



**THE GEORGE
WASHINGTON
UNIVERSITY**

WASHINGTON, DC

Task Force Report: A Review of GW Culture, Policies, and Practices

Charge

Use the Freeh Report as a catalyst to review GW's culture, examine our practices, improve our compliance, and reinforce a sense of ethics and responsibilities in all members of our community.

Executive Summary

GW exhibits a culture of openness and transparency; members of the community take pride in the institution and are eager to protect those in its domain. There is a shared sense of mission to protect the good name of a university that was founded in part through a bequest from a great American who personified integrity, civility, and honor: George Washington.

In November 2011, following the events involving Jerry Sandusky at Penn State University, the university engaged the firm Freeh Sporkin & Sullivan to conduct a thorough investigation and review of the university's actions to determine what went wrong. The firm released the Report of the Special Investigative Counsel Regarding the Actions of the Pennsylvania State University Related to the Child Sexual Abuse Committed by Gerald A. Sandusky in July 2012. The report concluded with a series of recommendations regarding culture; administration and general counsel; the board of trustees; compliance and risk; athletics; the university police department; programs for children and access to university facilities; and monitoring change and measuring improvement.

In response to that report, President Steven Knapp convened a task force and appointed Beth Nolan, senior vice president and general counsel, to lead it. The task force examined GW policies, guidelines, practices, and procedures in light of the report's

findings and recommendations. A task force steering committee, whose members included Lorraine Voles, vice president for external relations; Lou Katz, executive vice president and treasurer; Forrest Maltzman, senior vice provost; Barbara Porter, chief of staff for the Office of the President; and Aristide Collins, vice president and secretary of the university, used the Freeh Report as an opportunity to measure GW practices against the highest standards.

The steering committee used the findings and recommendations in the Freeh Report to examine GW policies and procedures, identifying those areas where GW was already meeting or exceeding the recommendations in the Freeh Report and those areas that merited further investigation.

In December 2012, a second task force, chaired by Toni Marsh, Associate Dean for New Initiatives in the College of Professional Studies, and Doug Shaw, Associate Dean for Planning, Research, and External Relations for the Elliott School of International Affairs, convened to use the Freeh Report recommendations as an opportunity to review GW's culture, examine our practices, improve our compliance, and reinforce a sense of ethics and responsibility in all members of the GW community. In addition to all of the areas in the Freeh Report, the task force examined research integrity and compliance; student rights and responsibilities; civility and community; and academic integrity.

Culture

In November 2012, President Knapp convened the GW deans and charged them with fostering a culture of openness and transparency; embracing a sense of civility that reflects GW's values; and encouraging escalation of significant issues in compliance with law and policy.

The deans assessed the culture of openness, civility, escalation and compliance at GW and made recommendations to promote civility as a behavioral norm, encourage escalation to resolve issues, and increase compliance with federal, state or local laws and our own policies and practices. This effort was named the Culture Project because of the direct link between civility, escalation, and compliance to GW's culture and values.

The Culture Project chairs formally interviewed the deans and vice presidents and held informal discussions with others in the university community. Five areas of focus emerged:

1. Trust – Build trust into the organizational culture
2. Risk – Reduce risk aversion
3. Accountability – Hold ourselves and others accountable for our actions, take ownership of matters, and encourage people to solve problems and meet challenges together
4. Communication – Create an atmosphere where people feel they can safely disagree and needn't avoid conflict
5. Transparency – Increase the flow of information to the community and include more people in key decisions

The senior leadership team then created three working groups to address various elements of this: the Culture and Communication Committee, a group of deans and vice presidents who will develop an action plan to address the five themes; a second group to set agendas for senior leadership meetings to increase communication and foster collective ownership of the challenges and opportunities; and a third group that will work to streamline key processes.

Escalation of Significant Issues

GW's [non-retaliation policy](#) holds that retaliation against members of the university community who make good faith reports regarding potential university-related violations of laws, regulations or university policies is prohibited, and violators may be subject to disciplinary action.¹ It encourages members of the university community to report good faith concerns about university-related violations of laws, regulations or university policies and provides for recourse for those who believe they have experienced retaliation.

Administration and General Counsel

Develop a policy regarding the protection of minors

Since the start of the Task Force's work, the university has developed a [policy regarding the protection of minors](#) that reflects the university's commitment to the safety and well being of all members of its community, including minor children.²

The policy establishes guidelines and procedures for the protection and safety of minors in GW programs and non-GW programs on the GW campus and establishes procedures for reporting known or suspected abuse or neglect of minors.

¹ Non-retaliation Policy, <http://my.gwu.edu/files/policies/NonRetaliationFINAL.pdf>

² Protection of Minors Policy, <http://my.gwu.edu/files/policies/ProtectionofMinorsPolicyFINAL.pdf>

The university expects all members of the university community and non-university individuals who interact with minors in GW programs or in GW facilities to comply with the policy.

The policy defines the responsibilities of all members of the university community who interact with minors; mandates that every member of the university community who knows, suspects, or receives information indicating that a minor has been or is being abused or neglected must report this information to the university; refers to the university's background check policy; and provides for enforcement of the policy and corrective actions for violations

Administration and General Counsel – External Relations

Prepare draft of communication from the president to students, faculty, and staff at the beginning of each academic term to encourage reporting of misconduct and describe channels for direct or anonymous reporting

The Office of External Relations, in close consultation with President Knapp, has prepared a statement to the community that calls on the community, when a problem emerges, to “remain consistent in following our principles, no matter what the consequences may be in terms of public opinion...ask the tough questions and take on the responsibility, when necessary, of reporting incidents that are inconsistent with our shared values.”

The statement directs members of the community to report concerns to a supervisor or a university administrator and to report suspected criminal activity to the University Police Department.

Ensure that there are several and varied means of communication throughout the University community

The Office of External Relations has a fully developed communications plan that utilizes print and online publications including the GW website; Follow GW; GW Today; social media including Facebook, Twitter, YouTube, Flickr, LinkedIn, Instagram, and blogs; GW InfoMail; GW Campus Advisories via email and text message as needed; and live town hall meetings as needed.³

³ <http://www.gwu.edu/>; <http://www.gwu.edu/follow-gw>; <http://gwtoday.gwu.edu/>; <https://www.facebook.com/georgewashingtonuniversity>; <https://twitter.com/gwtweets>; <http://www.youtube.com/DiscoverGW>; <http://www.flickr.com/photos/gwalumni>; http://www.linkedin.com/groups?gid=52996&trk=myg_ugrp_ovr; <http://instagram.com/gwuniversity>;

Administration and General Counsel – Human Resources

Gather documentation of the size of HR staff, scope of responsibilities, performance management systems, and required employee training

University Human Resources has approximately 70 employees across several departments including EEO, Benefits, Compensation, Organizational Development and Effectiveness, Talent Acquisition, and other units. HR provides regular training, shares best practices, and updates its partners across the university through the HR Client Partner model.

The department's [Supervisor's Guide](#) provides extensive counsel and resources on, among other things, recruiting and hiring employees; maintaining diversity in the workplace; training and development; operating within the university; and keeping the university safe.⁴

The university expects supervisors to provide employees with ongoing feedback and coaching. Each supervisor is responsible for effectively managing employee performance and for completing an annual performance review for each staff member. HR facilitates this by providing extensive counseling and resources on performance management through its [website](#).⁵

Implement the Client Partner model and HR policy development process to ensure that GW does not have multiple silos acting without central policies

In 2010, GW implemented the HR client partner model to ensure consistency of HR services across the university. In March 2013, President Knapp directed HR to implement the client partner by summer 2013. The Law School has asked for additional time to determine how work will be reassigned for individuals who are currently managing HR services. All other schools have indicated progress.

Client partners receive regular training on updates to HR policies and updates on new employment regulations and discuss HR best practices at bimonthly client partner meetings. In addition, the subject matter experts in each of the HR departments work closely with the HR client partners to ensure that there is consistency in delivering HR services.

University HR is revising the GW Employment Guide as it relates to HR policy development with a targeted completion date of December 2013.

<http://gw-student-and-alumni-blogs.wikispaces.com/>; <http://webpresence.gwu.edu/infomail-protocol-guidelines>; <http://campusadvisories.gwu.edu/>

⁴ HR Supervisor's Guide, <http://hr.gwu.edu/supervisors-guide>

⁵ HR Performance Management Process, <http://hr.gwu.edu/performance-management-process>

Review new employee searches to ensure they are open and inclusive

University Human Resources has fully developed policies on open searches, and diversity and inclusion.

The GW Office for Diversity and Inclusion is housed in the Provost's office and has campus-wide authority to foster its mission to promote, advocate, support and advance the institution's commitment to diversity and inclusion as a strategic priority.

The GW Statement on Diversity and Inclusion declares that the university is committed to recruiting, interviewing, and hiring faculty, staff, and senior administrators drawn from varying backgrounds and identities throughout all departments and schools.

Review job descriptions for vice presidents and officers to determine whether revisions are needed

HR is reviewing the position descriptions of vice presidents and officers to ensure that they reflect the current scope and level of responsibility and plans to complete this by December 2013.

Administration and General Counsel – Human Resources – Background checks

Assess background checks, including criteria, population, and flags – update, standardize, centralize and monitor procedures; update background checks for employees, contractors and volunteers every five years; audit effectiveness of background check procedures and self-reporting system

The university is considering expanding the background check process to include all new faculty hires. As part of this consideration, GW is assessing the effectiveness of its current system and examining practices at peer institutions.

In keeping with best practices in hiring, particularly for educational institutions that regularly engage in activities involving minors, HR recommends that the university complete background checks on all applicants for employment, including faculty.

A consistent background check process across all employee groups will allow the university the opportunity to fully vet all applicants in a manner that protects individuals within the institution and those who engage regularly with its members.

The scope of peer institutions' background checks includes the following:

- All faculty
- All prospective and current employees, including faculty
- All prospective employees and current employees who have direct contact with non-student minors
- All prospective employees
- Only employees who have direct contact with non-student minors

Market basket universities that have adopted background checks for all members of the faculty include:

- Catholic University (all regular full time faculty hired after November 11, 2011)
- University of Virginia (all new faculty hires)
- Northwestern University (all applicants for employment)
- Vanderbilt University (all newly hired faculty and current faculty who interact with minors)
- Boston University (all prospective and current employees)
- Emory University (newly hired regular and temporary employees)
- George Mason University (all newly hired faculty)

In addition, the following national universities have adopted background checks for all members of the faculty:

- Ohio State University (regular and auxiliary faculty)
- Pennsylvania State University (faculty and staff)
- Purdue University (full and part time faculty)
- University of North Carolina at Chapel Hill (prospective faculty)
- University of Texas at Austin (all faculty)
- University System of Georgia (faculty and academic positions for new applicants and employees transferred, reassigned, reclassified, or promoted)

GW may consider whether it would be appropriate to:

- Expand the scope of its background check
- Implement a system to audit the effectiveness of its background checks

Administration and General Counsel – Board of Trustees

GW trustees receive effective orientation to the university and to their responsibilities therein. New GW trustees participate in a two-day orientation program in September of their first year of service. The program includes detailed briefings on governance and administrative policies, practices, and accountabilities at the university. Trustees re-elected to new terms are also invited to this program.

GW Trustees receive reporting adequate to identify patterns of risk to the university community and receive Clery Act reporting at meetings and through the password-protected board website. The Office of Safety and Security reports quarterly on campus crime to the board's Student Affairs Committee; this report is more thorough than the Act mandates. Further, the board has access to the online GW Crime Log, which is updated daily.

The Office of General Counsel reports regularly on legal issues to the full board in executive session. GW's President and the Vice President and Secretary of the university regularly report to the board regarding university matters.

The Athletic Director attends every meeting of the Board's Student Affairs Committee and reports to them regularly. The reports typically include the following:

- Executive summary
- Educational support services
- Compliance
- Facilities
- Budget and finance
- Development
- Lerner Health and Wellness Center
- Sports medicine
- Strength and conditioning
- Athletics communications
- Team performance

The director covers additional items where appropriate. The report always provides a general update on the department and key areas, and specific issues, trends, or specific matters that warrant notification to the Board.

The Secretary of the University routinely interacts with board members and trustees have reasonable access to other university staff.

GW may consider whether it would be appropriate to

- Evaluate existing trustee training programs to determine whether additional training is appropriate
- Develop a protocol to decide about which matters to notify the Board
- Invite all trustees to attend a training or orientation program annually

Compliance – Information Systems

GW maintains a [Code of Conduct for Users of Computer Systems and Services](#), a [Network Usage Policy](#), a [Policy on Personal Use of University Resources](#), and other policies that specify appropriate use of university information systems.⁶

The Code of Conduct states that users must apply standards of normal academic and professional ethics in the use of all university computing systems and are bound by the policy and applicable rules and regulations related to appropriate legal and ethical use of university computing systems and services, including the Code of Student Conduct and the Faculty Handbook. The policy further mandates that university computers may not be used in an obscene, harassing, or otherwise inappropriate manner.

A survey of twenty significant US universities found a diversity of policies on the use of university information technology resources to access pornography. Among the twenty institutions surveyed, thirteen institutions including MIT, Georgetown, and Duke did not explicitly reference pornography in information technology use policies they posted online. Five institutions (Cornell, Dartmouth, Johns Hopkins, Maryland, and Penn State) post policies explicitly prohibiting the use of university information technology to access child pornography. Stanford and the University of Virginia have more restrictive policies (prohibiting all pornography and all sexually explicit material, respectively).

GW may consider whether it would be appropriate to:

- Include a specific prohibition against using university information systems to store or view pornography

⁶ Code of Conduct for Users of Computing Systems and Services, <http://my.gwu.edu/files/policies/CodeofConductComputingFINAL.pdf>; Network Usage Policy, <http://my.gwu.edu/files/policies/NetworkUsageFINAL.pdf>; Personal Use of University Resources, <http://my.gwu.edu/files/policies/PersonalUseUnivResourcesFINAL.pdf>

Social media policy

GW has implemented a [social media policy](#) that requires all social media content created or posted on behalf of the university to comply with all applicable laws, regulations, and university policies and states that such content may not be abusive, threatening, defamatory, obscene, harassing, or create a hostile work or learning environment.⁷

Compliance – General

New Compliance Officer to convene a group including OGC, Compliance, Risk, and Internal Audit quarterly to coordinate compliance functions

Senior Associate Vice President and Chief Compliance Officer Ed Schonfeld has instituted a practice whereby he and his staff meet with the Office of General Counsel, Risk, Compliance, and Internal Audit regularly to review and coordinate compliance functions.

To date, there have been multiple meetings between Compliance and OGC, and Compliance and Internal Audit to address new and ongoing compliance matters. These meetings have taken place several times a month and in some cases as frequently as several times per week. The group will meet as a whole in October 2013 to address current compliance matters and to coordinate compliance functions.

Compliance – Clery Act

Clery Act training and compliance

The Clery Act defines university police departments and certain university employees - such as deans, athletic coaches, resident advisors, and other individuals who have significant responsibility for student and campus activities - as Campus Security Authorities.

In March 2010, the GW Office of Safety and Security initiated the Skillport online training system, which allows for more efficient tracking and reporting of Clery Act training. CSAs access the course through the Skillport system, which verifies that they have completed the training, tracks completion rates, and sends reminders to CSAs who have not completed the training.

⁷ Social Media Policy, <http://my.gwu.edu/files/policies/SocialMediaPolicyFINAL.pdf>

In December 2011, the office identified the GW CSAs and began training them in Clery Act compliance. At GW, all CSAs receive annual Clery Act training.

Athletics

Evaluate security and access protocols for athletic, recreational and camp facilities and modify as necessary to provide reasonable protections for those using the facilities

Mount Vernon Pool

A parent or guardian must accompany all minors under the age of 16 when they are at the Mount Vernon pool.

School Without Walls

Students who attend School Without Walls may use the athletic facilities at the Lerner Health and Wellness Center. The following protocols are in place:

- Personnel check in SWW students using a full roster of SWW students at the control desk of LHWC.
- The SWW physical education teacher MUST be with the students for them to access the facility.
- The SWW physical education classes are scheduled for specific times and at specific locations within LHWC so that SWW and LHWC personnel can monitor and supervise them.
- LHWC administrators and SWW administrators will meet to discuss the current protocol and implement any necessary changes, including a check out system to complement the check in system currently in place.

Clearly define athletics department lines of authority, responsibilities, and reporting relationships

The clearly defined lines of authority, responsibilities, and reporting relationships can be found are detailed in an organizational chart. Further information about names, titles, and contact information of all athletics department personnel is in the [athletics department directory](#).⁸

⁸ See <http://www.gwsports.com/school-bio/gewa-school-bio.html> for the athletics department directory, which includes names, titles, and contact information for all athletics personnel

Integrate, where feasible, academic support staff, programs, and locations for student-athletes

The Department of Athletics and Recreation employs five full-time staff members and 30 – 40 tutors to assist over 400 student-athletes. Through the support of the faculty and administration, the mandate of the Department of Athletics and Recreation, and the dedication of the student-athletes, the department claims a high graduation rate for all of its sports.

Established in 1983, the Academic Support Services Program was initially designed to provide support services to a small group of students. The program has expanded to include services for all student-athletes, with an emphasis on individual responsibility and pride in academic accomplishments.

Academic support services include:⁹

- Academic Counseling
- New Student Orientation
- Academic Monitoring
- Assessment
- Study Hall
- Individual and Group Tutoring/ Review Sessions
- Learning Strategies Development
- Writing Instruction
- Athletic Career Track Program (ACT)
- Athlete Mentor Program (AMP)
- Leadership Development
- Community Service
- Referral to University Support Services

Provide initial and ongoing training for Athletics staff, including in Clery Act compliance

All GW athletic personnel comply with all university-wide training mandates, including Clery Act training.

In the summer of 2013, all athletics staff members participated in a mandatory educational program on sexual violence that the Office of the Vice Provost for Diversity and Inclusion developed through its director of Campus Inclusions Initiatives and Sexual Harassment Response Coordinator. In October 2013 the office presented the session

⁹ Athletics Department academic support services, <http://www.gwsports.com/school-bio/gewa-academicssupport.html>

for all GW student athletes and athletics staff members who had joined GW after the summer session. The office will present this session regularly to new student athletes and athletics staff.

Review staffing level for Athletics Compliance and consider whether Athletics Compliance Report should be sent to Compliance and Privacy Office and benchmark other schools

GW, with 25, 260 students and 24 sports, meets or exceeds all NCAA compliance and reporting requirements even though it has the second highest enrollment and the most sports of its peer institutions in the A10 and Eastern conference, yet has the second lowest number of full time athletics compliance staff members, with one and a half. Among peer institutions, the number of full time compliance employees ranges from one (St. Bonaventure; 2460 students; 14 sports) to three (University of Massachusetts; 21,812 students; 19 sports).

GW may consider whether it would be appropriate to:

- Hire an additional full time employee in compliance to match levels at peer institutions

University Police Department

GW Police Department Special Police Officers receive comprehensive police academy training mandated by the local jurisdiction in which they are licensed; Security Officers do not attend a police academy, but receive in-service training from the GW Police Department.

In both cases, GW Police Department personnel are trained in the criminal code and GW policy issues, response and investigation techniques, and reporting responsibilities appropriate to their work. This training specifically includes appropriate response to sexual assault. GW Police Department personnel are trained to investigate sexual assault against adult victims and to report incidents of sexual assault against persons 17 or younger to local police immediately. GW Police Department personnel are also trained to notify the GW Sexual Assault Crisis Consultation Team member on call when a sexual assault is reported.

The GW Police Department maintains a crime log updated on a daily basis. This [crime log](#) is available online¹⁰ and in hard copy during business hours in Rome Hall Suite 101.

¹⁰ Crime log, <http://police.gwu.edu/crime-log>

Workplace Harassment

Consistent with the focus on embracing GW Values, the Office of Organizational Development and Effectiveness developed an online training program designed to provide information and to prevent workplace harassment. The training program is mandatory for all GW supervisors, staff, and administrators.

Sexual Harassment and Sexual Violence policy

GW's sexual [harassment and sexual violence policy](#) states that sexual harassment is destructive of the "dynamic, student-focused community stimulated by cultural and intellectual diversity and built upon a foundation of integrity, creativity, and openness to exploration of new ideas" that is its mission and therefore will not be tolerated.

In accordance with US Department of Education recommendations, the GW policy defines sexual harassment; prohibits it; encourages reporting; ensures confidentiality to the extent it is possible; prohibits retaliation for reporting; and outlines detailed and extensive procedures for redress, including consultation with a sexual harassment response coordinator, administrative review, and formal hearing. There is no time limit on reporting although the policy states, "a complaint of sexual harassment should be filed as soon as possible after the alleged harassment occurs. The University recognizes that victims of sexual harassment may not always file complaints immediately, but notes that its ability to perform an administrative review may be limited by the passage of time."¹¹

On August 20, 2013 GW launched [Haven](#)¹², an initiative of the Office for the Vice Provost for Diversity. Haven is a centralized website that brings together on-campus and off-campus resources, options, information and immediate and confidential access to help regarding incidents of power-based harassment and abuse, such as sexual assault, domestic violence, and stalking.

¹¹ Sexual Harassment and Sexual Violence Policy and Procedures, <http://my.gwu.edu/files/policies/SexualHarassmentFINAL.pdf>

¹² Haven, <http://haven.gwu.edu/>

Programs for Minors and Access to Facilities

Increase the physical security and access procedures in areas frequented by children or used in camps and programs for children

There is no single model protocol or university-wide protocol for working with minors on or off campus; each program has its own protocol.

The GW Pre-College Program has a long-running, wide-ranging program and has developed a detailed and thorough safety and emergency protocol utilizing an array of university resources to provide comprehensive protection to the minors in the program. Human Resources provides background checks; Housing provides resident staff training; Risk Management reviews codes of conduct and protocols; EMeRG provides staff CPR training and support services; GWPD meets with pre-college students prior to the program and maintains a list of all attendees; Student Health provides health support and maintains a list of all attendees; and faculty receive special training and have supervisory and reporting duties.

The protocol contains a series of rules and procedures covering activities, curfews, and access and has accompanying informational, release, and waiver forms.

This fall, members of the Office of Risk Management and Insurance, the Office of Summer and Special Programs, and the liaison to the First Star greater Washington Academy attended a regional conference and workshop on protecting minors on campus.

GW may consider whether it would be appropriate to:

- Use the Pre-College program protocol as a model for all minor activities
- Modify the Pre-College program protocol to use with other programs involving minors

Research Integrity and Compliance

The Office for Research Integrity and Compliance is responsible for research involving human subjects, animals, biohazardous materials, and nuclear materials.

Compliance is a crucial element of GW's sponsored research work. Along with increasing sponsored research, compliance is one of the two major pillars of the mission

of GW's Office of the Vice President for Research. An effective Institutional Review Board for Human Subjects Research is essential to ensure compliance at all major research universities.

Vice President for Research Leo Chalupa recently commissioned WCGIRB Consulting to conduct an external review of GW's IRB. Jeffrey Cooper, MD, an expert in human research subject protection, led the review.

On August 20, 2013, WCGIRB delivered a draft report comparing GW's IRB to others in terms of best practices, staffing, and other specific considerations. This report contained recommendations that have already helped GW's IRB improve its process, for example through providing more education to users of GW's IRB early in the process. The Office of the Vice President for Research continues to use this report to improve the effectiveness of GW's IRB.

Responsible Conduct of Research

The George Washington University encourages all of its faculty and students to become familiar with professional and ethical standards in academia in general as well as in their chosen fields. In fulfilling its responsibility to prepare the next generation of responsible researchers, GW offers a wide range of [mandatory and optional training](#) to all faculty and students interested in research, including Responsible Conduct of Research (RCR) training, NSF RCR training, and NIH RCR training.¹³

Research Integrity

The University has a broad range of policies governing research activities in the research and finance sections of the university's policies. It is the responsibility of everyone associated with research at GW to comply with federal, state, and local laws and regulations and university policies in all aspects of any research conducted for or on behalf of the university.

General Compliance Considerations

In addition to all university policies related to research integrity, government and general compliance standards apply to conducting research at GW as referenced in GW's [Employee Compliance Guide](#). The Guide addresses a number of specific laws, policies, rules and regulations, but is not intended to be a comprehensive list of legal and ethical standards.¹⁴

¹³ Online research training guides, <https://research.gwu.edu/training>

¹⁴ GW Employee Compliance Guide, <http://www.gwu.edu/~comply/ComplianceAwarenessGuideFINAL.pdf>

The university maintains a compliance and ethics program to exercise due diligence in preventing and detecting improper and criminal conduct and to otherwise promote a culture that encourages ethical conduct and a commitment to compliance with the law. Specific ethics or employee compliance questions are to be directed to supervisors first and then to the Compliance and Privacy Office.

Reporting observed or suspected misconduct in research

The university's [research misconduct policy](#) states that all employees or individuals associated with the university have a responsibility to report observed, suspected, or apparent misconduct in research to the Associate Vice President for Research Integrity and Compliance.¹⁵

If an individual is unsure whether a suspected incident falls within the definition of research misconduct, he or she may call the AVPR to discuss the suspected misconduct informally. If the circumstances described by the individual do not meet the definition of research misconduct, but do raise other legitimate concerns, the AVPR will refer the individual or allegation to other offices or officials with responsibility for addressing the concerns. At any time, an employee may discuss and consult with the AVPR regarding possible research misconduct and the AVPR will provide counsel about appropriate procedures for reporting allegations.

Federal Standards

The university uses the federal research standards as guidelines and conducts all of its research in accordance with those standards.

Human Subjects Research

The Institutional Review Board reviews all human subject research unless it is exempt under [45 CFR 46](#)¹⁶, which lists a number of instances of human subject research that do not require IRB review. It is up to the faculty and department heads to determine preliminarily whether the research is exempt, then submit the claim of exemption to the director of IRB, who will confirm or deny the claim.

¹⁵ Research Misconduct Policy, <http://my.gwu.edu/files/policies/ResearchMisconductPolicy.pdf>

¹⁶ 45 CFR 46, <http://www.hhs.gov/ohrp/humansubjects/guidance/45cfr46.html#46.101>

GW may consider whether it would be appropriate to:

- Adopt an enterprise-wide personnel tracking system like Skillport that will allow the Office of Research Integrity and Compliance to monitor researchers, catalog their job descriptions and salaries, and ascertain whether they have received mandatory training
- Mandate RCR training for all students, staff, and faculty engaged in sponsored research
- Use the WCGIRB Report to establish guidelines to improve the process and increase the effectiveness of GW's IRB

Student Rights & Responsibilities, Civility & Community, and Academic Integrity

The [Offices of Student Rights & Responsibilities, Civility & Community Standards, and Academic Integrity](#)¹⁷ support the university's academic community by educating students, parents, and other members of the GW community regarding their roles in maintaining a healthy and safe university community by adhering to university policy and the law.

Civility & Community

The George Washington University is committed to ensuring that our students and staff uphold high standards of civility and community standards. The Office of Civility & Community Standards typically addresses incidents of minor or moderate non-academic student misconduct, which may result in an administrative record or a disciplinary record. Students may be sanctioned with censure or disciplinary probation, among other educational sanctions.

Student Rights & Responsibilities

The Office of Student Rights & Responsibilities typically addresses instances of significant or recidivistic non-academic student misconduct that may result in a disciplinary record and sanctions that include, but are not limited to, cancellation of a student's housing license agreement, suspension, or expulsion from the university among other educational sanctions.

¹⁷ Student Conduct, <http://studentconduct.gwu.edu/>

Academic Integrity

All students must be familiar with and abide by the provisions of the [Code of Academic Integrity](#), which sets minimum standards for academic student conduct.¹⁸ The Code:

- Defines the rights of students charged with academic disciplinary violations
- Lists the procedures for resolving academic disciplinary matters
- Provides guidance for academic disciplinary sanctions
- Addresses other issues regarding academic student conduct

The Academic Integrity Council administers all procedures under the Code. Faculty, students, librarians, or administrators may initiate charges of violations of the Code. A hearing panel evaluates the charges and issues a report. If the panel determines that the charging party has established guilt, it will recommend sanctions in its report.

The hearing panel forwards the report to the Provost and Executive Vice President for Academic Affairs, who reviews it and either affirms the recommended sanction or revises it if in the judgment of the Provost the sanction is significantly at variance with those issued in similar cases.

Students may appeal decisions upon the basis of new evidence or evidence of bias. The President of the University or a designee reviews and decides upon appeals.

GW may consider whether it would be appropriate to:

- Allow academic integrity appeals to lie with the Provost, as the Provost is the chief academic officer of the University and appeals may only be based on new evidence or evidence of bias, not upon allegations of error in the Provost's determination

¹⁸ Code of Academic Integrity, <http://studentconduct.gwu.edu/code-academic-integrity>

Monitoring Change and Measuring Improvement

GW may consider methods to periodically monitor and measure progress regarding the following items, among others, with participation as appropriate by members of the GW community in implementing change:

Foster a culture of openness and transparency; embrace a sense of civility that reflects GW's values; and encourage escalation of significant issues

To consider:

Examine the effectiveness of the three Culture Project committees' work: the Culture and Communications Committee's work on trust, risk, accountability, communication, and transparency; the working committee to set agendas for leadership meetings; and the working committee to streamline key processes

Gather information about Client Partner model and HR policy development process to ensure that GW does not have multiple silos acting without central policies

To consider:

Fully implement the HR client partner model
Revise the GW Employment Guide as it relates to HR policy

Review job descriptions for vice presidents and officers to determine whether revisions are needed

To consider:

Review the position descriptions of vice presidents and officers to ensure that they reflect the current scope and level of responsibility

Assess background checks

To consider:

Decide whether to expand background checks to include all faculty
Implement a system to audit the effectiveness of its background check procedures and self-reporting system

Board of Trustees

To consider:

Decide whether additional trustee training is appropriate
Develop a protocol to decide about which matters to notify the Board
Decide whether to invite all trustees to attend a training or orientation program annually

Information systems

To consider:

Include a specific prohibition against using university information systems to store or view pornography

Compliance

To consider:

Track the progress and accomplishments of the Compliance/OGC/ Risk/Internal Audit group

Athletics

To consider:

Create a model protocol for athletics programs involving minors on and off the GW campus
Track athletics personnel completion of Clery Act training
Decide whether to hire an additional full time athletics employee in compliance to match peer institutions

Workplace harassment

To consider:

Track completion of mandatory workplace harassment training
Track incidents of workplace harassment

Sexual harassment and sexual violence

To consider:

Track the incidents of sexual harassment and sexual violence at GW
Track traffic on Haven to gauge effectiveness

Programs for Minors and Access to Facilities

To consider:

Devise model protocols for residential programs involving minors at GW, non-residential programs involving minors at GW, and programs involving GW students and non-student minors off campus
Conduct an annual survey of programs involving minors and a review of those programs' protocols

Research Integrity and Compliance

To consider:

Adopt an enterprise-wide tracking system
Mandate RCR training for all students, staff, and faculty engaged in sponsored research
Use the WCGIRB Report to establish guidelines to improve the process and increase the effectiveness of GW's IRB

Civility & Community, Student Rights & Responsibilities, Academic Integrity

To consider:

Track incidents involving non-academic and academic misconduct
Track sanctions in such incident and gauge whether severity is increasing or decreasing
Allow academic integrity appeals to lie with the Provost, as the Provost is the chief academic officer of the University and appeals may only be based on new evidence or evidence of bias, not upon allegations of error in the Provost's determination

Respectfully submitted,

Toni Marsh and Douglas B. Shaw
November 1, 2013