

4.4 - Integrity

Integrity focuses on how the institution ensures legal and ethical behavior and fulfills its societal responsibilities. The institution should provide evidence for Core Components 2.A. and 2.B. in this section.

4P4: PROCESSES

Describe the processes for developing and communicating legal and ethical standards and monitoring behavior to ensure standards are met. In addition, identify who is involved in those processes. This includes, but is not limited to, descriptions of key processes for the following:

- Developing and communicating standards
- Training employees and modeling for ethical and legal behavior across all levels of the institution
- Operating financial, academic, personnel and auxiliary functions with integrity, including following fair and ethical policies and adhering to processes for the governing board, administration, faculty and staff (2.A.)
- Making information about programs, requirements, faculty and staff, costs to students, control, and accreditation relationships readily and clearly available to all constituents (2.B.)

4R4: RESULTS

What are the results for ensuring institutional integrity? The results presented should be for the processes identified in 4P4. All data presented should include the population studied, response rate and sample size. All results should also include a brief explanation of how often the data is collected, who is involved in collecting the data and how the results are shared. These results might include:

- Summary results of measures (include tables and figures when possible)
- Comparison of results with internal targets and external benchmarks
- Interpretation of results and insights gained

4I4: IMPROVEMENT

Based on 4R4, what process improvements have been implemented or will be implemented in the next one to three years?

Responses

4P4a. Developing and communicating standards

The College has high expectations for the ethical behavior and conduct of all individuals associated with the Institution. LCCC establishes standards for ethical behavior and adherence to

legal matters through the Board of Trustees policy and procedure [governance model](#). As described in Section 4.3, the Board adopts and adheres to policies that set the context for their governance. The Board expects the President to establish and maintain effective and efficient administrative procedures, developed within an environment embracing shared governance, to ensure the College's actions align with Board policy. The Board's [code of ethics and standards of practice policy](#) provides the foundation, and the President establishes administrative procedures to ensure these standards are carried out in the operations of the Institution.

The Board's policy on [Policy Development and Approval](#) and its accompanying [procedure](#) establish a rigorous, inclusive process through which the Board ensures broad, two-way communication regarding the Institution's practices, grounded in the ethical conduct and appropriate legal practices. Policy and procedure development, review, and recommendation to the President and the Board is one of the key processes of the College Council (described previously) and helps facilitate the College's commitment to shared governance. Policies and procedures are published publicly online in the [College's Policy Library](#).

4P4b. Training employees and modeling for ethical and legal behavior across all levels of the institution

LCCC develops legal and ethical behavior within the College's workforce through a robust offering of human resource development programs. For example, all new College employees participate in a new employee orientation program that, among other things, orients new employees to College policy and procedure including employee conduct (see [Policy 6.10](#) and [Procedure 6.10P](#) (pg. 2)), standards of practice, relevant legal parameters (e.g., Family Educational Rights and Privacy Act [FERPA]), etc.

Many other employee training programs also support legal and ethical behavior of employees. For example, all employees must complete a screening committee certification program before being allowed to serve on new employee search committees. This training includes expectations for conduct, confidentiality, and ethical participation in the recruitment and hiring processes of the Institution. Ethical behaviors and legal parameters are also covered in the mandatory LCCC basic supervisory training and Title IX training.

In addition to formal training, employees see ethical leadership modeled daily by administrators. Described previously within this section and in section 4P3 (Leadership) above, the Board of Trustees has adopted a code of ethics and standards of practice that they model and that they expect the College's executive leadership to model on a continual basis. This expectation for ethical and legal behaviors by the Board and its senior leadership is assessed annually through the Board's evaluation process as well as the 360° Feedback process incorporated into the annual performance evaluations of the President and President's Cabinet members. The 360° Feedback process includes an entire section devoted to integrity and trust.

4P4c. Operating financial, academic, personnel and auxiliary functions with integrity, including following fair and ethical policies and adhering to processes for the governing board, administration, faculty and staff (2.A.)

LCCC operates ethically and with integrity in its academic, financial, human resources, and auxiliary functions. The College has Board Policies and Administrative Procedures established for these areas, as well as many program or unit-level guidelines that ensure these functions operate with integrity (2.A.). The process for establishing the policies and procedures has been explained in greater detail previously within this systems portfolio.

For example, a variety of Board Policy and Administrative Procedures pertain to the fiscal and human resources operations of the College. These include the various sub-processes associated with accounting functions, auditing of the Institution's financial statement, investments, employment practices, etc. These examples can be found on the [College's Policy Library](#) under the [Finance](#) and [Human Resources](#) sections. Similar suites of policies and procedures exist for academics and other operational areas of the Institution.

4P4d. Making information about programs, requirements, faculty and staff, costs to students, control, and accreditation relationships readily and clearly available to all constituents (2.B.)

The College 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 through official outward-facing (public) institutional communication systems. The College's website, printed materials, and interpersonal communication processes (e.g., orientation, advising, etc.) contain all information the public needs to understand these items.

For example, the College provides a [compliance and consumer information webpage](#) with comprehensive information regarding the costs and institutional effectiveness as well as links to accreditation information. In addition the College's [catalog](#) and portal, [MyLCCC](#), provide information employees and students need to make informed decisions and provide sound advising. Also, the College routinely distributes information about school calendar deadlines, requirements for admission or registration, financial obligations, and other items of importance through digital announcements, press releases, video messages, radio messages, and digital message boards around campus.

In totality, the College has been effective in presenting 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 (2.B.).

4R4a. Summary results of measures (include tables and figures when possible)

LCCC employee surveys include custom items related to legal and ethical behaviors at the College. [Table 4R4-1](#) presents relevant historical results from the Ruffalo Noel-Levitz College Employee Satisfaction Survey (CESS). On three of the four items, respondents gave a rating of approximately 4 on a 5-point scale.

In addition, the College monitors and tracks a variety of other outcomes pertaining to institutional compliance with legal and ethical expectations. Examples include:

- LCCC continues to have clean financial audits demonstrating compliance with the fiduciary legal expectations for its operations. More specifically, in the last audit, no deficiencies in internal control over compliance were identified and considered to be material weaknesses (see 5R3a for a [copy of the letter](#), p. 56 and 60).
- Responses from the 360° Feedback component of President's Cabinet members' annual evaluations on areas on integrity/trust and policy compliance/application have most respondents indicating that Cabinet members meet or exceed expectations for these areas.
- Similarly, the [2018 results](#) from the President's 360° Feedback process show he meets or exceeds expectations of most respondents on integrity, trust and leadership.
- LCCC's Human Resources department conducts new employee orientations multiple times per year. Over the past three years alone, 109 (roughly 290 percent) of all employees have gone through this program.
- HR also tracks the total number of employee infractions of ethical use policies and, in the past three years, there has not been a single violation that led to disciplinary action.
- Since 2014, the College has had just two formal complaints filed with the Office of Civil Rights or the Equal Employment Opportunity Commission. Both were resolved without findings (see [letter one](#) and [letter two](#)), while providing opportunities to improve LCCC's processes.

4R4b. Comparison of results with internal targets and external benchmarks

The College's internal target for employee survey items is simply to increase annually, especially with those referenced above as they are custom items LCCC includes in the survey, and thus they have no national benchmark. Establishing benchmarks for many of the other items the College monitors is problematic; in many ways the desired target or benchmark is zero. But overall, the College aspires that these items return few negative outcomes, and, if they do, the College works, with demonstrated success, to ensure they are resolved quickly and completely.

4R4c. Interpretation of results and insights gained

Similar to other results in this chapter, LCCC has witnessed significant gains in the responses on the employee satisfaction and engagement surveys. Also similar, the national comparison benchmarks have essentially remained flat during this same time period. LCCC still has some room to improve to reach or surpass the benchmarks; however, it is evident that the Institution is on the right path.

It is worth noting the substantial work LCCC has done since the previous systems portfolio on employee development processes and, more importantly, processes to handle challenges that may arise from its employees. This work has produced the results intended with few issues surrounding employee violation of legal or ethical expectations and rapid, successful institutional responses to those few issues that rise to the level of institutional response.

4I4. Based on 4R4, what process improvements have been implemented or will be implemented in the next one to three years?

LCCC is focused on three areas of improvements that pertain to specific processes intended to ensure the legal and ethical behavior of its employees and fulfill its societal responsibilities. These include the following:

Over the past few years, LCCC has invested heavily in the development of a robust process for mitigating and responding to issues of alleged harassment and/or sexual misconduct. Given the changing landscape with federal regulation and directives and the rise of the public awareness around campus safety, LCCC has been a leader in the design of a comprehensive structure and process for education, investigation, and response.

For example, LCCC has implemented mandatory Title IX training for all employee and all students, engendering an awareness of the duties to notify, identifying potentially concerning behaviors, their own conduct, etc. Likewise, the College has implemented an integrated process for Title IX investigations that include a trained, knowledgeable corps of Title IX investigators from all areas and employee classifications who are empowered to objectively investigate, report, and record the circumstances of Title IX cases. For the past five years LCCC has also been a leader in the region by hosting an annual Title IX Investigator training for regional higher education institutions. Finally, LCCC has improved significantly in its case management system allowing for better tracking and archiving of cases.

LCCC has also begun the early work to improve upon the policies, procedures, and processes for the education and reporting of both the Board of Trustees and all employees around their responsibilities to uphold integrity, standards of practice, and conflicts of interest. Although LCCC has had a good process in place for many years (referred to earlier in this section), complexities of external rules, regulations, and expectations, as well as advances in technology, provide the opportunity to improve how the College instills and complies with expectations for ethical behaviors and standards. Updated and/or new policies and procedures have been drafted and are in the consultative review and feedback stages. From there, education/training offerings will be developed and deployed, and improved systems for reporting, compliance monitoring, and response will be created.

Finally, and referenced in Chapter 6, a robust performance evaluation model (system) is being developed to aid in the accurate and consistent performance assessment of LCCC's people. This will enable specific employee improvement within current roles and competency-based, focused development toward the fulfillment of future roles at LCCC. Accomplishing this goal will require aligning employee job performance with meaningful, role-focused competency models in order to foster shared understanding and establish clear expectations across LCCC; providing employees with consistent performance feedback; enabling better coaching on the part of supervisors; allowing for better institutional tracking and reporting of employee performance across levels and groups; and tying employee development and performance assessment to function outcomes.