

Criterion Two



Integrity, Ethical, and Responsible Conduct:
The institution acts with integrity; its conduct
is ethical and responsible

Integrity is of central importance to KCUMB for multiple reasons.

First, integrity is essential to KCUMB's students. As graduates pursuing careers in the health professions, the integrity and professionalism of KCUMB's alumni is critical to maintaining the public trust in the institution and people who are charged with providing for the physical well-being of society. Second, as an institution of higher education, integrity is essential to maintain the quality and reputation of the enterprise of education.

Finally, integrity is essential to KCUMB's viability as an organization. Integrity in the actions of the organization is important to maintain the support of its constituents and to assure potential students of the value of the education the University provides.

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.

University policies and procedures are available to external constituents through the University's website and internally through the University's intranet [K84]. The University's Equal Opportunity Employer statement, located on the external website, states that the University:

"... is an Equal Opportunity Employer. Equal opportunity is and shall be provided for all employees and applicants for employment on the basis of their demonstrated ability and competence without discrimination on the basis of race, color, religion, sex, gender, national origin, ethnicity, genetic information, ancestry, age, disability, or status as covered veteran in accordance with applicable federal, state, and local laws. KCUMB is committed to equal treatment concerning an employee's compensation, benefits, terms and conditions of employment, opportunities for promotion, training and development, transfer, and other privileges of employment."

The University also has a specific policy related to Sexual Discrimination and Harassment as required by Title IX of the Education Amendments of 1972. This policy is located in the University Policy Library.

The University's website clearly provides prospective students with admissions and financial aid requirements. The Student Handbook [K56] is linked to from the external site, and the current and previous University Catalogs are also available. The website also clearly states the students' right to privacy of their academic records pursuant to the Family Educational Rights and Privacy Act of 1974.

Faculty policies and procedures are available in the Faculty Handbook [K58], which is linked to from the intranet site. Staff policies are maintained in the University Policy Library, which was recently reviewed and updated by outside legal counsel and is also located prominently on the University's intranet site. Information about the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and students'

responsibilities are clearly defined in the Policies and Procedures section of the Clinical Clerkship Manual. This manual is provided to all third- and fourth-year medical students. This manual is located in the University Policy Library.

Integrity became an important focus for KCUMB following the financial misconduct of the administration of its former president and chief executive officer, Karen Pletz, J.D. In addition to the injury to KCUMB's reputation, the actions of the former administration raised questions about the integrity of the University's processes and policies. An intentional review of critical policies and processes followed the change in administration. The resulting changes were made to ensure the integrity of the institution and to prevent such misconduct from happening in the future. To this end, the University has focused on revising and/or implementing new policies and procedures since 2010. Table 2.1 lists those policies and their purpose.

Table 2.1 KCUMB Revised Policies and Purposes

Executive Compensation Policy	This policy ensures that the University utilizes best practices in establishing executive compensation and ensures such compensation is at a reasonable and competitive rate within its marketplace.
Corporate Minutes and Records Policy	This policy describes the processes for recording, circulating, approving, and storing Board minutes, as well as the checks and balances used to ensure accuracy of the information included in the minutes.
Form 990 Review Policy	This policy follows best practices for the preparation and review of the federal 990 form, including approval of the Audit Committee and review by the Board of Trustees.
Conflicts of Interest Policy	This policy describes the processes for identifying, evaluating, and resolving actual and apparent conflicts of interests at all levels of the University, as well as the reporting structure to be utilized when resolving the same.
Travel Policy	This policy is designed to ensure travel expenses are approved only for legitimate University-related travel and provides for levels of approval to limit possible abuses of this policy.
Whistleblower Policy	This policy provides a process that encourages and enables individuals to raise concerns within the University and to report breaches of conduct of University policies or applicable laws. The process includes reports to the Audit Committee of the Board of Trustees. Whistleblowers are also provided confidentiality and protection from retaliation.
Harassment-Free Policy	This policy describes the University's commitment to a safe and equitable work environment. Also detailed in this policy are the processes involved in reporting and investigating harassment. Annual training related to harassment is required for all employees.
Anti-Nepotism Policy	This policy prevents the hiring of anyone directly related to an existing employee.

GOVERNANCE

Beginning in spring 2010, significant administrative changes were made in the operation and structure of the Board of Trustees. These changes helped to strengthen the financial oversight of the Board, increase the amount of experience in higher education, and strengthen the integrity of Board committees and processes.

New Board Members with Financial and Higher Education Expertise

A total of 11 new members have joined the Board [K11] since early 2010 (nearly 65 percent of its 17 current members). These members include additional financial experts and trustees with higher education administration or clinical practice experience, many of whom are at-large members of the public. The University's Executive Committee also contains public members. The following list includes the members that have joined the Board since 2010, who have specific experience with finance or administration in higher education:

- Daniel J. Haake, CPA/PFS – Owner and partner, Hutchins and Haake, LLC, a full-service accounting and consulting firm
- Kevin D. Kaufman – Partner, KPMG, LLP, one of the world's largest tax, audit, and advisory firms
- John M. Parry – President, the Parry Group
- Ronald Slepitza, Ph.D. – President, Avila University, a private college accredited by HLC

Comprehensive Review of Governance Documents

Working with Virginia C. Gross, J.D., a consultant from Polsinelli, LLP, and a well-known expert in the field of non-profit governance, the Board conducted a comprehensive review of its governance documents. Board committee charters [K80] and bylaws [K10] were revised or developed to ensure a governance structure and processes consistent with best practices. Committees are charged with the annual review of their individual charters, and Polsinelli, LLP, conducts an annual review of governance documents [K24].

Creation of an Advisory Board

A non-voting Advisory Board [K25] was created to provide expert advice to the Board of Trustees, the Board chairman, and the president of the University. Members are selected to provide experience and knowledge in higher education administration. For example, the Advisory Board includes members with expertise in higher education administration, finance, academics, research, or clinical administration. Advisory Board members attend Board meetings regularly and are actively engaged in discussions. The following are the current members of the Advisory Board:

- Gerald Baird, Ph.D. - Former executive vice president, Johnson County Community College
- Fr. Thomas B. Curran, O.S.F.S - President, Rockhurst University
- William Duncan, Ph.D. - Consultant, retired researcher and former president of the Kansas City Area Life Sciences Institute
- Anthony Tocco, Ph.D. - Professor of accounting, Helzberg School of Management, Rockhurst University



Creation of an Audit Committee

A separate Audit Committee was created in 2009 to support the Board's obligations of financial oversight. In brief, this committee functions to ensure the effectiveness of internal financial controls, the independence of the University's auditors and accountants, and University compliance with government financial regulations. Members are selected to maintain the independence of the Audit Committee from the Finance Committee [K80] (only one member serves on both committees) and from the Executive Committee of the Board (again, no more than one member can overlap). The composition of these committees reflects the University's dedication to avoiding possible conflicts of interest.

Development of New Policies

New Board policies [K91] were developed to reflect best practices:

- The Executive Compensation Policy utilizes best practices in establishing executive compensation.
- The Corporate Minutes and Records Policy stipulates processes for recording, circulating, approving, and storing Board minutes.
- The Form 990 Review Policy follows best practices for the preparation and review of the federal 990 form, including approval of the Audit Committee and review by the Board of Trustees.
- The Conflicts of Interest and Documentation Policy describes the processes for identifying, evaluating, and resolving actual and apparent conflicts of interests at all levels of the University.
- The Gift Acceptance Policy describes restrictions on gifts accepted by the University and its employees, and ensures proper handling of gifts.

New Board Member Orientation

An orientation process [K82] for new Board members was instituted. New Board members complete the orientation prior to attending their first Board meeting. Critical components of the orientation include the review of governance processes and committee structures, a review of Robert's Rules of Order, and an overview of the history of the University. Additionally, the orientation includes an in-depth discussion of the governance responsibilities of the Board of Trustees as mandated by the HLC.

FINANCE

The Finance Department supports the University's mission through a commitment to stewardship, fiscal responsibility, and by overseeing the business departments on campus.

In addition to changes at the Board of Trustees level, KCUMB reviewed and updated its financial processes and policies to ensure the financial integrity of its actions. The following examples describe the current evidence of integrity in KCUMB's financial functions.

- KCUMB contracts with BKD, LLP, a certified public accounting and advisory firm, to conduct the annual audit of its finances. BKD, LLP, reports directly to the Audit Committee of the Board of Trustees and provides a number of specified reports, including:
 - The annual accountant's report and consolidated financial statements, including:
 - Assessment of GAAP compliance
 - Review and assessment of internal controls
 - Assessment of compliance with federal award programs (OMB circular A-133)
 - Report on schedule of expenditures of federal awards

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- An executive compensation audit
- Preparation of the federal 990 form
- An annual audit of retirement plans
- The Finance Department provides monthly reports, including the institution’s balance sheet, income statement, and a review of investments to the Board of Trustees, which enables the Board of Trustees to meet its fiduciary obligations. The Finance Department also produces other reports that provide financial information and support to the University.
- Financial policies and processes are currently under review and revision. Updated versions will be available in the Electronic Resource Room by the time of the site visit.

ACADEMIC

The faculty support the University mission by providing outstanding educational programs, conducting research, and providing services to the greater community.

Academic operations at KCUMB are governed by the executive vice president for academic and medical affairs, provost, and dean of the College of Osteopathic Medicine. Policies that affect academic affairs are approved by the provost, in consultation with the appropriate departments and committees.

The Faculty Handbook [[K58](#)] describes the committee governance structure and provides policies and processes that govern faculty work. Although KCUMB does not grant tenure, the guidelines for the promotion process are detailed in the Faculty Handbook. In addition, the handbook provides expectations for faculty work and conduct in all areas of faculty responsibility (e.g., teaching, research, advising, and service). The handbook also contains a subset of University policies. Faculty members are subject to the policies that govern all KCUMB employees, but some of the specific policies that pertain more closely to academic work and are included in the Faculty Handbook include the following:

- Intellectual Property Policy
- Discipline Policy
- Academic Freedom Policy and Professional Responsibility
- Ethics and Business Conduct Policy

PERSONNEL

All policies were reviewed by an external consultant during 2013. Integrity in actions with employees is essential in the Human Resources Department.

The University maintains a policy library [[K84](#)] that is available to KCUMB employees. The policies are accessible to all employees on the KCUMB intranet and specify the rights and responsibilities of KCUMB employees. The following examples provide evidence of the University’s effort to provide clear and ethical policies that maintain the integrity of the institution. These policies will be available in the Electronic Resource Room by the time of the site visit.

- Whistleblower Policy: This policy provides a process for reports of misconduct that includes the Audit Committee of the Board of Trustees. Whistleblowers are provided confidentiality and protection from retaliation.

- **Harassment-Free Policy:** The Harassment-Free Policy describes the University's commitment to a safe and equitable work environment. Also detailed in this policy are the processes involved in reporting and investigating harassment. Annual training related to harassment is required for all employees.
- **Employee Grievance Policy:** The grievance policy provides employees the right of grievance with immunity from disciplinary action.
- **Ethics Policy:** A general policy on ethical behavior that covers interpersonal behavior and the treatment of confidential institutional information.
- **Anti-Nepotism Policy:** This policy prevents the hiring of anyone directly related to an existing employee.

Evaluation of faculty and staff occurs annually. During the 2012-2013 academic year, an ad hoc group of the Faculty Senate was formed to review the evaluation process for all faculty members. A revised process will assure faculty members are evaluated based upon progress toward goals as it relates to their teaching, administrative, research, clinical, and service duties. The ad hoc group's recommendations will be presented to the full Faculty Senate in 2013, with the final recommendation forwarded to the Leadership Team for approval.

Similarly, a review of staff evaluation processes was conducted by an ad hoc committee of staff representing the departments of Human Resources, Community Clinical Education, Advancement, Student Affairs, University Relations and Enrollment Management. The committee and subsequent advisory group addressed a variety of content and process issues before providing their recommendations to the Leadership Team. A revised staff evaluation process was introduced in spring 2013 that includes a mid-year evaluation component and stresses progress toward goals as a central component of the evaluation.

In spring 2013, a Staff Senate [K2] was formed, consisting of 10 elected staff members. The Staff Senate serves as a means of both representation and communication within the University for issues related to staff. An elected member from the Staff Senate will represent non-faculty in the Provost's Academic Council and will report, as needed, to the Leadership Team. In addition, it will develop a means of supporting the KCUMB mission and help cultivate programs for employee education, enrichment, and development.

INITIATIVES AND OPPORTUNITIES

During the self-study process, the Steering Committee and executive vice president for academic and medical affairs, provost, and dean of the College of Osteopathic Medicine recognized a need for a policy audit. An external consultant is reviewing all University policies to ensure compliance with federal and state statutes. A new online policy library will be available prior to the arrival of HLC visit in September. A link to this updated policy library will be available in the HLC Electronic Resource Room by the time of the site visit.



SUMMARY STATEMENTS

- KCUMB has made significant progress in operating with integrity in its operations, policies, and practices. The Board of Trustees restructured its membership and revised its operational practices. These changes enhanced the financial oversight of the Board, increased the amount of experience in higher education among Board members, and strengthened the integrity of Board committees and processes. A non-voting Advisory Board was created to provide expert advice to the Board of Trustees, the Board chairman, and the president and chief executive officer of the University. Members are selected to provide experience and knowledge in areas where the Board may lack such expertise.
- The policies and procedures established for its Board and its employees are fair, equitable, and ethical. A separate Audit Committee was created in 2009 to enhance the Board's oversight of financial matters. The University maintains policies that help to ensure the integrity of its financial processes. The financial processes and policies have been reviewed and updated to ensure the financial integrity of its actions. An external firm conducts an annual audit of its finances and reports directly to the audit committee of the Board of Trustees. The firm also audits executive compensation, prepares the IRS 990 form, and audits retirement plans. Each month, the Finance Department prepares reports to the Board on the institution's balance sheet, income, and investments.
- The executive vice president for academic and medical affairs, provost, and dean of the College of Osteopathic Medicine governs academic operations at KCUMB. Expectations for faculty are codified in the Faculty Handbook, which describes the committee governance structure and provides policies and processes that govern faculty work. The handbook also contains a subset of University policies that pertain more closely to academics, such as intellectual property, discipline, academic freedom, professional responsibility, and ethics and business conduct.
- The University maintains a policy library, which is accessible to all employees on the KCUMB intranet, and specifies the rights and responsibilities of KCUMB employees. In spring 2013, an external consultant reviewed all University policies to ensure compliance with federal and state statutes.
- Evaluation of faculty and staff occurs annually. A new process for evaluating non-faculty employees, called Performance Planning and Review, has been implemented. This process places greater emphasis on attainment of goals and measures of work performance. An ad hoc group of the Faculty Senate is developing a new evaluation tool for faculty that assures faculty members are evaluated based upon progress toward mutually agreed-upon goals related to teaching, research, clinical and service duties, and administrative responsibilities.
- The Staff Senate was formed in 2013 and consists of 10 elected staff members. A member from the Staff Senate represents non-faculty employees to the Provost's Academic Council. In addition, the Staff Senate is charged with developing a means of supporting KCUMB's mission and helping to cultivate programs for employee education, as well as avenues for engagement and communication.

2.B The institution presents itself clearly and completely to its students and to the public with regard to its programs, requirements, faculty and staff, costs to students, control, and accreditation relationships.

KCUMB has a variety of mechanisms for communicating information about itself, its programs, and its processes. The most public mechanism is the KCUMB external website. The website provides a variety of public information, including the following:

- Mission, vision, and values of the University
- Admissions requirements for both the College of Osteopathic Medicine and the College of Biosciences
- Academic program and curriculum information
- Consumer information: The Registrar's page on the website provides links to critical information for potential students, including the following:
 - Tuition and financial aid information
 - Safety and security information
 - Student outcomes data
 - Links to specific policies that affect students
 - Privacy policies
 - Copyright policies
 - Technology use policies
 - Disabilities and accommodation information
 - Links to academic program information
- Faculty credentials: Profiles of all faculty include information about the education and interests of the faculty member. Current curriculum vitae are linked to faculty profiles [\[K87\]](#).
- University Leadership: Information (names and photos) about Board of Trustees [\[K11\]](#) members and Advisory Board [\[K25\]](#) members is posted on the website. In addition, information about KCUMB's Leadership Team is posted.
- Accreditation relationships: The accreditation page provides brief information about the two organizations that accredit KCUMB programs: The Council on Osteopathic College Accreditation (COCA) and the Higher Learning Commission (HLC). Links from this page also connect site visitors to COCA and HLC websites, and the Mark of Affiliation [\[K88\]](#) from HLC provides access to the current Statement of Affiliation Status for KCUMB on the HLC website.

On April 26, 2013, the American Association of Colleges of Osteopathic Medicine (AACOM) held its annual awards banquet in Baltimore, Md., and recognized KCUMB for outstanding creativity and leadership during the past year. AACOM Excellence in Communications Awards were presented to KCUMB in the following four categories:

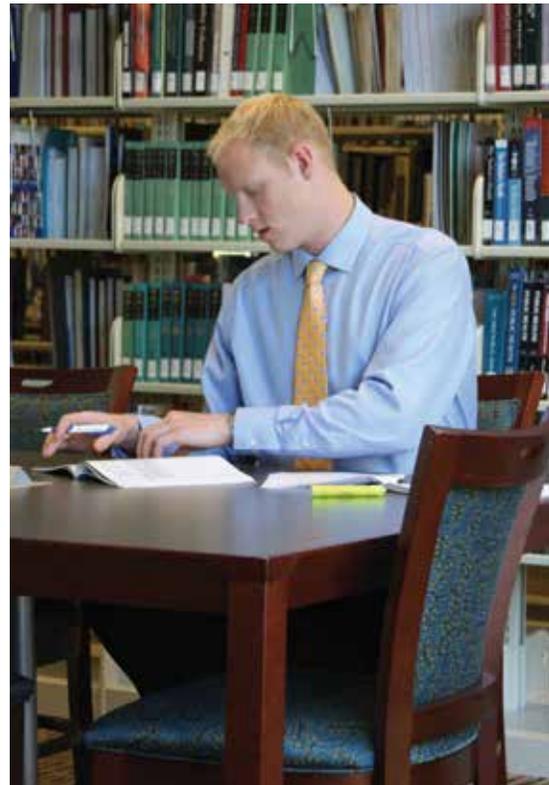
- *KCUMB Magazine* received first place for Best Magazine (Print).
- The KCUMB website received first place for Best Website.
- KCUMB's email marketing campaign received second place for Best Recruitment Piece/Multimedia.
- KCUMB's Facebook page received second place for Best Social Media Effort.

The University also communicates with its constituents through print and electronic publications. Major publications are vetted with the Department of University Relations as well as with the president or the Leadership Team.

- *KCUMB Magazine* [K59], formerly the *KCUMB Communicator*, is published three times a year, and includes a message from the president as well as stories about alumni and current students. Important initiatives, such as the Strategic Plan, are also communicated through the magazine.
- KCUMB also publishes a quarterly electronic alumni newsletter, *Alumni Connections* [K89], which solicits and features news about alumni as well as important University events and initiatives. The newsletter is available by email subscription or through the KCUMB website.
- Targeted email messages (blasts) are sent from the president or the provost to announce important changes, new initiatives, or to provide critical information. Groups receiving these email blasts include faculty, staff, students, and alumni, depending on the content of the message.
- Targeted email messages are also sent from the KCUMB Alumni Association or the Office of Alumni Relations/Advancement to KCUMB alumni. These messages are generally sent to update alumni on fund-raising opportunities or progress, and to solicit gifts for special projects.

Finally, KCUMB communicates with potential students through the Office of Admissions.

- New admissions representatives are given an Office of Admissions Manual and participate in targeted training, including financial aid training, to ensure that they are knowledgeable and accurate when conversing with potential students.
- Collateral materials (brochures, etc.) are prepared in conjunction with the Department of University Relations that provide prospective students with information about KCUMB's degree programs, facilities, student life, and opportunities (e.g., community service, research). As with other publications, the University Relations Department reviews these materials before printing.
- The Office of Admissions reports to the vice president for enrollment management. The vice president is responsible for keeping the admissions group informed about changes in curriculum, entrance requirements, etc., that might affect future students. In order to stay informed, the vice president sits on the Provost's Academic Council, which meets semi-weekly and discusses a variety of issues related to academic matters.
- KCUMB maintains regularly updated versions of both the University Catalog and the Student Handbook on its external website for prospective students to review.
- KCUMB also hosts four or five open house events for prospective students in the summer. Students who have inquired about KCUMB receive a direct email, and notices for the dates and times of each open house are also posted to the KCUMB Facebook page and the AACOM website.



- Finally, KCUMB hosts a biennial undergraduate advisor workshop on campus. Undergraduate advisors meet with Admissions Department personnel, who provide information on student success, and with faculty advisors, who provide updates on KCUMB didactic and clinical curricula.

OPPORTUNITIES AND INITIATIVES

During the self-study process, a careful audit of website content revealed areas or items that had not been updated or that were missing. All deficient areas were updated appropriately.

SUMMARY STATEMENTS

- The University presents itself clearly and completely to its students and to the public with regard to its programs, requirements, faculty and staff, costs to students, control, and accreditation relationships. KCUMB utilizes a variety of mechanisms for communicating information about itself, its programs, and its processes, including its external website and print and electronic publications.
- KCUMB was recognized in 2013 by AACOM for excellence in communication in four areas. KCUMB received first-place recognition for best print magazine and best website. Second-place recognition was received for best social media effort for the KCUMB Facebook page [K90] and best recruitment piece/multimedia for the email marketing campaign.
- KCUMB communicates with potential students through the Office of Admissions. Potential applicants can access online information or obtain print brochures on the University's academic programs, facilities, student life, and opportunities for research and service.

2.C The governing board of the institution is sufficiently autonomous to make decisions in the best interest of the institution and to assure its integrity.

The KCUMB Board of Trustees [K11] consists of 13 to 17 voting members, including the president of the KCUMB Alumni Association. According to the bylaws of the corporation, a majority of the voting trustees must be University alumni. Trustees are elected by the incumbent Board members based on a slate of candidates provided by the Board's Governance and Nominating Committee [K80]. The Board meets at least three times a year, and is charged with the management of the property, business, and affairs of the institution.

KCUMB's Board of Trustees has adopted practices and policies to ensure effective oversight of the University and to assure the University's integrity.

Virginia C. Gross, a consultant from Polsinelli, LLP, and a well-known expert in the field of non-profit governance, has worked with the Board of Trustees since 2010 to adopt changes in order to bring Board processes and structures into better alignment with best practices for boards in higher education. These changes were discussed previously and include the following examples:

- Board governance documents were reviewed to create processes and policies that match best practices for Board activities and responsibilities.

- An orientation process for new Board members was developed to educate new members regarding Board responsibilities (demonstrating compliance with Core Component 2.C).
- An Advisory Board was created to provide the Board with expertise in areas of critical interest to the best interests of the University (demonstrating compliance with Core Component 2.C).



Additionally, the Board of Trustees Responsibility Statement and Code of Conduct Policy [K91] describe the duties and responsibilities of the trustees. In this document, trustees are informed that, “Each trustee has a legal and ethical duty to ensure that the University fulfills its educational mission ...” The following duties and responsibilities are part of this policy document:

- The Board is responsible for review and support of the mission and the direction of the University to achieve its goals, which also demonstrates compliance with Core Component 1.A.
- Trustees have a duty of care to be informed and prepared, and to exercise effective oversight of the University.
- Trustees have a duty of loyalty, which includes following the University’s conflict of interest policies. The Board is responsible for financial oversight, including “the preservation and protection of (the University’s) assets.”
- The Board is responsible for maintaining the reputation and quality of the University’s academic programs.

The Board of Trustees is actively engaged in matters that will preserve and enhance the University.

The Board of Trustees is closely engaged in planning for the future of KCUMB. Board members have participated in the recent revision of the mission, vision, and values of the University, the strategic planning effort, the Campus Master Plan, and this self-study for accreditation. Regular Board deliberations also demonstrate the role of the Board in setting institutional priorities.

- The Board approves the University budget on an annual basis.
- Board approval is required for all institutional mission and planning documents.
- The current Strategic Plan and strategic initiatives were brought to the Board for review and approval in April 2012.
- Elements of the Campus Master Plan are regularly brought before the Board for approval. For example, the Board approved the use of funds in January 2013 to hire architects to design a new clinical simulation facility.
- All major initiatives are brought before the board for review and approval. For example, in September 2012, the Board approved research and due diligence regarding the possibility of a branch campus or additional site in Joplin, Mo., for the College of Osteopathic Medicine.

The Board of Trustees' decision-making process reflects the interests of the University's internal and external constituencies.

The Board of Trustees gathers information from a variety of constituents in its decision-making processes, which demonstrates compliance with Core Component 2.C.

- The president of the KCUMB Alumni Association holds a seat on the Board of Trustees. This allows the Board to consider input from alumni in important institutional decisions.
- The Student Government Association president provides a report on student concerns to the full Board at each meeting.
- As part of the Academic, Research and Medical Affairs Committee meetings, the committee hears reports from the Faculty Senate president and the provost regarding academic and medical affairs.
- For the past several years, KCUMB has conducted an annual Employee Perception Survey. The results of that survey are shared with Board.
- The Advisory Board to the Board of Trustees provides advice and expertise from external constituencies to the Board.

The Board of Trustees is autonomous and acts without undue influence.

The bylaws [K10] and policies of the KCUMB Board are structured to limit the influence of external parties on Board decisions and to minimize any real or apparent conflict of interest, which demonstrates compliance with Core Component 2.C.

All members of the Board are required to complete and sign a conflict of interest [K91] statement annually. In addition, the University conflict of interest policy requires the disclosure of a conflict of interest and a requirement for recusal of Board members who have disclosed such a conflict.

- The Gift Acceptance Policy [K91] holds that, “*The University will not accept gifts that ... violate the terms of the University's governing documents ... or ... are for purposes outside the mission of the University.*”
- The Board bylaws state that salaried employees of KCUMB are ineligible to serve as trustees (with exception of the *ex-officio* position occupied by the president of the University).

While maintaining oversight of the University, the Board of Trustees appropriately delegates day-to-day management to the KCUMB administration with the expectation that faculty oversee academic matters.

The Board delegates its authority relative to the day-to-day operations of KCUMB to the University administration, which demonstrates compliance with Core Component 2.C. As described in the KCUMB bylaws, “*The president shall have general supervision of the business and finances of the Corporation and shall see that all orders and resolutions of the Board of Trustees are carried into effect.*” The president is evaluated annually by the Executive Committee of the Board, based on “*progress toward any established performance measures,*” and his or her compensation is determined by the work of the Compensation and Benefits Committee of the Board.



SUMMARY STATEMENTS

- The governing Board of the institution is autonomous. The Bylaws and policies of the KCUMB Board are structured to limit the influence of external parties on Board decisions, and to minimize any real or apparent conflict of interest. To enhance deliberations, the Advisory Board provides advice and expertise to the Board. The Board is not involved in the day-to-day operations of KCUMB.
- The governing Board is charged with making decisions in the best interest of the institution. The Board of Trustees has adopted changes in order to bring Board processes and structures into better alignment with best practices for boards in higher education, including: 1) Board governance documents were reviewed to create processes and policies that match best practices for Board activities and responsibilities; 2) An orientation process for new Board members was developed to educate new members regarding Board responsibilities; 3) An Advisory Board was created to provide the Board of Trustees with expertise in areas of critical interest to the best interests of the University.
- The governing Board has adopted policies to assure its integrity. The Board of Trustees Responsibility Statement and Code of Conduct Policy describe the duties and responsibilities of Board members. The Board is responsible for review and support of the mission and the direction of the University to achieve its goals. In addition, it is responsible for finances and for maintaining the reputation and quality of the University's academic programs.

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

As with any institution of higher education, the central purpose of KCUMB is learning. KCUMB also declares its commitment to learning through its core values of *Curiosity* and *Innovation*, as well as in its dedication to research and lifelong learning. In all these ways, the University recognizes the importance of learning and, by implication, the pursuit of truth.

KCUMB recognizes the importance of academic freedom and freedom of expression as an integral part of effective teaching and learning. The University subscribes to the principles of academic freedom described in the 1940 Statement of Principles on Academic Freedom and Tenure, from the American Association of University Professors and the Association of American Colleges. These principles suggest that academic freedoms should be balanced with appropriate and professional conduct. The Faculty Handbook [[K58](#)] section, titled Academic Freedom Policy and Professional Responsibility, describes the three principles of academic freedom.

OPPORTUNITIES AND INITIATIVES

- With the introduction of a tablet-based curriculum, new opportunities for curricular enhancement and faculty training may challenge current Information Technology processes.

SUMMARY STATEMENTS

- The institution is formally committed to freedom of expression and the pursuit of truth in teaching and learning. The University subscribes to the principles of academic freedom described in the Statement of Principles on Academic Freedom and Tenure, from the American Association of University Professors and the Association of American Colleges. These principles are articulated within the Faculty Handbook [[K58](#)].
- The institution encourages and supports the development of new approaches to teaching and learning. Innovations in teaching/learning efforts do not require prior review, except when the content of the offering is new or changed from previously approved efforts. This process allows KCUMB to balance curricular oversight with faculty flexibility to develop new approaches to teaching and learning.



2.E The institution ensures that faculty, students, and staff acquire, discover, and apply knowledge responsibly.

The core value of *Integrity* guides KCUMB's actions to promote respect, honesty and professionalism. When it comes to the discovery, acquisition and application of knowledge, the value of integrity establishes the importance of responsible behavior that is honest and respectful to individuals and to the larger society.

University policies mandate ethical and responsible behavior by faculty, staff and students.

At KCUMB, specific policies and professional codes of conduct govern the behavior of faculty, staff, and students. These policies help to ensure ethical and responsible behavior and demonstrate compliance with Core Component 2.E.

- The Ethics and Business Conduct Policy charges faculty and staff to maintain compliance with all laws and regulations. To ensure integrity in scholarly practices, one specific component of this policy specifies respecting trademarks and copyrights.
- The Intellectual Property Policy specifies the intellectual property rights of faculty, staff, and students, with respect to research and educational efforts at KCUMB. The Office of Research and Sponsored Programs publishes a collection of policies specifically aimed at ensuring research is conducted responsibly and ethically. These policies include:
 - Intellectual Property Policy
 - Scholarly and Scientific Misconduct Policy
 - Conflicts of Interest Policy
 - Radiation Safety Policies and Procedures
- The Student Handbook [K56] contains a comprehensive description of policies and processes that govern student behavior. The following items apply to the acquisition, discovery, and application of knowledge:

The University Catalog and the Student Handbook include a statement regarding academic honesty, which demonstrates compliance with Core Component 2.E and reads, in part, *“The University holds its students to the highest standards of intellectual integrity. Therefore, the attempt of any student to pass any examination by improper means, present work which the student has not performed, or aid and abet a student in any dishonest act may result in disciplinary action including immediate dismissal.”*

- Course/Section Syllabi
 - Clinical syllabi (COM) include copyright policy and academic honesty statements [K97].
 - COM sections that require the use of information resources also include copyright policy statements in the syllabi.
 - Thesis guidelines for biomedical sciences include no aspect of plagiarism; non-disclosure of personal identifiers and approval from the IRB prior to commencement of research.
- Course/Section components
 - KCUMB medical students sign a statement of exam honesty with every exam that they take.

In the biomedical sciences program, required courses in epidemiology and research methods include research ethics in the course content and goals.

- The Code of Professional Conduct prohibits (among others):
 - All forms of dishonesty: cheating, plagiarism ...
 - Placing a patient in needless jeopardy
- The AOA Code of Ethics, which applies to students in the COM, includes:
 - A physician shall practice in accordance with the body of systematized and scientific knowledge related to the healing arts.
 - A physician shall not hold forth or indicate possession of any degree recognized as the basis for licensure ... unless he is actually licensed on the basis of that degree in the state in which she/he practices.
 - A physician shall not intentionally misrepresent himself/herself or his/her research work in any way.

When participating in research, a physician shall follow the current laws, regulations, and standards of the United States or ... in the nation where the research is conducted.

- All COM students must sign an agreement *“not to engage in any activity which may be construed as the practice of medicine or any phase thereof.”*
- The Whistleblower Policy encourages the reporting of violations of law or policy and protects those reporting from retaliation. The policy specifies the reporting of *scientific misconduct or suspected scientific misconduct* among its protections.

The University provides student support services to offer guidance and ensure ethical practices related to academics, research, and patient care.

In addition to official statements of policy and codes of conduct, students are provided with other opportunities to be made aware of the importance of ethical and responsible behavior, which further demonstrate compliance with Core Component 2.E.

- Orientations
 - A required orientation process is provided for COM students prior to beginning their coursework. This orientation includes a review of the Student Handbook sections on the Code of Conduct and academic honesty.
 - Students in the College of Biosciences programs also attend a comprehensive orientation program that includes a review of the Student Handbook and Code of Conduct.
 - Third-year medical students are required to attend an orientation to clinical practice before embarking on their clerkship opportunities, which take place in years three and four of the curriculum. The students are provided with the current Clerkship Manual [[K98](#)], which includes the professional Code of Conduct.
- Research opportunities
 - Students participating in the Summer Student Research Fellowship [[K99](#)] are provided with an orientation that includes lab safety and the completion of a conflict of interest forms. Students also review the research lab policies document during orientation.
 - COM students receive HIPAA training and recertification throughout the four years. This includes guidelines for research involving human subjects.
 - Students in the master of science in biomedical sciences research track are required to complete a one-hour research ethics course online.

- Library instruction – From the Library Annual Report, 2011-2012

“To ensure that faculty and students are aware of library services and resources, various presentations and classes are given to incoming first-year students, refresher classes to second-year students, newly hired faculty, anatomy fellows, OMT fellows, College of Biosciences research students, bioethics research students, and to other groups or individuals, when the needs arise to meet the needs of the KCUMB community. Specific resources, such as PubMed, OVID, and various research databases, are covered as well as literature searching techniques. In the past fiscal year, 19 instruction sessions were held with 850 participants.

The list of classes offered at the D’Angelo Library continues to expand as new resources are purchased and research methodologies change. The core class offered for MSI students emphasizes the various databases available at KCUMB, how to access them and use them to find information as well as a thorough introduction to the Library’s website, including accessing e-journals and e-books. MSII students are given a database refresher class, with an emphasis on evidence-based, point-of-care databases, which they will need to use during their clerkship years. The success of these classes is attested as evidenced in feedback received from surveys, the demand for more classes, increase in participants, and follow-up conversations with attendees who seek out the class instructor for further in-depth exploration of particular research questions. It is expected that this aspect of the D’Angelo Library services will continue to expand.”

- Preparation for clinical clerkships

One critical area of education with respect to the responsible application of knowledge is the preparation of KCUMB’s medical students for their clinical clerkships, which are governed by formal and current written agreements. It is the University’s responsibility to ensure that students who are working directly with patients can competently and ethically apply the knowledge that they have learned.

To facilitate this learning, KCUMB established the Kesselheim Center for Clinical Competence (KCCC). First- and second-year medical students have scheduled sessions at the KCCC that develop and evaluate their skills and competencies for clinical practice in the clerkship experiences. Through this process, the required competencies that are assessed are drawn directly from the clinical competencies identified by the American Association of Colleges of Osteopathic Medicine, the Association of American Medical Colleges, and the National Board of Osteopathic Medical Examiners.

At the KCCC, students interact with standardized patients (actors hired to portray patients) and with patient simulators. Physicians work with the students to provide the training and evaluation. Students must pass a Clinical Skills Assessment at the end of the first year and again mid-way through the second year to ensure students are adequately prepared for clinical-skills competencies.

The University provides effective oversight to maintain integrity in academics and research.

KCUMB also ensures the responsible conduct of research through policies on academic honesty and integrity. Specific committees are designed to promote safety and ethical behavior in research endeavors.



The University maintains an Institutional Review Board (IRB) [K100] for research involving human subjects. The IRB is essential for ensuring that humans participating in research as subjects are protected from physical, emotional, and mental harm to the extent they agreed when entering a study and for ensuring that all research involving human subjects complies with regulations and University policy.

The Animal Care and Use Committee [K101] reviews all research protocols involving research with live vertebrate animals. The committee ensures such protocols adequately protect the health and welfare of animals utilized for research and ensures compliance with all regulations governing the use of such animals.

The Biological Safety Occupational Health and Infectious Disease Committee [K102] reviews protocols for research involving recombinant DNA, biohazardous materials, infectious agents, and biologically derived toxins, including select agents. The committee reviews such protocols for adequate safety measures, lab-specific standard operating procedures, training, compliance with regulations and University policy, etc.

OPPORTUNITIES AND INITIATIVES

- Lab-specific policies related to conduct in each venue exist for some, but not for all venues. The Office of Research and Sponsored Programs, is working on overarching policies for labs, and individual researchers will be crafting nuanced policies for their own individual labs.
- The Belmont report and other core resources (e.g. Office for Human Research Protection documents, decisional charts) need to be accessible to all University researchers and students.
- The University should consider adopting AAUP principles on academic freedom.
- A policy related to academic integrity among faculty with a process for dealing with faculty plagiarism or misconduct is suggested for inclusion in Faculty Handbook and Human Resource policies.
- The University should implement an annual review of due process statements and protocol for faculty, staff, and students.
- Thesis requirements and evaluation criteria for COB thesis are being developed.
- A social media etiquette policy (e.g. Blackboard) is in progress.

SUMMARY STATEMENTS

- The institution offers multiple opportunities for faculty, students, and staff to acquire, discover, and apply knowledge responsibly. KCUMB has specific policies and professional codes of conduct that govern the behavior of faculty, staff, and students. These policies help to ensure ethical and responsible knowledge behavior. The Student Conduct Policies section in the Student Handbook contains a comprehensive description of policies and processes that govern student behavior. The importance of ethical and responsible behavior is reiterated to students at multiple points in the curricula in both colleges.
- KCUMB also ensures the responsible conduct of research through specific committees that are designed to promote safety and ethical behavior in research endeavors. The University maintains an Institutional Review Board (IRB) for research involving human subjects. The Animal Care and Use Committee reviews all research protocols involving research with live vertebrate animals. Finally, the Biological Safety Occupational Health and Infectious Disease Committee reviews protocols for research involving recombinant DNA, biohazardous materials, infectious agents, and biologically derived toxins for the University. KCUMB conducted an extensive external audit of all policies to bring them into agreement with all federal and state statutes and to ensure internal consistency in spring 2013.

Exhibit #	CRITERION TWO EXHIBITS
K2	Staff Senate (PDF)
K10	Board of Trustees - Bylaws (PDF) - password protected
K11	Board of Trustees
K24	Board of Trustees - Board Governance Documents (PDF) - password protected
K25	Advisory Board
K56	Student Handbook (login required)
K58	Faculty Handbook (PDF)
K59	KCUMB Magazine
K80	Board of Trustees - Committee Charters (PDF) - password protected
K82	Board of Trustees - Handbook (PDF)
K84	University Policy Library (login)
K87	Faculty Profile (PDF)
K88	HLC Affiliation
K89	Alumni Connections
K90	KCUMB Facebook
K91	Board of Trustees - Rosters and Policies (PDF) - password protected
K97	Statement of Academic Honesty - University Catalog (PDF)
K98	Clerkship Manual
K99	Summer Student Research Fellowship
K100	IRB Committee (PDF)
K101	Animal Care and Use Committee (PDF)
K102	Biological Safety Committee (PDF)
K103	Degree Program Description - College of Osteopathic Medicine

