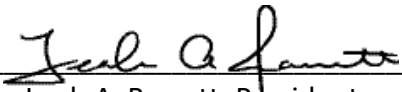


**Monitoring Report
EL-09, Organizational Integrity
June 12, 2024**

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 6 June 2024

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

INTERPRETATION

Standard of Measurement: An internal benchmark is established on an employee engagement survey to questions relating to organizational integrity. In the Fall of 2023, Northeast Community College administered an Employee Engagement Survey utilizing the services of McLean & Company. Employees were asked two questions which I interpret to be related to organizational integrity: "I am not discriminated against at Northeast Community College" and "I am emotionally safe at work." Whether an organization has a high degree of integrity is at least partly a matter of perception, and asking employees is a reasonable way to assess it. Since this is the first engagement survey utilizing McLean & Company, it is reasonable to establish a benchmark and then create a future target.

Level of Achievement: Compliance will be demonstrated initially by establishing a benchmark, and compliance will be demonstrated in future years when there is indicated on the employee engagement survey a satisfaction score equal to or greater than the benchmark score to the questions "I am not discriminated against at Northeast Community College" and "I am emotionally safe at work." This is reasonable because establishing a benchmark is required to show compliance for future years, and a satisfaction score equal to or greater than the benchmark indicates that employee perception of the integrity of the organization is being maintained.

EVIDENCE

- a) Initial internal benchmark: 85% of employees responded with a level of 5 or 6 on a six-point scale the extent to which they agreed with the statement: "I am not discriminated against at Northeast Community College." **The benchmark compared to other higher education institutions serviced by McLean for the responses to this question was 81%. As noted, an internal benchmark will be established for the future.**
- b) Initial internal benchmark: 84% of employees responded with a level of 5 or 6 on a six-point scale the extent to which they agreed with the statement: "I am emotionally safe at work." **The benchmark compared to other higher education institutions serviced by McLean for the responses to this question was 79%. As noted, an internal benchmark will be established for the future.**

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

... the President shall not:

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

INTERPRETATION

Standard of Measurement: I interpret the "mechanism" for confidential reporting of alleged or suspected improper activities without fear of retaliation to mean there is a written procedure in place, reviewed at least every five years, that:

- a) Clearly defines "improper activities." Clear, written guidelines explaining the circumstances that are not acceptable assist an employee in making the decision to report an activity.
- b) Specifically outlines the steps to be taken by an employee to report those activities. Knowledge of the process to follow is crucial for proper reporting.
- c) Provides for an option to report an improper activity without reporting directly to his or her immediate supervisor. It is important for an employee to be able to submit a complaint without fear of retaliation, regardless of who has committed an alleged improper activity.
- d) There are no reports of alleged or suspected improper activities that have not been addressed without appropriate discipline.

EVIDENCE

The following operational procedure provides employees with a mechanism for confidential reporting of alleged or suspected

improper activities: AP-3050.0 [Fraud and Whistleblowing](#). Review of this procedure confirms:

- a) Improper activities are clearly defined by including descriptions of unacceptable acts or circumstances.
- b) The reporting process is clear and specifically outlined.
- c) The process includes multiple individuals to whom a report may be made, including an individual other than an employee's immediate supervisor. The procedure also includes a section which provides that retaliation against an employee who reports an improper activity is specifically prohibited. In addition, on the College website employees are provided with information for reporting suspected criminal activity ([Link to Crime Reporting](#)) and a [Resource Guide](#) with contact information for reporting any campus safety concern.
- d) All reports of fraudulent or improper acts are submitted to Human Resources for investigation and appropriate action. Review of HR files confirms there were no reports of fraudulent or improper acts during the reporting period.

...the President shall not:

2. Operate without a framework for the confidentiality, integrity and availability of employee and student data and electronic resources.

INTERPRETATION

I interpret the "framework" for confidentiality, integrity and availability of employee and student data and electronic resources to mean:

- a) There are written procedures in place, reviewed at least every five years, that address general data privacy concerns of College employees and students, as well as the specific legal requirements of applicable data privacy laws including FERPA, HIPAA, GLBA and PCI-DDS. This is reasonable because legal requirements reflect the industry norms for privacy policies.
- b) During the reporting period, no violations of any applicable data privacy law were reported to the respective government enforcement agency for which the College was responsible.

EVIDENCE

- a) The following written procedures governing the use of data at the College are currently in place and were last reviewed in June, 2023, and are scheduled for next review in June, 2028:

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](#)

AP-3511.4 [Identity Theft Prevention](#)

AP-3511.5 [Electronic Messaging](#)

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](#).

- b) Verification of all legal notices received by the College during the reporting period confirmed that no notices were received from:
 - i. The Department of Education for a FERPA violation;
 - ii. The Office of Civil Rights for a HIPAA violation;
 - iii. The Federal Trade Commission for non-compliance with the GLBA; or
 - iv. The Payment Card Industry Security Standards Council for non-compliance PCI-DDS standards.

...the President shall not:

3. Cause or allow operations and handling that does not adhere to the ethical treatment of animals.

INTERPRETATION

Compliance will be demonstrated when:

- a) There are no negative findings by the accrediting body of the College Vet Tech program regarding the ethical treatment of animals. This is reasonable because part of the accrediting agency's responsibility is to determine the program falls within the agency's accreditation standards regarding the treatment of animals.
- b) No reports of mishandling of animals were made by any individuals receiving services from the College Vet Tech program. This is reasonable because reports of mishandling of animals is an indication of whether the animals are being ethically treated.

EVIDENCE

- a) The College Vet Tech program passed their accreditation process in 2024, and verification with the Director of the Vet Tech program, found there were no negative findings regarding the ethical treatment of animals in the report from the accrediting agency.
- b) The College Vet Tech program follows the [Northeast Community College Veterinary Technology Program IACUC Approved Animal Use Protocols](#) and [Northeast Community College Veterinary Technology Animal Care Program](#). Verification with the

Director of the Vet Tech program confirmed there were no reports of mishandling of animals during the reporting period.

...the President shall not:

4. Cause or allow research that does not adhere to generally accepted ethical principles or been subject to independent ethical review.

INTERPRETATION

Compliance will be demonstrated when all research projects involving human subjects are reviewed by an Institutional Review Board (IRB) and only those projects approved by the IRB are allowed to proceed. This is reasonable because an IRB is a group 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 ensure that appropriate steps are taken to protect the rights and welfare of humans participating as subjects in the research.

EVIDENCE

The College does not regularly engage in research projects on humans which require independent ethical review by an Institutional Review Board (IRB). 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. In the past year, two projects were submitted for review and approval using the guidelines found in the [Northeast Community College Faculty Handbook, page 44](#). The College has a working draft of a new procedure that will be presented to the Educational Services Standing Committee in September, 2024.