employees, Queer Faculty Association, and the Women’s Leadership Council within the first year of his tenure.

### **2.C.3. The governing board reviews the reasonable and relevant interests of the institution’s internal and external constituencies during its decision-making deliberations.**

To ensure that the governing board reviews the reasonable and relevant interests during its decision-making deliberations, the BOT follows a [yearly agenda cycle](#). At the beginning of each academic year, the BOT creates work plans for committees and the Chancellor and Board Chair develop a plan of work for the Board. For example, at FEAC meetings, academic unit deans provide a written report each quarter and one or more units present orally. In addition, standard reports are scheduled for three of the four FEAC meetings:

- September: Faculty teaching report with a credit hour analysis;
- January: Review of Board-approved academic program changes, promotion and tenure recommendations and sabbatical leave recommendations;

- June: Five-year budget, review of approved academic programs, and faculty award recommendations.

**2.C.4. The governing board preserves its independence from undue influence on the part of donors, elected officials, ownership interests, or other external parties.**

Annually, trustees and other senior campus leaders sign a Letter of Commitment that details the members' commitments and responsibilities and asks for conflicts of interest statements. Board members also sign the [Conflict of Interest Disclosure](#) annually as required by the Audit Committee.

**2.C.5 The governing board delegates day-to-day management of the institution to the institution's administration and expects the institution's faculty to oversee academic matters.**

The [Board](#) delegates broad responsibility for management of the University and for day-to-day operations to the Chancellor, other leadership, and the faculty. As detailed in [Article 5, Section 1](#) of the BOT Bylaws, the Chancellor is the chief executive and administrative officer of the University and has general oversight over all departments of instruction. For example, the preparation of the annual budget is carried out under the supervision of the Provost, working under the direction of the Chancellor [[Article 7, Section 1 Bylaws](#)].

In addition, as detailed in [Article 7](#) of the BOT bylaws, the Provost and Executive Vice Chancellor is the chief academic officer and is responsible for day-to-day operations including academic planning and policy, preparation of the university's budget, faculty development, student enrollment, student affairs, and other campus operations assigned by the Chancellor. As another example, the Senior Vice Chancellor for Financial Affairs and University Treasurer is the chief financial officer and is responsible for financial planning, policy and control, debt and asset management, and more. Other administrative personnel, such as Vice Chancellors, are appointed and removed by the Chancellor, who also determines the duties of each position.



## 2.D - Core Component

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The institution is committed to academic freedom and freedom of expression in the pursuit of truth in teaching and learning.

### Argument

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#### **2.D – The institution is committed to academic freedom and freedom of expression in the pursuit of truth in teaching and learning.**

Academic freedom is critical to DU’s mission; without it, faculty would not be able to fully promote learning, advance scholarly inquiry, cultivate critical and creative thought, or generate knowledge. Following an affirming vote by the full faculty, the BOT approved updated [Policies and Procedures Relating to Faculty, Appointment, Promotion, and Tenure](#) in 2015. This document reaffirms the University’s support for the academic freedom of its faculty throughout their careers. Specifically, in Section 1.1., the University acknowledges that academic freedom is the bedrock principle upon which the advancement and dissemination of knowledge rests.

In Spring 2016, Faculty Senate appointed an ad hoc committee to draft an explicit statement on freedom of expression (FOE). The committee researched free speech policies from other universities and past speech controversies on the DU campus. It met with faculty, staff, and students across campus. During the fall of 2016, an incident involving expression that some found offensive on an (informally named) “Free Speech Wall” heightened both tension and awareness on campus about free speech issues [[DU Clarion Article](#)].

The committee presented a draft FOE statement to Faculty Senate at a special meeting in April 2017 and revised its draft in response to feedback. Faculty Senate then sponsored two campus-wide meetings to discuss the draft statement. In May 2017, Faculty Senate adopted the [Statement of Policy & Principles on Freedom of Expression](#). In June 2017, it was approved by a vote of 86 percent of the full faculty, and in January 2018, it was endorsed and affirmed by the BOT.

This policy defends and supports the stance that freedom of expression is vital to the fundamental goals of DU and higher education. Recognizing that there can be challenges, especially with controversial speech, the policy creates a [Freedom of Expression Committee](#) to develop opportunities for meaningful dialogue around contentious issues and to ensure the principles of free speech are upheld. The Committee serves an advisory role to the Chancellor and is charged with proactively creating forums for meaningful, responsible engagement of diverse and opposing viewpoints. The committee comprises students, staff, and faculty members chosen after an open call for participation made to the entire campus [[Open Call December 2018](#)].

In order to ensure safety at public events, [the Speaker and Public Events policy](#) outlines the procedure for notifying Conference and Event Services (CES) of public speakers. Requests are submitted through the University scheduling software or a [form](#). CES reviews the speaker information and notifies relevant stakeholders for additional input, which may include consultation

with the Freedom of Expression committee. The stakeholders provide their expertise if additional planning steps are needed to ensure a safe, robust experience for event attendees.

## 2.E - Core Component

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The institution's policies and procedures call for responsible acquisition, discovery and application of knowledge by its faculty, students and staff.

1. Institutions supporting basic and applied research maintain professional standards and provide oversight ensuring regulatory compliance, ethical behavior and fiscal accountability.
2. The institution provides effective support services to ensure the integrity of research and scholarly practice conducted by its faculty, staff, and students.
3. The institution provides students guidance in the ethics of research and use of information resources.
4. The institution enforces policies on academic honesty and integrity.

### Argument

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#### **2.E.1 Institutions supporting basic and applied research maintain professional standards and provide oversight ensuring regulatory compliance, ethical behavior and fiscal accountability.**

DU is dedicated to the highest standards of research integrity and is committed to responsible and ethical conduct for all those involved in research.

In alignment with federal regulations and state laws, University policies recognize researchers may have financial interests in research sponsors and/or in entities with business interest closely related to their research. The [Office of Research and Sponsored Programs \(ORSP\)](#) is responsible for the financial oversight of research spending and provides annual reports and regular updates on specific metrics to ensure compliance [[FY2019 Annual Report](#)]. In the fall of 2018, DU completed its most recent comprehensive research audit with the Clifton Larson Allen LLP (CLA), which identified no findings. ORSP also completed an institutional audit of research in the fall of 2019 and identified no findings.

Within ORSP, the [Office of Research Integrity and Education \(ORIE\)](#) oversees and implements research conflict of interest (COI) [policies and procedures](#), ensures compliance with applicable research COI regulatory requirements, and provides guidance and support regarding COI policies, systems, standards, and procedures. All DU faculty and staff investigators are required to complete a COI [disclosure](#) annually and must update their disclosure if a new COI arises during the year.

ORIE is also home to the [Human Research Protection Program \(HRPP\)](#) and the [Institutional Review Board \(IRB\)](#), the [Institutional Animal Care and Use Committee \(IACUC\)](#) and [Institutional Biosafety Committee \(IBC\)](#). These compliance committees are responsible for reviewing and overseeing research protocols involving human subjects, animals, or biological materials.

The [HRPP](#) is a comprehensive system designed to ensure the protection of the rights and welfare of participants in human research. The HRPP is composed of institutional leadership, the ORIE

staff, the Institutional Review Board (IRB), the Post Approval Monitoring (PAM) Program staff, investigators and their study staff, and other relevant offices. Federal Wide Assurance (FWA #00004520) with the U.S. Department of Health and Human Services (HHS) Office of Human Research Protections (OHRP) has been established by DU. The DU IRB is covered by HRPP [policies and procedures](#).

The [IACUC](#) is charged with oversight functions to provide ongoing assessment of the animal care and use program and to ensure that any research involving animals is conducted according to federal regulations. DU requires all individuals who are investigators conducting research involving animals to complete mandatory training before approval will be issued for any new project or new personnel are added to a protocol. Through the [Collaborative Institutional Training Initiative \(CITI\) Program](#), training modules are available for faculty, staff, and students who are investigators or key personnel working with animals. In 2010, and again in 2019, DU [received full accreditation](#) from the Association for Assessment and Accreditation of Laboratory Animal Care.

The [IBC](#) reviews, approves, and oversees research and teaching activities that involve the use of recombinant or synthetic DNA/RNA and other biohazardous agents. The IBC's primary objective is to safeguard protection of personnel, the general public, and the environment. To meet this goal, the IBC works with the DU [Environmental Health & Safety](#) (EHS) Department to establish requirements for safe laboratory and biological safety practices, and to review and approve policies, procedures, and training programs pursuant to the safe use of biological agents, other biological materials, and toxins. IRB, IACUC, and IBC compliance committees are provided with ORIE administrative and professional personnel to oversee the research conducted by affiliated investigators on the DU campus. In addition, before IRB approval, the institution requires investigators conducting research using recombinant or synthetic DNA/RNA and other biohazardous agents to complete [mandatory training](#).

The [Responsible Conduct of Research](#) (RCR) Program has been designed to meet the requirements outlined in Section 7009 of the America COMPETES Act, which mandates training in the responsible conduct of research for National Science Foundation (NSF) funded projects. [Training](#) is focused in nine core instructional areas, including but not limited to: data acquisition, management, sharing and ownership, peer review, and research misconduct. ORIE provides research compliance services, including conducting classroom presentation on various topics related to research ethics, research compliance workshops, and research ethics consultations.

On behalf of the Secretary of HHS, ORIE oversees and directs Public Health Service (PHS) research integrity activities. This includes oversight of research misconduct inquiries and investigations, as well as of institutional compliance. In consultation with the Senior Vice Provost of Research, ORIE administration assists in handling allegations of research misconduct and monitors and reports all research misconduct activities to ORIE through an annual report. ORIE also oversees and implements [Misconduct in Research policy](#) and encourages reports of ethical violations to the Anonymous Ethics Hotline via phone or [online](#).

Within the last five years, to better serve faculty, staff, and students, ORIE added two full-time positions—an IRB Research Compliance Administrator and a Research Compliance Monitor—as

well as an intern program. Furthermore, Sponsored Programs Administration, a department within ORSP that supports, monitors, and manages research proposals and awards, added two full-time grant and contract administrator positions and an intern program.

[Environmental Health and Safety](#) (EH&S) oversees and provides the [training](#) for laboratory safety and inspection required for every person working in a laboratory on campus. EH&S coordinates annual reviews and accountability through collaboration with ORSP and ORIE.

## **2.E.2 The institution provides effective support services to ensure the integrity of research and scholarly practice conducted by its faculty, staff, and students.**

DU supports its faculty, staff, and students in their research endeavors. The [Office of Research and Scholarship](#) reduces barriers to submitting proposals to external agencies, celebrates the accomplishments of the community, and promotes innovative ways to partner with industry and the local community in order to drive economic development and support the entire community's desire to become nationally recognized for its intellectual contributions to society.

As described in Criterion 2.E.1., the University research offices (ORSP and IRB) provide support for faculty and students in addition to their compliance function.

DU also has a robust seed funding system to support faculty research. This encompasses a wide variety of mechanisms to work in concert from broad to targeted areas and small to large investments. For consideration of funding, all faculty members must go through a peer review process as well as post-award reporting to ensure ethical behavior within all funding processes [Examples: [Professional Research Opportunities for Faculty](#), [Faculty Research Fund](#), [Public Good Fund for Faculty \(RFP\)](#), [Internationalization grants](#), and [Knoebel Institute for Healthy Aging pilot grants](#)].

Additionally, the [Undergraduate Research Center](#) (URC) is a centralized campus resource that provides educational and funding resources for students to develop their research skills and to learn how to conduct ethical research. All students who receive grants from the URC work with a faculty mentor in their discipline who provides research guidance and methodological expertise to develop high-quality research products. All grant proposals are vetted by an interdisciplinary faculty committee that reviews the promise and integrity of the proposal based on research novelty and impact, proposed methods, writing presentation, personal student outcomes, student preparation, and faculty collaboration [[Evaluation Rubric](#)]. Students conducting human or animal research cannot receive any awarded funds until they have received IRB or IACUC approval. URC also collaborates with ORIE to help students understand the expectations, policies, and responsibilities connected to their research. The URC provides information about [intellectual property guidelines](#).

The Office of Teaching and Learning (OTL) provides [sample syllabus statements](#) about Honor Code/Academic Integrity, Research Center Services, and other resources for faculty to use when creating their syllabi. In this way, students receive regular and consistent reminders of how to access research support with respect to information resources.

As discussed in Criterion 2.A. and B, the [University's Student Rights & Responsibilities](#) (SRR) office is a resource for students to learn about their roles, responsibilities, and expectations for ethical behavior grounded in the values of respect, integrity, and responsibility. The website



offers students information about the [policies and procedures within the Honor Code](#), including the definition of Academic Integrity and Academic Misconduct, with sample syllabus statements for faculty. For students to be well-versed in student conduct policies, [Know the Code](#), an educational campaign, occurs every year during the summer and fall quarter to educate the campus community on the [Honor Code](#) and Student Conduct Policies. Students can also contact staff within the office for more support related to conduct.

### **2.E.3. The institution provides students guidance in the ethics of research and use of information resources.**

University Libraries plays a pivotal role in helping students identify and ethically use information sources through point-of-need help, research consultations with librarians, and standalone and course-integrated library instruction. The Libraries' [Research Center](#) assists with citation and source use through virtual or in-person consultations. Librarians also teach course-integrated instruction and standalone workshops as part of the [library instruction program](#). In these workshops, librarians discuss the ethical use of sources through the lens of the Association of College and Research Libraries' [Framework for Information Literacy in Higher Education](#), particularly through the *Information Has Value* framework. Librarians provide support and training on reference management systems, such as [RefWorks](#) and [Zotero](#), which allow students to seamlessly cite sources in their research papers.

The [DU Writing Program](#) is committed to developing students' ability to ethically use information resources. With respect to the ethical use of information, the [Writing Center](#) offers guidance through individual, group, and class consultations. Through individual and group consultations, students gain deep insight on thoughtful integration of source material as well as proper citation methods.

Some academic programs provide their students more specific guidance on research. For example, Psychology Ph.D. students complete a departmental orientation that includes training in FERPA and Title IX. All students complete CITI training in research ethics in their first quarter and take a course in ethical behavior ([PSYC 4920 Ethics in Psychological Research](#)); clinical students take a second course ([PSYC 4925 Clinical Ethics and Professional Issues](#)). New clinical Ph.D. students receive the *APA Ethical Principles of Psychologists and Code of Conduct* and must meet with a core clinical faculty member to discuss the *Code*. The department also evaluates student ethical behavior in all clinical and research work [[Annual Review Form](#), [Graduate Handbook](#)].

In addition, all NSM graduate students attend annual trainings on topics such as Title IX and FERPA. Individual programs also require lab training appropriate for their subject. For example, all students (grad or undergrad) who work in a Biology faculty member's lab must do appropriate research compliance training CITI courses from ORSP. Graduate students take a course for credit called Responsible Conduct in Research (BIOL 4231) and they must do a module of same name from CITI. For Physics PhD students, the basics of research ethics are covered in the required first year sequence of courses Introduction to Research (PHYS 4001-4003).

#### **2.E.4 The institution enforces policies on academic honesty and integrity.**

At DU, research misconduct is defined as fabrication, falsification, plagiarism, or other practices that seriously deviate from those that are commonly accepted within the scholarly community for proposing, conducting, reviewing, and/or reporting research. Research misconduct also includes making knowingly false accusations of misconduct by another, violating IRB policies and procedures, or willful failure to comply with federal and other requirements. All persons, including (but not limited to) faculty members, post-doctoral associates, graduate students, undergraduate students, staff, and administrators, may be subject to allegations of research misconduct [[Research Misconduct](#)].

Reports of misconduct can be reported through the Audit Hotline or directly to the chief research officer (CRO) or dean. Reporters can maintain anonymity throughout the process. All reports are passed to the CRO for preliminary evaluation to determine next steps. If the report doesn't fall under the definition of misconduct, the CRO can refer it to the proper governing body. If the report does fall within the definition, it is formally referred to a confidential inquiry committee and the process outlined in the policy are followed [[Misconduct Policy](#)]. Complaints regarding human subject violations or animal care and use policies are evaluated by committees consisting of experts from those governing bodies.

As discussed in 2A2, DU's [Academic Misconduct Policy](#) is clearly articulated on the SRR [website](#). The University [has six case resolution bodies](#) who make decisions regarding possible policy violations, including the Director of SRR, SRR staff, housing and residential education staff, faculty, [Student Accountability Board](#), and the Restorative Justice Conference. In addition, SRR provides [resources for faculty](#) when dealing with matters related to academic integrity.