Criterion 2. Integrity: Ethical and Responsible Conduct

The institution acts with integrity; its conduct is ethical and responsible.

2.A. Core Component

The institution establishes and follows policies and processes to ensure fair and ethical behavior on the part of its governing board, administration, faculty, and staff.

1. The institution develops and the governing board adopts the mission.
2. The institution operates with integrity in its financial, academic, human resources, and auxiliary functions.

Argument

2.A.1. The institution develops and the governing board adopts the mission.

As discussed in 1.A, the University developed the current mission statement in 2006, with review and ratification by the governing and advisory bodies of the University, including the Faculty Senate, the Staff Advisory Council, the Undergraduate Student Government (USG), the Graduate Student Government (GSG), the Deans' Council, University Council, Chancellor's Cabinet, and ultimately the Board of Trustees (BOT). The strategic plan, DU IMPACT 2025, demonstrates the University's continuing commitment to the mission.

2.A.2. The institution operates with integrity in its financial, academic, human resources and auxiliary functions.

Financial Integrity

To operate with integrity in all financial matters, DU follows processes and policies for fair and ethical behavior.

DU is audited annually by an external firm (Clifton Allen Larsen since 2014), and the Office of Internal Audit independently and objectively evaluates financial and operational activities. Internal Audit identifies opportunities to improve operations and reduce risk, increase ability to meet strategic goals, and provide assurance of DU's financial integrity. The Director of Internal Audit reports to the BOT Audit Committee and to Vice Chancellor of Legal Affairs.

Annually, Internal Audit selects areas of focus based on organization-wide risk assessment and objective evaluation of whether current procedures reasonably achieve goals. In the past 10 years, 60 areas have been audited. Internal Audit, with University Counsel and Enterprise Risk

Management (ERM), manages the anonymous hotline reporting system to ensure DU's compliance with state and federal laws. They also manage the Conflict of Commitment and Interest Policy. DU expects the highest standards of conduct, and University representatives must fulfill their institutional responsibilities with loyalty and avoid activities that conflict with, or appear to conflict with, those responsibilities.

The BOT and senior leadership approve and promulgate policies related to Business Operations, Fiscal and Business Affairs, and Funds and Accounts [examples: Budgetary Responsibility and Structure, Consolidated Endowment Fund: Management and Distribution, and Business Expense Policy]. Limits of Authority defines roles and responsibilities of contractual authority for University positions and is updated annually upon approval by the Finance and Budget (F&B) Committee.

Three BOT committees meet regularly to ensure financial integrity through governance and oversight of University operations:

> **F&B Committee:** Responsible for financial governance of the University, adoption of the annual budget, review of budget variance to actual performance, and oversight of capital project planning and execution
>
> **Investment Committee:** Responsible for endowment and policy development, including selection of investment managers, specific investment decisions, spending distribution rate, and allocation of financial assets.
>
> **Audit Committee**: Responsible for ensuring a sound internal control environment through consultation with the Chancellor and Senior Vice Chancellor for Business Affairs and University Treasurer. Reviews development and implementation of ERM framework, selects and retains external auditors, reviews audit documents and accounting changes, and examines internal audit results

To demonstrate financial soundness, discussed in Criterion 5, Moody's and Fitch, bond rating agencies, have recently rated the University of Denver A and AA.

DU is committed to transparency and engaged collaboration. The Office of the Provost annually provides access to the University's Budget Transmittal to all DU employees and welcomes questions from the community [2019-2020 Budget Transmittal, 2020-2021 Budget Transmittal].

The Office of University Budget, Planning, and Administration works with the Controller's Office and Shared Services to provide information, planning tools, and training on budget, finance, and human resource systems for business officers through an online course and the Business Officer Training Schedule, Location of Key Systems and Processes, and ACH and Wire Transfer Form.

Policies and procedures published on PioneerWeb (DU's intranet) and the Business and Financial Affairs website define community expectations, such as purchasing card policies and procedures. The Code of Business Conduct guides appropriate business behavior for the BOT, employees, contractors, students, and volunteers [Supplier Code of Conduct]. DU uses Pioneer Travel and Expense for business-related travel to ensure accountability and precision in faculty and staff expenditures.

The intellectual property (IP) policy and support available via the Technology Transfer Office provide transparency and certainty on ownership and disposition of IP created using University resources to allow commercialization and transfer of such IP to the public good through economic development. The policy protects traditional rights of scholars and products of their intellectual endeavors.

Academic Integrity

DU promotes an environment of shared responsibility, advancing a community of critical, ethical, and civically engaged thinkers. DU approaches academic integrity realistically, inclusively, and pedagogically for all its members. The Honor Code establishes the ethical foundation for all community members to support intellectual inquiry and the public good. The BOT Faculty and Educational Affairs (FEAC) Committee meets regularly to review the composition and quality of academic programs, approve new or modified academic programs, assess programs relative to other comparable institutions, and consider enrollment goals [June 2019 Agenda].

Preventing academic misconduct is a responsibility of all University community members. Student Affairs defines types of academic misconduct violations and the Academic Misconduct Process Flow Chart. As appropriate, a developmental restorative justice approach is taken for students who violate the Honor Code. Individuals can report violations of the honor code using the University Academic Misconduct Students Right and Responsibilities Incident Form. Criterion 2.E.4. details how the University addresses academic dishonesty.

Some professional schools have additional codes of conduct; Sturm College of Law (SCOL) has a separate Code of Academic Conduct and students in the Graduate School of Professional Psychology (GSPP) sign an honor code in line with the American Psychological Association [Guidelines for Ethical Behavior].

Students may appeal academic- and status-related decisions or seek resolution of complaints/ grievances through the Academic Grievance and Appeal Procedure. The Academic Exceptions Committee considers requests for exceptions to University-wide academic policies [Academic Exceptions Policy]. As warranted, employees are able to file grievances [Employee Grievance Process].

DU is committed to safeguarding and accurately maintaining student records. The Office of the Registrar provides information on students' rights regarding educational records as outlined in Family Educational Rights and Privacy Act of 1974 (FERPA) and addresses general questions, concerns, or informal complaints.

DU is dedicated to integrity in its academic research activities. ORIE supports DU's research community and works with ORSP and the Office of the Provost to encourage faculty, students, and staff to conduct research with the highest ethical standards. The Misconduct in Research Policy, covered in 2.E, requires that all University community members take responsibility for intellectual honesty and ethical research standards.

Human Resources Integrity

To operate with integrity in all personnel matters, DU establishes policies and processes for fair and ethical behavior by the BOT and employees. The BOT have approved numerous policies for benefits, employee relations, equal opportunity, faculty personnel guidelines, leave, separation and rehire, and enterprise risk management [Benefits Eligibility Criteria, Affirmative Action, Workers Compensation Policy].

The Employee Handbook, distributed at orientation, outlines professional expectations. Faculty appointment, tenure, and promotion guidelines are published through Faculty Senate, including information on appeal processes.

To promote fair, consistent and equitable hiring processes, a staff hiring guide and faculty hiring guide were developed to promote best practices for hiring supervisors in 2017. The HR partners with the Office of Equal Opportunity to provide quarterly trainings for all hiring supervisors and search committees.

The Office of Equal Opportunity and Title IX ensures compliance with the University's anti-discrimination policies. In 2014, DU approved a Discrimination and Equal Opportunity Policy outlining how DU strives to maintain a community that treats people with dignity, decency, and respect.

For performance management, DU provides clear policies on employee evaluation processes in the Employee Handbook, with more specific information regarding performance management on the People Development section of the Human Resources (HR) website.

The University outlines clear expectations for employee behavior, including rights and responsibilities [Alcohol, Employee Political Involvement, Social Media Use and Freedom of Expression]. The IT department outlines policies around acceptable use, email, software and more [Secure Computing, Email as Official University Communication, Computer and Network Acceptable Use Policy.]

In 2016, DU completed a Staff Compensation Study of approximately 1,500 benefited employees [Purpose and Outcomes] and created consistent job descriptions, titles, and salary ranges. This study also established a framework for all elements of employee compensation to ensure consistent practices. The HRIC website presents general job descriptions and career ladders for staff positions [Business Officer, I, II, III, IV].

In 2019, DU conducted a voluntary Pay Equity Study to determine whether systemic inequities impact our non-union benefited faculty and staff salaries based on gender and under-represented minority status. The University hired a third-party vendor, Gallagher, to conduct the study, guided by an HR administrative team. Results of annual analyses of tenure-line faculty salaries by discipline and rank compared to peer institutions were distributed to deans to assist with distribution of additional funds for market-based adjustments. The average salary deficit for University faculty members was $3,652 in FY2017, compared to deficits of $5,405 in FY2015 and $9,235 in FY2013 [Faculty Salary Study Fall 2018].

Integrity in Auxiliary Functions

DU manages auxiliary enterprises through third-party vendors, primarily bookstore operations with Follett Corporation, food services with Sodexo America, and custodial management with Aramark. To operate with integrity in all auxiliary matters, the University contractually requires

that third-party vendors meet financial and service expectations, including regular updates. Annual planning meetings and routine updates allow the University and vendors to address service concerns.

DU ensures that third-party subcontractors or subrecipients operate with integrity. We abide by federal code 2 CFR 200 requirements for sub-recipients and perform risk assessments before and after grants are awarded. DU uses a score sheet from the Federal Demonstration Partnership to rate sub-awards as low, medium, or high risk and establish appropriate monitoring systems. Principal investigators must submit a Subrecipient Monitoring Record for the subaward to document issues and resolution [Subrecipient Certification Form, Monitoring Notice Template, and Monitoring Notice Sample]. Sub-recipient monitory records must be current before future funding is released.

2.B. Core Component

The institution presents itself clearly and completely to its students and to the public.

1. The institution ensures the accuracy of any representations it makes regarding academic offerings, requirements, faculty and staff, costs to students, governance structure, and accreditation relationships.
2. The institution ensures evidence is available to support any claims it makes regarding its contributions to the educational experience through research, community engagement, experiential learning, religious or spiritual purpose, and economic development.

Argument

2.B.1. The institution ensures the accuracy of any representations it makes regarding academic offerings, requirements, faculty and staff, costs to students, governance structure, and accreditation relationships.

DU uses various processes to ensure the quality and accuracy of data used for internal decision-making and external communications. The BOT and Senior Leadership institutionalize data integrity and transparency with the University community and a shared governance structure to provide checks and balances for decision-making. Including student voices through Undergraduate Student Government (USG), Graduate Student Government (GSG), and other student associations further ensures quality of information and accountability to students.

Administratively, units ensure data used for decision-making and communication is consistent and accurate. Key data stewards such as the Office of the Registrar, Human Resources, Controller's Office, Office of Admission, Office of Financial Aid, Student Financial Services, Office of University Advancement, and Office of Research and Sponsored Programs (ORSP) ensure data are entered correctly through department audits and trainings. Data shared between units for institutional operations and analyses are examined for accuracy and consistency during each endeavor. Enterprise Application Services and the Office of Institutional Research and Analysis (IR) collaborate with University data stewards to ensure appropriate data usage. Working groups and committees, such as the Registration and Billing Committee, Registrar's annual Bulletin review, Information Measurement & Analysis Council, and Data Cleanup Project, promote data cleaning and accuracy. As discussed in 2.A.1, the Office of Internal Audit examines processes and procedures for data usage and representation.

IR delivers objective, systematic research and analysis to inform strategic planning, decision-making, and policy development. Complex interactions between academic and business systems and processes require IR experts to provide information and insights that promote strategic and appropriate use of data across campus. IR is the clearinghouse for official University data and responds to external requests for information [Factbook, Consumer Disclosures, Common Data Set, National Center for Education Statistics]. Accreditation relationships with the institution are explained on the IR website.

Requirements for degree and certificate programs, admission standards, enrollment policies, major and minor requirements, and course descriptions are published in Undergraduate and Graduate bulletins. DU publishes information outlined in Higher Education Opportunity Act of 2008 online to help students make informed decisions.

Academic units publish unit-specific policies and requirements on their websites, including handbooks and coursework plans [Josef Korbel School of International Studies (JKSIS) 2019-2020 Handbook, Graduate School of Social Work (GSSW) Advanced Standing Course Planning Worksheet 2020, Two Year Course Planning Worksheet 2021].

The Office of the Registrar maintains degree requirements in an electronic audit system updated through the same curriculum administration workflow as approvals and Bulletin editing. For undergraduate degrees, evaluators in the Registrar's Office use the system as the primary tool for degree clearance. Office of Graduate Education and graduate schools use similar tools for degree clearance.

The University's website is managed by the Office of Marketing and Communication (MarComm). While individual departments have the responsibility to manage their respective websites, MarComm maintains ultimate approval of all published content [Academic Programs Content Governance and Academic Programs Maintenance Plan]. In 2017, the University overhauled DU's website, making information more accessible and easier to navigate.

From the main Admissions page, individuals can find a listing of degree programs [undergraduate, graduate] with application instructions and requirements. This page also links to attendance costs and financial aid and scholarship information for undergraduate and graduate students. All recruitment materials accurately reflect DU's mission [College of Natural Sciences and Mathematics Recruitment Email, Undergraduate Student Customized Viewbook, Information Session Presentation for Undergraduate Students, Admitted Student Brochure 2017 and 2020.]

The DU directory pulls from the Banner system to ensure that faculty and staff information is accurate. Faculty and staff are responsible for updating their personal information, biographies, and achievements in Academic Insights. Unit websites list current faculty and staff [College of Natural Sciences and Mathematics faculty directory, Graduate School of Social Work faculty, Graduate School of Professional Psychology].

2.B.2. The institution ensures evidence is available to support any claims it makes regarding its contributions to the educational experience through research, community engagement, experiential learning, religious or spiritual purpose and economic development.

IR maintains multiple data dashboards available to the community, including general facts, degrees awarded, graduation rates, financial aid, and study abroad. *Data Insights* is a secure access reporting tool that provides operational and historical data for strategic planning [Dashboard Home Page, Example Report 1 and Example 2].

In 2017, DU launched a Diversity and Inclusive Excellence website to improve communication about diversity efforts and consolidate the many resources available to our community; it is

currently undergoing a significant update. In partnership with IR, ODEI created the Diversity Dashboard, a snapshot of student demographic composition, student engagement benchmarks, and student outcomes.

Many departments, centers, and units produce annual reports that evidence their impact. The Center for Community Engagement to advance Scholarship and Learning (CCESL) produces publicly accessible end-of-the-year reports on the impact of programming such as community-engaged learning mini grants and community-engaged fellows [2018-2019 Report]. The Interdisciplinary Research Institute for the Study of (in)Equity (IRISE) also produced an annual report in 2018-2019 that highlights the work of faculty fellows and post-doctoral students. Office of International Education (OIE) annual reports detail activities of study abroad and Cherrington Global Scholars [2018-2019 Report]. With 77.4% of students participating, Open Doors ranked DU third in the nation for study abroad. The Cherrington Global Scholars initiative is key; in 2018-2019, 86.59% of students who studied abroad were Cherrington Global Scholars [Cherrington Data].

The Office of Career and Professional Development issues a First-Destination Outcomes Report annually that details undergraduate and graduate student employment, internship, and salary outcomes as discussed in 4.A [Class of 2018 Report].

ORSP produces an annual report of topics such as research performance, faculty and student reports, research integrity, and education and award abstracts [2018-2019 Annual Report]. The Senior Vice Provost for Research produces an annual report and quarterly newsletters with reflections and data on number of students and faculty supported and institutional resources expended for research [Fall 2019, Spring 2017, Fall 2015].

2.C. Core Component

The governing board of the institution is autonomous to make decisions in the best interest of the institution in compliance with board policies and to ensure the institution's integrity.

1. The governing board is trained and knowledgeable so that it makes informed decisions with respect to the institution's financial and academic policies and practices; the board meets its legal and fiduciary responsibilities.
2. The governing board's deliberations reflect priorities to preserve and enhance the institution.
3. The governing board reviews the reasonable and relevant interests of the institution's internal and external constituencies during its decision-making deliberations.
4. The governing board preserves its independence from undue influence on the part of donors, elected officials, ownership interests, or other external parties.
5. The governing board delegates day-to-day management of the institution to the institution's administration and expects the institution's faculty to oversee academic matters.

Argument

2.C.1. The governing board is trained and knowledgeable so that it makes informed decisions with respect to the institution's financial and academic policies and practices; the board meets its legal and fiduciary responsibilities.

The University of Denver Board of Trustees (BOT) consists of a maximum of 38 voting board members, elected to four-year terms. Its primary roles include selection and performance assessment of the Chancellor, management of the endowment and University investments, oversight of financial and other controls, legal compliance, and approval of strategic plans and annual budgets. The Board operates through nine committees: Advancement, Athletic Affairs, Audit, Buildings and Grounds, Campus Life and Student Success, Faculty and Educational Affairs, Finance and Budget, Investment, and Nominating and Governance. Committee chairs and members are appointed annually by the Chair of the BOT with the Chancellor's counsel. Except where indicated, the Chair may appoint non-trustee members with additional skills, expertise, and/or perspectives.

The onboarding process ensures new Board members are knowledgeable and trained to meet legal and fiduciary responsibilities. The Nominating and Governance Committee presents nominations for officers and vacancies in the BOT at the annual meeting [Nominating and Governance Committee Charter]. Each Trustee receives an orientation briefing and campus tour [Section 4 Bylaws] as well as materials important to their service, such as the Charter, Bylaws, minutes of Trustees' recent meetings, most recent annual audit report, most recent budget, and University catalogs. The committee evaluates performance in trusteeship and attendance at meetings of the Board and, if necessary, provides recommendations for removal [Considerations for Appointment of Trustees]. The Nominating and Governance committee provides oversight and recommendations to the Board on selection of the chair-elect [Chair Position Description]. The Board Chair is elected at the annual meeting, or another meeting for this purpose, and serves a term of four years, until their successor is elected and barring inability to serve,

disqualification, resignation, or removal [Article 4]. Trustees may serve no more than three consecutive terms; however, a Trustee may be re-elected following one year's absence from Board service.

2.C.2. The governing board's deliberations reflect priorities to preserve and enhance the institution.

BOT bylaws inform decisions in the best interest of the institution and ensure integrity. For example, the September 2019 board meeting included a discussion of operating margin and enrollment, which included an update from the Vice Chancellor of Enrollment; the group subsequently discussed responses to enrollment deficits. Working with the Board of Trustees regarding COVID concerns has been essential to protect core academic functions while making budgetary decisions.

Throughout the DU IMPACT 2025 planning process, ongoing consultation with the BOT occurred in meetings of the full board and executive committee. The Strategy Committee engaged in the process, and two committees (CLASS and FEAC) contributed to regular meetings [Strategic Planning Process].

The Board has made two significant decisions regarding Chancellorship over the last ten years. In January 2014, Chancellor Coombe announced his retirement. The search committee was diverse and represented DU's faculty, staff, and community constituencies. Throughout the process, representative groups of faculty, staff, students, and administration met with candidates. In June 2014, the BOT hired Chancellor Rebecca Chopp.

In April 2019, Dr. Chopp announced her decision to step down due to a serious health condition. The BOT executive committee worked with Faculty Senate, campus leadership, affinity groups, the broader community, and national experts to define qualifications for DU's 19th chancellor. After evaluating the highly competitive nature of the higher education landscape and considering the importance of sustaining the focus and momentum of DU IMPACT 2025, the Board concluded with confidence that Provost Jeremy Haefner, a national thought leader in student and faculty success and a champion of University goals, would chart a successful future for the University as Chancellor. In June 2019, the BOT voted to appoint Jeremy Haefner, the sitting Provost, effective July 15, 2019.

Chair O'Leary and Chancellor Haefner spent the next several months meeting with campus groups to communicate the decision-making process and chart a unified vision for the University. They also embraced three recommendations made by the Faculty Senate which have been implemented, [Provost Search Leadership, Establishing R1 Discussion Processes, and Shared Governance Understanding Process].

2.C.3. The governing board reviews the reasonable and relevant interests of the institution's internal and external constituencies during its decision-making deliberations.

To ensure the governing board reviews reasonable and relevant interests during its decision-making deliberations, the BOT follows a yearly agenda cycle. At the beginning of each year, the Chancellor and BOT create work plans. At quarterly FEAC meetings, academic unit deans provide a written report and one or more units present orally. Standard reports are scheduled for three FEAC meetings:

- September: Faculty teaching report with credit hour analysis
- January: Review of Board-approved academic program changes, promotion and tenure recommendations, and sabbatical leave recommendations
- June: Five-year budget, review of approved academic programs, and faculty award recommendations

2.C.4. The governing board preserves its independence from undue influence on the part of donors, elected officials, ownership interests, or other external parties.

Annually, trustees and other senior campus leaders sign a Letter of Commitment detailing their commitments and responsibilities and submit conflict of interest statements. Board members sign the Conflict of Interest Disclosure annually as required by the Audit Committee.

2.C.5. The governing board delegates day-to-day management of the institution to the institution's administration and expects the institution's faculty to oversee academic matters.

The Board delegates broad responsibility for day-to-day University management to the Chancellor, other leadership, and faculty. As detailed in Article 6 of the BOT Bylaws, the Chancellor is chief executive and administrative officer of the University and has general oversight of departments of instruction. Preparation of the annual budget is carried out under supervision of the Provost with direction of the Chancellor [Article 8].

As detailed in Article 8 of the bylaws, the Provost and Executive Vice Chancellor is the chief academic officer responsible for day-to-day operations, including academic planning and policy, preparation of the budget, faculty development, student enrollment, student affairs, and other campus operations assigned by the Chancellor. The Senior Vice Chancellor for Financial Affairs and University Treasurer is the chief financial officer responsible for financial planning, policy and control, debt and asset management, and more. Other administrative personnel, such as Vice Chancellors, are appointed and removed by the Chancellor, who determines the duties of each position.

2.D. Core Component

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

Argument

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

Academic freedom is critical to DU's mission and faculty's ability to fully promote learning, advance scholarly inquiry, cultivate critical and creative thought, and generate knowledge. In 2015, the faculty and BOT approved updated [Policies and Procedures Relating to Faculty, Appointment, Promotion, and Tenure](#) to reaffirm DU's support for academic freedom of faculty throughout their careers. Specifically, in Section 1.1, the University acknowledges academic freedom as the bedrock principle for advancement and dissemination of knowledge.

In fall 2016, an incident involving expression that some found offensive on an (informally named) "Free Speech Wall" heightened tension and awareness about campus free speech issues [*[DU Clarion](#)* [Article](#)]. In spring 2016, Faculty Senate appointed an ad hoc committee to draft an explicit statement on freedom of expression (FOE). They researched free speech policies from other universities and past speech controversies on the DU campus; met with faculty, staff, and students across campus; and revised the committee's draft based on feedback. In May 2017, Faculty Senate adopted the [Statement of Policy & Principles on Freedom of Expression](#). In June 2017, it was approved by a vote of 86% of the full faculty, and in January 2018, it was affirmed by the BOT.

This policy affirms that freedom of expression is vital to the fundamental goals of DU. Recognizing that there can be challenges, especially with controversial speech, the policy created a [Freedom of Expression Committee](#) to promote meaningful dialogue around contentious issues and uphold principles of free speech. The Committee advises the Chancellor and proactively creates forums for responsible engagement of diverse and opposing viewpoints. The committee comprises students, staff, and faculty chosen after an open call for participation [[Open Call December 2018](#)].

To ensure safety at public events, [the Speaker and Public Events Policy](#) outlines procedure for notifying Conference and Event Services (CES) of public speakers. Requests are submitted through a University scheduling [form](#). CES reviews speaker information and notifies relevant stakeholders for additional input, which may include consultation with the Freedom of Expression Committee. Stakeholders provide their expertise if additional planning steps are needed to ensure a safe, robust experience for event attendees.

2.E. Core Component

The institution's policies and procedures call for responsible acquisition, discovery and application of knowledge by its faculty, students and staff.

1. Institutions supporting basic and applied research maintain professional standards and provide oversight ensuring regulatory compliance, ethical behavior and fiscal accountability.
2. The institution provides effective support services to ensure the integrity of research and scholarly practice conducted by its faculty, staff, and students.
3. The institution provides students guidance in the ethics of research and use of information resources.
4. The institution enforces policies on academic honesty and integrity.

Argument

2.E.1. Institutions supporting basic and applied research maintain professional standards and provide oversight ensuring regulatory compliance, ethical behavior and fiscal accountability.

DU is dedicated to the highest standards of research integrity and committed to responsible and ethical conduct for all those involved in research.

In alignment with federal regulations and state laws, University policies recognize researchers may have financial interests in research sponsors and/or entities with business interests related to their research. The Office of Research and Sponsored Programs (ORSP) oversees research spending and provides annual reports and regular updates to ensure compliance [FY2019 Annual Report]. In fall 2018, DU completed a comprehensive research audit with Clifton Larson Allen LLP (CLA), which identified no issues. ORSP completed an institutional audit of research in fall 2019 and identified no issues.

Within ORSP, the Office of Research Integrity and Education (ORIE) oversees and implements research conflict of interest (COI) policy and procedures ensuring compliance with COI regulatory requirements and provides guidance and support regarding COI policies, systems, standards, and procedures. All DU faculty and staff investigators are required to complete a COI disclosure annually and update their disclosure if a new COI arises.

ORIE is home to the Institutional Review Board (Human Subjects Research) (IRB), Institutional Animal Care and Use Committee (IACUC) and Institutional Biosafety Committee (IBC). These compliance committees review and oversee research protocols involving human subjects, animals, or biological materials.

The Human Research Protection Program (HRPP) is a comprehensive system designed to protect participants' rights and welfare in human research. The HRPP comprises institutional leadership, ORIE staff, IRB, Post Approval Monitoring Program staff, investigators and their study staff, and other relevant offices. DU has established Federal Wide Assurance (FWA #00004520) with the U.S. Department of Health and Human Services (HHS) Office of Human Research Protections (OHRP). The DU IRB is covered by HRPP policies and procedures.

IACUC provides ongoing assessment of the animal care and use program and ensures research involving animals is conducted according to federal regulations. DU requires all investigators to

complete training before approval for any new project or new personnel are added to a protocol. The Collaborative Institutional Training Initiative (CITI) Program provides training for faculty, staff, and student investigators working with animals. In 2010 and 2019, DU received full accreditation from the Association for Assessment and Accreditation of Laboratory Animal Care.

The IBC oversees research and teaching activities that involve recombinant or synthetic DNA/RNA and biohazardous agents. The IBC safeguards protection of personnel, the general public, and the environment; they work with DU's Environmental Health & Safety (EHS) Department to establish requirements for laboratory and biological safety practices and review and approve policies, procedures, and training programs pursuant to the safe use of biological agents, other biological materials, and toxins. IRB, IACUC, and IBC compliance committees are provided ORIE administrative and professional personnel to oversee research conducted by affiliated investigators on the DU campus. Before IRB approval, investigators conducting research using recombinant or synthetic DNA/RNA and other biohazardous agents must complete mandatory training.

The Responsible Conduct of Research (RCR) Program meets requirements of Section 7009 of the America COMPETES Act, which mandates training in responsible conduct of research for National Science Foundation (NSF) funded projects. Training includes nine core instructional areas, including data acquisition, management, sharing and ownership, peer review, and research misconduct. ORIE provides research compliance services, including conducting classroom presentations on research ethics, research compliance workshops, and research ethics consultations.

On behalf of the Secretary of HHS, ORIE oversees Public Health Service (PHS) research integrity activities, including research misconduct inquiries, investigations, and institutional compliance. In consultation with the Senior Vice Provost of Research, ORIE investigates allegations and reports all research misconduct activities in an annual report. ORIE also implements Misconduct in Research policy and encourages reports of ethical violations to the Anonymous Ethics Hotline via phone or online.

Within the last five years, to better serve faculty, staff, and students, ORIE added two full-time positions—IRB Research Compliance Administrator and Research Compliance Monitor—and an intern program. Sponsored Programs Administration, which supports, monitors, and manages research proposals and awards, added two full-time grant and contract administrators and an intern program.

EHS oversees and provides training for laboratory safety and inspection required for everyone working in campus laboratories. EH&S coordinates annual reviews and accountability through collaboration with ORSP and ORIE.

2.E.2. The institution provides effective support services to ensure the integrity of research and scholarly practice conducted by its faculty, staff, and students.

DU supports faculty, staff, and students in their research endeavors. ORSP reduces barriers to submitting proposals to external agencies, celebrates accomplishments of the community, and promotes innovative partnerships with industry and community to support the University's drive for national recognition for intellectual contributions to society. As described in 2.E.1, University

research offices (ORSP and IRB) provide support for faculty and students in addition to their compliance function.

DU's robust seed-funding system supports faculty research, including a variety of mechanisms from broad to targeted areas and small to large investments. For consideration of funding, faculty members go through peer review and post-award reporting to ensure ethical behavior [Professional Research Opportunities for Faculty, Faculty Research Fund, Public Good Fund for Faculty (RFP), Internationalization grants, and Knoebel Institute for Healthy Aging pilot grants (2016, 2019)].

The Undergraduate Research Center (URC) provides educational resources and funding for students to develop research skills and learn how to conduct ethical research. Students who receive grants from URC work with a faculty mentor who provides research guidance and methodological expertise to develop high-quality research. Grant proposals are vetted by an interdisciplinary faculty committee that reviews the promise and integrity of the proposal based on research novelty and impact, proposed methods, written presentation, student outcomes, student preparation, and faculty collaboration [Evaluation Rubric]. Students conducting human or animal research cannot receive awards until they receive IRB or IACUC approval. URC collaborates with the Office of Intellectual Property and Technology Transfer to help students understand expectations, policies, and responsibilities connected to their research and provides information about intellectual property policy.

As discussed in 2.A and B, the University's Student Rights & Responsibilities (SRR) office is a resource for students to learn about their roles, responsibilities, and expectations for ethical behavior grounded in values of respect, integrity, and responsibility. The website provides information about policies and procedures within the Honor Code, including definitions of Academic Integrity and Academic Misconduct. The Office of Teaching and Learning (OTL) provides sample syllabus statements about Honor Code/Academic Integrity, Research Center Services, and other resources for faculty, so students receive regular reminders of how to conduct ethical research and access research support. Students can also contact the office for support related to conduct and the Honor Code.

2.E.3. The institution provides students guidance in the ethics of research and use of information resources.

University Libraries plays a pivotal role in helping students identify and ethically use information sources. The Research Center assists with citation and source use through virtual and in-person consultations. From 2010-2018, Research Center staff answered 73,605 questions from students at our desk and conducted 7,579 in-depth consultations with students about their research. Librarians teach course-integrated instruction and standalone workshops through the library instruction program to discuss ethical source use based on the Association of College and Research Libraries' Framework for Information Literacy in Higher Education, particularly through the *Information Has Value* framework [Winter 2020 Workshops, Spring 2020 Workshops]. From 2010-2018, librarians have taught a total of 3,043 library instruction classes to a total of 54,594 students. Librarians provide training on reference management systems, such as RefWorks and Zotero, which allow students to seamlessly cite sources [Library Accreditation Report].

The DU Writing Program is committed to developing students' ability to ethically use information resources through course instruction and assessment, and the Writing Center offers guidance through individual, group, and class consultations that explain rationales and strategies for thoughtful source integration and proper citation [Writing Program Enrollments, Writing Program Assessment Report, Writing Center Data].

Some academic programs provide more specific research guidance. Psychology Ph.D. students complete a departmental orientation that includes training in FERPA and Title IX. All students complete CITI training in research ethics and take a course in ethical behavior (PSYC 4920 Ethics in Psychological Research); clinical students also take PSYC 4925 Clinical Ethics and Professional Issues. New clinical Ph.D. students receive the *APA Ethical Principles of Psychologists and Code of Conduct* and meet with a core clinical faculty member to discuss the *Code*. The department evaluates student ethical behavior in all clinical and research work [Annual Review Form, Graduate Handbook].

All NSM graduate students attend annual trainings on topics such as Title IX and FERPA. Individual programs require lab training appropriate for their subject. All students who work in Biology faculty labs complete CITI research compliance training. Graduate students take Responsible Conduct in Research (BIOL 4231) for credit and complete a module from CITI. For Physics PhD students, research ethics are covered in the required first-year sequence, Introduction to Research (PHYS 4001-4003).

2.E.4. The institution enforces policies on academic honesty and integrity.

At DU, research misconduct is defined as fabrication, falsification, plagiarism, or other practices that seriously deviate from those commonly accepted within the scholarly community for proposing, conducting, reviewing, and/or reporting research. Research misconduct also includes making knowingly false accusations of misconduct by another, violating IRB policies and procedures, or willful failure to comply with federal and other requirements. All persons, including faculty, post-doctoral associates, graduate students, undergraduate students, staff, and administrators, may be subject to allegations of research misconduct [Research Misconduct].

Misconduct can be reported through the Audit Hotline or directly to the chief research officer (CRO) or dean. Reporters can maintain anonymity and all reports are evaluated by the CRO to determine next steps. If the report doesn't meet the criteria of misconduct, the CRO refers it to the proper governing body, usually a confidential inquiry committee [Misconduct Policy]. Complaints regarding human subject violations or animal care and use policies are evaluated by committees of experts from those governing bodies.

As discussed in 2.A.2, DU's Academic Misconduct Policy is clearly articulated on the SRR website. The University has six case resolution bodies who make decisions regarding possible policy violations, including the Director of SRR, SRR staff, housing and residential education staff, faculty, Student Accountability Board, and the Restorative Justice Conference. SRR provides resources for faculty dealing with matters of academic integrity.