

Working Group 2 Report Template

Standard II: Ethics and Integrity

1. **Overview of Working Group's Charge.** This group is responsible for fulfilling all aspects of the general Working Group charge with respect to **STANDARD II: Ethics and Integrity** and will do the following:
 - a. Determine to what extent CU meets Standard II and its Criteria, Requirements of Affiliation #5, #6, #12, #13, and #14, and Accreditation-relevant federal regulations for Verification of Compliance.
 - b. Consider how Institutional Priorities #1, #2, #3, and #4, and Intended Outcomes #1, #2, #3, and #4 are addressed in Standard II.
 - c. Collect and examine relevant data, policies, processes, and procedures for Standard II.s
 - d. Identify the University's strengths, challenges, and opportunities for improvement for Standard II, recommend strategies for improvement, and implement strategies where feasible.
 - e. Develop draft reports and incorporate feedback into a final report for Standard II according to established timelines.

2. **Description of Lines of Inquiry.** This group pursued the following lines of inquiry to determine to what extent CU meets the Standard and Criteria.
 - a. What does the evidence reveal about the University's commitment to academic freedom, intellectual freedom, freedom of expression, and respect for intellectual property rights?
 - b. To what extent has the University established a climate that fosters respect among students, faculty, staff, and administration from a range of diverse backgrounds, ideas, and perspectives?
 - c. To what degree do University policies, procedures, and practices assure fair and impartial treatment of constituencies in all aspects of operations, address complaints and grievances, avoid conflicts of interest, and communicate with honesty and integrity with all constituencies?
 - d. What does the evidence show about how the University complies with all applicable federal, state, and Commission reporting policies, regulations, and requirements including those items in the Verification of Compliance?
 - e. How does the University review, approve, and oversee its contracts and agreements (e.g., transfer agreements, articulation agreements, and other contractual arrangements) to assure that all obligations and responsibilities are fulfilled?
 - f. How does the University periodically assess ethics and integrity as evidenced in institutional policies, processes, practices, and the manner in which these are implemented?

3. Collaboration with the Working Groups

Collaborations exist with Working Groups 1, 7, & 8, President's Office, Provost's Office, Institutional Effectiveness, Human Resources, Marketing and Communications, Diversity, Equity, and Inclusion Office, Enrollment Management, Student Success and Campus Life, Registrar's Office, Financial Aid

4. Assessment Information Utilized to Evaluate the Lines of Inquiry

Evidence included but is not limited to the Student Handbook, HR Web page, Code of Conduct, Systematic Review of Board Policies, Financial Aid Information, Conflict of Interest Policy, Collective Bargaining Agreements, Climate Survey, NSSE Survey, Institutional Effectiveness Web Site, Marketing and Communications Web Site, Consumer Information Web Page, University Senate Constitution (for policy development/revision)

5. Analytical Report

Standard II

Ethics and integrity are central, indispensable, and defining hallmarks of effective higher education institutions. In all activities, whether internal or external, an institution must be faithful to its mission, honor its contracts and commitments, adhere to its policies, and represent itself truthfully.

INTRODUCTION

Commonwealth University (CU) demonstrates ethics and integrity as defined by its mission and strategic statements and by the actions of leadership, faculty, staff, and students. The **mission** highlights an affordable, high-quality education emphasizinginclusivity supporting all learners. The **vision** features ... an accessible and transformative educational experience while the **values** and **priorities** elevate being student-centered, resilient, collaborative, accessible, innovative, and welcoming and inclusive. Finally, CU's three **core commitments** of (1) diversity, equity, inclusion, and belonging; (2) strategic communications, and (3) thriving students, faculty, and staff are considered to be essential to the success of our Strategic Plan and are ideals fundamental to Standard II.

Tangible actions demonstrate throughout the CU community how CU lives the strategic statements, as articulated in CU's Institutional Effectiveness Plan, and fosters a positive living, learning, and working environment for all key stakeholders. Planning, resource allocation, assessment, and continuous improvement processes include interim and annual year-end reporting in the assessment platform, at university forums, through oversight committees, at President's Cabinet, and to the CU Council of Trustees (COT). These processes and reports provide evidence of CU's dedication to accomplishing its mission and goals.

Ethics and integrity are essential elements of CU's policies, practices, procedures, and daily operations. Ethical principles inform CU policies which are codified by the Policies, Procedures, and Guidelines web page, Human Resources (HR) web page, student handbook, code of conduct, and collective bargaining agreements (CBAs). Specifically, CU's policies address discrimination, harassment, sexual misconduct, gender identity, conflict of interest, and student conduct, among other topics. The code of conduct and academic integrity policy (i.e., PRP 3512) for students purport to cultivate a culture of integrity both in societal and academic contexts. CU's new transparent governance structure openly communicates policies, decisions, and financial matters to the university community.

Educational opportunities and professional development equip students, faculty, and staff to act ethically and with integrity. The General Education program theme for *Citizenship and Responsibility* embeds ethical reasoning and critical analysis in the curriculum to inform students about making ethical decisions and fulfilling their societal responsibilities. Moreover, employee training ensures that faculty and staff understand their responsibilities as a CU community member.

As a state institution, CU is subject to state laws protecting the public interest. The University honors its contracts and commitments in good faith, with actions for delivering a quality and affordable education, upholding vendor contracts, and implementing CBA provisions. For instance, CU implements the negotiated compensation and benefits, fair evaluation and promotion provisions, and committee and governance structures as stipulated in union CBAs. The University regularly reviews its contracts through negotiations and its policies as stipulated in the Senate Constitution and Policy on Policies.

University areas with primary responsibilities for communication adhere to professional standards and codes of conduct set forth by professional organizations [e.g., the American Marketing Association (AMA) Code of Conduct and the international Council for Advancement and Support of Education (CASE) Principles of Practice for Communications and Marketing Professionals at Educational Institutions] and state guidelines for data integrity. CU seeks to present itself truthfully by socializing and monitoring its brand identity and practices to ensure accuracy of data and information.

ACADEMIC FREEDOM, INTELLECTUAL FREEDOM, AND FREEDOM OF EXPRESSION (CRITERION 1)

A commitment to academic freedom, intellectual freedom, freedom of expression, and respect for intellectual property rights

CU commits to academic freedom, intellectual freedom, freedom of expression, and respect for intellectual property through its mission, vision, values, policies, programs, and initiatives. The mission and *Academic Excellence and Innovation* priority advocate for high-quality education, high-impact practices (e.g., undergraduate research and capstone courses), and advancing scholarship, creative works, and innovation. The values emphasize being:

- Welcoming and Inclusive – to encourage robust dialogue, intellectual curiosity, and diversity of thought
- Exceptional and Innovative – to build connections to new opportunities and programs, leveraging alumni, employers, and cutting-edge research

The values excerpts, the APSCUF CBA, Student Handbook, and CU policies cohere to protect these freedoms and create a campus culture that supports them. CU is also an affiliate member of Scholars at Risk, an organization that protects scholars' freedom to think, question, and share ideas; has held a CU-wide information session about the cause; and delivers an experiential course to promote the awareness of the persecution of academics and imprisoned scholars.

Academic and Intellectual Freedom

The APSCUF CBA Article 2, Academic Freedom, provides faculty members full freedom in research and the publication of the results... [and] freedom in the classroom in discussing their subject. Articles 2 and 4 remind faculty of the academic responsibility they carry to assure accuracy, appropriate restraint, and respect for others' opinions and to safeguard academic freedom by fulfilling their duties as a faculty member according to the CBA. The academic freedom and responsibility language corresponds to the 1940 Statement of Principles on Academic Freedom and Tenure on the AAUP web page.

In the Student Handbook, the Student Code of Conduct articulates ideals and responsibilities and states that:

The University community exists for the pursuit of learning, the transmission of knowledge, the development of students as scholars and citizens, and ultimately, for the general well-being of society. Freedom of inquiry, speech, action, and expression is indispensable in the attainment of these goals. Students, as members of the University Community, are encouraged to engage in a sustained, critical, and independent search for knowledge. The student conduct program supports this endeavor through policies that balance the freedom of the individual student with the interests of the University Community as a whole, and procedures that apply these policies in an equitable and consistent manner.

CU supports academic and intellectual freedom in many ways. The University libraries provide resources and services to promote intellectual pursuits, with print and digital holdings. Librarians provide library research guides, information literacy sessions, and research assistance. Faculty mentorship and discourse also ensue through CU's Center for Teaching and Learning (CTL) with locations on each campus. CTL facilitates dialogue among faculty, encourages discussion and exchange of ideas, and disseminates information to advance teaching and learning. Sponsored research, faculty grants, leaves, sabbaticals, and awards affirm a commitment to research, intellectual freedom, and scholarly development. More information is available in Standard III.

Freedom of Expression

Freedom of expression encourages discourse, develops awareness, and builds tolerance and understanding. The University is unwavering in its commitment to fostering open and free exchanges of ideas to enhance the learning environment, both inside and outside the classroom. To uphold this commitment, CU transparently presents expectations and makes them easily accessible on the web in strategic statements and policies. New employee orientation introduces CU's commitment to freedom of expression while town halls, committee meetings, and DEI trainings, for example, reinforce it.

The APSCUF CBA, Article 2, asserts that as a citizen and member of a learned profession, faculty are afforded the freedom to speak or write free from University censorship or discipline. In addition, policies such as PRP 2100 - Policy on Time, Place, and Manner Guidelines for the Exercise of Expressive Activities ensure that various forms of freedom of expression are available and supported for members of CU's campus community and the public with respect to time, place, and manner limitations. The policy also addresses the appropriate use of University buildings and grounds. The original policy was instituted at the BL Campus (pre-integration) in 2021. The policy was updated in 2023 for CU and includes all campuses with designated public and university forum areas identified for each location. The policy covers areas that are utilized regularly by advocacy groups, protests, or election / political events. In Spring 2024, an expressive activities handout was created, with feedback from campus student government leaders, about the exercise of expression and serves as a digital and physical tool to overview CU's freedom of expression activities and resources. Staff and CU police can distribute these resources in real time to students, faculty, and staff with questions or concerns during an active event. Finally, CU has instituted a First Amendment Landing Page, built as an FAQ in early 2024, and will evolve as materials are added. The expressive activities handout is also linked to this page.

CU also employs organizational communications to reinforce these values and expectations. Regular updates and reminders are conveyed through official communication channels, e.g., President's, Provost's, DEI, and the Triad (i.e., the weekly internal newsletter) emails reinforce the institution's commitment to facilitating an environment where diverse perspectives can be freely expressed and contribute to the rich tapestry of academic discourse. This multi-faceted

approach ensures that the ethos of open dialogue and the value it brings to the classroom are deeply ingrained in the university culture. Opportunities for free expression exist across CU locations and includes visual and performing arts shows, student-run radio and newspapers, and posts on student social media pages. Each campus has a student-run newspaper including BL – The Voice, LH – The Eagle Eye, and MA – The Flashlight; BL also operates a radio station – WHSK The Husky Student Radio. Each campus presents theatre shows open to CU and community members and produce at least one theatre event for Spring 2024. BL Players will present “A Divine Kerfuffle”, a new play from Houston-based playwright H. Russ Brown. LH Players (student volunteers) will present “Wait Until Dark.” At MA, the Music, Theatre, and Dance Departments will stage the musical “Kiss Me, Kate.” In terms of literary journals, CU publishes the BL Literary and Art Journal (just celebrated 75th anniversary) as well as a Prism Arts and Literature Magazine in collaboration with MA and LH. (Previously, LH published The Crucible: The LH Literary and Arts Journal). Finally, each academic year, each campus hosts student art exhibitions, also open to CU and local communities. Students also gain an appreciation for different perspectives through all general education program themes but especially through *Interconnections*, which emphasizes mutual respect and tolerance through meaningful discourse, and *Creativity and Expression*, which explores how artistic works are imagined and created.

Intellectual Property

Intellectual property rights protect inventors’ ideas and creative efforts, and several protections exist for members of State System universities. Act 188 and the related state-owned University Intellectual Property Act, 24 P.S. § 2521 et seq., give CU and its faculty the ability to develop and market intellectual property owned or created by an employee. The provisions also allow private individuals to use public resources lawfully. The CBA (Articles 39 and 41) also defines faculty-developed ideas, inventions, materials, and creative works resulting from scholarly activities as intellectual property owned by the faculty who created them. Similarly, CU policy, PRP 2910, Patents and Copyrights, clarifies that copyright, patent ownership, and royalties arising from the normal course of faculty duties belong to the faculty member. PRP 2550, Acceptable Use of Technology Policy, also endeavors to protect the rights of all university community members as IT users must respect intellectual property rights and are prohibited from copyright infringement, including illegal file sharing of video, audio, and software.

CAMPUS CLIMATE AND DIVERSITY (CRITERION 2)

A climate that fosters respect among students, faculty, staff, and administration from a range of diverse backgrounds, ideas, and perspectives

CU fosters respect among all community members in its *Welcoming and Inclusive* value statement, *Welcoming and Inclusive Community* Strategic Plan priority, and related goal to “create an inclusive and welcoming university culture while developing and strengthening connections among our multiple locations and within our local communities.” The APSCUF CBA Preamble also promotes a climate of respect and inclusion by encouraging its members to “cooperate in mutual respect and harmony” and “show respect for the opinions of others”.

Aligned with the Mission, the *Interconnections* and *Citizenship and Responsibility* general education program themes and learning goals cultivate student awareness and sensitivity to cultural differences, social justice, global perspectives, equity, and inclusion. Moreover, the sheer breadth of the general education curriculum through its five themes and 16 learning goals exposes students to diverse thinking, ideas, theories, and modes of inquiry. Co- and extra-curricular activities celebrate differences as support programs, advocacy groups, and student

organizations advance awareness, appreciation, and support for individuals and groups of varying characteristics within the campus community.

The Student Handbook and Code of Conduct outline expectations including behavior reflective of respect, responsibility, and integrity. The processes by which students can voice concerns are outlined on the Student Complaints and Concerns web page where students are directed to the Dean of Students for complaints and concerns and Director of Student Conduct for conduct issues. The Student Complaints and Concerns and Policies, Procedures, and Guidelines web pages also point students to other CU policies and offices that strive to establish a supportive living, learning, and working environment, and address issues, complaints, concerns, and appeals. CU policies espouse values that prohibit discrimination and harassment at CU, including PRP 4789 - Harassment and Discrimination Policy, PRP 2060 - Americans with Disabilities, PRP 4902 - Affirmed Gender Marker Policy, and PRP 4790 - Sexual Misconduct Policy. Table 2.1 provides examples of entities and initiatives that support campus climate and diversity.

Table 2.1: Examples of Entities and Initiatives in Support of Campus Climate and Diversity	
Entity or Initiative	Brief Description
Chief Diversity, Equity and Inclusion Officer and campus locations	A position created in 2021, the Chief Diversity, Equity, and Inclusion Officer oversees DEI staff and initiatives at each location. Using data and information, the team developed a DEI strategic plan with four priority areas that guide development of programs and services.
Disability Services	The Chief Accessibility Officer, a CU position created in fall 2023, oversees Disability Services and ensures that equal opportunities for individuals with disabilities and accommodation needs are met and reflected in CU's policies and practices. Oversight includes PRP2060, American with Disabilities Act, and Section 504 of the Rehabilitation Act.
Title IX Office	The Title IX Coordinator oversees the Title IX Office and deputy coordinators at each campus to provide supportive measures to faculty, staff and students and ensure that complaints are handled promptly and equitably, with fairness to all parties involved. Staff members conduct numerous educational programs regarding the university's processes and policies and general awareness regarding sexual misconduct and related matters.
Center for Global Engagement and Study Abroad	The director, campus-based staff, and faculty study abroad coordinators facilitate semester, year-long and faculty-led short-term programs across the globe. The center also promotes cultural programming and global awareness in the local community.
Multi-Cultural Resource Center	Each campus offers a center that fosters healthy relationships and community on campus by focusing on student success, leadership, and engagement.
Women's Resources	Each campus hosts a Women's Resource Center, overseen by a director, and a Women's Commission that advocate for women's issues and support students regarding issues of sex, gender, sexual violence, personal safety and health, social justice, and educational equity. The Center and Commission jointly sponsor events like the annual Take Back the Night event which focuses on sexual assault topics.
Student groups and clubs	All campuses offer a broad array of student clubs and organizations that represent topics and interests related to civic engagement, sports and recreation, health and wellness, leadership and governance, social action and advocacy, visual and performing arts, among many others.
Sankofa Conference	Held in February each year, this one-day conference helps students learn, understand, and appreciate the rich cultural heritage of people of African descent.
Multi-Cultural Field Day	This event focuses on building unity, connecting students, and strengthening a sense of belonging for all CU students through organized outdoor activities. LH hosted the Fall 2023 event for 250 students.
Out of Classroom and Into the Community	Led by the director of outreach initiatives, students volunteer for a community-based, service-learning project in urban areas, like Philadelphia, which gives visibility to CU and serves community needs.
Monthly Celebrations	Celebrations are held throughout the academic year to honor historic and milestone events including the MLK Commemoration, Black History Month, Native American Heritage Month, Women's History Month, Hispanic Heritage Month, and Disability Awareness Month, among others.

Table 2.1: Examples of Entities and Initiatives in Support of Campus Climate and Diversity

DEI Keepers of the Flame Awards	Annually, PASSHE recognizes one faculty member from the BL, MA, and LH campuses for their contributions to creating and promoting diverse, equitable, and inclusive environments that cultivate a sense of belonging.
DEIB Career Expo	Each campus sponsors a half day spring career expo for those employers who identify as being dedicated to DEI and are interested in hiring candidates from diverse backgrounds, demographics, and life experiences.
It's On Us PA	Part of a statewide campaign, It's on Us PA invites members of the educational community to reframe the conversation around sexual violence and pledge to be part of the solution. CU received \$60,000 in 2023-24 to implement initiatives including large-scale projects like: (1) advanced Rape Aggression Defense (RAD) Instructor training and adding BASIC RAD Instructors across CU; (2) hard-copy Title IX Toolkits issued to CU employees; (3) student club and organization incentive program to engage more students in Title IX/Sexual Misconduct education; (4) an August orientation speaker = Catharsis across CU.

CU's steadfast commitment to celebrating differences appears in its *Diversity, Equity, Inclusion, and Belonging* core commitment and *University Success* priority. With respect to diversity, CU proactively recruits for a more diverse student body and employee complement. This enduring aspiration has challenged CU campuses, located in rural, predominantly Caucasian communities in northern and central Pennsylvania. The communities tend to lack proximity to more urban communities with an array of services and opportunities that naturally attract diverse populations. CU has invested in three multi-cultural admissions recruiters and sponsored bus trips for prospective students and families from urban areas. Outreach has occurred with local businesses to offer personal health and care products for ethnically diverse populations. Activities such as the spring 2024 Washington D.C. Field Trip to the National Museum of African American History and Culture provide options for student activities in urban settings. DEI-sponsored faculty and staff networking socials intend to provide information about the DEI-related offices, build relationships, and foster a sense of belonging. CU closely monitors its key performance indicators (KPIs) for diversity. URM enrollment increased from 13.9% to 14.1% in Fall 2023, which sits just below the PASSHE average, and employee diversity is at 5.74% in Fall 2023, up slightly from 5.52%. Student success measures include both URM and Pell-eligible retention-to-second-year and four- and six-year graduation rates, as described in Standard IV. CU experienced an increase in retention-to-second-year rates from 61.0% to 68% for the Fall 2022 URM cohort and 66.6% to 69.7% for the Fall 2022 Pell-eligible cohort.

GRIEVANCE POLICIES (CRITERION 3)

A grievance policy that is documented and disseminated to address complaints or grievances raised by students, faculty, or staff. The institution's policies and procedures are fair and impartial, and assure that grievances are addressed promptly, appropriately, and equitably

CU is committed to providing accessible opportunities for students, faculty, and staff to voice concerns freely, ask questions about University policy and practices, and report complaints and grievances without fear of retribution. Policies and processes are also designed to facilitate the timely, proper, and equitable addressing of reports.

As stated in Criterion 2, web pages for Student Complaints and Concerns; Policies, Procedures, and Guidelines; the student handbook; and HR give ready access to the offices, policies, and myriad avenues for CU community members to address complaints and concerns. Nondiscrimination, sexual harassment, sexual misconduct, and ADA policies define procedures for employees and students to seek redress. Orientations for new employees and students incorporate segments that discuss expectations and disseminate policies. The online resources also provide complaint processes for both CU and external agencies that ensure protection of rights and fair treatment and comply with the Higher Education Act of 1965, as amended by the Higher Education Opportunity Act (HEOA) of 2008 and Title IV. Complaint processes and

contact information for the State System, Pennsylvania Department of Education, MSCHE, and the State Authorization Reciprocity Agreement (SARA) are linked from the Consumer Information web page and housed on the Student Complaints and Concerns web page.

The Student Handbook and Student Complaints and Concerns web page link to the PRP 3592 - Academic Grievance Policy, PRP 3512– Academic Integrity, PRP4862 - Student Non-Academic Grievance Procedures, and incident reporting forms or procedures for students of concern, the code of conduct, hazing, and student government concerns. Concerns about students are submitted to the Dean of Students and evaluated by the CU Campus Assessment, Response, and Evaluation (CARE) Team comprised of university professionals that connect students to resources on campus or in the local community. Standard IV offers more information on addressing concerns about students through the CARE Team and CU Succeed, the student success platform. Complaints concerning academic, student, conduct, discrimination, harassment, and sexual misconduct are handled through the aforementioned policies and procedures, but a general complaint process exists for issues not covered by a specific CU policy or procedure. The Dean of Students receives general complaints and appropriately refers them for redress.

Online CBAs outline grievance rights and detailed procedures for faculty and staff. The APSCUF (faculty CBA, Article 5 and coaches CBA, Article 4), AFSCME (Articles 37 and 38), OPEIU (Article 34), SCUPA (Article 13), and SPFPA (Recommendations 38 and 39) CBAs include grievance procedures, that by law, are applied to all members of the bargaining units fairly, in good faith, and without discrimination. The grievance procedures include timelines to assure prompt handling and outline appeal procedures and steps.

CONFLICT OF INTEREST (CRITERION 4)

The avoidance of conflict of interest or the appearance of such conflict in all activities and among all constituents

As a State System university, CU adheres to the Commonwealth of Pennsylvania regulations, State System policies and procedures, and CU PRP 2751 - Conflict of Interest, which abundantly address the potential, appearances, or incidences of conflict of interest. Policies, procedures, CBAs, and professional standards also guide behaviors across CU, particularly regarding admissions, financial aid, procurement, and personnel practices. The State Adverse Interest Act prohibits state agencies, the Board of Governors (BOG), COT, and public employees from having an adverse interest in a contract, representation for a contract, or decision making about contracting. The PA Public Official and Employee State Ethics Act lists restricted activities including conflict of interest, seeking improper influence, accepting improper influence, voting conflicts, etc. Conflict of interest provisions in the BOG Bylaws, PA Council of Trustees (PACT) Handbook, and Commonwealth of Pennsylvania Management Directive 505.7, Chapter 13, Conflict of Interest (pp. 106-109) reference and align with these Pennsylvania laws. The BOG, CU COT, and covered employees, including departmental chairpersons and administrators, complete Conflict of Interest forms annually. Processes are overseen by the President's Office for the CU COT and by HR for employees.

Furthermore, the BOG Policy 2012-01: Conflict of Interest describes the procedures for the Chancellor, presidents, and State System employees to prevent and deal with actual occurrences and instances of appearance of conflict of interest which may exist in auditing or reviewing State System operations; monitoring grants and subsidies; and procurement or contracting. The Management of Financial Conflict of Interest, State System Procedure/Standard Number 2016-22, addresses conflicts related to research, education, and

service activities to mitigate financial conflicts. The procedures protect the quality and objectivity in research, maintain credibility and integrity of faculty and staff, and ensure public trust. Additionally, CU's PRP 2751 - Conflict of Interest supplements the Ethics Act requirements. The policy addresses grant funding and conflicts of interest where financial or personal interests may compromise, or appear to compromise, a person's judgment or actions. Where financial interests could affect research or educational activities, PRP 2751 requires submission of a disclosure form prior to submitting a proposal to the funding entity.

CBAs prohibit employees from serving in positions that make decisions on matters of appointment, evaluation, tenure, promotion, and sabbatical of an immediate family member. Various departments have adopted professional standards for ethics and institute controls that eliminate conflict of interest. For example, Admissions abides by the National Association for College Admissions Counseling (NACAC) Code of Ethics and Professional Practices, for which implementation guidelines of professional conduct include steps to avoid conflict of interest and the appearance of unethical behavior. The principles prohibit incentive payments based on productivity measures, forbid accepting rewards or remuneration to influence decisions, and require adherence to standards set forth. Financial Aid staff avoid conflict of interest by adhering to professional standards set forth by the National Association of Student Financial Aid Administrators (NASFAA) in its Code of Conduct and Statement of Ethical Principles and by the government.

Additionally, the Student Billing / Bursar's Office continues to maintain internal control procedures that contain system security and controls for fund management and cover areas like billing, accounts receivable, financial aid, loan disbursement, waivers, and scholarships. Moreover, segregation of duties controls are built into the profile and permissions of software platforms, including the Banner student information system, SLATE customer relationship management, and SAP enterprise resource software.

The Commonwealth Procurement Code, Act 57 of 1998 and BOG Policy 2010-01-A: Expenditures of Public Funds, and BOG Policy 1998- 04-A: Procurement of Goods, Services, Supplies, and Construction guide all contracting processes. These documents include provisions that address conflicts of interest and outline steps that procurement officers and institutions follow in the contracting process. The shared services procurement office at the Office of the Chancellor oversees compliance with all aspects of the bidding and contracting processes, ensuring that the University contracts with responsible and competent vendors and honors contracts with prompt payment provided upon work completion and inspection.

The State System established a Fraud, Waste, and Abuse hotline for incident reporting, allowing confidential reporting of potentially inappropriate situations. The hotline provides a means for employees, students, and university community members to report incidents like abuse, improper conduct, policy violations, financial matters including theft and fraud, ethical concerns, legal violations, intercollegiate athletics violations, and environmental health and safety issues. Furthermore, all members of the CU community are encouraged to report improper activities, including pursuing benefits or advantages in violation of applicable law or policy or where there may be a perceived conflict of interest.

FAIR AND IMPARTIAL PRACTICES (CRITERION 5)

Fair and impartial practices in the hiring, evaluation, promotion, discipline, and separation of employees;

As an equal employment opportunity employer, CU commits to fair and impartial practices in its hiring and employment practices. To support this commitment, the University follows State

System policies and procedures, CU policies and procedures, and CBAs that guide these practices. These include established hiring processes that outline mandatory and recommended employment search procedures for all positions to ensure consistency and objectivity in CU's hiring processes.

After presidential approval, searches may commence by developing job postings that specify the selection criteria and qualifications consistent with university, professional, and/or specialized accreditation standards. CU uses PeopleAdmin, a talent-management software system, to develop job postings, which undergo several layers of review including those by the HR office. These checks assure agreement on job responsibilities, credentials, application materials, etc. HR meets with search committee chairs and members to review the hiring process and enforces search protocols assuring all steps comply with Equal Employment Opportunity (EEO) and CBA requirements. HR assists with placing appropriate external advertisements to develop qualified, diverse applicant pools. This oversight applies to and promotes consistency and fairness throughout the recruitment and selection processes. Once an employment offer is accepted, new employees receive an appointment letter or contract outlining basic terms of employment.

The CBAs (i.e., AFSCME, APSCUF, OPEIU, SCUPA, and SPFPA) set forth a uniform and impartial foundation for decision making in employee hiring, evaluation, and disciplinary processes. All staff and non-represented employees are evaluated using union- or System-approved (i.e., for management) evaluation instruments. HR monitors these processes and leverages DocuSign to efficiently move documentation through various steps. The Management process is discussed below. For staff, HR uses DocuSign to notify supervisors in advance of employees' evaluation date; distribute forms and job descriptions to verify currency; and route evaluations to the employee, supervisor, and reviewing officer for review, discussion, and signature. The final, signed document goes to HR, an office that oversees the entire process. The deans and provost oversee faculty evaluation and tenure processes per the APSCUF CBA and CU policies. They apply provisions to all faculty regardless of teaching level and modality as outlined in the CBA.

The CBAs also set provisions for promotion, discipline, and dismissal, which are applied equally to all employees as required by the CBAs. Employees can exercise their right to request a union representative during meetings that may result in discipline or dismissal and to grieve. CBA provisions assure due process and provide steps to forward unresolved grievances for consideration up to and including arbitration. In addition, various CBA provisions earlier discussed in Criterion 2.4 apply here as well.

BOG policies and procedures (e.g., BOG Policy 1984-14-A: Terms and Conditions of Employment of Senior Policy Executives, Management Directive 505.7: Personnel Rules, BOG Policy 1983-01-A: Merit Principles, and Non-represented Employee Performance and Reward Manual) govern employment conditions of senior executives and managers. The BOG policy on senior policy executives applies to presidents, vice presidents, and academic deans regarding their appointment, conditions of appointment, and termination. The Personnel Rules set forth guidelines for recruitment and selection, probationary periods, evaluation, discipline, and separation. Merit Principles reference fair treatment in all personnel processes but more specifically, address employee discipline and dismissal for non-represented employees. As it relates to performance evaluation, all managers must complete a Management Performance Evaluation and Development Form each year, Part IIA, which outlines goals and actions for the upcoming year in alignment with the Strategic Plan priorities and commitments. In August of the following year, managers receive an annual evaluation, which includes a review of outcomes

compared to goals and links to merit pay. All these documents provide fair and equal treatment of non-represented employees in personnel decisions.

HONESTY AND TRUTHFULNESS (CRITERION 6)

Honesty and truthfulness in public relations announcements, advertisements, recruiting and admissions materials and practices, as well as in internal communications

CU designated a core commitment for *Strategic Communications* that advances effective, timely, and accurate communication to all key stakeholders. All CU divisions and employees hold responsibility to follow processes and practices to ensure honesty and truthfulness in all external and internal communications. These processes and practices align with professional standards and ethics like those espoused by NACAC for enrollment management, AMA for marketing, and CASE for strategic communications. The Division of Strategic Communications and Marketing adheres to the international CASE *Principles of Practice for Communications and Marketing Professionals at Educational Institutions*.

The Division of Strategic Communications and Marketing (StratComm) oversees the practices and processes for communicating with various constituencies and works diligently to ensure that the University's interactions with the media and the public always provide accurate representations while buoying the CU brand. To aid in this process, StratComm has established a brand identity guide and socialized it widely through numerous presentations across CU. The guide, supporting materials, and a SharePoint site provide easy access to CU and campus logos, word marks, letterhead, Zoom backgrounds, slide deck templates, email signature templates, and an online stationery store, which promote compliance and consistency.

StratComm understands that the University communicates with multiple stakeholders across various formats and serves as the gatekeeper for university communications. StratComm and Enrollment Management work closely together in developing communications for the recruiting and admissions processes especially through StratComm's enrollment marketing director and Admissions' enrollment communications and graduate admissions director positions.

CU's efforts toward honesty and truthfulness are also reflected on the Consumer Information webpage in compliance with HEOA and MSCHE public disclosure policies. Criterion 8 describes more about compliance with public disclosure requirements and how Institutional Research (IR) verifies institutional data and reports to internal stakeholders and external entities. Criterion 9 discusses more about the CU policy review processes, including revisions to the CU Policy on Policies and a policy review schedule. CU's new shared governance structure also includes provisions for creating, reviewing, and approving policies. Both State System and institutional policies serve as a primary means of communication to CU stakeholders.

ACCESS AND AFFORDABILITY (CRITERION 7)

As appropriate to its mission, services or programs in place:

a. to promote affordability and accessibility;

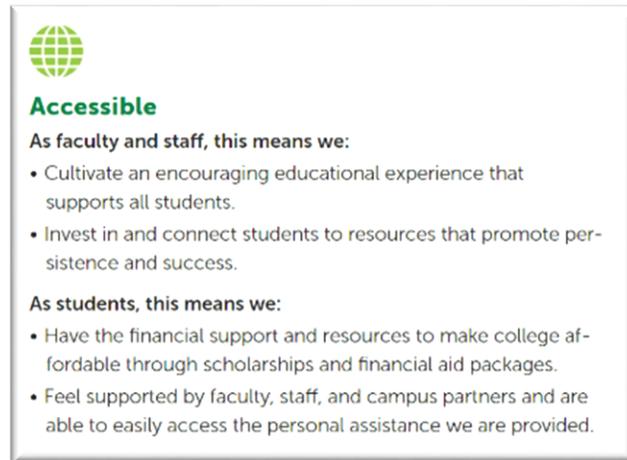
b. to enable students to understand funding sources and options, value received for cost, and methods to make informed decisions about incurring debt

Consistent with Act 188, CU's mission, vision, values, and *Student Success* priority collectively promote an affordable and accessible, high-quality education. CU desires to make its education accessible and affordable for all students and their families.

Accessibility

CU's values state in Figure 2.1 the faculty, staff, and student perspectives with respect to accessibility, ensuring availability of resources and personal assistance to support educational opportunity and student achievement.

Figure 2.1: Value for Accessible



Many students encounter barriers to access such as geographical, technological, physical, socio-cultural, educational, and financial. CU draws heavily from the rural counties surrounding its campuses, in which many students are first generation and educationally or economically disadvantaged. CU's Early College Program offers high school students a supportive environment to take courses online, face-to-face, or through concurrent enrollment in MA's approved districts at much lower or no cost, where donor funds offset cost of attendance. Dual admissions and Program-to-Program articulation agreements also lower cost and afford students at community colleges a head start and seamless transfer to CU. In addition, the technological investments at CU campuses, including We Connect rooms discussed in Standard 3 and the learning management system, have facilitated high-quality distance learning environments, extending CU's reach and increasing access to a broader program array across the campuses, the state, and nation.

The admissions web site touts its easily accessible online application, which provides a gateway to a highly personalized application process and ready connection to the admissions counselor responsible for recruitment activities where the student is located. Recruiting activities promote CU's high-value, affordable option to people from various backgrounds extending to high-yield, urban areas where populations are more diverse. CU recruits diverse populations and monitors success, for example, with IR dashboards filtered for URM, first generation, Pell-eligible, etc. CU enrolls 33% from the lower socio-economic status and 26% first generation. CU's participation in the Second Chance Pell Experimental Sites Initiatives (SCP ESI) provides an example of a special population, incarcerated individuals, for whom CU seeks to afford educational opportunity through programs at the Muncy and Mahanoy state correctional institutions with seven enrollees at each facility in 2023-24.

As described in Standard 4, CU offers programs and services to remove barriers and promote success. Disability services provides reasonable accommodations to students with disabilities and educates the CU community on equitable treatment of individuals with disabilities. Student Success programs give access and support to at-risk students who may be educationally

disadvantaged or underprepared for college-level work. These efforts, among other initiatives, are designed to give access to a more diverse student population.

Affordability

Making education affordable is the premise upon which the State System universities, including CU, were built. This topic dominates discussions at all levels as System and CU leadership demonstrably show their commitment. For example, Chancellor Greenstein's advocacy at the House Appropriations Committee in 2023 increased state funding to allow the BOG to hold in-state tuition flat for six consecutive years, an unprecedented tuition freeze which the BOG approved in July 2023. He recently testified in the 2024 hearings continuing to plea for increased funding. In podcasts, interviews, news releases, and presentations, President Hanna has publicly endorsed lowering the cost of attendance through CU's high school partnerships and merit-based institutional aid initiatives.

To this end, CU consulted with RNL on financial aid optimization strategies that leveraged funding options for students. RNL and CU representatives collaborated to design merit- and need-based aid strategies, improving yield of accepted first-year and transfer students. CU chose to focus heavily on merit-aid. Changes to Pell eligibility provided larger grants to economically disadvantaged students, which coupled with a wide-reaching merit-aid strategy, were expected to reduce unmet need and provide greater access to high-achieving and low-income prospective students. The admissions and financial aid counseling teams also leveraged additional need-based aid as impact awards for students with substantial need. Other CU initiatives target specific groups or populations. To promote affordability for MA students, CU implemented a strategy to offer in-state tuition and in-state merit awards for six counties in the Northern Tier of New York. In the performing arts, a new band scholarship, which required participation in marching band, was offered to a limited number of students on all campuses. Awarded in Fall 2023, CU's \$2.5M National Science Foundation S-STEM Grant funds need-based aid for students considering a major in the College of Science and Technology. The CU-THRIVE scholars receive up to \$15,000 per year to fill unmet need.

Following RNL studies and significant consultation, CU has invested more than \$26.7M in institutional aid, including leveraging foundation funds in a renewed institutional aid approach. The foundations provide significant aid through 1,091 scholarships (including those from the MA community foundation) that impacted 2,122 students in 2023-24 for a combined total of more than \$4.4M. CU continuously gauges affordability through Strategic Plan metrics of holding flat or decreasing average net price and average unmet need. Both measures are favorable (the lower the better), sitting below the PASSHE average.

Funding Sources and Options

CU offers several types of assistance to students and families. CU's Cost, Scholarship, and Aid and Consumer Information web pages comply with public disclosure requirements and provide information about the cost of attendance less aid, net price calculator, funding sources, and funding options for all locations, levels, modalities, and residencies. In Fall 2023, 33% of CU students were Pell-eligible, with a higher percentage at MA (42.4%) and LH (35.2%) than BL (30.5%). In 2023-24, 94% percent of first-year and transfer students received financial aid, up from 54% in 2022-23, resulting from the new aid strategies.

Several resources enhance understanding of the financial responsibility inherent in attending college before and after students' enrollment. In 2023-24, the financial aid and admissions offices coordinated to administer over 25 financial aid touchpoints including the web, email, print, social media, and events. The financial aid web page includes additional resources, using detailed web pages on the FAFSA simplification and completion process with written

instructions, YouTube videos, and ways to connect with financial aid staff. As part of the monthly next steps emails, Slate sends eight emails to prospective students, five of which are dedicated to financial aid, FAFSA, and financial literacy. Print materials include a Campus Visitor Financial Aid Guide and financial aid mailers, tailored to whether students are in-state, out-of-state, community scholars, or transfers. Financial aid also created CU social media campaigns on the primary platforms with timely, need-to-know student information. Beyond print and digital materials, financial aid offices participate in four virtual information sessions, and in-person events (e.g., accepted students day, open houses, and major showcases). CU offers scheduled and walk-in one-on-one financial aid appointments for enrolled students. They also provide telephone assistance for students and parents with questions regarding funding.

Financial Literacy

In its inaugural Strategic Plan, CU elevated the importance of financial literacy within the *Student Success* priority. The initiative states that CU will:

- Comprehensively embed financial literacy to enable informed decision-making regarding financial aid packaging, scholarships, and student employment opportunities

Ongoing or proposed financial literacy initiatives conducted by financial aid in collaboration with other offices include:

- Partnering with Admissions on a series of live workshops on using FAFSA to pay for college, budgeting, loan repayment processes, and other financial topics to incoming prospective students and families throughout the course of the recruitment cycle, including to students who are in their sophomore, junior, and senior year of high school as well as transfer students
- Collaborating on orientation and/or pre-semester Mascot Days events at each campus on topics based around financial literacy, which include presentations from the state employees credit union, PSECU.
- Presenting at First-Year Seminar Courses and TRIO SSS programming. FYS course instructors must include a financial literacy and wellness component, which may also involve partnerships and materials provided by local and the state credit unions, local grocery stores (e.g., to calculate cost of meals based on ingredients), etc.
- Sponsored in-person events across campuses to encourage FAFSA Completion and share financial literacy information (e.g., FAFSA Fridays, FAFSA / Scholarship Talk)
- Collaborated on DEI-sponsored financial literacy open house for all students but with targeted outreach to multi-cultural groups to learn from financial aid counselors about financial aid, scholarships, loans, and general financial literacy
- Added financial literacy information into the debt letter distributed through CampusLogic

Some additional initiatives related to access and affordability are presented in Table 2.2.

Table 2.2: Examples of Initiatives Related to Access and Affordability in Support of Campus Climate and Diversity	
Entity or Initiative	Brief Description [NEED STATS ON PARTICIPATION AND IMPACT]
URM FAFSA Filing GAP Analysis	CU tries to bolster FAFSA filing for all students, but a Fall 2023 review of URM FAFSA filers revealed that a much greater percentage [albert getting stats] of URM students did not complete the FAFSA. Outreach efforts including email campaigns, counselor meetings, and DEI-sponsored FAFSA workshops increased filing by 18%.
Last Dollar Assistance Program	Grant-funded initiative that assists URM students in reducing unpaid balances so they can register for classes. The program started at LH and BL and, with the grant, was expanded to MA in the spring of 2024.

Table 2.2: Examples of Initiatives Related to Access and Affordability in Support of Campus Climate and Diversity	
Early College Program Funding	C&N Bank donated \$40,000 to support the MA Early College Program, which operates through more than 100 partnerships with public and private schools, to enroll qualified high-school students via face-to-face or online instruction. Students earn college credits at 75% tuition reduction and receive automatic general acceptance for full-time enrollment at CU if they successfully complete the program.
TRIO SSS	TRIO SSS supports URM students to enroll and persist in college with accessible program services and staff; advising and mentoring; career explorations; financial aid counseling; financial literacy programs; scholarship opportunities; and more.
Bus Trips	DEI and admissions hosted bus trips from urban areas like Philadelphia with overnight and single-day visits for prospective students and their families.
Inclusive First-Day Access Programs	This is a course delivery system that affords students the latest online educational materials at prices below the typical cost of books. CU leverages volume purchasing to get students immediate electronic access to materials. The library also posts links to low-cost publishers, ebooks, and materials in the libraries' electronic collections.
Veterans Affairs	All students can access the Military Academic Credit Review Board, a school certifying official for GI bill benefits, a resource center or veterans lounge, and student organizations and/or Army ROTC. Each campus celebrates veterans like hosting military appreciation week at BL, annual veterans day luncheon at MA, or the Army ROTC military ball at LH.
PA Hunger-Free Campus Grant	CU received a \$60,000 grant to address food insecurity at the BL, MA, and LH campuses to expand pantry services with food purchases and refrigeration, upgrade existing facilities, and create a more standard system of food delivery and supply sharing across campuses.
University Disability Services	UDS regularly refers students to the PA Office of Vocational Rehabilitation, which provides funding support for tuition and assistive technology/devices for students with disabilities based on eligibility.

COMPLIANCE WITH FEDERAL, STATE, AND COMMISSION POLICIES (CRITERION 8)

Compliance with all applicable federal, state, and Commission reporting policies, regulations, and requirements to include reporting regarding

CU complies with federal, state, and commission policies, exercising due diligence with timely and accurate reporting. The Evidence Inventory and *Institutional Federal Compliance Report* verify compliance with federal, state, and MSCHE policies reporting requirements, and Requirements of Affiliation (ROA). To comply with the HEOA, Pennsylvania “right-to-know”, and other legislation, the Consumer Information web page provides a single point of access to information on general institutional policies and data, key offices, student financial assistance, health and safety data, student outcomes, and other key information.

Census data, used for official reporting, conforms to State System and Integrated Postsecondary Education Data System (IPEDS) standards. In compliance with the BOG Policy 1988-03: Data Collection and Reporting, IR supplies data and information to the State System for use in its data repository and data warehouse according to the annual data collection plan and established definitions, standards, and reporting procedures that align with IPEDS. Subjected to rigorous validation processes, these submissions enable the State System to meet CU’s federal and state reporting mandates. IR also stores these data to fulfill other external reporting requirements. While the State System handles most federal and state reporting requirements, IR assists with reporting for requirements like the NCAA graduation success rates (GSR) in conjunction with Athletics; teacher education reporting to the Pennsylvania Department of Education; ACT 101 program reporting to PHEEA; and MSCHE and program-specific accreditation reporting. IR also has an extensive library of Tableau dashboards that presents university and program-specific data to internal and external audiences.

The Accreditation and Consumer Information web pages both link from the “About” web page and acknowledge the University’s MSCHE accredited status with the published statement of accreditation status (SAS). A list and links also exist for specialized program accreditations for programs accredited or recognized by those accreditors. As a MSCHE accredited institution,

the University complies with the MSCHE ROA as documented in the Evidence Inventory and with linkages noted throughout the Self-Study where standards encompass ROA. The University also complies with MSCHE policies and procedures, including those on follow-up reports and substantive changes, by submitting to MSCHE on-time supplemental information reports and substantive change notifications immediately upon the identification of changes that necessitate them. Documented on the MSCHE SAS, examples of more recent submissions include the Complex Substantive Change (CSC) Request (2022), seven requests to close additional locations (2022), and six supplemental information reports as follow-ups to the annual institutional update and CSC (2022, 2023).

PERIODIC ASSESSMENT (CRITERION 9)

Periodic assessment of ethics and integrity as evidenced in institutional policies, processes, practices, and the manner in which these are implemented.

Board-Affirmed Metrics, KPIs, and Selected Strategic Plan Metrics

CU provides accurate data necessary for effectively assessing operations, establishing continuous improvement practices, and following federal, state, and local regulations. The State System Board-Affirmed Metrics and CU KPIs and Strategic Plan metrics track student and employee diversity, disaggregated retention and graduation rates for URM and Pell-eligible students, unmet need, and net price. Related to this Standard, other KPIs measure success in areas like campus climate through survey ratings, strategic communications through market research, new gifts and pledges with additional funding for student aid, and student engagement / community engagement, using the Optimal College Town Assessment. Working closely with CU administration, IR established and regularly updates a KPI and Strategic Plan Metrics dashboard that shows baseline data, where available, and current results against year-one and year-five Strategic Plan targets. Year-one results show progress toward accomplishing the Strategic Plan. [Provide year end results].

In addition to what is discussed below under Committees and Task Forces as well as Institutional Surveys and Studies, examples of DEI-focused initiatives include:

- Creating strategic partnerships with local educational institutions, community partners and government officials to increase recruitment and retention activities for URM groups
- Implementing diversity outcomes as part of the regular responsibility, accountability, and performance evaluation process of all managers and administrators across CU

Annual Reports and Unit Assessments

Each summer, CU's divisions and units report assessment results for the measures and targets established during the planning cycle, including units related to this area. The year-end assessment results inform action plans and next year's initiatives. Some units also prepare year-end reports to comply with external reporting requirements, which tender analyses and recommendations for improvement. [Provide examples of year-end results]

Policy Review

Following integration, CU adopted the BL policies in the interim while creating its Senate Constitution, which established the governance system and delineated shared authority among CU faculty, administrators, students, and recognized collective bargaining units. Per the Constitution, adopted in March 2023, the Senate regularly "deliberates, advises, and communicates concerns regarding matters related to the policies, functions, administration, and sustainability of the University," and has established how policies undergo regular review and

revision. Policies predominantly initiate in the Senate (sub-)committees, where data-informed recommendations are first made. The existing PRP 0101 – Policies, Rules, and Procedures (PRPs) Issuing Procedures was the first policy to proceed through the full review process and conform to the new policy template, which engenders consistency in policy development. The Policy on Policies establishes a regular review on a five-year cycle, with 20% of the total policy inventory being reviewed each year. With a voluminous set of legacy and interim policies requiring review, CU developed an expedited process, for use where feasible, and a policy review cycle, which accounted for priorities and edit types, e.g., substantive, minor, or administrative edits (e.g., change of name to CU).

Committees and Task Forces

The Strategic Planning Committee and CU Assessment Council review KPI and Strategic Plan metrics and proffer recommendations for change to President's Cabinet. Committees formed through the new shared governance system or on an ad hoc basis to address emerging needs are also vital to CU's assessment and continuous improvement processes. The following examples provide evidence of their importance to institutional effectiveness.

Transformation Accelerator Cohort (TAC) Team

In October 2021, CU (formerly BL) was accepted into the American Association of State Colleges and Universities (AASCU) 15-institution Transformation Accelerator Cohort (TAC). Funded by the Bill & Melinda Gates Foundation, the TAC initiative helps to identify best practices, make data-informed decisions, and enhance strategies to eliminate achievement gaps and promote student success for URM. To provide a basis for sense-making discussions, an institutional transformation assessment was administered to a cross-section of personnel (n=50 respondents) from divisions like academic affairs (including department chairs and faculty), student affairs, fiscal affairs, and senior administration. The TAC team held initial discussions about the data but deepened reflections in Portland, Oregon, where they traveled to participate in intensive data analysis and strategy setting. Discussion led to DEI dashboards being developed and released by IR to make more accessible disaggregated data on URM student achievement. The team also drafted three priorities around creating training that increases advocacy and promotion of diversity, closing the equity and achievement gaps for URM students, and establishing a campus climate built around cultural competency and inclusivity. These priorities aligned with climate survey results and some visible actions described in other criteria and tables, such as developing a DEI strategic plan, establishing the LH multi-cultural center, and conducting outreach initiatives (e.g., at mid-term and for financial aid). Lack of personnel and resources resulted in increasing dedicated staff at LH and MA in areas of DEI, Title IX, Pride, and the Women's Resource Center. Each campus also spearheaded alumni engagement activities like BL's 2023 Homecoming outreach bringing 60 URM alumni back to cultivate them to as serve speakers for special events, mentors, and donors. LH sponsored the black history month four-member alumni panel in spring 2023, and ESPN radio host, Freddie Coleman visited MA, his alma mater, in spring 2024 to engage with MA students.

Student Worker Committee and Task Forces

Following the 2022 NSSE results analysis and recognizing numbers of unfilled student worker positions, CU formed a committee and parsed the topics into three task forces to review student wages, student hiring on a new technology platform, and the student worker experience. Studies showed that the hourly rate for all campuses fell below the average hourly rate of PASSHE institutions and significantly below competitors in the surrounding communities in which the campuses are located. The first task force

studied these data resulting in an increase in student worker wages from \$8-9/hour to \$12/hour. The second task force reviewed technologies, selected JobX, and implemented the platform to ease the process of identifying student jobs, matching students to the work, and decreasing time required for hiring / onboarding. The third task force reviewed the student experience, working to create job descriptions and better match skill sets and majors where opportunities exist. With student employment policy changes at the PASSHE level, CU also revamped procedures to hire students as contingent employees while awaiting background check results and to remove the requirement entirely from student workers unless the position requires interaction with minors. This should make the hiring process less onerous and increase the ability to recruit and hire student workers.

Complaint and Concern Process

Pre-semester preparations for fall 2023 and insights from applying the complaint processes in 2022-23 identified the need for an ad hoc group to unify processes and improve communication to students and employees related to student concerns, complaints, and appeals. The ad hoc group included those with key responsibilities in this area (e.g., Dean of Students, Chief of Staff, Student Conduct, DEI, IE, Title IX, Disability Services, etc.). Through initial group dialogue, decisions resulted in moving to or creating all incident report forms in Maxient, the software platform for student discipline, integrity, and student care / concern. Maxient provides a single repository for all types of concerns and complaints, producing a complaint log that would help summarize issues (e.g., counts and types of incident reports) and give insight into trends that indicate systemic issues and the need for change.

The group compiled a single point-of-access web page, established points of contact for offices likely to receive complaints, and socialized new processes through emails and a pre-fall 2023 training session. Questions raised during the training session revealed remaining shortcomings in the complaint process with the lack of a dedicated faculty/staff process to report complaints and concerns. This process and form were created and socialized through an October 2023 training session, which featured specific scenarios to demonstrate appropriate use of policies and procedures, so points of contact better understand how to handle various circumstances. Ongoing improvements continued as the group developed an end-of-semester reporting form, established to ensure analyses occur and necessary actions are taken. Opening semester emails are now sent to employees to remind them about relevant policies and complaint reporting processes. Hard copy and digital materials, including flyers with a QR code were distributed to create student awareness about complaint and concern processes, and a quick reference take away was created and circulated to points of contact for distribution to individuals who inquire in person or via phone/email. [Provide stats about AY complaints]

Data Integrity and Transparency

With the launch of the Ellucian Banner student information system and Degree Works audit tool, CU contracted with third-party Ferrilli, to assist with implementation issues, reporting features, and data integrity. During registration, advisors used Ferrilli's office hours to resolve issues immediately. CU also established a Banner – Degree Works Issues log (i.e., Excel workbook) for faculty and staff to report concerns and have them addressed. Housed in SharePoint, the open access workbook included worksheets for "Open Issues" and "Resolved" to allow faculty and staff to document a concern, see the status, and know when and how it was resolved. The CU – Ferrilli team met weekly to discuss reported issues from training needs, required documentation, and transfer equivalencies to data integrity and coding. The CU-Ferrilli team worked to resolve reported issues to improve the user experience and reporting capabilities.

In addition, IR also worked with the consultant to create Argos reports that would be used for PASSHE/IPEDS reporting. IR and the consultant systematically developed specifications, reviewed the program logic, and tested the reports. IR continues to work with other administrative departments to ensure the system is configured for meeting reporting requirements. From the standpoint of transparency, IR developed several data dashboards, which are easily accessible on the web and were socialized at CU through President’s Cabinet, Council of Deans, Chairs meetings, and the Triad. Ongoing modifications have occurred since their launch in response to user questions for clarification and requests for information. Table 2.3 provides examples of improvements made during 2023-24 in response to user requests.

Improvement	User(s)
Added URM tabs and filters to all dashboards	Executive Staff and TAC Team
Added information about special programs (honors, ACT101, TRIO SSS, Dual Enrolled) and athletes	Provost
Developed a series of athletic dashboards based on reoccurring questions	Executive Staff and Athletics Directors
Added 30 of “Summary” dashboards to allow users to drill into and summarize the data differently	Various End Users
Developed merit scholarship models based on feedback	Vice Presidents
Added a user guide to help navigate the dashboards based on mentoring users	Various End Users
Added a dashboard to show minor enrollment	Academic Assessment Committee, Deans, and Chairs
Added the Key Performance Metrics dashboard to track/measure KPIs for the Strategic Plan	Executive Staff

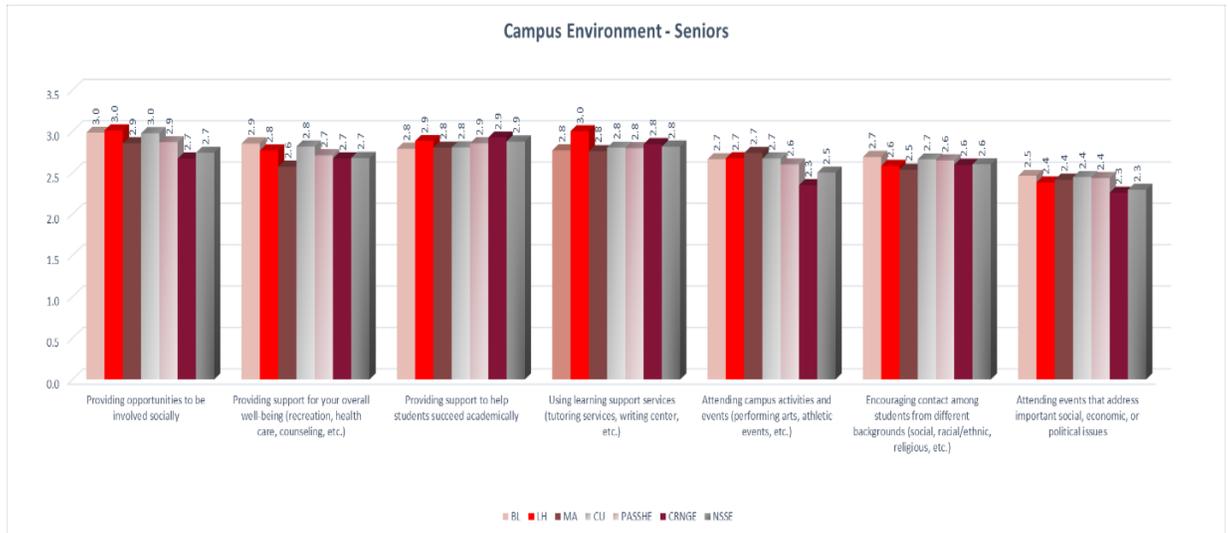
Institutional Surveys and Studies

CU assesses the learning, working, and living environments through various surveys and studies, and its campuses have long-standing practices of participating in such surveys as NSSE and First Destination. The Institutional Effectiveness Plan lists the high-level surveys conducted periodically. Results are presented to CU at Town Halls and unit meetings and were provided to Blue Beyond Consulting as part of their document review for the Strategic Plan. The Survey web page gives access to dashboards and reports that present longitudinal or current data for the campuses. Three examples are provided below.

National Survey of Student Engagement (NSSE)

CU evaluates data received from NSSE and regularly reviews institutional and comparative data for trends or issues that need to be addressed. Interestingly, the Spring 2022 survey administration coincided with efforts to integrate on July 1, 2022, yet still reflect favorably on student perceptions of aspects of the campus environment. Aspects include opportunities to socialize and interact with persons from diverse backgrounds, feeling supported in terms of overall well-being and academically, using support services, and attending campus activities and events that address political, social, and economic issues. Figure 2.2 indicates that CU is slightly above, just below, or equal to the average senior ratings for peers from PASSHE, its Carnegie Classification, and NSSE overall.

Figure 2.2: Average NSSE Ratings for CU and Peer Groups



Climate Survey

During the 2022 Spring semester, CU students and employees participated in a systemwide campus climate survey. Results were presented at faculty, staff, and student town halls and revealed many strengths and opportunities for improvement across seven key categories. Some strengths included perceptions that CU campuses are safe and welcoming to diverse populations, value diversity and inclusion, hold beliefs that people should be able to express political and religious views, and support advancement and student success. Table 2.4 includes examples of opportunities for improvement and visible actions resulting from the Climate Survey, which augmented other actions by the TAC Team and DEI Offices. Importantly, the climate survey was a primary source of data used in CU’s Strategic Plan development and helped to inform the selection of the *Diversity, Equity, Inclusion, and Belonging* core commitment and related initiatives in each priority.

Opportunities for Improvement Identified in Spring 2022 During Integration	Action(s) Since August 2022
Perceptions that senior leadership could increase consultation with stakeholders at all levels of the organization around key decisions	Conducted regular Town Halls; held campus administrators’ and President’s open office hours; created student advisory board and held meetings; endorsed new Senate structure and attend regularly scheduled Senate, Local Assembly, and subcommittee meetings to answer questions and conduct follow up
Expressed concerns about increased workload and job responsibility	Regularly review staffing plan, related DEI positions at LH, BL, and MA; contracted third-party training to conduct navigating change workshops, which also dealt with workload, burnout, and change management; hired positions in critical areas across CU like campus-based staff in the dean of students office to address student concerns, student success associate director at LH
Perception of lack of responsive to concerns	Awarded \$90,000 to CU campuses to support strategic, DEI-focused high-impact trainings; sponsored academic and co-curricular programming and professional development opportunities; delivered events designed to address discrimination, harassment, and racism; established The Robert and Dolores Lynch Multicultural Center at LH; conducted regularly scheduled Town Halls and issued CU-wide email responses to unanswered questions

A follow-up survey is slated to occur in Spring 2025, to evaluate the impact of changes made since the systemwide PASSHE survey. However, DEI has conducted numerous

assessments at various events and programs. Fall 2023 survey results affirmed the relevance of the planned initiatives for Spring 2024.

Overall, survey results reflect favorably on campus climate, especially at MA; however, in January 2024, Senator Art Haywood called out four State System campuses, including MA, as being hostile to students of color. This report received media coverage, and MA's inclusion was prompted by one isolated incident where the campus was targeted by a neo-Nazi organization whose protest moved from downtown MA to the public street of campus. This characterization caused discomfort for MA faculty, staff, and students and appeared unfair, especially since the group's actions were protected by First Amendment rights. President Hanna responded swiftly by sending an email to the campus community explaining what happened, acknowledging the hurt inflicted on CU and MA by the Senator's report, and encouraging members to seek support services if needed as CU continues to strengthen bonds in the community and celebrate diversity.

Ruffalo Noel Levitz (RNL) Studies

In October 2023, RNL conducted an organizational / operational assessment of marketing, admissions, DEI, financial aid, institutional research, and retention and student success. RNL reviewed data, documents, and the institution's website against a standard set of effectiveness indicators. Sources of evidence tied to each effectiveness indicator were evaluated against expectations, best practices, and general user experience expectations pertaining to the website. Next, interviews with key stakeholders involved with or responsible for the assessment areas were conducted. The combined quantitative (stage 1) and qualitative (stage 2) review enabled RNL to understand CU's current state regarding competencies, staffing levels, policies, processes, organizational structure, and technologies against national best practices.

CU's overall rating on this study was characterized as *accomplished* (2.11 on a 3-point scale). RNL reported that the score "reflects that the institution has worked extremely hard during the first two years of integration to develop a comprehensive enrollment management model... It is important to view the maturation scores for this assessment in the context of integration but, more importantly, regarding for implementation of the Slate CRM and OneSIS Banner system across three institutions simultaneously" (EM Organizational & Operational Review, slide 4). Notable strengths existed in marketing, admissions, financial aid, and institutional research with more opportunities for maturation in DEI and Student Success. Recommendations were offered in all areas. A sampling is included below.

- Move to a more prescriptive scheduling process for entering first-year students. Schedules should be completed ahead of time so that students can review at orientation; with input specifically on their FYS. Free agency scheduling for new first-year students is not a best practice.
- Engage alumni to brainstorm and support DEI initiatives in terms of time/treasure/talent
- Communicate with the campus community the plan and process for launching the new website in June 2024 and the process for building academic content
- Work closely with academic programs and departments to identify key differentiators by program along with student stories and profiles
- Build more robust parent and influencer communications at the point of application, including strong affordability messaging, outcomes, and information regarding Pathway programs to graduate studies

- Create a formal planning group that includes others outside of admissions, including financial aid, orientation, current students, athletics, and faculty
- Continue to build on the community outreach initiatives rolled out at the MA location between Commonwealth and local school districts and the BL model rolled out with local Head Start Programs as well as support of local community days

CONCLUSIONS

CU is committed to being faithful to its mission in its operation and activities. The University honors its contracts and commitments and adheres to pertinent laws, policies, rules, and regulations. CU also works diligently to represent itself truthfully to all its constituents. By following sound ethical principles in support of its commitment to provide a positive living, learning, and working environment, CU continues to show that it is an efficient institution of higher education. In addition, CU works diligently to preserve its trust with the public and maintain its commitments to its constituents.

CU has also taken multiple steps to address diversity, equity and inclusion. In particular, CU has implemented policies, procedures, programs, and support systems that highlight its commitment to create a welcoming and inclusive environment. A primary University objective is to develop additional initiatives that address CU community members' sense of belonging.

6. Areas of Strength

- Criterion II.1: Across the university, there is evidence of a strong commitment to this criterion. While some policies are still being developed, the new processes take these areas into account
- Criterion II.2: CU provides a variety of inclusive policies, practices, and programs that foster respect among students, faculty, staff, and administration from a range of diverse backgrounds, ideas, and perspectives.
- Criterion II.4: Adherence to university, system, state, and national professional organization policies on conflict of interest is demonstrated
- Criterion II.7: CU offers generous merit scholarships and need-based aid. Existing financial literacy initiatives arm students with the information needed to make informed decisions on funding their education and planning for post-enrollment financial management.
- Criterion II.9: CU has created the Student Complaints & Concerns Reporting web page for faculty & staff to document student-facing issues reported to them by students. This reporting process is outside of the other complaint reporting systems and is operated through Maxient software. Reported incidents can be reviewed and referred to the appropriate area. This process also allows for data review and development of a broad understanding of the patterns related to the types of complaints received so that any larger/systemic issues can be addressed.
- Our NSSE findings – very positive; speaks well to who we are as an institution; this is our baseline prior to integration on all 3 campuses.

7. Opportunities for Improvement and Innovation

- CU needs update key operational policies to align with organizational needs, eliminate legacy policies that are no longer relevant, build awareness of all policies (especially the grievance and student code of conduct), and move all policies through the new Senate structure.

- Continue to grow and refine efforts to enroll and support students with diverse backgrounds and to hire employees with diverse experiences and perspectives.
- CU still needs to evaluate and transition many of Bloomsburg University's practices, processes, and procedures. Also, gather information and refine assessment regarding students' understanding of and experiences related to DEI, including qualitative data. In addition, promote a campus culture that frames "diverse needs" through a paradigm of Universal Design and asset-based pedagogy.
- Consider emphasizing the value of academic freedom, intellectual freedom, freedom of expression as part of the CU's core values by creating educational opportunities for all CU community members.
- Create institutional aid plans... The plans will require resources as well as an extended cycle of development and implementation as the strategies are fine-tuned.
- Bolster financial literacy efforts by implementing a robust financial literacy curriculum relevant to the student's year in college – from prospective student through graduation.

8. Initial Strategies on Continuous Quality Improvement

- Updating key operational legacy Bloomsburg University, now CU policies, to align with current organizational needs and standards is a crucial long-term objective for implementing straightforward and efficient processes for students, faculty and staff and for merging and enhancing the distinct cultures of the legacy entities that now comprise CU.
- Build awareness of the grievance policy and student code of conduct among all community members.
- Consider emphasizing the value of academic freedom, intellectual freedom, freedom of expression as part of the CU's core values by creating educational opportunities for all CU community members.
- Create institutional aid plans... The plans will require resources as well as an extended cycle of development and implementation as the strategies are fine-tuned.
- Bolster financial literacy efforts by implementing a robust financial literacy curriculum relevant to the student's year in college – from prospective student through graduation.
- Communications – such a huge part of a gap and part of what is challenging for everyone, particularly building cohesion among integrated campuses; this is an area of development as we grow. Email is the standard with faculty/staff, but not with students. How to communicate with students more effectively. Need to build awareness & education that is a part of layered communication – multi-pronged, starting with orientation, all along the way. Nature of being a public campus that must allow outside groups to come to campus & have freedom of speech. How do we build awareness of communication as a campus community?