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## Standard Eleven: Integrity

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## Standard Eleven

### Integrity

#### The Integrity Environment at the University of Connecticut

Integrity is defined as the steadfast adherence to high moral and ethical principles (Encarta, 1999). The University of Connecticut's mission and purposes statement commits the University, through research, teaching, service, and outreach, to "cultivate... integrity... in our students, faculty, staff, and alumni." The University has the policies and practices in place to assure integrity and high ethical standards in the management of its affairs and in all of its dealings with students, faculty, staff, its governing Board, external agencies and organizations, and the general public. This commitment is significantly advanced in the University Guide to the State Code of Ethics (Exhibit 10.1), the University's Ethics Statement (Exhibit 10.1), the University's Employee Code of Conduct (Exhibit 10.2), and Student Code of Conduct (Appendix 6.1). The UConn Creed promotes the practice of personal and academic integrity by our students (Appendix 11.1). Integrity is also expected as a "(q)uality desired in teachers of all ranks" (*Laws, By-Laws and Rules of the University of Connecticut*, XV. J.2.d., Appendix 3.1). (11.1)

#### Ethics Statement and Code of Conduct

The University of Connecticut is committed to assuring the highest standard of integrity in all aspects of University life and in all University and University-sponsored activities (President's Letter, Dated 05.24.06 - Exhibit 11.1). It has established a Compliance Program administered by the Office of Audit, Compliance and Ethics to help to adhere to all federal, state, and local regulatory requirements. That office, based on the principles in the University Statement of Ethics, oversees enforcement of a University-wide Code of Conduct that serves to guide the conduct of University activities in support of the University's mission, and is designed to serve three key purposes:

1. To set the basic standards of workplace behavior that the University expects of all faculty, administrators and staff.
2. To state publicly the University's long-term commitment to the highest standards of integrity in education, research, health care and service.
3. To assure that faculty, administrators and staff understand their shared responsibility for keeping the University in full compliance with all applicable laws, regulations, and policies

The standards contained in this Code of Conduct reflect the University of Connecticut's core values, as they have been articulated over time by generations of faculty, staff, administrators, students, and the State of Connecticut. These values are essential and enduring tenets of our organization (President's Letter, Dated 05.24.06 - Exhibit 11.1). The Ethics Statement reflects the University's core values of honesty, integrity, respect, professionalism, and knowledge (Exhibit 10.1).

#### Compliance

The University has developed a comprehensive program to ensure adherence to federal, state, and local regulations and requirements. In 2004, the Board of Trustees expanded the role of its Office of Internal Audit and renamed it the Office of Audit, Compliance, and Ethics (OACE). Resources have been dedicated to fund this expanded role, including the addition of staff and other operating dollars. OACE is developing a comprehensive training program required for all University employees.

Compliance staff will be made available to provide guidance for any questions regarding interpretation and implementation of the Code as well as to provide guidance regarding compliance with University policies or procedures. Additionally, as State employees, University faculty, staff and administration are also subject to the State of Connecticut Code of Ethics. This State Code, which focuses on conflict of interest, use of public office for personal financial gain, and relationships with those with whom the University does business, is enforced by the Office of State Ethics. The University is also providing training to its employees for compliance with State requirements. We have designated a liaison with the Office of State Ethics so that we may keep up to date with recent statutory and regulatory changes and seek guidance from that office when questions are raised concerning the conduct of our employees.

#### Policies of Integrity

The University now posts all policies for Storrs and the regional campuses on an e-policy website (<http://www.policy.uconn.edu/pages/main.cfm>). In 2005, a new procedure was established for the establishment and review of policies. Each department that generates policies has a designated policy editor. Each department/division does due diligence in developing policy drafts and obtaining approval at the highest level within the department/division. An employee has been designated whose responsibility is to ensure that all University policies are updated, consistent and compliant with federal and state statutes and regulations and reviews any proposed policies drafted by these editors. Communication is sent out to the University community when such policies are finalized. Again, the OACE is a resource to any person that needs guidance on proper implementation of the policy or believes there has been a breach of policy protocol. (11.11)

Included are all policies related to the privacy rights of students and employees. Although the University conducted an extensive study regarding the implementation of HIPAA (<http://www.hhs.gov/ocr/hipaa/>), it was determined that an overall policy regarding privacy should be drafted to encompass all federal and state privacy mandates (including Freedom of Information Act, HIPAA, Federal Education Rights to Privacy Act, and Gramm-Leach-Bliley). Similarly, Information Technology security policies have been implemented to protect such confidential information. The Health Center has a process for creating policies pertinent to its campus, and is under the oversight of the OACE.

### **NCAA Compliance**

Like NEASC, the NCAA requires a self-study for certification of the Division I athletics program on a ten-year rotation. The last self-study was conducted in 1998, and an interim report was submitted in 2003. These two documents are in the Team Resource Room and Library. The University has policies and compliance forms for many areas, including a newly established written University event ticket and admission policy for all employees. There are also written procedures for investigating and reporting NCAA violations. The NCAA imposed no "corrective actions" "conditions for certification" or "strategies for improvement" on the University in its certification decision in 1998. Compliance reviews are conducted annually by external consultants, an outside law firm. These reviews have assisted the University in maintaining an exemplary record of NCAA compliance.

The University annually submits mandated reports to the NCAA regarding academic progress and graduation success rates. Academic eligibility of every intercollegiate student-athlete is reviewed each semester. Admission to the University of all student-athletes follows the same procedures as for all other students. Policies exist regarding absences from classes and missed work for student-athletes as well as all other students. The President's Athletic Advisory Committee regularly advises the President on all matters relating to athletics, including institutional control as defined by the NCAA. It should be noted that the University of Connecticut was one of the first in the country to develop a comprehensive plan to comply with the gender equity requirements of Title IX. The Title IX Compliance Plan is reviewed and assessed annually.

### **Intellectual Property**

The University has policies dealing with the inventions, copyrights and the ownership of such products that are consistent with U.S. Patent law and Connecticut statute (Appendix 11.2). (11.2)

Ownership: U.S. Patent law specifies that all inventions are owned by the inventor(s) unless the inventor(s) has transferred ownership or title to another entity. This applies to the University of Connecticut. Under Connecticut law (C.G.S., Sec. 102-11-b), the University of Connecticut has the right to own title to any invention conceived by University employees (including but not limited to full-time and part-time faculty, post-doctoral fellows, student employees, research assistants, visiting scientists, and emeritus professors) in the performance of customary or assigned duties or which emerges from any research or other program of the University, or which is conceived or developed wholly, or partly, with the use of University funds, facilities, equipment, or materials. That is, by virtue of employment, employees of the University of Connecticut are required to assign their right, title and interest in inventions to the University.

Copyright Ownership: The University's copyright policy is also based on Connecticut law (C.G.S., Sec. 10a-110g) which specifies that any literary, artistic, musical or other product of authorship covered by actual or potential copyright belongs to the author(s). In those instances where such works have been produced at the direct request of the University with specific financial support from the institution or with "substantial use" of University resources (equipment, facilities and support staff), the University should seek a reasonable return upon commercialization. To do so, the author may be required to assign rights to such copyright to the University. Such works also include software. (This area of copyright is receiving new and close scrutiny at this time.) Also, if copyrightable material is produced under a grant or sponsored research agreement awarded to the University and the University needs to fulfill a contractual obligation, the author is required to assign rights to such copyright to the University.

**Student Ownership of Inventions:** The University requires students to assign rights to inventions occurring at the University under any of the following conditions: 1. When the student makes “substantial use” of University facilities and/or equipment in developing the invention (“Substantial use” is a term of art and requires a review of the facts in each case); 2. When the student is an employee of the University, performing services in return for monetary compensation, and the invention arises within the scope of that employment; or 3. When the student is participating in sponsored or organized research at the University.

**Invention Commercialization:** The University’s intellectual property is commercialized/licensed to interested parties by the University’s technology transfer office, the Center for Science and Technology Commercialization (CSTC). The University is required by Connecticut law (C.G.S., Sec. 10a-110c) to share with the inventor a minimum of 20 percent of the amount of net proceeds (i.e. after the recovery of out-of-pocket expenses, primarily for patenting) generated by commercialization of an invention, provided that the inventor fulfills statutory obligations. These obligations are: 1. Disclose the invention to the CSTC; 2. Cooperate in securing patent protection; 3. Assign rights, title and interest in a patent to the University. In addition, it is expected that employee inventors will cooperate fully with the CSTC in its efforts to commercialize the University’s inventions. Current University policy allocates 33.3 percent of such income to the inventor(s) as personal income, 33.3 to support additional research (fifty percent to the inventor(s)’s active University research program, thirty percent to the inventor(s)’ Department, and twenty percent to the inventor(s)’ Dean) and 33.3 percent to the University.

### **Conflicts of Interest Policy**

The University had adopted a Conflict of Interest in Research Policy consistent with 42 CFR Part 50 and 45 CFR Part 94 (See Exhibit 11.2). In addition, the Code of Ethics for State Employees, amplified in the new University of Connecticut Ethics Statement (Exhibit 10.1), specifies certain conditions and conduct that may cause conflict. These policies and laws relate to accepting gifts, fees or honoraria, personal business obligations versus state responsibilities, acting in an official capacity, accepting contracts without bids, and giving the appearance of conflict. (11.2)

### **The Student Code**

*The Student Code of Conduct* addresses the rights of each member of the academic community, regarding equitable opportunities to participate fully in community life. The expectations for academic integrity are clearly spelled out in Undergraduate Education and Research (Appendix A in the *Student Code*) and in Graduate Education and Research (Appendix B in the *Student Code*). In the instances where there is felt to be academic misconduct, the Rights and Responsibilities of the University and the Student are clearly delineated, in a manner that is deemed to be just and fair for all parties concerned. (See Appendix 6.1) (11.2)

### **Academic Freedom**

The University of Connecticut provides a forum for the free expression of ideas – to search for truth, to explore, discover, question assumptions, to engage in healthy debate and in the interchange of diverse ideas. As stated in the *Laws, By-Laws and Rules of the University of Connecticut*, the University subscribes to the AAUP 1940 Statement of Principles on Academic Freedom (Appendix 11.3). As outlined in its Mission Statement, the University also encourages the dissemination of new knowledge. The right to publish is a basic tenant of academic freedom. Academic freedom also applies to policies relating to intellectual property and the timely filing of patents in order not to impede publication of scholarly works. (11.3)

### **Non-discriminatory policies**

The University of Connecticut is an Equal Employment Opportunity/Affirmative Action Employer in accordance with state and federal laws and regulations. The University prepares an Affirmative Action Plan (available in the Team Resource Room and Library) in compliance with CT Gen. Stat. Sec. 46a-68. The plan articulates the University’s strategy to combat discrimination and implement affirmative action in employment. The plan supports the University’s goal of developing a diverse workforce by ensuring equal employment opportunity. Relevant policies include the Policy Statement on Affirmative Action & Equal Employment Opportunity, the Policy Statement on Harassment, the Policy Statement on People with Disabilities, and the Policy Statement on Diversity (All these policies can be accessed on the e-Policy website, <http://www.policy.uconn.edu/pages/main.cfm>, and in Appendix 11.4). The University has developed procedures for handling discrimination complaints (<http://www.ode.uconn.edu> and Appendix 11.5). Human Resources and the Office of Diversity & Equity have developed policies and procedures surrounding recruiting and hiring faculty and unclassified staff (Appendix.11.6). (11.5) Human Resources also develops and

administers policies and procedures to support Equal Employment Opportunity and Affirmative Action in the employment of classified staff.

The University's policies regarding affirmative action with respect to admissions are reaffirmed in the undergraduate (p. 2), and graduate (p. 2) catalogs. The University subscribes to the Statement of Principles of Good Practice of the National Association for College Admission Counseling.

### **Integrity in Administrative Operations**

The University applies its commitment to honesty and integrity to all of its operations and branches including admissions, undergraduate and graduate education, research, and construction and general operations. There have been instances over the past ten years when the University has discovered problems in such areas as the construction programs, handling of hazardous wastes, and sponsored research accounting. The University has reaffirmed sound practices while adapting to new issues as they have arisen. It recognized areas needing improvement and the need to strengthen compliance and oversight activities, and has made appropriate policy, organizational and administrative changes to prevent a recurrence of these issues. (See Exhibit 8.6- COO plan for correcting construction program issues and Exhibit 8.7 – Description of new building program processes). See the discussion in Chapter Eight concerning capital construction processes and procedures.

### **Conferences, Institutes, and Workshops**

The University of Connecticut is dedicated to excellence in higher education and demonstrates its commitment to its land-grant mandate and lifelong learning through its statewide program of continuing education and extension services. The University sponsors conferences, institutes, workshops and other educational programs that enrich the lives of Connecticut's citizens.

### **Integrity Policies Relating to Workforce and Collective Bargaining Agreements and the Department of Human Resources**

In addition to Federal and State law, the *Laws, By-Laws and Rules of the University of Connecticut* and codes of conduct issued by the University, most of the faculty and staff are governed by collective bargaining agreements (CBAs). Two of these agreements are University-negotiated and approved by the University Board of Trustees and the State legislature: the contracts with the American Association of University Professors (AAUP) and the University of Connecticut Professional Employees Association (UCPEA). Staff in statewide classified bargaining units are governed by agreements negotiated by the State Office of Labor Relations under the Office of Policy and Management (OPM). Managerial and confidential staff, faculty at the School of Law and the Health Center, and students are not covered by collective bargaining.

The University's Department of Human Resources (HR) is charged with contract administration of all CBA's and with negotiating the AAUP and UCPEA agreements. It is the responsibility of HR to provide such services, under the guidelines provided by State and Federal law and the CBA itself.

The AAUP collective bargaining agreement recognizes the authority of the *Laws, By-Laws and Rules of the University of Connecticut* and the prerogatives of the Board of Trustees, along with the principle of shared governance. (Article 4) Collegiality and academic freedom are specified and upheld (Articles 3 and 4), as well as a commitment by the University and the AAUP to uphold with integrity the principles of non-discrimination (Article 5), diversity and affirmative action (Articles 5 and 6). University management commits to exercising its rights, responsibilities and prerogatives consistent with the specific terms and provisions of the CBA (Article 7). Standards of integrity require that the University honor due process for faculty to protect against "discrimination, prejudice and distortion in their records pertaining to evaluation for promotion, tenure and any other University personnel matter." (Article 8) The University honors with the strictest integrity the implementation and practice of the procedures of the CBA, such as contractual grievances (Articles 10, 11), the content of personnel files (Article 12), appointment and evaluation procedures (Articles 13, 15), reduction of staff (Article 14), salary and benefits (Articles 18, 19, 24, 25, 26, 29), disciplinary procedures (Articles 13, 24, 26, 27) and the rights of the AAUP. (Articles 9, 16, 17)

The professional employees' association, UCPEA, is likewise governed by a CBA which recognizes that standards of integrity must be part and parcel of implementing the provisions of the union contract. The CBA recognizes the professional freedom of staff (Article 4), principles of non-discrimination (Article 5), maintenance of salary, benefits, job security, union rights and security and just cause in disciplinary matters.

The University conducts performance appraisals for classified and unclassified staff, and for the promotion, tenure, and reappointment of faculty according to the relevant collective bargaining agreements as well as the *Laws, By-Laws and Rules of the University of Connecticut*. (Appendix 3.1)

Grievance procedures for faculty and staff, which are outlined in the several collective bargaining agreements, continue to be adhered to in the administration of contractual requirements. The Labor Relations Unit at the Department of Human Resources ensures the equitable application of these procedures. Staff in collective bargaining units have access to union advocates and stewards at each step of the grievance, up to and including arbitration by an outside arbitrator. Unrepresented staff follow the procedures of the *Laws, By-Laws and Rules of the University of Connecticut*. In Article XV "University Staff", Sections E, F and G provide detailed procedures for terminations, dismissals, suspensions and terminal salary that govern University practices in relevant professional staff cases. Appeals and grievances may also be filed by unrepresented faculty, managerial and confidential staff using the steps of the *Laws, By-Laws and Rules*. This class of employees may retain personal legal counsel if they choose. The administration continues to apply *By-Law* procedures uniformly to all cases brought before them and oversees implementation with legal counsel where appropriate.

The Department of Human Resources exercises the highest standards of professionalism in administering sound human resources policies, procedures and programs that support the University's mission (Mission Statement). The department staff commits to integrity in all matters, including customer service, communication and productivity, exercising confidentiality at all times without exception (General Standards).

The Department of Human Resources launched a New Employee Orientation early in 2005. This program includes a presentation on University employment-related policies, as well as a basic overview of the payroll, human resources, diversity and equity, information technology, environmental health and safety and parking procedures. Written materials are provided to all new administrative and support staff with phone numbers and websites which they may reference for guidance on specific issues.

The Department of Human Resources developed an Employee Handbook which is housed on the Human Resources website at <http://www.hr.uconn.edu/emptitle.html>. The web version provides a format to continually update materials as procedures, benefits and union contracts are renegotiated. (See discussion of the Faculty Handbook, which is maintained electronically by Human Resources, in Chapter 5.)

### *Appraisal*

#### **Progress Since the 1996 Self Study**

The University has recently accelerated its efforts in promoting its commitment to integrity in all aspects of University life. Since the 1996 self-study, the University Senate adopted policies regarding the timeliness of course deletions. Throughout the University, a program of assessment is being developed (see Chapter Four for more information). The student Code of Conduct went through major revision in 1999-2000 and other revisions are currently being considered. The Dean of Students Office has a procedure for handling complaints by students regarding faculty and grading. Although this procedure is not formalized, this approach seems appropriate at this time. Also, both the undergraduate and graduate catalogs provide guidance on the "Appeals of Assigned Course Grades." The University has developed copyright compliance guidelines for library reserve materials. (Appendix 11.7) Also, a comprehensive articulation agreement with community colleges is being developed.

Since 1997, the number of full-time faculty at the University has risen from 1040 (fall 1997, excluding UCHC) to 1,251 as of the fall of 2005. The proportion of faculty that are female has risen from 27 percent to 34.6 percent. The proportion of administrators (non-faculty titles) that are female has fluctuated from twenty-four to thirty-nine percent since 1995, and is currently thirty percent. If female department heads and assistant/associate deans/directors are added, the percentage increases to fifty-five percent. Minority enrollment at the University has increased by 111 percent for freshmen since 1995. Thus, most projections from the 1996 self study have been achieved. As guided by the Diversity Plan, the University is committed to increasing diversity and fostering an appreciation of diversity. (See Appendix 2.4) The Office of the Vice Provost for Multicultural and International Affairs (VPMIA) and the Office of Diversity and Equity (ODE) monitor implementation of the University's Diversity Plan and the Affirmative Action Plan.

The Office of Diversity and Equity (ODE) advises the President and senior executives on matters related to civil rights, social equity, and performs multiple affirmative action law-related compliance functions. For instance, ODE staff conducts in-stream, affirmative action reviews of recruiting and hiring activities for faculty and professional staff positions. Human Resources performs this in-stream review for classified staff recruiting and hiring. ODE is also charged, by statute, with investigating all internal discrimination and sexual harassment complaints filed against

employees for the Storrs and regional campuses (excluding the Health Center), reporting investigatory findings to the President, and recommending remedial and disciplinary action if warranted. Discrimination complaints originating from external agencies are addressed by the Department of Human Resources. The ODE Director serves as the University's Americans with Disabilities Act (ADA) compliance officer and assists in monitoring Title IX compliance. ODE staff drafts the University's annual Affirmative Action Plan which is submitted to external civil rights enforcement agencies.

ODE is characterized, by statute, as a neutral investigatory unit accountable for issuing objective conclusions following thorough investigations into internal discrimination complaints, and the independence of the office is amplified by its reporting structure to the President and Vice Provost for Multicultural & International Affairs. At the direction of the President and Vice Provost for the Office of Multicultural & International Affairs, ODE overhauled the University's internal discrimination complaint management system with the goal of improving workforce confidence in internal mechanisms to address discrimination and sexual harassment complaints. The office was also charged with increasing external civil rights enforcement agencies' confidence in the University's commitment to aligning investigation activities and case decisions with current law and standards of review. ODE's track record for successful resolution of complaints, and affirmations of its decisions by external civil rights enforcement agencies, has resulted in employee confidence and reliance on ODE, with a concomitant increase in the filing of complaints. Consequently, ODE's case management staff is severely strained to handle the new workload demands. In order to maintain the high degree of confidence in the University's commitment to diversity and equity, consideration should be given to increasing ODE's staff.

The University has a long tradition of extending its educational resources into the community. UConn's schools, colleges, institutes, centers and regional campuses offer a wide range of non-credit learning experiences to thousands of individuals across the state each year. The University strives to position itself as a major intellectual resource for individuals, business and industry, professional associations, nonprofit organizations, labor and government. The University of Connecticut ensures that regardless of sex, race, creed, age, national origin, or physical condition, all the people of Connecticut have effective access to these programs and services.

In addition to excellence in content, the University strives to fulfill its outreach mission by ensuring the integrity of its program management, honesty in its marketing communications, and continuous improvement in its quality through needs assessment and program evaluation.

Consistent and clear institutional procedures and policies are essential to quality programs and honest management. The University regularly communicates its management policies and procedures with members of the University community by e-mail messages with links to the University's website where critical management policies and procedures are published. Employees without computer access receive hard copies of relevant policies and procedures.

Under the auspices of the Office of Audit, Compliance and Ethics, the University of Connecticut has recently entered into an agreement to provide ethical and code of conduct training to all University employees. In addition, the Office of Diversity and Equity has been conducting sexual harassment and diversity workshops for some time. The Vice Provost for Research and Graduate Education sponsors a "Helpline" that trains the elected Graduate Council of senior research faculty in a variety of topics, including integrity in research and compliance with federal and state regulations regarding carrying on research and reporting results. The offices responsible for training have limited resources, so keeping a changing faculty and staff appropriately trained is a challenge. The University of Connecticut is, however, committed to this training and is pursuing it aggressively.

#### *Projection*

There are several training and discussion venues for University employees on integrity-related issues. These include the CITI program sponsored by the Office of Sponsored Programs, a regular program of training and professional development for University employees sponsored by Human Resources, diversity training sessions sponsored by the Office of Diversity and Equity, department head training programs sponsored by the Provost's Office, and the formal ethics training program sponsored by the Office of Audit, Compliance and Ethics (OACE). As mentioned above, the Office of Audit, Compliance and Ethics staff is working on developing a comprehensive ethics training program for University employees. All employees will be mandated to participate; in fact, an attestation of attendance will be required by each employee.

As of June 19, 2006, the University has in place a "report line" service. This service is available twenty-four hours a day, seven days a week. Any member of the University community is able to report, without fear of retaliation, any wrongdoing perceived. The Compliance Office will then be able to follow-up, investigate, and appropriately deal with

such allegations. Interpreters are provided for those for whom English is not their first language. It is anticipated that identification of wrongdoing will not only serve as a deterrent, but will provide an opportunity to put into place improved policies, procedures, and training on such issues.

The University will continue to promulgate policies for faculty and staff. In addition to the current e-mail and newsletter announcements, the offering of additional educational workshops at regular intervals would serve constituents well. Workshops would present the administration's interpretation of policies, provide opportunity for clarification and serve to unify understanding among faculty and staff. There would also be a foundation for an authoritative standard for issues that are vulnerable to being interpreted in differing ways. To that end, the Department of Human Resources is partnering with the University Controller's Office to design, develop and deliver a comprehensive training institute for key business and administrative staff on a complete range of fiscal and administrative functions. The institute will be run twice a year and will better equip administrative and business staff to comply with University policies and procedures as well as enhance their understanding of the legal and regulatory foundations of those procedures.

Over the coming months the "General Rules of Conduct" are expected to be incorporated into the University's Code of Ethics to provide clear statements for faculty and staff members. The Department of Human Resources' New Employee Orientation program will continue to be the standard for providing relevant employment-related policy statements and selected general procedures to all administrative and support staff from the very first day of employment. Ongoing evaluation of this program will ensure timely adaptation of topics that will serve the need to inform new employees of updated policy information.

### **Integrity and Public Disclosure**

Above is a discussion of the dynamic tension felt by the University of Connecticut and caused by the need to balance the privacy rights of individuals associated with the University and the University's need to investigate misconduct allegations with the demands for public disclosure to appropriate authorities, and/or to the media. As its Mission and Ethics Statement point out, the University of Connecticut is dedicated to the highest ethical standards. During the period since the last NEASC review, the University of Connecticut faced challenges involving allegations of misfeasance, malfeasance and/or nonfeasance by a few isolated employees or students. Many actions have been taken recently to communicate and bolster the University's commitment to integrity in all its endeavors, including adoption of the Employee Ethics Statement and Code of Conduct, the strengthening of the Office of Audit, Compliance and Ethics, the establishment of a Construction Assurance Office, and the creation of a twenty-four hour "report line" to receive allegations of alleged violations of laws or regulations. The University of Connecticut takes seriously its responsibility to the citizens of the State and its donors, grantors and other constituencies. It constantly endeavors to strengthen its responsiveness to the public trust.

### **INSTITUTIONAL EFFECTIVENESS**

During this self-study period, through a few highly publicized occurrences, the University of Connecticut has had the opportunity to test its commitment to integrity. In every instance, it has acknowledged the unfortunate events, analyzed their cause, and made process improvements, including hiring more personnel in some areas, making policy changes and increasing monitoring and enforcement mechanisms. Its actions exemplify its commitment to integrity in all of its operations.