



Office of the President
Annual Report on Institutional Integrity
Academic Year 2014-15

Institutional integrity is characterized as “inclusive of numerous aspects or elements that should support a) the mission and goals of the institution, b) academic and intellectual freedom, as well as c) equity and diversity.”¹

AUB has in recent years developed and implemented, through a process of shared governance, unified policies and procedures to support institutional integrity in its educational programs, healthcare services, and research activities. These policies and implementing mechanisms are a key pillar of AUB’s commitment to providing a safe, inclusive, and non-discriminatory learning and working environment.² The University is also committed to compliance with Title IX of the Education Amendments of 1972, which prohibits sex-based and gender-based discrimination (including sexual harassment and sexual violence) in the University’s educational and healthcare programs and activities.

Key challenges with respect to ensuring a safe and non-discriminatory environment include the need for: a) greater awareness of basic rights, reporting options, and responsibilities, b) extensive education and training across all constituencies to improve internal effectiveness and external compliance, c) standardized reporting and case management protocols and mechanisms, and d) gender equity and campus ‘climate’ data on which to base initiatives and formulate effective responses.

In **Section I** below an overview of key initiatives is provided for academic year 2014-15 (AY 14-15) related to enhanced compliance and reporting under the policy and regulatory framework. In **Section II**, data for the year related to reports of alleged sex-based or gender-based discrimination including harassment is provided, and in **Section III** the use of sanctions is summarized. In **Section IV**, information is compiled for other types of alleged misconduct as reported to the Internal Audit Office (IAO) through the ‘safe reporting’ mechanism.³

¹ Middle States Commission on Higher Education (MSCHE), Part II: Standards of Excellence.

² Policies and forms related to institutional integrity including those referenced in this report are available at: <http://www.aub.edu.lb/pnp/Pages/index.aspx>

³ A report can be submitted in English or Arabic at <http://safereport.aub.edu.lb>

I. Summary of key initiatives AY 14-15

During AY 14-15, efforts were focused on responding to informal incident reports and addressing formal complaints according to internal policies and applicable regulatory guidelines. The University took specific steps to facilitate broader awareness of and reliance on the policies and procedures related to institutional integrity and reporting of alleged misconduct.

Policy Development and Management

The Policies and Procedures Review Committee (PPRC) initiated work in late 2014 to provide oversight and guidance in the development, review, and harmonization of key University-wide policies and procedures.⁴ Reporting to the president, the PPRC completed an assessment of key challenges, guided finalization of a comprehensive inventory of all governance documents, and secured approval of an updated 'policy on policies'.⁵ With the support of the Purchasing Department and IT, the PPRC also initiated and participated in the competitive selection through a RFP of a policy management software solution. Currently being implemented by a working group formed by the PPRC, the professional policy management application is considered an essential component of a strengthened ethics and compliance program.

Awareness and Training

Following the appointment of AUB's Title IX Coordinator in August 2014, the Office of the Provost published a resource page, "Non-Discrimination, Harassment, & Title IX", in October 2014 to raise awareness of these issues in particular for students, and as a reference for the entire AUB community.⁶ The Title IX Coordinator attended intensive certification training in the U.S. in January 2015, and subsequently presented customized orientation sessions for select campus and medical center cohorts to raise awareness. Attendance data provided by each organizing unit or faculty (and disaggregated by gender as available) is as follows:

- **New Students:**
 - o 190 students in two orientations, January 2015
 - o 2,350 students in five orientations, August 2015.
- **New Faculty:**
 - o 10 faculty members (4 female/6 male), January 2015
 - o 19 faculty (7 female/12 male), August 2015

⁴ The PPRC is charged with identifying areas in which University-wide policies and procedures need to be updated (or developed) and in coordination with the department responsible for the policy agreeing on a scope and timeline for work. The PPRC provides expertise in the development and management of policies, and keeps the president informed of the status of documents under review.

⁵ "Policy on the Development and Revision Of Bylaws, Policies, Procedures, and Manuals", (December 17, 2014)

⁶ Online resource page can be accessed at: <http://www.aub.edu.lb/titleix>

– **Faculty of Medicine:**

- Continuing Medical Education (CME)
 - 83 medical staff and students, Surgery Grand Rounds, April 2015
- Graduate Medical Education (GME)
 - 121 residents and fellows (62 female/59 male), June 2015

The Title IX Coordinator also participated in an extended Q & A session, following a sexual harassment sensitivity presentation by Dr. Brigitte Khoury of AUB's Faculty of Medicine, with approximately 25 academic advisers in the Faculty of Arts and Sciences (FAS) in December 2014.

Training: Human Resources organized 11 workshops during the AY 14-15 that covered topics related to institutional integrity including non-discrimination, prohibited harassment, and professional ethical standards. The training is required for new employees as part of orientation. A total of 83 employees attended as follows:

- 45 Non-academic (26 female/19 male)
- 1 Academic (female)
- 37 Managerial (26 female/11 male)

A preliminary training plan is being developed by AUB campus HR in collaboration with the Title IX Coordinator to address the immediate need for greater awareness and understanding of the issues, and as an initial phase of broader efforts related to education needs and compliance requirements. A modified version of the current new employee orientation training focused on discrimination/harassment is being developed, and will be mandatory for all managerial level non-academic employees. Separate training sessions will be developed for non-academic employees below managerial level, and for safety officers. A core group of faculty/senior administrators will also be provided specialized training to support the University's response to formal complaints.

II. Reported incidents of alleged sex-based or gender-based discrimination received/investigated

AUB is responding effectively to complaints, whether reported anonymously, informally, or through a formal complaint process that involves a special panel for each case. Policies and procedures have been designed to encourage resolution of less serious issues such as workplace friction at the department or unit level. Informal complaints are systematically addressed even in the absence of a formal complaint, although the ability to effectively respond and evaluate a

specific case may be limited accordingly. In the case of both formal and informal complaints, disciplinary and/or other actions are taken in line with University policies and procedures and within the applicable legal and regulatory frameworks.

Formal complaints are made through the “Notice of Discriminatory Harassment Form”, and are addressed and evaluated by a special panel formed for each case in accordance with the “Policies Concerning Sexual and Other Discriminatory Harassment” (December 12, 2012) and the “Procedures to Address Formal Allegations of Sexual and other Discriminatory Harassment”.

Informal complaints are also systematically addressed even in the absence of a formal complaint although the ability to effectively respond and evaluate a specific case may be limited accordingly. In the case of both formal and informal complaints, disciplinary and/or other actions are taken in line with AUB policies and procedures and within the applicable legal and regulatory framework. If sufficient information is available, the incident is referred for possible action by the appropriate office or department. The incident reports help AUB develop a coordinated and effective campus response related to issues raised by these incidents.

Underreporting is clearly an issue at AUB, as it is at all institutions. Key factors impacting willingness to report include fear of retaliation, weak awareness of rights and policies, confidentiality concerns, and perceived status of individuals as ‘untouchable’.

Reported incidents of alleged sex-based or gender-based discrimination (including sexual harassment) for AY 14-15 are provided in Table A below. This information reflects reports rather than confirmed violations of University policy. An overview of outcomes is also provided below. It should be noted that multiple incident reports related to a formal investigation are reported as a single “report” for purposes of this report, and a report may include multiple categories of alleged misconduct (e.g. harassment and retaliation). Incidents are considered “not actionable” if reported informally and information is insufficient to allow investigation, or reported confidentially within a legally privileged context.

Table A. Reported and documented incidents of prohibited discrimination and harassment AY14-15

ACADEMIC YEAR		AY 2013-14	AY 2014-15
LOCATION	AUB MAIN CAMPUS	11	11
	AUB MEDICAL CENTER	6	4
	OFF-CAMPUS	1	1
TOTAL		18	16
ALLEGED MISCONDUCT (Multiple categories may be reported)	SEXUAL HARASSMENT	17	12
	RETALIATION CONNECTED TO COMPLAINT	0	2
	GENDER DISCRIMINATION (other than harassment)	1	3
	OTHER PROTECTED-BASE DISCRIMINATION	0	2
PROCESS	INFORMAL	13	9
	FORMAL	5	7
STATUS*	VIOLATION OF POLICY & SANCTIONS and/or REMEDIES	8	4
	NO VIOLATION OF POLICY	2	2
	WITHDRAWN	1	1
	NOT ACTIONABLE	7	7
	PENDING	0	2

*Status as of October 31, 2015

Of the sixteen (16) reported and documented complaints for academic year 2014-15, nine (9) were addressed through the informal complaint process and seven (7) through a formal process involving an internal review or panel evaluation. Of the seven (7) formal complaints two (2) resulted in employment and/or disciplinary actions, two (2) allegations were determined not to involve violations of policy, one (1) complaint was withdrawn, and two (2) cases are pending. AUB investigated the remaining reports to the extent possible and issued administrative sanctions in two (2) of the cases.

III. Sanctions in Discrimination/Harassment Cases

If a respondent to a formal or informal complaint of sex-based or gender-based discrimination is found to have violated policy the University takes action to eliminate the misconduct, prevent its recurrence, and remedy its effects. According to University policy the president, based on the findings of the review panel and an independent assessment by the Title IX coordinator, determines the

final outcome of a formal investigation and sanctions if any to be imposed. Generally multiple sanctions are utilized for a respondent who is found responsible for violating policy, and the presidential decision is not subject to internal appeal. Depending on multiple considerations including the severity of the incident(s) and pattern history (if any), sanctions range from mandatory awareness training, no contact sanctions, official warnings, disciplinary probation, suspension without pay, to termination.

IV. Safe Reporting – Cases of alleged misconduct received/investigated

Reports of alleged misconduct can be made anonymously through the safe reporting website. Reports may also be reported orally or in writing to the university auditor, the secretary of the university, or the president, or if any of these three is the subject of the complaint, the complaint may be made to another named officer or to the chair of the audit committee or the chair of the board of trustees. Safe reports and fraud complaints are addressed by the university auditor in accordance with procedures within the “Safe Reporting Policy” and “Fraud Policy”.

During the Academic year 2013-14 and 2014-15, the Internal Audit Office (IAO) received sixteen and eighteen reports respectively (Table B) including: twenty-four (24) regarding financial matters that alleged conflict of interest; altered documents; theft and/or improper budgeting/reporting; six (6) allegations related to human resources; three (3) allegations related to academic matters; and, one (1) regarding safety and security. Twenty-eight of the reports concerned the AUB Campus and six concerned the AUB Medical Center. The IAO addresses the safe reports on a priority basis guided by perceived severity and consequence.

Table B. Safe reports AY year 2013-14 and 2014-15 alleged misconduct

Year		2014			2015			
Location	Category	Completed	In Progress	Pending	Completed	In Progress	Pending	Total
AUBMC	Financial	2			2			4
	HR				2			2
AUBMC Total		2			4			6
Campus	Academic	2			1			3
	Financial	6	1	2	4	4	3	20
	HR	1		1	2			4
	Safety	1						1
Campus Total		10		3	7	4	3	28
Total by Status		12	1	3	11	4	3	34
Grand Total		16			18			34

Of the twenty-three (23) completed reports (twelve in 2014 and eleven in 2015): one (1) report had no identifiable basis; eight (8) concerned administrative and/or harassment issues that were reported to management for follow-up; and the

remaining fourteen (14) reports over the two years were investigated and reported by IAO. These fourteen (14) reports are described in the following eleven (11) summaries. Similar reports are described together.

Financial category

1. Report regarding cash mishandling led to a formal investigating committee and a termination of employment.
2. Report resulted in an extensive investigation, which separated ongoing processes (referred to operational management for action) from allegations of impropriety (investigated by IAO). Documentation showing proper procedures and authority was found. No evidence of impropriety was found. Internal control and communication improvements were recommended and are being implemented.
3. Report identified employee loan variations that resulted in policy amendments.
4. Report and preliminary assessment resulted in an audit of financial assistance and related budgeting processes.
5. Report regarding overbilling of medical supplies. No evidence of misconduct was found. The review identified weaknesses in the implementation of a new system/ process.
6. Reports related to alleged conflict of interest. The results of the reviews showed lack of awareness among many AUB staff and faculty regarding AUB policies and procedures.
7. Report regarding consultancy services resulted in identifying inconsistencies between AUB policies and procedures.
8. Report regarding altered contracts led to a formal investigating committee and disciplinary actions against the Administrative Assistant and the Supervisor.

Academic category

9. Report regarding access to exams was referred to management and to the academic committee already charged with reviewing such issues. The review found no evidence supporting the specific allegations and found credible alternative explanations for the outcomes.
10. Report alleging that an impostor took a competency test for an AUB job applicant was found to be true. Improvements in internal control, including improved supervision and review, have been recommended and are being implemented.

Safety category

11. Report submitted under the category of safety raised concerns about the quality of water at AUB and whether it is tested. The outcome was more frequent periodic testing, confirmation of chlorination to address biological matter, and like most piped water in Beirut this summer, confirmation of the poor taste of water with high total dissolved solids.

V. Conclusion

Increasingly, universities are required to respond to multiple constituencies and external agencies in formulating potent programs to address issues of equity, inclusion, and diversity as a critical element of overall institutional integrity efforts.

AUB is committed to ensuring a safe, non-discriminatory, and inclusive educational, working, and healthcare environment. Significant work is being done related to institutional integrity; certainly much more can be accomplished. Given the complex and variant needs of the diverse constituencies of AUB—an integrated liberal arts teaching/research university and leading academic medical center—resources dedicated to equity issues in recent years have been modest. Immediate efforts to support a non-discriminatory and inclusive environment will be focused on broadening awareness of basic rights and responsibilities, extending education and training across all constituencies, and collection of gender equity and ‘campus climate’ data on which to base initiatives and formulate effective responses.