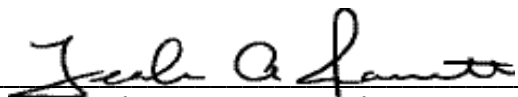




Monitoring Report
EL-09
April 14, 2022

I hereby present my monitoring report on the **Executive Limitations Policy EL-09: Organizational Integrity** according to monitoring report schedule (BPD-04). I certify that the information contained in this report is true and represents compliance with a reasonable interpretation of all aspects of the policy unless specifically stated otherwise.

Signed 
Leah A. Barrett, President

Date April 12, 2022

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

INTERPRETATION

I interpret “not permitting a culture that lacks a high degree of integrity,” to mean an organization that:

- a) has operational procedures setting standards of appropriate workplace behavior and respectful treatment of fellow employees and students;
- b) has an expectation that employees follow these standards and operationally provides employees with a method of reporting behavior that does not meet these standards;
- c) provides employees with resources to assist them in meeting workplace behavior standards; and
- d) has operational procedures which provide a framework for the confidentiality, integrity and availability of employee and student data and electronic resources.

EVIDENCE

Evidence for items a) through c) above is provided in the evidence to items #1 and #2 following in this report.

Evidence for item d) above, the following is provided:

AP-3511.0 [Information Security](#)

AP-3511.1 [Acceptable Use of Technology Resources](#)

AP-3511.2 [Peer to Peer Filing Sharing Procedures](#)

AP-3511.3 [Privacy and Release of Information](#)

In addition, the Institutional Research and Analytics department of Northeast Community College adheres to the Association for Institutional Research (AIR) Statement of Ethics which is part of the department's Annual Plan.

Further, without limiting the scope of the above statement by the following list,

... the President shall not:

1. Operate without enforced internal expectations of behavior, of which all employees are made aware, that clearly outlines the rules of expected behavior for employees.

EVIDENCE

The following College operational procedures outline the rules and internal expectations of behavior for employees:

AP-1010.0 [Nondiscrimination](#)

AP-1010.1 [Harassment](#)

Policy on Harassment and Nondiscrimination for all Faculty, Students, Employees and Third-Parties

AP-3235.0 [Tobacco and Alternative Nicotine Products Use Procedures](#)

AP-3237.0 [Alcohol and Controlled Substance Testing for Commercial Driver's License](#)

AP-3511.3 [Privacy and Release of Information](#)

AP-7315.0 [Employee Performance Review Procedures](#)

AP-7322.0 [Progressive Discipline for Non-Faculty Employees](#)

AP-7322.1 [Progressive Discipline for Faculty Employees](#)

AP-7325.0 [Employment Probation](#)

AP-7392.0 [Unauthorized Absence](#)

BP-7231 [Continuation-Amendment-Termination of Employment-Faculty](#) (Note: this needs to be an AP)

BP-7327 [Suspension, Demotion and Termination for Cause](#) (Note: this needs to be an AP)

All employees are made aware of these operational procedures by:

1. Providing an explanation of the content and location of the procedures, and how to access them, to all newly hired employees during the orientation and onboarding process;
2. Requiring all new employees to sign a **Board Policies & Administrative Procedures Acknowledgement** ([Link to Acknowledgement](#)) verifying they know where to find the procedures and that they understand and agree to be held accountable to their terms; and
3. Publishing updates to all procedures in the employee **Newsletter** ([April 7 Newsletter](#))
4. The Northeast **Alcohol and Drug Prevention Program** ([Link to Program](#)) is a Health and Wellness resource for employees on the College website, which outlines the resources available and the standards of conduct for employees by referring to Northeast policies on drugs and alcohol, as well as state and federal laws regarding the use of drugs and alcohol.

...the President shall not:

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

EVIDENCE

The following operational procedures provide employees with a mechanism for confidential reporting of alleged or suspected improper activities:

Policy on Harassment and Nondiscrimination for all Faculty, Students, Employees and Third-Parties

AP-3050.0 [Fraud and Whistleblower Procedures](#)

AP-7710.0 [Employee Grievance Procedures](#)

AP-7325.0 [Employment Probation](#)

AP-7015.0 [Workplace Threats and Violence Reporting](#)

Employees are made aware of these operational procedures in the same manner as #1 above. In addition, on the College website employees are provided with information for **reporting suspected criminal activity** ([Link to Crime Reporting](#)) and a **Resource Guide** ([Link to Resource Guide](#)) with contact information for reporting any campus safety concern.

...the President shall not:

3. Cause or allow research that does not adhere to generally accepted ethical principles.

EVIDENCE

Northeast Community College Veterinary Technology Program IACUC Approved Animal Use Protocols

Northeast Community College Veterinary Technology Animal Care Program

Research Guidelines - Faculty Handbook (pgs. 44-46)

...the President shall not:

3.1 Permit employees to be without readily available guidelines for ethical research and treatment and assistance in identifying and solving ethical problems.

EVIDENCE

See Evidence provided for item #3 above.

...the President shall not:

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

EVIDENCE

The College does not regularly engage in research projects on humans which require independent ethical review by an Institutional Review Board (IRB). An IRB is a group that is required under FDA regulations that has been formally designated to review and monitor biomedical research involving human subjects. The purpose of an IRB is to assure that appropriate steps are taken to protect the rights and welfare of humans participating as subjects in the research. In the event such a research project was contemplated, Northeast would enter into a written agreement with an institution with an Institutional Review Board, such as the State College system or the University of Nebraska system, to ensure compliance with all FDA regulations and the protection of human rights. *See* Northeast Community College Faculty Handbook, page 44. The College does not have a specific procedure regarding the compilation and use of an IRB, however, it is anticipated that such a procedure will be completed by the next Monitoring Report.