## 2.A - The institution operates with integrity in its financial, academic, personnel, and auxiliary functions; it establishes and follows fair and ethical policies and processes for its governing board, administration, faculty, and staff.

### Assurance Evidence
**Compliance activities**

The Office of Policy and Compliance (OPC) was established in 2010 in response to a recognized need for a centralized policy library containing current and accurate statements of official policy; a consistent business practice for adopting and changing university policies; and an open, transparent policy development method that embraces and reflects the shared governance model of the University. The OPC is responsible for researching, drafting, and facilitating the approval process for a wide range of University policy and procedures documents affecting employees, students and the larger university community. In addition, the OPC provides resources to assist departments in reviewing and understanding compliance issues and to help foster business practices that comply with applicable laws, rules and regulations across many administrative and academic areas. The Director of Policy and Compliance reports to the Vice President for University Operations. The OPC maintains the policy library as an online resource to the institutional community.

In addition to the OPC, there are collaborative compliance functions in many other areas of the institution, including (for example) the Research Integrity and Compliance Review Office (RICRO), the Office of Risk Management and Insurance, the Compliance Office of the Department of Athletics, the Office of Equal Opportunity (OEO), and the Department of Internal Audit of the CSU System.

Consistent with its commitment to integrity as revealed through ethical and civically responsible behavior, the University established the Compliance Reporting Hotline in August, 2010, for employees, students, and constituents to report issues, in good faith, regarding compliance with laws, regulations, and substantive University policies, as well as other types of complaints and issues. Subsequently this program was expanded to operate at the System level and to provide the same review process for all of the System's institutions. This reporting mechanism allows people to report issues anonymously if they wish to do so. The issues reported are first reviewed by the appropriate CSU System officials (Director of Internal Audit and Office of the General Counsel) to determine if further investigation and actions are warranted. University officials can then be brought into the review process to directly address the problem or concern. The University takes every allegation of illegal or unethical conduct seriously. Further discussion of the Reporting Hotline activity is included in the Federal Compliance section under Policy 4.0 (b).

The Office of Equal Opportunity (OEO) supports CSU's commitment to promote human and intellectual diversity by fostering an inclusive environment for all members of the University community. OEO ensures the University's obligations of equal access and equal opportunity in education and employment for all faculty, staff, and students through the application and implementation of policies, procedures and practices that are equitable, transparent and understood by members of the University community. In 2010, OEO was established as a compliance-focused administrative unit separate from the responsibilities of the Vice President for Diversity. Since the reorganization, OEO has made notable progress in the following activities:

- Enhanced collection and creation of affirmative action utilization and impact ratio analyses data.
- Improved search processes by creating a manual and online tools to guide processes.
- Expanded search process training to include search committee members and support staff in addition to search chairs and EO coordinators to make the process more transparent.
- Updated disability determination and reasonable accommodations practices for better ADA compliance and provided improved disclosure of reasonable accommodations for employees.
- In support of Title IX compliance, added a deputy Title IX coordinator to implement a

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defined structure responding to student sexual harassment and sexual violence concerns.
- Launched a program of employee exit interviews to enhance the exit survey process.
- Improved awareness communications to constituents through brochures and websites, such as How to File a Complaint and Sexual Harassment Awareness and Prevention.
- All CSU employees are required to take and pass a Sexual Harassment training module.

Efforts are underway to further enhance access and opportunities for employment through the proposed acquisition of an online application tool for more efficient recruitment, submission of applications, and processing of personnel data to improve searches and the administrative procedures of HR and OEO. OEO has also established a goal to review and update discrimination and harassment policies.

Monitoring of financial integrity is described in Component 5.A.5.

### Ethics and Conduct

Expectations for ethical conduct are also reflected in the *Academic Faculty and Administrative Professional Manual*, sections D.3.3, D.3.4, D.3.5, D.3.6, D.3.7, D.6, D.7.19, and D.9, among others. A comprehensive and effective Conflict of Interest policy is incorporated in section D.7.6, and a Conflict of Interest Committee exists to review actual and apparent conflicts that are self-reported or reported by others, review conflict management plans, and make recommendations to the Provost/EVP for resolving conflicts. All employees in positions of trust, or who have access to sensitive data, financial records, sponsored programs funds, and business decision-making are required to update their financial disclosures annually to help assure that conflicts of interest are identified and acted upon in a timely manner with **management plans implemented when appropriate.**

**State Classified personnel are governed by the** Colorado Department of Personnel Board Rules and Administrative Procedures, **which includes guidance on employee responsibilities and ethical behavior.**

Many academic and administrative departments have their own ethical codes. For example, the Department of Computer Science's Code of Ethics reflects responsibilities of students, faculty and staff in addition to those enumerated in other University policies. The Purchasing Department has a Code of Ethics governing purchasing agents' responsibilities to the institution, the vendor community, and the people of the State of Colorado. Student government (ASCSU) has adopted a Code of Ethics of its own, prohibiting abuse of any student government position or office. These are just a few examples of locally imposed ethical codes and standards observed at the University.

Students are governed by a comprehensive *Student Conduct Code* that applies to:

- All persons taking courses at the University, either full-time or part-time, pursuing undergraduate, graduate, professional, or continuing education;
- Those students who withdrew after allegedly violating the Student Conduct Code;
- Those who are not officially enrolled for a particular term but who have a continuing relationship with the University;
- Those who have been notified of their acceptance for admission;
- Persons who are living in University-owned or -operated housing though not enrolled in this institution;
- All CSU students enrolled through University programs who are studying abroad or at other remote locations, including the Denver campuses; and
- All recognized student organizations and clubs with any number of persons who officially have complied with formal requirements for registration/recognition as a University student organization or sport club.

### Athletics

CSU has established high standards for academic performance and integrity in all athletic programs. CSU Intercollegiate Athletics continues to support outstanding academic progress by student-athletes in compliance with all policies and procedures of the National Collegiate Athletic Association (NCAA):

- **The** Intercollegiate Athletics Compliance Office, **which reports to the Office of the President,**

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is responsible for ensuring that all individuals who represent the institution's athletic programming comply with the rules and regulations set forth by CSU, the Mountain West Conference and the NCAA.

- CSU's graduation rate among student-athletes is 69%, as compared to a rate of 63% for the general student population.
- CSU has led the Mountain West in graduation rates for five consecutive years (Air Force does not report graduation rates). The average rate for the Mountain West is 62% for both student-athletes and the student body.
- CSU's football graduation rates for student-athletes (78%) ranks 21st nationally among Division I/FBS Division institutions. CSU is believed to be the only institution in the country to require 100% of its players to participate in community service three times during each academic year.
- All 16 CSU sport programs had an Academic Performance Rate (a measurement used by the NCAA) above 925. Five of these 16 sport programs had a perfect APR score of 1,000.
- CSU has never been sanctioned by the NCAA for a major violation.
- **The President meets annually with the Department of Athletics coaches to discuss the** importance of ethical and responsible conduct, as well as being available to receive direct reports from the compliance officer.
- Recently, the Division of Student Affairs has become more engaged in providing student support services to the student-athletes through joint sharing of responsibilities rather than the Department of Athletics providing sole oversight.
- The position of Senior Associate Athletic Director for Diversity and Inclusion was created in 2013 to implement a comprehensive program focused on the transition, adjustment, and retention of student-athletes at CSU.
- The University adopted a new Fan Code of Conduct in 2013, designed to ensure a safe, respectful, and high-quality experience for all fans attending CSU athletics events.
- Athletics has included a provision in coaching contracts that makes all coaching bonuses contingent on players making satisfactory academic progress and teams receiving no major violations of NCAA rules.

The CSU Sport Clubs program consists of 29 programs that allow more than 1,100 student athletes to be involved in competitive activities. Sport Clubs at CSU are student-run organizations that are funded through student fees, dues, and club fundraising. The Sport Clubs program allows students to participate in sport activities beyond the scope of the Intramural Sports program. These programs compete with other colleges and universities, travel, and play in national events.

The philosophy of Sport Clubs includes providing opportunities for sport clubs to challenge other schools and represent CSU while promoting an educational component of leadership development. Students are involved in fundraising, event planning, coaching selection, and budgeting/financial management of the club. The Sport Club area has a requirement that all students are full-time students and maintain a 2.0 cumulative GPA to participate. Each of the sports belongs to different governing bodies that have individual requirements. If the governing body has a policy that exceeds the CSU policy, then that policy takes precedent.

## Sources

Academic Faculty and Administrative Professional Manual 2011-12 (Page 59)
Accommodations for Employees with Disabilities brochure
Athletics Compliance Office
CO Personnel Board Rules and Procedures 2011
Exit Interviews flyer
Final Report on the Fan Experience (Page 9)
How to File a Complaint brochure
Office of Equal Opportunity
Office of Policy and Compliance
Sexual Harassment Awareness and Prevention brochure
Student Conduct Code
Student Sexual Harassment and Sexual Violence Awareness brochure

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