

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

Wayne State University (WSU) policies and processes [ensure integrity and fair and ethical behavior](#) at all levels of the institution. [Integrity](#) is among university values articulated in "[Distinctively Wayne State University](#)," the university's mission statement and strategic plan for 2016-2021.

In 1963, the [Constitution of Michigan](#) established the Board of Governors (BOG) as the university's controlling board, charged with "*general supervision of its institution and the control and direction of all expenditures from the institution's funds.*" The BOG declares university policy at the highest of three levels of policy that work together to promote integrity and fair and ethical behavior:

1. The [Wayne State University Code Annotated](#) (WSUCA) comprises policies enacted by the BOG as university statute.
2. [University Policies](#) (UP) implement BOG-enacted statute and are issued by the President through authority delegated by the BOG.
3. The [Administrative Policies and Procedures Manual](#) (APPM) operationalizes policies implemented by UP by establishing organizational responsibilities, operating requirements, procedures, and processes; and by ensuring legal compliance and ongoing monitoring review of standard practices.

WSU's commitment to affirmative action/non-discrimination, and its stance against sexual harassment and sexual assault provide an example of how policy creation, implementation, and procedures come together:

- At the highest level of policy making, the BOG declares WSU's commitment to equal opportunity in all operations, employment opportunities, educational programs, and related activities through WSUCA [Statute 2.28.01](#); it declares its stance against sexual harassment through Statute [2.28.06](#).
- The President implements BOG statutes through university policies for [Non-Discrimination/Affirmative Action](#), [Sexual Harassment](#), [Sexual Assault](#), and [Supplier Diversity](#); and through the [Student Code of Conduct](#).
- The APPM documents procedures for [reporting and processing allegations of policy violation](#).
- Policy administration is integrated in the [Office of Equal Opportunity](#) (OEO) through UP on the [Discrimination and Harassment Complaint Process](#), which delegates to the OEO

Director responsibility for receiving, investigating, and recommending disposition of complaints.

- The OEO [reports annually](#) to the BOG on WSU workforce diversity and peer institution comparisons; discrimination and sexual harassment complaints and case dispositions; and diverse supplier initiatives and purchasing volume (see BOG Personnel Committee meeting minutes of [June 24, 2016](#)). The report is available to the public on the BOG website for transparency.

Another example is conflict of interest (COI):

- WSUCA [Statute 2.41.03](#) established a BOG commitment to proactively manage potential COI and directed university administration to develop and implement policy to this end.
- As described in Section 2.C., BOG bylaws include a [COI Policy](#) that applies to university governors and establishes a [process for annual disclosure](#).
- UP on [COI Disclosure](#) applies to faculty and management personnel, and establishes a process for [annual disclosure](#);
- UP on [Investigator Disclosure](#) addresses financial conflict of interest or effort and applies to faculty and staff engaged in sponsored research, and complements [Michigan Law](#) requiring public entity governing board approval of contracts with public servants. Proposals to the BOG are available online in advance of public meetings ([example](#)); summary information for each approved contract is disclosed in BOG minutes ([example](#)).
- Graduate School policy requires [disclosure of COI by all dissertation committee members](#).
- The Office of the General Counsel integrates COI education and oversight; a [dedicated reference page on its website](#) answers common questions and provides links to the relevant statutes and policies referenced herein.

Financial

[Finance and Business Operations policies and procedures](#) are documented in UP and the APPM. In addition, WSU's annual Current Funds Budget publishes budget policies and practices and budget management procedures. All policies and the annual Current Funds Budget are available to the public online for transparency.

Financial integrity is assured by independent audits at required frequencies.

- An annual, independent audit of WSU's [financial reports](#) includes auxiliaries; and an [audit of federal awards](#), as required by the OMB Uniform Guidance. The BOG Audit Subcommittee and Budget and Finance Committee review and approve audited reports. The Compliance Filing (Section 5) confirms no material findings by auditors for the three-year reporting period. Documents are available to the public online for transparency.
- An independent audit of WSU's [radio station](#) assures compliance with Corporation for Public Broadcasting requirements.

A proposal for [Facilities and Administrative costs](#) is submitted to the Department of Health and Human Services (DHHS) on a four-year cycle, and is the basis for negotiation of an overhead

rate applicable to federal research awards. University cost accounting practices are disclosed and certified in the proposal.

As reported in Section 5 of the HLC Compliance Filing (submitted with this Assurance Argument), in June 2015, the U.S. Department of Education (DOE) conducted a [program review of WSU's Title IV financial aid program](#); WSU received the program review report on March 23, 2016. The DOE identified [ten recommendations for improvement](#); WSU resolved all ten issues and formally responded to the findings on [June 9](#) and Aug. 25, 2016. A final determination by the DOE remains outstanding as of February 2017.

Faculty and Staff

Personnel policies for faculty and academic staff are administered by the Office of the Provost, in coordination with Human Resources (HR); policies for non-academic staff are administered by HR, according to the [Personnel Manual for Non-represented Employees](#).

- Full-time faculty are covered by a collective bargaining agreement (CBA) with the [American Association of University Professors \(AAUP\)-American Federation of Teachers \(AFT\)](#); part-time faculty are covered by the [Union of Part-time Faculty-AFT](#).
- The AAUP-AFT CBA also covers academic staff.
- The [Graduate Employees Organizing Committee-AFT](#) CBA covers graduate teaching and assistants.
- [Nine CBAs](#) cover union-represented staff; policies and procedures for these employee groups are administered by HR, in collaboration with Labor Relations.

The OEO has institutional responsibility for training and policy administration for the Equal Employment Opportunity Act, the Title IX Gender Equity Program, the Americans with Disabilities Act; and for administration of the discrimination and harassment complaint process for faculty, staff, and students.

Students

Academic regulations for undergraduate and graduate students are published in WSU [Bulletin](#). Policies promote student rights and correlative duties of the WSU community, including academic integrity and campus civility; and also establish due process and a procedural framework for adjudicating allegations of wrongdoing in the university setting.

The Dean of Students Office (DOSO) [Community Standards webpage](#) aggregates student policies in a single portal:

- [Student Code of Conduct](#)
- [Student Rights and Responsibilities](#)
- [Non-Discrimination/Affirmative Action Policy](#)
- [Acceptable Use of Information Technology Resources](#)
- [Housing and Residential Life Community Living Guide](#)
- [Sexual Assault Policy](#)
- [Sexual Harassment Policy](#)

University Athletics complies with federal regulations as promulgated by the DOE in Titles IV and IX; and with the constitution, operating bylaws, and administrative bylaws published in the [National Collegiate Athletic Association \(NCAA\) 2015-16 Division II Manual](#).

Internal Controls

At the institutional level, the [Office of Internal Audit](#) (OIA) promotes integrity through independent and objective audits, reviews, investigations, and consulting activities. To ensure its independence, OIA reports administratively to the President and functionally to the BOG Audit Subcommittee (ASC), which operates under a [charter](#) documenting its role, responsibilities, and authority. The charter provides OIA with full and free access to all university records and personnel in the conduct of its work. OIA meets with the President monthly, and with the ASC three times/year. All OIA reports ([samples](#)) are provided to the President, senior management, external auditors, and the ASC; OIA follow-up activities ensure that corrective actions are implemented. Management is required to present the status of past due corrective actions at each ASC meeting until such actions are fully implemented.

OIA educational activities include presentation of [ethical responsibility and university policies](#) at employee orientation sessions, and fraud awareness training to minimize institutional losses. The OIA offers [anonymous mechanisms](#) through which employees and students may report suspicious activity without fear of reprisal. All tips are investigated and reported to the President and ASC. The President communicates anonymous tip mechanisms [every semester via email](#) to remind employees and students of reporting options, and to affirm WSU's commitment to integrity and accountability.

At the school/college and division levels, [Business Affairs Officers](#) (BAOs) support deans, academic Directors, and Vice Presidents by maintaining integrity of operational functions. BAOs provide internal controls by assuring policy compliance and accuracy of transactions, monitoring and improving business workflow, and collaborating across the university to establish new business processes.

Sources

- 2015-16 NCAA Division II Manual - Effective August 1, 2015
- Administrative Policies and Procedures Manual - Website Homepage
- Affirmative Action Status Report - 2015
- Affirmative Action Status Report - Report to BOG Personnel Committee - 2016_06_24
- APPM 3.0.2.1 - Formal Complaints
- Audited Financial Report - 2015
- Audited Financial Report - Year Ended Sept. 30, 2015
- BOG Audit Subcommittee Charter
- BOG Bylaws - Revised 2007_11_28
- BOG Bylaws - Revised 2007_11_28 (page number 10)
- BOG Personnel Committee Meeting Minutes - 2016_06_24
- Business Affairs Officers - Website Homepage
- Collective Bargaining Agreement - WSU and AAUP-AFT, Local 6075

- Collective Bargaining Agreement - WSU and GEOC-AFT
- Collective Bargaining Agreement - WSU and UPTF-AFT, Local 477
- Collective Bargaining Agreements - WSU and Non-Academic Staff
- Conflict of Interest Disclosure Form - BOG - 2016
- Conflict of Interest Disclosure Form - Management - 2015
- Conflict of Interest or Commitment Among Members of Dissertation Committees - Policy and Procedure for Disclosure and Management
- Constitution of Michigan of 1963 - Excerpt
- Dean of Students Office - Community Standards Webpage
- Dean of Students Office - Student Code of Conduct - Misconduct Referral Form
- Distinctively Wayne State University - Strategic Plan - 2016-2012
- Distinctively Wayne State University - Strategic Plan - 2016-2012 (page number 8)
- DOE Program Review Report - Wayne State University Title IV Financial Aid Administration - 2016_03_17
- DOE Program Review Report - Wayne State University Title IV Financial Aid Administration - 2016_03_17 (page number 4)
- Example Proposal to BOG - Contract with External Organization in Which University Employee Participates
- Facilities & Administrative Costs - Proposal to DHHS - 2013_05_01
- FY2017 Current Funds Budget
- Guiding Principles - Policies and Procedures
- Housing and Residential Life - Community Living Guide
- Michigan Compiled Laws - Act 317 of 1968 - Contracts of Public Servants with Public Entities
- NCAA - Agreed Upon Procedures Report - 2013
- Office of Equal Opportunity - Website Homepage
- Office of Internal Audit - Anonymous Tips Form
- Office of Internal Audit - Sample Reports - 2013-15
- Office of Internal Audit - Website Homepage
- Office of Internal Audit Presentation - New Employee Orientation
- Office of the General Counsel - Conflict of Interest - Webpage
- Official Proceedings - BOG - 2015_06_26
- Official Proceedings - BOG - 2015_06_26 (page number 19)
- President's New Semester Email - Anonymous Tip Mechanisms
- Student Code of Conduct - 2005_11_30
- Supplement to Audited Financial Report - Federal Awards - 2015
- University Policies - Finance and Business Operations
- University Policies - Website Homepage
- University Policy 00-1 - Acceptable Use of Information Technology Resources
- University Policy 01-5 - Sexual Assault
- University Policy 04-2 - Supplier Diversity Program
- University Policy 05-3 - Discrimination and Harassment Complaint Process
- University Policy 08-1 - Conflict Of Interest Disclosure
- University Policy 08-2 - Investigator Disclosure (Second Release)
- University Policy 3.0.2 - Non-Discrimination and Affirmative Action
- University Policy 3.0.4 - Sexual Harassment

- Wayne State University Code Annotated - Summary of Statutes
- WDET-FM Radio - Financial Statements - 2014 and 2015
- WSU Response to DOE - 2016_06_09
- WSUCA Statute 2.28.01 - Non-discrimination and Affirmative Action
- WSUCA Statute 2.28.06 - Sexual Harassment
- WSUCA Statute 2.31.01 - Student Rights and Responsibilities
- WSUCA Statute 2.41.03 - Conflict of Interest - Contracts