2014 HLC Assurance Report
Criterion Two: Integrity: Ethical and Responsible Conduct

December 11, 2014
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**

*Palmer maintains its integrity through established policies and practices that provide an ethical, rational, and consistent context for decisions and actions by its governing board, College administrators, faculty, and staff.*

The Office of Institutional Compliance was established to affirm the College’s commitment to conduct all its operations and activities in compliance with requisite law, to increase awareness of such objectives, and to foster a culture of compliance and accountability. The Office serves as the official repository and point of contact for all Institutional Policies, processes, and procedures, providing a single locus for the College community. Palmer is committed to ensuring its policies are legally sound, current, and meet the highest fiduciary standards through regular review.

**Integrity of Financial Functions**

*Legal Compliance*

The College understands and abides by applicable regulations regarding its financial functions as well as the importance of transparent and responsible stewardship of resources granted to the institution. Primary regulations governing financial functions rest at the federal level and govern the receipt of federal funding via the federal Office of Management and Budget (OMB). The College complies with three principal sets of regulations: OMB circulars A-21 (cost principles), A-110 (administrative requirements for grants), and A-133 (audits). Financial reports accounting for the College’s financial activities are filed with administrators, state agencies, auditors, and other external parties.

Established practices and procedures provide a framework for effective and efficient financial administration. Palmer employs generally accepted accounting principles to ensure consistent and transparent financial processes. Financial reporting requirements are held at the state and federal level. Florida and California Secretaries of State require brief annual informational reports only. Palmer College is incorporated in the state of Iowa and, there are no annual reporting requirements for Iowa. The annual external audit performed by McGladrey, LLP is prepared in accordance with federal regulations contained in A-133 and submitted to the US Department of Education. Additional detail regarding College compliance with Commission policy FDCR.A.10.060 (Title IV Program Responsibilities) can be referenced in Palmer’s Federal Compliance Report.

*Oversight*

The College’s Conflict of Interest policies and procedures act as safeguards to prevent employees, consultants, members of governing bodies, and others from using their positions for purposes that are, or give the appearance of being, motivated by a desire for private financial gain for themselves or others with whom they have close ties. The Board of Trustees plays an integral role in the oversight and implementation of controls to mitigate the risk of fraud and misconduct. The issue of conflict of
interest is addressed at two levels, board and institutional (employee). Board members are bound by policy to disclose actual and perceived conflicts of interest or commitment, financial or non-financial. Every trustee and officer must acknowledge the review and understanding of the policy by completing and annually updating a supplemental disclosure form. The disclosure form is filed with the Chair of the Trustee Development Committee, with a copy maintained by the Secretary of the Board and legal counsel.

The Board-approved institutional operations policy, BO 402, regarding employee conflict of interest requires the implementation of institutional policies requiring all employees to disclose to their appropriate supervisor the existence of any and all conflicts. The Executive Administration is required to disclose annually in writing any conflicts of interest. The Office of Compliance developed a Conflict of Commitment and Interest institutional policy, which was recently passed by the executive administration. Expectations regarding employee conflict of interest disclosure are outlined in the Staff Handbook.

Management or elimination of potential financial conflicts of interest provides assurance to our students, patients, accrediting bodies and the general public that personal interests have not influenced employees and administration in fulfilling the mission of the College. In addition to policy requirements, the Board actively monitors the integrity of College activities through regular written and oral reports received from the Chancellor and executive administration to its standing committees for review, to prevent, detect and respond to issues regarding financial integrity.

**Fundraising**

All fundraising efforts across all campuses, including student fundraising, are coordinated through the Development Office. The College ensures all gifts to, or for, the use of the College are structured to provide maximum benefits for the donor and support the mission of the College. Donors are offered opportunities to make gifts to the College, both of cash and non-cash assets in a manner beneficial to the donor while protecting the fiscal and legal integrity of the institution. Key to the success of the College’s fundraising program is its institutional ability to approach fundraising in a strategic, disciplined and coordinated way to ensure activities and accepted gifts align with departmental procedures and regulatory guidelines. Departmental procedures developed under the direction of the Executive Director of Alumni currently guide the fundraising process. Gift Acceptance Policies and Guidelines drafted in conjunction with the Office of Institutional Compliance is in final review with approval targeted for early 2015.

Annual fund, endowment and capital campaigns are based upon the needs of the College as determined by the Board of Trustees, Chancellor and Executive Administration. Once a need is determined, the Executive Director of Alumni provides leadership and direction for the Development Office in planning and execution of fundraising related activities.

Fundraising is conducted in accordance with current departmental procedures, IRS guidelines, and professional best practices. For each campaign, a specific case statement is developed and solicitation begins. Potential donors are contacted through direct mail, e-mail, phone calls and/or personal visits. Coordination exists across multiple College departments once a campaign is underway to ensure the necessity, usefulness, and desire of potential gifts-in-kind. Internal Revenue Service publications 526, 561, and 1771 guide the definition, valuation, and disclosure of charitable contributions made through Development campaigns. The Development Office utilizes educational resources and training provided by the Partnership of Philanthropic Planning and abides by the Association of Fundraising Professionals Code of Ethical Principles and Standards as a departmental best practice. Capital campaigns, while following the same basic departmental processes, have specific goals and are
closely managed with the use of consultants.

**Integrity in Academic Functions**

**Academic Policies**

Palmer maintains College-level academic policies, which are enforced by the deans on each campus. The academic policies communicate the College’s expectations to instructors and students regarding classroom policies, attendance policies, grading, syllabuses, procedures for examinations and reasonable academic accommodations. Information relating to the College’s Academic Policies and the College’s Codes of Ethics can be accessed in the College Catalog, Student Handbook and through the Policy Library within the Palmer Portal.

**Student Code of Ethics**

Maintaining high standards of ethical conduct is integral to the College’s academic programs. Students are expected to demonstrate ethical and professional conduct when dealing with persons in the academic community, patients, and the public. The Student Code of Ethics addresses the College’s expectations for students’ ethical conduct. The College’s expectations for academic honesty and students’ rights and responsibilities are reinforced in course syllabi, at orientation, upon matriculation. Students are provided training in ethics and professionalism in patient care and business practices in technique, diagnosis, clinic, and business and practice management courses throughout the DC curriculum. Oversight for the fair and ethical processes for resolution regarding student conduct is administered by the Office of Adjudication.

**Code of Ethics**

The College’s Code of Ethics communicates key standards defining acceptable ethical practices and is available on the Palmer public website. The document outlines ethical principles for Palmer faculty and staff regarding academic inquiry and interactions with students, colleagues, patients, and other members of the campus community. These general principles are guided by standards set by the American Association of University Professors and are the basis for the ethical standards Palmer employees are expected to follow.

**Academic Oversight**

The College Academic Oversight Committee (CAOC) approves curriculums and policy changes implemented across the three campuses. Any member of the College community may submit proposals for revisions to current academic policies. The role and responsibilities of the CAOC are provided in the Academic Affairs Committee Policies. Academic oversight over programs and academic policies are further discussed under Core Component 4.A.

**Clinical Academic Experience**

Established policy communicates expectations regarding ethics and integrity for faculty, staff, and students relating to clinic procedures, patient care, and off-campus clinical experiences. The Clinic Operations Procedural Manuals are the primary source of information for students and are provided to them during their first introductory course to patient care. Expectations regarding ethics and integrity in the Palmer clinic environment are clearly communicated. Other documents that communicate ethical expectations to students regarding their clinical education both on and off campus include the Intern Preceptorship Program Handbook, Clinic Abroad Program Handbook and the DOD-VA
Chiropractic Internship Program Handbook.

In 2007, Clinic Affairs developed and implemented a system-wide Clinic Integrity Program (CIP). This quality assurance process for patient care is a vital part of how the Palmer Clinics achieve integrity to ensure statutory and regulatory compliance and to advance the quality of health care delivery and the intern education experience. The CIP provides the processes and mechanisms by which quality-related clinic and provider data are captured, recorded and used to improve the educational and patient care environments. Through chart auditing procedures, the CIP evaluates monitoring priorities prescribed in the annual work plan at each of the College’s clinics according to standards set for the clinic system by the clinic administrators. A quarterly CIP Quality Scorecard is used to monitor key clinical performance indicators that impact student clinical training. The overarching goal is to maintain the highest quality of students, faculty, staff, and administrators at Palmer’s main and branch campuses and embrace a culture of continuous quality improvement.

Integrity in Personnel Functions

Palmer is an Equal Employment Opportunity employer and strives to maintain fairness and transparency in its employee practices. Multiple policies and procedures govern ethical and responsible actions in the area of personnel management. This includes an Equal Opportunity Policy prohibiting discrimination in employment, admissions or in educational practices, programs, services or activities. These policies and procedures are implemented consistently and are clearly communicated across all campuses to ensure fairness in all personnel functions. Employment, admissions and educational decisions are based on merit, qualifications, and competence. The College’s fair employment practices include all aspects of hiring, promotion, assignment, discharge and other terms and conditions of employment. These employment practices are communicated in staff and faculty handbooks, as well as in campus collective bargaining agreements. Further, staff, faculty, and student satisfaction surveys assess perceptions of fairness regarding policies, channels for complaints, exams, probation, ethics rules, and faculty impartiality.

Fair and Ethical Policies & Processes – Governing Board

The Board of Trustees establishes fair and ethical Board Policies that include 1) policies by which, the Board operates and governs itself, as well as 2) policies which serve as an umbrella to provide high-level guiding principles and direction for which the College administration is responsible. Additional information about the Board’s governance and Board policies is provided under Core Component 5.B.

Fair and Ethical Policies & Processes – Administrators, Faculty & Staff

The Board of Trustees’ policies provide the overarching framework for a series of institutional policies, as well as campus, division, and department policies. The Board recognizes the need for the College to develop, institute and enforce institutional policies to fully comply with Board policies, applicable laws, and accreditation requirements. Such institutional policies provide specific rules and provisions for implementing Board of Trustees policies, aligning operations, communicating policy roles and responsibilities, and setting expectations for operation across the College. These policies and procedures are implemented and enforced across the three campuses to ensure fairness and integrity by all members of the College community. All members of the College community are responsible for complying with the College’s policies and related processes.

Annual mandatory training is required of staff and faculty to reiterate polices to include HIPAA, FERPA, Safety, Sexual Harassment, Discrimination and Clery Act. During the fiscal year 2012-2013, 517 employees (across all three campuses) were required to complete the mandatory training in which
497 (96%) employees successfully completed all of training modules. All members of the College community who engage in scientific research must annually complete Protection of Human Subject Participant training from the NIH.

In January 2014, a designated policy library page of the Palmer Portal became the official repository for all institutional policies, processes and procedures, providing a single location for institutional documents for the College community. The location of institutional policies is referenced in the Student Handbook, staff handbooks, Collective Bargaining Agreements, the College Catalog, the Guide to Campus Safety, the Research Handbook and the Student Clubs and Organizations Handbook.
2.B - Core Component 2.B

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

Argument

Palmer clearly communicates information regarding the College’s program descriptions, requirements and cost; faculty and administration; and control and accreditation relationships to all of its constituents through its publicly accessible website, Catalog, recruiting materials, and face-to-face representation.

College information provided to the students, prospective student and the public in the Catalog, website, recruitment brochures, and other publications are in compliance with the U.S. Department of Education regulations, accrediting agencies (HLC and CCE) policies, and state higher education disclosure and fair consumer practice requirements. The accuracy and integrity of the information contained in the College materials is the responsibility of the department content experts. Each department follows department-level procedures to update and review information.

College Website

The website is the most comprehensive, dynamic and accessible resource for communicating information about the College to all constituents. The website houses all educational program information, to include admissions requirements, graduation requirements, and cost; faculty and administration; accreditation and state authorization disclosures. Accuracy of information provided on Palmer’s website is managed by the Marketing and Communications department and the each College department that provides contents. The Marketing and Communication Department follows an Annual Website Review Process for updating the website allowing information to be revised and managed by the appropriate College departments that have the most current and department-specific knowledge.

An internet best practices group, the “Exterals Group,” was recently established through the Marketing and Communication department to continuously review the College’s internet publication practices for adherence with department procedural standards. This group captures the input of the College community to review the website, as well as admissions and recruitment publications, for accuracy of information provided to constituents.

College Catalog

The Catalog is a hard-copy publication provided to all students, communicating information about the College. The information in the Catalog is comprehensive and includes information about the College’s mission, academic calendar, accreditation, state licensure disclosures, academic programs, program requirements, course descriptions, cost to students, financial aid, and the administration and faculty. The College Catalog is updated biennially through a comprehensive review process involving all departments across all three campuses, including administrators, the compliance and accreditation offices, and legal staff to ensure the accuracy of and to provide updates to the information provided in the Catalog. Any revisions that occur between printing dates are provided on the College website as amendments. The Student Handbook follows the same review and update processes. The Catalog and the Student Handbook are accessible to students, prospective students and the public on the College
website.

**Recruitment Material, Admissions Representatives, Campus Guides and Campus Visits**

The Admissions department utilizes several key documents when presenting information to prospective students. These documents, which include the College Catalog, Campus Fact Sheets, cost and funding options, provide basic information regarding the College in general as well as campus-level overviews.

Designated College representatives are responsible for providing clear and accurate information regarding Palmer’s degree programs, admission and graduation requirements, tuition and fees, student services, and student outcomes to prospective students. Admissions representatives and student Campus Guides are highly visible members of the College community. Admissions representatives recruit and advise prospective students through matriculation into the College, while student Campus Guides must be prepared to accurately address or direct any questions regarding the institution that a prospective student may have during campus visits. The College offers weekly campus visit opportunities to prospective students year round at all three campuses. During campus visits prospective students interact with faculty, staff, and students, and meet face-to-face with representatives from Financial Planning and Admissions to address questions on programs, admission requirements, costs and financial aid opportunities.

**Admission Representative and Marketing Compliance Training**

To ensure College departments are providing the most up-to-date information to the public regarding the Palmer’s programs, the College provides training and follows ongoing review processes for the Catalog, website, Student Handbook, and recruitment materials. Annually, the Office of Accreditation and Licensure updates and provides Compliance Training for College Communications to both the Admissions and Marketing and Communications departments. This training is both a requirement of state licensure (Florida Commission for Independent Education) and an institutional best practice. The content covers the topics of misrepresentation of information and fair consumer practices from a federal, state, and accrediting agency regulatory perspective regarding required disclosure of information such as Title IV default rates, student financial aid information, and program information. Certification of completion is filed with the Office of Accreditation and Licensure.

**Other Means of Communication of Information**

In addition to providing key information through the website, Catalog and College representatives, Palmer also utilizes the following vehicles to share information its constituencies:

- Palmer Portal
- Student Handbook
- New Student Orientation
- Academic Advising
- Recruiting Events
- Highlights Publication
- TuesdE-news
- Social Media (e.g., Twitter, Facebook, and YouTube)
2.C - Core Component 2.C

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

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

Argument

Sub-Component 2.C.1: The governing board’s deliberations reflect priorities to preserve and enhance the institution.

The College's Board of Trustees faithfully fulfills the College's mission and objectives and ensures that their deliberations preserve and enhance College operations. All Board members are committed to serving the College's best interest. The Board's deliberations routinely address issues that affect the reputation, well-being, and quality of the College.

The Board of Trustees’ Bylaws and Articles of Incorporation and committee charters describe board members’ duties and responsibilities as the governing unit of the College. The Board formulates broad policies that are consistent with the intentions of the institution, while ensuring that allocation of resources is consistent with those policies. Furthermore, Board members provide policy and strategic programmatic direction for the College and make judgments about the strengths, opportunities, and needed improvements at the institution. Through the charges to its committees, the Board demonstrates its commitment to long-range planning, strategic development, accreditation, educational excellence, and fiscal responsibility in support of the mission of the College.

The Board established Communication Protocol safeguards appropriate communication of information both from the College administration to the Board and from the Board to the College administration. This ensures the Board is informed about important matters relating to the operation and business of the College. Additional information is provided under Core Component 5.B.1.

Sub-Component 2.C.2: The governing board reviews and considers the reasonable and relevant interests of the institution’s internal and external constituencies during its decision-making deliberations.

The Board is committed to inclusion and participatory processes. The administrative structure fosters collaboration between the Board and executive administration.

The Board fosters an environment supporting teamwork among internal stakeholders and collaborative partnerships among external stakeholders to consider reasonable and relevant interests in its decision-making. It engages in regular communication between key stakeholders to ensure that the
Board is sufficiently knowledgeable to make the best decisions possible. Trustees regularly interact with key external constituencies such as employers, alumni, donors, legislators, and other representatives of professional organizations. These relationships provide contemporary insight into educational needs and coming trends that help inform Board deliberations and aid the College in its vision of being “The Trusted Leader.”

The Board fulfills its ongoing responsibilities through an organized standing committee structure, with each committee pursuing defined goals and duties. These committees meet with relevant constituencies to inform their oversight and decision-making. Minutes of all committee meetings are maintained and distributed to all Trustees. The Board of Trustees regularly receives reports directly from the College administration. The Board also holds retreats to improve communication and build a shared understanding of how it should function and how it may advance the Mission of the College. Core Components 5.B.1 and 5.D.2 provide in-depth description of processes for communication and information sharing between the Board of Trustees and the executive administration of the College.

Sub-Component 2.C.3: The governing board preserves its independence from undue influence on the part of donors, elected officials, ownership interests, or other external parties when such influence would not be in the best interest of the institution.

The Board of Trustees and Officers of Palmer serve the public trust and have a clear obligation to fulfill their responsibilities in a manner consistent with this fact. All decisions of the Board and Officers are to be made solely on the basis of a desire to advance the best interest of Palmer College and the public good.

The composition of the Board of Trustees and its structure and policies ensure its autonomy. Expectations for independence imparted to the College’s Board of Trustees are clearly laid out in the Board’s guiding governance documents, the Bylaws and Board of Trustees Policies.

While many actual or potential conflicts are and will be deemed inconsequential, every Trustee and Officer is responsible to ensure conflicts of interest that compromise the institution’s best interest are avoided. To ensure transparent decision-making reflecting the best interests of the institution that is independent of undue influence, all Trustees are required annually to disclose potential conflicts of interest. They are also required to refrain from participating in transactions where conflicts of interest have been determined.

The Bylaws contain a conflict-of-interest policy, membership policies, and reimbursement of expenses policy for Board members. Such policies indicate that Trustees will not receive any compensation for their services as trustees although they may receive reimbursement of expenses incurred for attendance at regular or special meetings. Assurance that Board members’ personal or outside interests will not conflict with the interests of the institution is further guaranteed through respective Bylaws, as is the provision for the removal of members from the Board of Trustees. The Board of Trustees is therefore sufficiently independent of any relationships that could interfere with the exercise of independent judgment and is free from pressures from individuals or groups, whether internal or external to the institution.

Sub-Component 2.C.4: The governing board delegates day-to-day management of the institution to the administration and expects the faculty to oversee academic matters.

The Board of Trustees delegates day-to-day institutional management to the administration in accordance with Board bylaws and established Board policy. Consequent organizational structure and academic policies lend to the expectation of faculty overseeing academic matters.
through participation on academic committees.

Bylaws of the Palmer College Foundation delineate specific responsibilities for matters relating to the Board of Trustees. Key to the delegation of management are requirements of the Trustees to participate in the creation of Board policies that a) advance the College to the benefit of students, faculty, staff, and the chiropractic profession and b) safeguard the properties and the integrity of the Foundation and all of its campuses, and c) conform with all applicable rules, laws and regulations.

The Office of Compliance created an institution-wide policy, Policy Structure and Administration, in which all policy structure is arranged into three primary categories: Board, Institution-Wide and Non-Institution-Wide. Both institution-wide and non-institution-wide polices are promulgated by Board policies. Institution-Wide policies pertain to applicable laws and accreditation requirements, and govern the operations of the College. The Board delegates administration of individual institutional policies to the Chief Compliance Officer (CCO). The Board delegates control to the Executive Administration to create Non-Institution-Wide policies, which include division-, department-, and campus-specific policies, to increase efficiency of day-to-day management and operations. All institutional policies are compliant with relevant Board policies and applicable law.

Board policy BT 103, Delegation of Authority to the Institution to Create Institution-Wide, Divisional, and Campus-Specific Policy, assigns the chancellor responsibility to develop and enforce a College policy structure pursuant to Board bylaws and Board policy. This policy also delegates day-to-day management of the institution to the chancellor, who is in turn charged with effective institutional leadership and delegating authority to the executive administration.

The Palmer College of Chiropractic Organizational Structure and Function document outlines the formal reporting lines in the organizational structure and administrative functions of the College as whole. Under the one-college structure the chancellor leads the entire College. The provost and vice chancellors manage College-divisions with specialized knowledge, while the campus presidents provide campus day-to-day management of campus operations with campus-specific insight.

Specific to faculty involvement in academic matters, the Academic Affairs Committees policy defines the standing academic committees, their purposes, reporting lines, and membership. This policy stratifies committee structure into College-level and Campus-level. Faculty members participate in academic matters primarily through campus-level academic committees. Through each of the nine campus-level standing committees faculty provide key insight into matters of policy management, curriculum and assessment, academic/facility needs, faculty enrichment, and faculty promotion. Further detail regarding faculty involvement in academic matters is discussed in Sub-Components 5.B.2 and 5.B.3.
2.D - Core Component 2.D

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

Argument

The commitment of Palmer to freedom of expression and the pursuit of truth in teaching and learning is evidenced through guiding institutional documents, policy, and ongoing assessment methods.

Commitment to Free Inquiry

The institutional commitment to freedom, both academic and of inquiry, are publicly affirmed by the Palmer Board of Trustees through various official documents, including the Mission, Vision, and Philosophy statements, Values, Practice Paradigm, Chiropractic Pillars, Educational Principles and Board policies. When considered comprehensively, these sources affirm that the success of Palmer is appreciably contingent upon the provision of an environment of lifelong learning, effective teaching, academic freedom, scholarship and sound administrative leadership by both faculty and staff. Students and faculty alike can benefit from the guidance of these documents in the establishment of a culture embracing a curriculum founded on academic freedom, research, scholarship and evidenced-based principles.

The Florida Campus Faculty Handbooks and collective bargaining agreements guide faculty relative to academic freedom boundaries. Faculty are afforded freedom in research, publication, classroom teaching to include selection of text and supporting materials, as well as the right to identify their academic rank and association with the College. All academic freedoms are subject to state and federal law, as well as College guiding documents and institutional policy.

A review of faculty satisfaction surveys administered from 2008-2013 indicated the overall satisfaction with the degree of academic freedom at Palmer to be an overall weighted average of 79.5 percent. This campus-wide average shows a high degree of satisfaction, substantiating the effectiveness to which Palmer communicates academic freedom to its constituents.
2.E - Core Component 2.E

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

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

Argument

Sub-Component 2.E.1: The institution provides effective oversight and support services to ensure the integrity of research and scholarly practice conducted by its faculty, staff, and students.

Palmer College maintains written policies and procedures designed to ensure research and scholarship is conducted with the highest level of ethical conduct and oversight.

Research Policy

The College enacts policies and procedures that inform faculty, staff, and students about responsible scholarship and ethical conduct of research. Developing a responsible use of knowledge involves applying normative behaviors and codes congruent with appropriate professional conduct. In addition to these policies and procedures, Palmer articulates and integrates professional and legal codes, as well as behavioral standards into the undergraduate, graduate and DCP curriculums. Members of the faculty, staff, administration and student body who engage in research must follow appropriate standards regarding human and/or animal protections necessary to conduct such research.

Modeling responsible use of knowledge by faculty and staff through professional behaviors, actions, and codes is important for maintaining a climate of high academic standards and rigor at Palmer College. Supporting these professional behaviors, actions and codes are policies and procedures outlined for faculty, staff, and students in publicly available documents such as the Chiropractic Oath, College Catalog, faculty collective bargaining agreements, staff handbook, student and Clinic Operations Procedural Manuals, the Palmer Research Policy Manual, and Palmer’s Institutional Review Board website.

Human Subject Research

Human subject research at Palmer College is reviewed at the system-level by the College Institutional Review Board (IRB) and Human Protections Administrator for compliance with Protection of Human Subjects and IRB (45CFR46 and 21CFR56) regulations. All human subject research is initially submitted to the College Human Subject Administrator, who reviews the proposal for completeness, scientific accuracy, human subject protection, and necessary permissions and approvals. The IRB Chair and Human Protections Administrator are appointed by the Vice Chancellor for Academic Affairs, under whose authority the IRB is coordinated. All members of the IRB, and all staff, faculty, administration and students who conduct human subject research are required to complete initial training in the Protection of Human Research Participants (PHRP) though NIH, and are required to renew this training annually.
Projects not ruled exempt are submitted to the full IRB for consideration of being expedited or undergoing full board review.

The IRB is charged with assessing the risk versus benefit for all human subject research conducted at Palmer College of Chiropractic. Only after the IRB approves a research protocol can that research be conducted. During the approval process, the IRB examines the potential risk, the potential benefits, and the scientific basis and methodology for the study, including its protocols and statistical methodology. Palmer’s IRB closely reviews research proposals and their accompanying informed consent documents to assure that proper research protocols and human protections are in place in the IRB approval process. In the years 2011-13, the IRB approved 20 scientific protocols through review of the full IRB, 50 through expedited review, and numerous others through exemption under criteria specified in 45CFR546. This recognizes that faculty educators also engage in scientific research, accounting for the higher number of approvals through expedited approval, reflecting that much educational research is minimal risk. All clinical research receives approval through full board review.

Animal Subject Research

The College Institutional Animal Care and Use Committee (IACUC) operates in similar fashion to the IRB, acting under the Animal Welfare Act (Public Law 89-544, 1966, as amended; P.L. 91-469 and P.L. 94-279, USC section 2131 et seq) and the Health Research Extension Act. As part of the requirements of this Act, the College has established an Animal Care and Use Committee (IACUC). Research on animal subjects is carried out under the regulations of the Federal Animal Welfare Act and the Public Health Service Policy on Humane Care and Use of Laboratory Animals. Palmer College, through its IACUC, reports annually to the Office of Laboratory Animal Welfare of NIH and the Animal and Plant Health Inspection Service of the U.S. Department of Agriculture.

Support Services

All research submitted to a funding agency receives additional review by the College Business Office, the Compliance Office, Human Resources and the specific campus president, as well as the Vice Chancellor for Research and Health Policy. Support and training to all non-research faculty members who wish to conduct research, engage in scholarship or enhance teaching is under the main framework of the Center for Teaching and Learning.

Sub-Component 2.E.2: Students are offered guidance in the ethical use of information resources.

The Palmer College Student Code of Ethics and Academic Policies offer guidance in the ethical use of information resources.

Technological advances in the dissemination of information have led to new challenges in higher education. To address these challenges, Palmer College’s Student Code of Ethics booklet provides information related to appropriate use of information. Students are provided training in the proper use of information resources as early as the first trimester. Courses such as Rights and Responsibility (Davenport Campus); and Foundations for Practice: Professional Responsibilities (Florida Campus), and Ethics and Jurisprudence (West Campus) expose students to copyright law as well as definitions of plagiarism. The Foundations of Evidence Based Clinical Practice (Davenport Campus), Introduction to Evidence Based Clinical Practice (Florida Campus), and Evidence Based Chiropractic I and II (West Campus) courses train students in the use of library information resources and cover social and legal issues of information use.

The College Academic Policies document contains policies on academic integrity. Students are
strongly encouraged to carefully read the entire Student Code of Ethics as published in the Student Handbook. Cheating, Plagiarism, or other acts of dishonesty and/or any other violations of Palmer’s Student Code of Ethics may result in the filing of a charge of misconduct under the Student Disciplinary Code as described in the Student Handbook. Sanctions up to and including suspension or dismissal from the College may be imposed upon students found to have violated the Code of Student Ethics.

Sub-Component: 2.E.3: The institution has and enforces policies on academic honesty and integrity.

Palmer College of Chiropractic adheres to academic misconduct standards related to cheating and plagiarism that is applicable to all constituents within the College, including students, faculty, staff, and administration.

Academic integrity is enforced by the College through the Student Ethics process by the Office of Adjudication. All Palmer students are introduced to this code during orientation. Davenport Campus students have additional exposure to guest lectures during their first trimester in the required Rights and Responsibilities course.

All syllabuses used in the College, at all levels of education contain the following Palmer Student Code of Ethics statement, which is supported by policies outlined in the Student Handbook.

“Students are expected to comply with Palmer’s Student Code of Ethics. Students are strongly encouraged to carefully read the entire Student Code of Ethics as published in the Student Handbook. Cheating, plagiarism, other acts of dishonesty and/or any other violation of Palmer’s Student Code of Ethics may result in the filing of a charge of misconduct under the Student Disciplinary Code as described in the Student Handbook."

"Students charged with misconduct will be assigned a grade of “Incomplete” until the charge(s) is concluded in accordance with the Student Disciplinary Code as describe in the Student Handbook. Sanctions up to and including denial of academic credit, suspension or dismissal from the College may be imposed upon students found to have violated the Code of Student Ethics."

The Student Code of Ethics is an institutional level policy applicable to all three College campuses; violations are aggregated across the three campuses, categorized, and tracked by the Office of Adjudication. Of the 263 total Student Ethics cases from 2009-2013, Academic Dishonesty accounts for 39.5%, while “Other” misconduct, such as misuse of College resources, harassment, disruption of teaching and learning, and failure to comply with sanctions and theft accounts for 33.8% of all student misconduct.

Ethics violations and consequent data trends are monitored in efforts to improve student adherence to the Student Code of Ethics. Violation tracking aids the Office of Adjudication in determining the areas requiring additional review. Students in the first trimester class, Rights and Responsibilities, on the Davenport campus receive two presentations from the Lead Adjudication Coordinator in which any areas highlighted by data collection are reviewed through a fictional case study. Further, identified issues are presented to the West and Florida campus students by the Directors of Student Services and Human Resources manager.

The Office of Adjudication is the centralized complaint repository regarding violations of the Student Code of Ethics. The Office of Adjudication administers fair and consistent policies, rules, processes, practices, and procedures to prevent, report, investigate, and resolve complaints regarding student ethical misconduct. The Office of Adjudication utilizes informal and formal hearing processes. The
informal process affords an opportunity for the filer and respondent to resolve the charges administratively during a meeting that is overseen by the Judicial Coordinator. The Coordinator determines if a charge can be disposed of informally on a basis acceptable to the College. Additionally, the filer and respondent have to agree to attempt to resolve the charges informally. Charges of misconduct are resolved utilizing the formal hearing process for those charges that are deemed unacceptable for the informal process, in situations in which no resolution was reached by the parties through an informal process, or in cases that a formal hearing was requested by either the filer and/or respondent. Of the total cases tracked by the Office of Adjudication, 60.84% (160) of cases were resolved informally and 39.16% (103) of cases were resolved formally.

Potential sanctions for students that have been found in violation of misconduct are listed in the Student Code of Ethics. The goal of the College regarding sanctions is to impose a sanction that will educate the student regarding his or her misconduct to include how the misconduct affects their current education as well as the potential effects of their misconduct had it occurred as a practicing chiropractor.

Upon completion of the Student Ethics process students are provided an opportunity to complete an adjudication process survey. This purpose of the survey is to gain information about the student’s experience and satisfaction with the Office of Adjudication in the administration of the student ethics process. Overall student satisfaction with the adjudication process is high. Given the high satisfaction rates major revisions to the adjudication process have not been warranted to-date. The Office of Adjudication has made only minor procedural changes to streamline the process.

The College does not currently have a formalized Academic Integrity program but rather communicates expectations for academic honesty in the classrooms, during the Rights and Responsibilities course, New Student Orientation, and through the Student Code of Ethics.
2.S - Criterion 2 - Summary

The institution acts with integrity; its conduct is ethical and responsible.

Summary

Ethical and responsible conduct is an integral part of all operations at Palmer College of Chiropractic. Admissions and marketing staff complete annual trainings to ensure they provide prospective students and the general public with accurate information that enables them to make informed decisions. Scholarship and research are monitored by a series of policies in the Research Policy Handbook, and by an Institutional Research Board, while still allowing for academic freedom. Students are expected to conduct themselves in an ethical manner guided by the Palmer College Student Code of Ethics, which is published in the Student Handbook. Students also learn about professional ethics through courses, mentorship, and internship handbooks. Through a series of policies, procedures, and trainings, including but not limited to the aforementioned examples, the College ensures that students and employees at all levels conduct themselves with integrity in their dealings with the general public, patients, the health care community, and each other.