

2.A - Core Component 2.A

The institution operates with integrity in its financial, academic, personnel, and auxiliary functions; it establishes and follows policies and processes for fair and ethical behavior on the part of its governing board, administration, faculty, and staff.

Argument

The most significant decision taken in recent years with regards to institutional integrity was the college's abandonment, beginning with the entering class of 2013, of the policy of open admission, and its replacement by a policy of what the college termed 'generous' admission. Open admission had been implemented in the early 1970s at a time when ensuring access to higher education was regarded as paramount by national policy-makers and when the level of federal student aid grant funding covered tuition costs at many institutions. In that historical moment, it seemed appropriate for Columbia make a commitment to – in the words of the 1987 mission statement – “provide a college climate that offers students an opportunity to try themselves out, to explore, and to discover what they can and want to do” and “help students to find out who they are and to discover their own voices, respect their own individuality, and improve their self-esteem and self-confidence.”

The open admission policy certainly contributed to the long run of enrollment growth that the college enjoyed into the late 2000s. But it also could be said to have contributed to a strain of 'magical thinking' at the institution – in which it accepted all comers in the belief that it could, like Michelangelo, liberate the angel in the block of marble in some of them – that was not supported by the evidence. By the time total enrollment peaked at 12,462 in 2008, Columbia was [retaining only 64.3 percent of incoming full-time freshmen to their sophomore year](#) (three-year average, fall 2006-08 entering cohorts); only [28.7 percent of the fall 2006-08 entering cohorts would go on to graduate in four years](#), and only [42.0 percent in six](#). As was customary in the period immediately preceding the Great Recession, students had become increasingly reliant on high-interest private student loans to cover the cost of their education, so many of those who did not persist to graduation found themselves burdened with crushing student loan debt, no formal degree or qualifications, and limited prospects.

Longtime employees will admit that even in the good times of growing enrollment and expanding resources, an undercurrent of unease existed within the institution about the wisdom and ethics of admitting students whose readiness for college-level work was questionable, and saddling them with expensive private loan debt in the process. Once the private loan market collapsed in the wake of the Great Recession and the college found itself having to replace those student financial aid dollars out of its own pocket in the form of institutional grants, the alignment of ethical concerns and institutional self-interest shaped an emerging understanding within the college's leadership that it was no longer appropriate for the college to admit and enroll students without assessing their capacity to persist to graduation. The abandonment of open admissions was a critical step in an evolving reorientation of the college's common work away from a focus on student access for its own sake and toward the facilitation of student persistence to graduation.

It has also led to a review and revision of policies and practices in other administrative areas to ensure their alignment with the new generous admissions focus. For example, the Student Financial Services office (SFS) has made considerable efforts to improve the efficacy and consistency of its financial counseling and financial literacy services for students:

- Each semester, SFS sends a link to a comprehensive [consumer information disclosure](#) to all enrolled students. The document includes information on SFS policies and procedures related to financial aid, billing, campus card services, and services for veterans. It also points students to college-wide consumer information on the website, advises them of employee codes of conduct, and provides a link to the college's Whistleblower Policy (see below).
- Every student who enrolls at the college must agree to Columbia's [Acceptance of Financial Responsibility Statement](#), whose language adheres to a format recommended by the National Association of College and University Business Officers.
- As a member institution, Columbia adheres to the Statement of Ethical Principles and Code of Conduct of the National Association of Student Financial Aid Administrators. It publishes its [student loan code of conduct](#) in the disclosures section of its website in accordance with federal law.
- Since 2015, SFS has developed a more robust financial counseling and financial literacy program for current and incoming students, using online resources, workshops, and peer counseling.
- In October 2016, SFS led the institution's review of its Title IV Program Participation Agreement to ensure compliance with federal statutes. The next such review is scheduled for October 2018.
- A revised financial aid policies and procedures manual that adheres to a template provided by the U.S. Department of Education went into effect in the 2017-18 academic year.
- Until recently, SFS did not engage in an in-depth conversation with admitted students and their families about tuition payment plans and other financial management tools until summer orientation. Beginning with the 2017-18 new student recruitment cycle, however, SFS has also held these sessions at the earlier Admitted Student Days. In addition, admissions recruiters are now trained to discuss institutional aid policies and practices at a high level and to help admitted students estimate their financial obligations once they receive their financial aid awards.
- SFS staff who are responsible for compliance-related activities attend the Federal Student Aid conference at least every other year.

Recent trends in Columbia's [student loan default rate](#) provide some evidence of the progress that has been made in this area, as well as that which remains to be achieved. After peaking at (a very problematic) 14.8 percent for the cohort that entered repayment in FY2010, the rate has fallen to 9.0 percent for the FY2015 cohort. It remains higher than the comparative rates for student cohorts at a selected set of peer, aspirational, and local colleges and universities.

Student Records

Until 2016, Columbia did not have a true registrar's function. Those responsibilities were divided between separate entities, a records office in the academic affairs unit and an office of degree evaluation in the student affairs unit. The two offices were siloed and communication between them was inadequate.

In the spring of 2016, following an assessment by consultants from the American Association of

Collegiate Registrars and Admissions Officers, records and degree evaluation, supplemented by staff who carried out registrar's functions in other offices, were merged into a unitary office of the registrar based in academic affairs. Much of its work over the past two years has involved efforts to ensure and enhance the integrity of student records:

- The registrar's office, working with the IT staff, has corrected a series of errors cited in Columbia's three most recent single (formerly A-133) audits of federal government disbursements. All of them concerned problems with the timely reporting of changes in students' enrollment status, which can impact their federal student loan repayment. The office has now instituted an internal auditing process to review student status report changes on a regular basis, comparing National Student Clearinghouse data with National Student Loan Data System data to ensure their consistency. Staff training in this area has been expanded and the report generated by the student information system has been enhanced to prevent any future recurrence of the problem.
- Degree audit encoding, which was formerly embedded in the academic deans' offices and the provost's office, has been centralized in the registrar's office. This audit intersects with many other registrar functions such as oversight of students' satisfactory academic progress, transfer credit equivalencies, and grading. The consolidation of these functions ensures the consistent and accurate tracking of students' progress to graduation.
- The registrar's office has taken over transfer credit and degree audit evaluation and graduation clearance from the office of degree evaluation. Centralizing this work has improved its accuracy and ensures that all students who have completed their degree requirements graduate in a timely fashion.
- In 2016, curriculum management, including the publication of the college catalog and the development and maintenance of a college-wide course numbering system, was centralized in the registrar's office, which also adopted new technological tools to integrate these functions. This ended a division of the responsibility for overseeing these information sources between the academic affairs office, which published the catalog, and the three academic deans' offices, which entered the curriculum into the student information system and prepared the catalog text. The tighter controls have resulted in cleaner and more functional course and academic program data and eliminated inconsistencies between the catalog and the information available on the student registration portal.
- The registrar's office has implemented a mandatory attendance reporting process to verify student enrollment prior to each semester's enrollment 'census date'. Under the system, the academic advising office reaches out to students whose faculty report them as consistently absent at the start of the semester. Students whose intention not to enroll for the semester is confirmed, whether directly or by inference, have their registrations voided, and they are neither counted in the census nor billed for tuition.
- The college is in the midst of a cull of boxes of paper records dating back to the 1920s that had been stored in unsafe conditions across campus, leaving them vulnerable to fire, flood, and vermin infestation. Documents that do not have to be retained according to the college's records retention policy are safely destroyed. Documents that must be retained are cross-referenced against the electronic records database and, if not already scanned, are scanned into it.

Audits

The college's auditors have identified the same two findings in the year-end audited financial statements over the past three years, but there has been marked improvement in the single audit, with eight findings on the FY15 audit reduced to three on the FY17 audit. In 2017, in response to several findings of deficiencies in the FY16 audited financial statements related to the adequacy of internal controls, the college reinstated and filled the position of internal auditor, which had been eliminated a few years earlier for budgetary reasons, and hired a grants manager to oversee the management of grant funding across the institution. In addition, the dissolution of the Center for Community Arts Partnerships (CCAP) in 2016 and the relocation of its functions to the three undergraduate schools has addressed concerns about federal grants management that were identified in the college's FY14 and FY15 single audits. The auditors have noted, and the college is aware of, isolated but chronic issues with inadequate IT controls on employee and vendor access to student records, employee records, and the general ledger and payroll systems. The internal auditor and IT department have developed a series of draft policy revisions and requisite action steps to address these issues, and hope to implement them by the end of calendar year 2018.

Policies and Procedures

The college has a number of policies in place to ensure that trustees, employees, and students behave with integrity in their interactions with members of the Columbia community:

- In July 2018, the college launched a new intranet website, overseen by the internal auditor, to serve as a central repository for all approved institutional policies and procedures. The goal is for policies and procedures governing all facets of college operations to be added to the repository over time.
- Although Columbia is not legally obligated to adhere to the Sarbanes-Oxley Act, the Board of Trustees has adopted a trustee [conflict-of-interest policy](#) that incorporates its fundamental principles. This policy acknowledges that its effectiveness is reliant on "the vigilance and sound judgement of each individual" and that "[e]ven the appearance of a conflict can cause damage to the College." The policy notes that "not all conflicts are financial in nature." Every year, trustees and senior administrators complete a [conflict-of-interest disclosure](#) that extends to family members. This document covers the prior fiscal year and comprehensively surveys any possible interactions that might have been associated with College activities. In addition, individuals are required to identify any organizations they or their family members which could "reasonably be anticipated to enter into transactions or arrangements with the College."
- The [student code of conduct](#) is part of the student handbook and is published in hard copy and on the college's website.
- An existing written employee code of conduct was withdrawn in [year] because of concerns that it was out of date and insufficiently comprehensive. The Human Resources and General Counsel's offices are currently assembling the college's first-ever staff handbook, which will incorporate an updated, more focused code of conduct. They expect to release the document to the college community during the fall semester of 2018 **[update status as of time of submission]**.
- In July 2018, the college implemented a new policy that places more stringent controls on the bidding, negotiation, authorization, and execution of [institutional contracts](#) by employees.
- In 2015, the college implemented a [Whistleblower Policy](#) that provides a channel for the anonymous reporting of instances of malfeasance or unethical behavior by members of the

college community. The policy includes sanctions against both retaliation and false reports. A small campus team used to review whistleblower reports; the internal auditor does so now.

- Following the U.S. Department of Education's Office for Civil Rights's issuance of guidelines in 2011 requiring higher education institutions to bring their policies and procedures for adjudicating sexual misconduct cases involving students into compliance with Title IX of the Education Amendments of 1972, the college updated its policies and procedures in this area. The [student sexual misconduct policy and procedures](#) are part of the student handbook and are published in hard copy and on the college's website. The college has also engaged in intensive education efforts to encourage all members of the community to complete recommended training on these issues, using an online portal. As of the time of writing, 1,531 current and former faculty and staff and 26 of 30 sitting trustees had completed the online training; the human resources office plans to conduct an audit to identify those who have not done so.

The Title IX training is one of two training components – the other being training on employees' responsibilities as 'mandated reporters' under the state of Illinois's Abused and Neglected Child Reporting Act – that has been integrated into the on-boarding process that occurs in the period between an individual's formal acceptance of an employment offer from Columbia and that individual's start date. The college has also established two full-time staff positions for Title IX oversight on campus; these individuals report to the dean of students. Notwithstanding the current administration's withdrawal of the 2011 guidelines, Columbia's commitment to maintaining an educational environment that is free of sexual violence, harassment, and discrimination remains unwavering.

The Audit Committee of the Board of Trustees receives annual, aggregated reports on the adjudication of cases involving the college's Student Sexual Misconduct Policy and Procedure and a monthly summary of complaints submitted under the Whistleblower Policy.

Human Resources

Another area where improvements in operational efficiency have produced beneficial follow-up effects on institutional integrity has been the college's human resources function:

- The college has centralized what had been decentralized, inconsistent, opaque, and at times inequitable hiring processes for faculty and staff. A recruitment manager in the human resources office now assists departmental hiring managers with the various stages of the search and recruitment process, and all job applications are funneled through a centralized candidate tracking system, which is especially helpful when it comes to establishing candidates' qualifications and building diverse applicant pools. This [system](#) is already in effect for [staff and full-time faculty hiring](#) and will be extended to part-time faculty hiring beginning in the fall of 2018.
- Prior to 2017, Columbia did not employ a consistent criminal background check, educational attainment verification, and prior employment verification system for prospective employees. These checks are now required for all new hires prior to the start of their employment at the college. The narrative for Core Component 3.C discusses efforts by the provost's office since 2014 to require documentation of the academic credentials and professional qualifications of current full- and part-time faculty.

Faculty Manual

[The Faculty Manual](#) documents and articulates policy and procedures on a wide range of areas. The roles and responsibilities of various bodies to create shared governance (Board of Trustees, Administration, Faculty Senate, and College-wide committees) are described. The hiring processes for Administration (President, Provost, Deans, and Chairs) are articulated, as are those for faculty.

Faculty categories are defined, as are faculty related policies and categories (workload, sabbaticals). In addition, conflicts of interest are defined, such as outside employment conditions, use of the college name for personal use, and a prohibition of selling course material directly to students.

The Manual also contains academic and classroom policies, including the Academic Integrity Policy, grading, and copyright. Finally, the Manual includes College-wide policies, such as Equal Opportunity, FERPA, and Drug-Free Workplace.

Faculty Appointments and Tenure

The document [Statement of Policy on Academic Freedom, Faculty Status, Tenure, and Due Process](#) articulates faculty appointments, tenure, and academic freedom. This document was approved by the Board of Trustees in 1997 (when tenure was first implemented) and updated seven times since (most recently in 2017).

Major sections of this document include:

Academic Freedom: Academic Freedom at Columbia and its protection are defined.

Faculty Appointments: Types of faculty appointments and respective workload are articulated.

Tenure: Criteria for tenure are articulated, including evaluation process and granting of tenured appointments, and post-tenure review.

Other sections identify sanction or dismissal of faculty appointments, maintenance of Academic Personnel files, and the All-College Tenure and Procedural Review Committees.

All new faculty are invited to a two-day [New Faculty Orientation](#) that introduces faculty to College policies and various resources for student support.

College Catalog

The College Catalog is discussed in the narrative for Core Component 2.B.

Adjunct Faculty Union Contract

The College's adjunct faculty was unionized in 1998 and relations with adjunct faculty are governed by the [Collective Bargaining Agreement](#). This current contract went into effect in the Fall 2013 semester. It expired in August 2017 but remains in effect while the College and the adjunct faculty negotiate a new contract.

The agreement acknowledges the College has management rights in academics (policies, curriculum, graduation requirements, scheduling), resources (budget, facilities) and personnel, all "except as modified by this agreement."

One of the major features of this contract compared to prior contracts was the implementation of a tiering system, based on seniority, giving more senior members of the part-time faculty priority on

class assignments (p. 12).

The contract articulates policy and procedures for College and union relationships (p. 5), academic freedom (p. 9), governance and committee work (p. 10), remediation (p. 16), workload (p. 17), grievance process (p. 17), discipline (p. 19), and evaluation (p. 21).

Staff Union Contract

Non-exempt staff at Columbia organized into a union, called the United Staff of Columbia College (USofCC), in 2009. (Some non-exempt staff are not included in the bargaining unit [**clarify**].) Since then, the College's relationship with the unionized staff has been governed by the [Collective Bargaining Agreement](#).

The CBA covers all aspects of the employee/college relationships, including Job Descriptions (p. 11), roles on Search Committees (p. 11), Evaluation (p. 12), Grievances (p. 17), and Compensation and Benefits (p. 20).

Policies regarding recruiting and hiring and promotion ensure that the institution implements equal opportunity and affirmative action employment practices. Staff are covered under policies regarding fair salary; addressing catastrophic leave and creation of a catastrophic leave bank ; and protecting them from unfair or unreasonable work schedules. Staff also have clear policies regarding performance assessment and the classification system, and are given opportunities for staff development. To ensure fairness, staff are also covered by policies regarding and defining employee infractions, and the system for four-part counseling for remedying instances of inadequate performance. The Classified Staff Handbook details expectations, benefits, policies on overtime and leave, etc.

Sources

- 2013-2017 CCC PFAC CBA
- 2015-2018 USofCC CBA
- ASL_BA_ASL_4YearPlan_2018
- ASL_BA_ASL_Transfer_2018
- CCC Faculty Manual, A Guide to Policies and Procedures
- Cohort default rate.FY09_FY15
- Conflict of Interest.Policy_Disclosure Form.FY17
- Conflict of Interest.Policy_Disclosure Form.FY17 (page number 2)
- Conflict of Interest.Policy_Disclosure Form.FY17 (page number 5)
- Contracting policy
- NFO 1.11 and 1.12.18 Agenda FTF
- Position requisition form
- Position requisition process
- Retain.grad.rolling.FY06_FY08
- SFS code of conduct
- SFS policies.2017_18
- SFS.accept.responsibility

- Statement of Policy on Academic Freedom, Faculty Status, Tenure, and Due Process Amended May 11 2017(2)
- Student code of conduct
- Student Sexual Misconduct Policy And Procedures
- Whistleblower policy

2.B - Core Component 2.B

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

Argument

Catalog

The [College Catalog](#) is the comprehensive source for academic requirements, policies, and resources. It is online and a new version is published every academic year on July 1. Older catalogs are archived and available for reference by anyone accessing the College's web site.

Sections of the Catalog are:

Academic Calendar: Start and end dates, add/drop, holidays for Fall, Spring and Summer terms.

Academic Policies: Academic Integrity Policy, Campus Security Act, Family Educational Rights and Privacy Act. Included in the Academic Policies section are Graduate Academic Policies and Undergraduate Academic Policies.

Courses: Course numbers, titles, and descriptions for all active courses.

Majors and Programs: List of all degree programs. Included in the list are program descriptions, program outcomes, and lists of required and elective courses. Minors are also listed, along with their program descriptions. (The following section, Programs and Courses by Department, has the same information, organized by department.)

Four-Year Planning Tools: Four year plans for all majors, including electives and LAS Core classes. A sample for the [American Sign Language](#) major serves as an example.

Transfer Planning Tools: Resources for non-Columbia students wishing to transfer. Included are four-year guides to assist in transfer planning. A sample for the [American Sign Language](#) major serves as an example.

Requirements for Undergraduate Admission: Articulates requirements for undergraduate admission and identifies categories of admitted students.

Requirements for Graduate Admission: Articulates requirements for graduate admission and identifies categories of admitted students.

Consumer Information on College's Web Site

The [Consumer Information](#) section on the College's web site is a rich source of information for students.

The [Student Financial Aid and Services](#) section includes a wealth of information on costs, including:

Tuition and fees for [undergraduate](#) and [graduate](#) attendance, estimated costs of attendance for both

[undergraduate](#) and [graduate](#) students, [net price calculator](#), potential costs associated with [changes in attendance/enrollment](#), and a [comprehensive list](#) of policies, due dates, and other essential information to students.

The Institutional Effectiveness Office (IE) also publishes data about students on the Consumer Information site. Included are: [Six-year graduation rates](#), [fall-to-fall retention rates](#), and a summary of the most recent [Alumni Survey](#).

In addition to the information IE publishes on the Consumer Information web site, IE shares a wealth of research and reports from its [own site](#). The KPI area contains two documents: the annual [Key Performance Indicators](#) report, which has updated data on applications and retention; instructional staff (faculty counts, FTE enrollments); productivity (ratios, class size); and finance (revenues, expenditures, default rates). It also publishes an infographic, the [Strategic Plan Scorecard](#), which reports on enrollments and first year and graduating student surveys. The site also has links to the current and prior year [Fact Books](#), which contain highly detailed information on student demographics (ethnicity, geographic origin); graduation rates and enrollments (per program); ratios (faculty:student, FTE faculty:student); and finance (revenue, expenses). The majority of these data pieces present trends. Survey results are also provided, including the [Alumni Survey](#) and [Graduating Student Survey](#). Finally, IE has created an [Interactive Reporting Tool](#), which allows any user to generate reports on enrollments, graduation and retention rates, applications, and credit hour generation. Reports can be run with a wide array of variables, including gender, ethnicity, place of origin, EFC, and Academic Rank (Student Academic Preparation).

Assessment of Student Learning

The Office of Accreditation and Assessment has adopted the National Institute for Learning Outcomes Assessment's (NILOA) [Transparency Framework](#) for its web site, sharing virtually all of its assessment processes, activities, and results with both internal stakeholders and with the public. The [Assessment Web Site's](#) sections share reports and documents and consists of:

1. [Student Learning Outcomes](#): This page provides a link to the list of SLOs for all majors in the catalog and also includes a link to the College's Universal Learning Outcomes.
2. [Assessment Plans](#): Descriptions of prior year assessment plans are placed here.
3. [Assessment Resources](#): This page contains resources, such as outlines for annual reports, guides for writing outcomes and assessing outcomes, and links to external organizations (AALHE, NILOA, AAC&U)
4. [Current Assessment Activities](#): This page contains the documents that outline the current AY's assessment activity for each department.
5. [Evidence of Student Learning](#): This page has the most recent annual reports for each department.
6. [Use of Student Learning Evidence](#): This section has summaries of how assessment results have been used across the campus.

All of the above materials are available to any visitor to the College's web site; none of these files is password protected.

Student Handbook

The [Student Handbook](#) is published annually and contains a wealth of information for students. Its sections are:

1. *The Basics*. Included sections: How to register for classes; Catalog; Directory; Online Administrative Student Information System (OASIS, the student information and records system); Tuition and fees; Student Financial Services; and student email.
2. *Your Community*. Included sections: Student Government Association; Student Organizations; Fitness, Athletics and Recreation; Student Programs and Activities; Student Diversity and Inclusion.
3. *Columbia's Policies and Procedures*. Included sections: Academic Policies, Academic Integrity; Satisfactory Academic Progress; Drug and Alcohol Policy; FERPA; Sexual Misconduct and Procedures (Title IX); and Student Code of Conduct.
4. *Student Support*. Included sections: Dean of Students; Veteran's Services; College Advising Center; Degree Evaluation; Honors Program; Global Education; Registrar; Counseling Services; Health Center; and Safety and Security.
5. *Our Traditions*. Included sections: History of the College; New Student Convocation; and Manifest (the end of the school year arts festival).
6. Campus Life. Included sections: Campus Map; Building Hours; the Library; Museums and Galleries; and the Bookstore.

Specialized Accreditation

Three of Columbia's programs at Columbia have specialized accreditation and these are noted on the College web site:

The American Sign Language/English Interpretation Program is accredited by the [Commission on Collegiate Interpreter Education](#).

The Interior Architecture Program in the Design Department is accredited by the [Council for Interior Architecture Accreditation](#).

The Dance/Movement Therapy Program is accredited by the [American Dance Therapy Association](#).

Sources

- 6 Yr Graduation Rates
- Alumni snapshot: 2016 alumni one year out
- Alumni Survey 2017
- ASL CCIE Accrediation Letter July 2018
- ASL_BA_ASL_4YearPlan_2018
- ASL_BA_ASL_Transfer_2018

- Assessment Plans Web Site
- Assessment Resources Web Site
- Assessment Web Site Main Page
- CCC 2018 COA Program Letter Self Study
- CCC NILOA Framework Main Page
- Change in Enrollment Status and Costs
- CIDA Int Arch Accreditation 2018
- Consumer Information Web Page.pdf
- Cost of Attendance 18-19 GRAD
- Cost of Attendance 18-19 UG
- Current Assessment Activity Web Site
- Evidence of Student Learning Web Site
- Factbook_2017
- Graduating Student Survey 2017
- IE Website
- Institutional Effectiveness Interactive Reporting
- Key Performance Indicators 2017
- Net Price Calculator
- RetentionRates
- SFS Disclosures
- SFS Main Page on Consumer Information
- StrategicPlan2017_infographic
- Student Learning Outcomes Statements Web Site
- Tuition and Fees GRAD 18-19 from SFS
- Tuition and Fees UG 18-19 from SFS
- Universal Learning Outcomes of Columbia College Chicago-Final Draft
- Use of Student Learning Evidence Web Page
- YFCY 2015 vs 2016

2.C - Core Component 2.C

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

1. The governing board's deliberations reflect priorities to preserve and enhance the institution.
2. The governing board reviews and considers the reasonable and relevant interests of the institution's internal and external constituencies during its decision-making deliberations.
3. The governing board preserves its independence from undue influence on the part of donors, elected officials, ownership interests or other external parties when such influence would not be in the best interest of the institution.
4. The governing board delegates day-to-day management of the institution to the administration and expects the faculty to oversee academic matters.

Argument

The [Columbia College Chicago Board of Trustees](#) operates in accordance with [bylaws](#) that are reviewed and updated on a regular basis, most recently in May 2017. A modest revision in May 2015 brought the bylaws into compliance with the Illinois General Not For Profit Corporation Act of 1986. In 2018-19, the Board will hold three business meetings and one retreat, which is conducive to proper oversight of management. The Board delegates oversight of particular areas of expertise to its standing committees (Academic Affairs, Audit, Finance, Governance, Investment, and Student Affairs). The current Board chair is seeking to strengthen the autonomy of the Board and its standing committees by eliminating the Executive Committee's duplicative review of standing committee recommendations that are forwarded to the Board for review and action. Agendas and supporting materials for all Board and standing committee meetings are distributed beforehand in a timely manner, and minutes are taken at all such meetings.

Historically, the Board has tended not to insert itself deeply into specialized academic matters, deferring instead to the faculty's expertise. While it does approve changes to major academic policy documents such as the [Statement of Policy on Academic Freedom, Faculty Status, Tenure, and Due Process](#), it does not, unlike some governing boards, approve faculty tenure appointments or the establishment or substantial revision of degree programs. (Were the college to propose the elimination of a degree program and the termination of its tenured faculty, under the Statement of Policy the Board would be responsible for making the final decision.)

The Board is structured in a way that allows trustees to hear the perspective of internal and external constituencies. Its membership includes the sitting president of Columbia's alumni association, who is an *ex officio* trustee, as well as non-voting faculty and student representatives. The latter two individuals serve on the Board's Academic Affairs and Student Affairs Committees, respectively, and deliver end-of-year reports at the final Board meeting of the academic year. Under the most recent collective bargaining agreement between the college and its part-time faculty union (Pfac), the Academic Affairs Committee also receives semi-annual reports from the Pfac president.

Leaving aside matters related to its internal management, such as trustee and Board officer elections, the Board's actions in the 2017-18 academic year reflected "priorities to preserve and enhance the institution":

- It authorized the sale of college properties at [1401-1415 S. Wabash](#) (a former set shop rendered redundant by the renovation of the Getz Theatre) and [731 S. Plymouth Court](#) (which among other things houses campus offices that will eventually move to the new student center), and approved [a \\$2.5 million increase in FY18 capital expenditures to complete the Getz Theatre renovation](#).
- It directed the president to prepare and submit to the chair of the Board an advisory report, incorporating the requisite comments and recommendations of the Executive Committee of the Faculty Senate, on [the future of the college's degree and certificate programs in early childhood education and creative arts therapies](#). This was the first step, under the Statement of Policy (see above), in the proposed closure of these programs. Apropos of the Board's review and consideration of "the reasonable and relevant interests of the institution's internal and external constituencies," it should be noted that the Board, responding to concerns articulated by the Faculty Senate and seconded by the Faculty Representative, subsequently agreed to defer action on the closures pending a further review and revision of the provost's supporting analysis.
- It approved the [final FY18 operating budget and capital plan](#). Subsequently, it voted to [reduce the budgeted endowment draw for FY18 from 7 percent to 5 percent](#) based on favorable end-of-year actual-to-budget projections and on Standard & Poor's observation in its 2017 review of the college's bond rating about the risks of relying on "extraordinary" endowment draws to achieve "full accrual operating surpluses."
- It approved the [proposed tuition, residence hall rate, and student fees schedule for FY19](#).
- It approved [a \\$20 million transfer from the college's operating reserves to the Board-designated endowment](#).
- It approved [a \\$450,000 contribution to the defined benefit pension plan fund](#) to forestall the assessment of a \$14,000 underfunding penalty by the Pension Benefit Guaranty Corporation, and [authorized the college's administration to offer a voluntary termination program to plan participants in 2018](#) as an additional risk reduction measure.
- It accepted the [FY17 audited financial statements, Single Audit report, and Form 990 filing with the Internal Revenue Service; a charter for the restored internal audit function](#) (see the narrative for Core Component 2.A); and the language of the [FY19 trustee conflict-of-interest disclosure statement](#).
- It approved the slate of [Commencement 2018 honorary degree recipients, two dean emerita nominations](#), and the list of [candidates for degrees for 2017-18](#).

The Board undertakes a robust annual evaluation of the president that is intended to delineate presidential responsibilities and hold the president accountable for a set of mutually agreed-upon expectations. In its current iteration, the process begins in late May with the president's submission of an annual self-evaluation to the chairs of, respectively, the Board and the Presidential Annual Evaluation Subcommittee, comprised of a subset of the Board's Executive Committee, which conducts the performance review. The full Executive Committee of the Board reviews the results of the review in July and approves any annual subsequent adjustment of the president's compensation. For 2018-19, the Board has retained the Association of Governing Boards (AGB) to conduct a fuller 360-degree presidential review.

Columbia is an independent 501(c)(3) institution, so there are no "ownership interests" that could

exercise undue influence and no elected officials to whom it is ultimately accountable. The Board has a formal [conflict-of-interest policy](#) and trustees are required to sign an up-to-date [conflict-of-interest disclosure](#) annually (as are donors who have given an aggregate amount greater than 2% of the total contributions received by Columbia before fiscal year-end from September 1, 2012 through August 31, 2017). No sitting trustee's current business relationships with the college necessitate the careful management of actual or potential conflicts-of interest, although there have been isolated instances of this in the past. All new trustees complete a Board orientation that addresses the expectations, responsibilities, and ethical obligations of their service.

Sources

- Board of Trustees meeting minutes.2017.09.26
- Board of Trustees meeting minutes.2017.09.26 (page number 3)
- Board of Trustees meeting minutes.2017.09.26 (page number 4)
- Board of Trustees meeting minutes.2017.12.05
- Board of Trustees meeting minutes.2017.12.05 (page number 2)
- Board of Trustees meeting minutes.2017.12.05 (page number 4)
- Board of Trustees meeting minutes.2018.02.13
- Board of Trustees meeting minutes.2018.02.13 (page number 3)
- Board of Trustees meeting minutes.2018.02.13 (page number 4)
- Board of Trustees meeting minutes.2018.05.10
- Board of Trustees meeting minutes.2018.05.10 (page number 4)
- Board of Trustees.FY18
- College.bylaws.current.05.11.2017
- Conflict of Interest.Policy_Disclosure Form.FY17
- Conflict of Interest.Policy_Disclosure Form.FY17 (page number 2)
- Conflict of Interest.Policy_Disclosure Form.FY17 (page number 5)
- Statement of Policy on Academic Freedom, Faculty Status, Tenure, and Due Process Amended May 11 2017

2.D - Core Component 2.D

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

Argument

Academic Freedom

The College defines and articulates its protection of Academic Freedom in the document "[Statement of Policy on Academic Freedom, Faculty Status, Tenure, and Due Process](#)." Faculty, "regardless of employment status ... are protected against institutional discipline or restraint in their discussion of relevant matters in the classroom, exploration of self-chosen avenues of scholarship, research and creative expression, and speaking and writing as public citizens." The part-time faculty CBA also discusses the [protection of academic freedom](#), stating that "unit members are protected against institutional discipline or restraint in their discussion of relevant matters in the classroom, exploration of self-chosen avenues of scholarship, research and creative expression, and speaking and writing as public citizens."

The [Student Code of Conduct](#) also addresses concepts of academic freedom. It states that the College provides an "environment ... in which freedom of expression is valued." The Code of Conduct "encourages the personal and intellectual development of each person."

The [College Mission](#) also speaks to freedom of expression in multiple areas. Among the College's stated purposes are:

- to educate students for creative occupations in diverse fields of the arts and media and to encourage awareness of their aesthetic relationship and the opportunity of professional choice among them;
- to provide a college climate that offers students an opportunity to try themselves out, to explore, and to discover what they can and want to do;
- to help students to find out who they are and to discover their own voices, respect their own individuality, and improve their self-esteem and self-confidence.

Student Clubs and Organizations - Copy pending

Diverse Curriculum

As discussed in 1.C and 3.B, the College offers a wide range of courses that speak to freedom of expression and the pursuit of truth. A short sample from the Spring 2018 semester schedule includes courses such as Black Arts and Visual Culture; Story in Fiction and Film: International; African History and Culture Since 1600; Gay, Lesbian, Bisexual, and Transgender History in the U.S.; The Chinese City in Literature, Art, and Media; Revolution and Jihad in the Middle East; Native American Literature; and Caribbean Art, Literature, and Music. In addition, the Dean for Academic Diversity Equity and Inclusion (DEI) has worked closely with departments to more intentionally incorporate DEI components into both the new Columbia Core Curriculum (effective Fall 2019) and into the curriculum for all majors.

Sources

- 2013-2017 CCC PFAC CBA
- 2013-2017 CCC PFAC CBA (page number 9)
- 2017-Mission- Purpose_ Columbia College Chicago
- Academic Integrity Policy Catalog
- Statement of Policy on Academic Freedom, Faculty Status, Tenure, and Due Process Amended May 11 2017
- Statement of Policy on Academic Freedom, Faculty Status, Tenure, and Due Process Amended May 11 2017 (page number 9)
- Student-code-of-conduct
- Student-code-of-conduct (page number 3)

2.E - Core Component 2.E

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

1. The institution provides effective oversight and support services to ensure the integrity of research and scholarly practice conducted by its faculty, staff, and students.
2. Students are offered guidance in the ethical use of information resources.
3. The institution has and enforces policies on academic honesty and integrity.

Argument

Institutional Review Board

The College's Institutional Review Board (IRB) is responsible for reviewing and approving all research with human and animal subjects conducted by faculty, staff, and students of Columbia College Chicago, when performed as part of their work or study at Columbia. It should be noted that a broad category of research students do as part of their studies is excluded from IRB review (as stated in the document [Categories of Exempt Research](#)).

The IRB schedules regular meetings and [publishes a schedule of deadlines](#) for applications and reviews. In general, the IRB is guided by the regulatory and ethical principles outlined in several important guiding documents, including the Belmont Report, the Health and Human Services Federal Policy for the Protection of Human Subjects (the "Common Rule"), and the Declaration of Helsinki.

The IRB web site contains links to all of the [policies and forms](#) related to its review. It also includes the [Roster](#), extensive [FAQ document](#), and a [Guide for Class Projects](#). Prior to applying to the IRB, all researchers must successfully complete the [CITI Online Training Module](#).

Forms for projects under IRB review and approval accommodate the range of project circumstances, from Exemption to Amendment to Completion:

1. [Application](#)
2. [Informed Consent](#)
3. [Request for Exemption](#)
4. [Request for Continuation](#)
5. [Project Completion](#)
6. [Project Amendment](#)
7. [Protocol Deviation Report](#)

In addition, the College's IRB accommodates non-Columbia participation in research, but the external party must complete the [Non-Affiliated Researcher](#) form.

Meeting minutes are maintained and samples of recent meeting minutes can be found here: [May 2018](#), [October 2017](#), and [September 2017](#). To facilitate and manage the IRB processes, the College uses the ProIRB Program. ProIRB is designed to help track the progress of research applications submitted by faculty and students to the IRB for federally mandated approval of research projects involving human subjects. The software is designed to allow the IRB Coordinator to enter all relevant information about each proposal into the ProIRB database in a consistent, easy-to-track way. This includes: the

project name and assigned protocol application number; the name and contact information for the principal investigator (PI) and faculty coordinator (if the project is student-generated); the dates of receipt, review, approval, and project renewal or completion; the level of IRB review requested by the PI (Exempt, Expedited, or Full Board review). The software also allows the coordinator to automatically generate letters informing the PI of a proposal's approval (with or without contingencies that need to be addressed) or rejection.

Academic Integrity

Columbia has a clearly defined [Policy on Academic Integrity](#), described in full in the Catalog. The policy covers a wide range of academic integrity issues, including definitions of the different categories of violations: 1) Plagiarism; 2) Recycling; 3) Cheating; 4) Denial of Access; 5) Fabrication; 6) Facilitation; and 7) Falsification.

The Procedures for action when a faculty member suspects a violation are clearly articulated in the policy. Step 1 has the faculty member discuss the issue with the student and, if both agree, the faculty member may impose the appropriate penalty. If the violation is significant, the Senior Associate Provost and the department chair are notified. If the student does not agree, s/he can appeal the decision to the department chair. If the student wishes to appeal the judgement of the department chair, s/he can appeal to the school dean.

When a student is found to be in violation of the academic integrity policy in either a "Serious" or "Significant" category, the faculty member reports the student in the Feith reporting system and this instance is recorded and reviewed by the Senior Associate Provost. If a student is found to be in violation multiple times, the range of consequences is articulated, including dismissal from the College. From Fall 2013 through the Fall 2017 semester, a total of 63 students were reported to be at either a Serious or Significant level and one student was expelled from the College for repeated and Serious violations.

Columbia College Chicago Library

[The Library](#) offers guidance in the use of information resources in numerous ways. In the Library classroom, in classrooms around the campus, and via online [research guides](#), librarians offer instructional programming to support and guide students in all aspects of the research process, from brainstorming and searching to evaluating and citing sources. Library instruction is provided to classes across the curriculum and within all three schools. In 2016-17, a total of 225 instructional sessions were offered, attended by a total of 4,217 students. Tailored instruction for many individual courses has been developed. Examples include [Entrepreneurship](#) and [Introduction to Management](#). This programmatic approach within the B&E department has meant that students are familiar with the resources available to them at the beginning of their program and utilize these throughout their course of study. The English and Creative Writing Department is another major area of instruction. All Writing and Rhetoric II sections are targeted for information literacy instruction. Reference and Instruction Librarians were invited to participate in curriculum planning in the First Year Writing Program and have worked closely with faculty to revise library research instruction in line with changes to the curriculum. The Library also provided faculty with content to help introduce students to basic considerations around copyright and intellectual property.

The Library has created a total of 77 Research Guides on a range of disciplines and majors ([Advertising and Public Relations](#), [Art and Art History](#), and [History](#)); on various topics ([Black Lives Matter](#) and [Sustainable Design](#)); and on research fundamentals ([Avoiding Plagiarism](#), [Finding and Using Images](#), and [Database Tutorials](#)). The guides direct students and faculty to recommended

subscription databases in their fields and highlight selected resources from the print and streaming collections as well as vetted resources from the internet. In addition, students have access to research assistance from librarians via SMS, chat, phone, email, and in-person, and may schedule in-depth research consultations with a librarian.

Program in Writing and Rhetoric (PWR)

The effective use of research and information is covered in [Writing and Rhetoric II](#), where learning outcomes indicate that students should be able to:

- Synthesize sources into a project that represents the complexity of perspectives involve
- Understand fair use and intellectual property rights and use others' work ethically and legally

As part of this course, students represent other people's ideas, and sometimes their own images, sounds, and video. They learn to consider the ethical and legal implications for working with all kinds of sources.

PWR collaborated with the library to produce the Provost's Copyright & Intellectual Property resource site for all instructors, college-wide. This site has four sections: [Overview and Definitions](#); [What's at Stake](#); [Applications in the Classroom](#); and [Online Resources](#). This site provides an overview of important concepts, their pedagogical implications, and a list of resources for instructors. The PWR also provides regular professional development sessions for instructors so that they are prepared to help students achieve course outcomes. Every instructor of Writing and Rhetoric courses has attended a two-hour training session for Writing and Rhetoric I and II that included the topic of intellectual property, fair use, and copyright.

Sources

- Academic Integrity Policy Catalog
- Ad and PR
- Art and Art History
- Avoiding Plagiarism
- Black Lives Matter
- Categories of Exempt Research
- Copyright and IP - Applications
- Copyright and IP - Online Resources
- Copyright and IP - Overview
- Copyright and IP - Whats at Stake
- Course and Topic Guides
- Database Tutorials
- English WR II manual FA18
- English WR II manual FA18 (page number 5)
- Entrepreneurship
- Finding and Using Images
- Guidance for Class Projects
- History
- Informed Consent
- Intro to Management

- IRB Amendment Review
- IRB Continuation Form
- IRB Exemption Request
- IRB FAQs
- IRB Forms and Definitions
- IRB Meeting Minutes - 2017-09-18
- IRB Meeting Minutes - 2017-10-16
- IRB Meeting Minutes - 2018-05-21
- IRB Non-Affiliated Researcher Form
- IRB Project Completion Form
- IRB Protocol Deviation
- IRB Research Training
- IRB Roster 2017-18
- IRB Schedule 18-19
- IRB_Application Form_Revised 2017.doc
- Library Homepage
- Policies and Guides IRB
- Research and Course Guides
- Sustainable Design