

# 202-2023 REPORT

FROM THE OMBUDS OFFICE

# TABLE OF CONTENTS

A MESSAGE FROM THE OMBUDS	. 3
FACULTY CONCERNS BY THE NUMBERS	4
THE OMBUDS OFFICE EFFECT	5
FACULTY UTILIZATION OF THE OMBUDS OFFICE	9
ADDENDUM A	11

# A MESSAGE FROM THE OMBUDS

Faculty have once again used the Ombuds Office in record numbers this academic year, vastly outpacing the concerns raised in prior years. Some might conclude that this is because their problems are increasing. Others could deduce that faculty are acclimating to a world where conflict seems to increase exponentially around us. Many would fear that it means chaos and complaints.

However, based on my experience, I suggest it is something altogether different. Our faculty are utilizing the Ombuds Office more because they have determined that it will help them. And it has, even apart from the resolutions they achieve. They are learning techniques to manage conflict. They are advocating for their careers, and themselves. They are strategizing and weighing options, reframing issues through the lens of achieving their goals. They are practicing how to write and speak through discomfort. They are learning about institutional procedures and practices, and sometimes, about how to change them. They are setting boundaries. They are exploring their expectations of others, of their careers and of themselves. They are accepting that conflict is manageable. They are de-escalating their concerns. They are searching for what is fair. They are navigating their path through adversity. They are growing.

I am inspired every day by the courage of these faculty. It is my great privilege to accompany them on their journey of self-discovery in conflict management. Our University administrators equally awe me with their humility, their capacity for thoughtfulness, and their eagerness to continue building this amazing institution, which unites us all.

With gratitude,

Megan P. Willoughby, Esq.

Faculty Ombuds

### **TESTIMONIALS**

"The Ombuds Office was incredibly helpful.

I would strongly recommend colleagues using this resource."

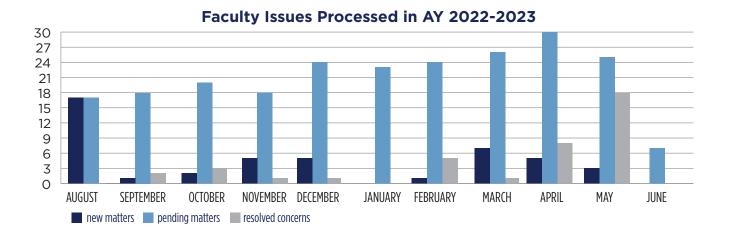
"I cannot speak highly enough of my experience working with Meg. She listened sympathetically to the account I gave her of my problem, analyzed the issues it raised forensically, and provided wise counsel about the possible action I could take and the redress I could seek. She was unfailingly generous with her time, attending several meetings on Zoom and in person over many

months. Not only was my issue resolved satisfactorily, but I also learned a huge amount from her about how to navigate this institution in the future. I felt supported and ultimately empowered by the whole process."

"The Ombuds office found and provided me with resources for a colleague that was undergoing some difficult times. It was helpful to have a means to reach out to the office for advice without sharing details the colleague may have not wanted to share."

# FACULTY CONCERNS BY THE NUMBERS

Each faculty matter is the story of what occurred, as perceived by faculty. None results in a finding, judgment, or determination about its veracity or validity by the Ombuds. During the academic year, from August 2022 through May 2023, faculty brought 46 matters to the Ombuds Office. This is a 15% increase from the number of matters raised in 2021-22 (40). In addition to the 13 matters that remained pending from the 2021-22 academic year, faculty-initiated another 17 concerns in the fall semester and 16 in the spring semester of the 2022-23 academic year. This varies from the distribution of matters raised during the 2021-2022 academic year, when there were half as many matters raised in the fall semester as in the spring.



Thirty-nine matters reached a successful resolution, while seven remain pending for the upcoming 2023-24 academic year. A successful resolution of a matter represents a conclusion of the issue raised with the Ombuds Office. While there is not a typical resolution for faculty, most include an enhanced understanding of University policy and procedures, improved relationships with colleagues, and a renewed sense of empowerment about their work and workplace. Pending matters include faculty plans in process, unmade decisions, or complexities that have not been fully sorted out.

All faculty matters raised this year involved multiple concerns: within those 46 matters, there were 380 concerns. The number of concerns raised in the past three academic years has grown significantly: from 115 in 2020-21 to 233 in 2021-22, to 380 in 2022-23. On average, there were eight concerns initiated per matter this year. All faculty raised at least three concerns. Half had eight or fewer concerns, and the other half had nine to 12 concerns. In 2021-22, faculty raised an average of six concerns per matter, and they raised an average of three concerns per matter in 2020-21.

This increase in concerns is due, in part, to the intensity of consultations yielding more robust results. Twelve faculty maintained year-long professional coaching relationships with the Ombuds Office in which they raised successive, unrelated concerns. The Ombuds Office is also becoming more well-known across the University, encouraging wider and deeper use by faculty. Over 70% of faculty who consulted with the Ombuds this year did so for the first time.

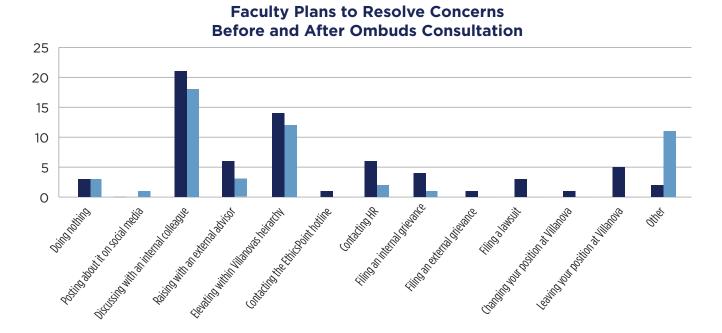
### **TESTIMONIALS**

"The Ombuds Office helped me deal with a situation in a way that was professional. It clarified the gap between policy and informal practice in a way that allowed me to communicate my grievance in a way that allowed me to keep doing my job and learn about how the institution works."

"I had never spoken with an Ombudsman in my career until recently. Meg Willoughby was so incredibly kind, easy to speak with, not biased, professional and most of all, highly effective!! I was ready to leave Villanova until I met with our Ombuds."

# THE OMBUDS OFFICE EFFECT

Prior to consulting with the Ombuds Office, faculty were considering taking formal actions to resolve their conflicts. After working with the Ombuds Office, faculty drastically de-escalated their action plans. In feedback provided to the Ombuds Office, three had planned to file a lawsuit prior to consultation; significantly, none planned to afterward. Even more significantly, five had planned to leave Villanova prior to consulting, but none planned to afterward. Four faculty had planned to file an internal grievance prior to consulting with the Ombuds, but only one planned to afterward. One had planned to file an external grievance prior to consulting, but none planned to do so afterward. Another one had planned to raise an EthicsPoint complaint, but none planned to do so afterward.



After their consultations with the Ombuds, three fewer faculty planned to discuss the matters with an internal colleague, another three fewer faculty planned to raise their concerns with an external advisor, and two fewer faculty planned to elevate the matters within Villanova's hierarchy. Four fewer faculty planned to contact Human Resources after their consultations.

Instead, they planned to take creative steps that they strategized in consultation with the Ombuds to resolve their conflicts. Their plans were unique to the details of their individual circumstances. Significantly, they occurred outside of formal resolution channels.

### **TESTIMONIALS**

before after

"Ombuds Meg Willoughby does an outstanding job in listening, and diligently providing options in a caring, comforting, and healing way."

"The Ombudsperson provided perspective, support, and a kind ear when I truly needed it. The Ombudsperson validated me, my concerns, and my reactions. I didn't feel like I was on an island anymore, and the entire experience helped me to move forward. This resource is truly valuable. I remember stating "I never thought I would need a service like this", but I believe that's why it's so important that this resource exists on campus. Specifically, Meg is a truly supportive and trusting person to have in this office and I am overly grateful to have had her as my support person during a difficult experience."

# **Distribution of Faculty Concerns**

The 380 concerns raised in 2022-23 had the following distribution by subject area and scope, as analyzed by the Ombuds Office.



Thus, most issues involved employment concerns (82%), and most were of an individual nature (67%). Systemic concerns decreased significantly this year: from half of all concerns raised in 2021-22 to only a third of the concerns raised in 2022-23. For two years in a row, there has been a double-digit decrease in the number of systemic issues raised, from 64% in 2020-21 to 54% in 2021-22, and down to 33% in 2022-23. This is notable as systemic issues affect multiple individuals in a widespread manner, so their reduction signifies a compounded improvement across the University.



A small percentage of overall concerns implicated bias this year (17%), although this was larger than the slim percentage raised in 2021-22 (10%). Most concerns raised were relational (59%); a sizable portion was procedural in nature. Considered together, most of the relational concerns did not raise issues of bias.



Most concerns raised in 2022-23 were intradisciplinary (57%), while many were interdisciplinary (43%). Only a third arose at the departmental level (37%), as compared to half originating there in 2021-22. Many more emerged at the University level, 43% as compared to 27% last year, and college concerns remained consistent at 20% from year to year. Viewed together, most issues arose at and within the University-level infrastructure.

# **Classification through Uniform Reporting Categories**

The International Ombuds Association (IOA) developed a classification system specifically designed for Ombuds to categorize concerns presented to them. The Uniform Reporting Categories (URC) has nine broad categories:

- 1) Compensation and Benefits
- 2) Evaluative Relationships
- 3) Peer and Colleague Relationships
- 4) Career Progression and Development
- 5) Legal, Regulatory, Financial and Compliance
- 6) Safety, Health and Physical Environment
- 7) Services/Administrative Issues
- 8) Organizational, Strategic and Mission Related
- 9) Values, Ethics and Standards.

An explanation of each category and its subcategories is contained in the Addendum.

In order to promote uniformity and ensure anonymity, Villanova's Ombuds Office categorized faculty concerns utilizing the URC.

# Faculty Concerns by Uniform Reporting Category in 2022-2023



2. Evaluative Relationships

3. Peer and Colleague Relationships

4. Career Progression and Development

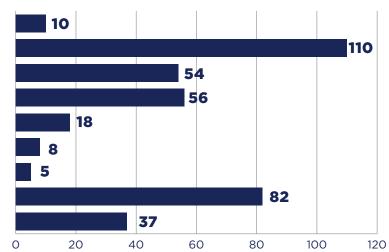
5. Legal, Regulatory, Financial and Compliance

6. Safety, Health and Physical Environment

7. Services/Administrative Issues

8. Organizational, Strategic and Mission Related

9. Values, Ethics and Standards



The Evaluative Relationships category represented the most concerns this year (110), as it did in 2021-22. The other top categories of concerns this year were Organizational, Strategic, and Mission Related (82), Career Progression and Development (56), and Peer and Colleague Relationships (54). Of those, the Evaluative Relationships and Organizational, Strategic, and Mission Related categories were also in the top four concerns in the prior academic year, 2021-22. It is notable that there were modest numbers of concerns raised this year in the Safety, Health and Physical Environment category (8), as well as Services/Administrative Issues (5), as compared to 2021-22; those categories had no concerns in 2020-2021.

Faculty who provided confidential feedback to the Ombuds Office also categorized their concerns within the URC framework. They ranked Peer and Colleague Relationships as the most problematic (18), and they also ranked Values, Ethics and Standards (13) and Career Progression and Development (10) as categories with the most concerns. Of those three categories, only Values, Ethics and Standards was not ranked as a top concern by the Ombuds Office.

### **Self-Identification of Faculty Concerns by URC in 2022-2023**



Most responding faculty indicated that their concerns did not implicate bias. Some stated that it existed in ways that were nuanced, like academic elitism. Others indicated that they experienced it based on protected categories in decisions, as well as through comments and behavior.

### **TESTIMONIALS**

"I was extremely grateful for the advice and insight. The tone and tenor of the conversation was also reassuring and helpful."

"First and foremost, I felt heard. The Ombudsman did a fantastic job of asking important questions to gain context regarding an incident of major concern. Equally important, actionable steps were put forth that enabled me to address an incident of racial bias. While the proposed steps did require me to step outside my comfort zone, they were an important way to let others know that racism would not be tolerated. In my opinion, this approach prevented the incident from escalating and hopefully provided a learning opportunity for others."

"Meg has continued to be an invaluable resource as I navigate various challenges."

"Meg provides invaluable guidance to issues that may arise through her professional expertise as an attorney, conflict resolution skills, and active listening. She enables faculty to understand the issues at hand, weigh several options, and view these options in light of University policies. She is a tremendous asset to the University."

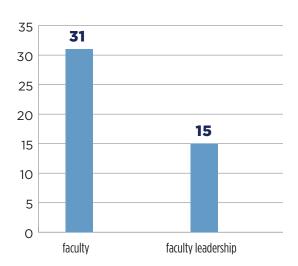
# FACULTY UTILIZATION OF THE OMBUDS OFFICE

Faculty from almost all University colleges utilized the Ombuds Office this year. Of those faculty, more than half were not eligible for tenure (24), while another seven were on the tenure track. The remaining 15 were tenured. Over a third (15) held faculty leadership positions.

# Position of Faculty Utilizing Ombuds Services

# 25 20 15 10 7 5 0 tenured tenure track non-tenure track

# Leadership Status of Faculty Utilizing Ombuds Services

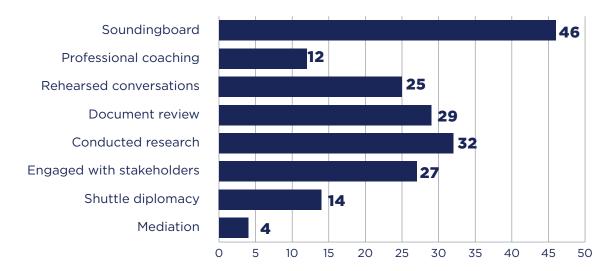


The Ombuds Office conducted consultations with all faculty, either in person or through online platforms and telephone. Each matter began with an initial consultation, during which faculty discussed their concerns. After probing to identify all important information, they considered options, weighing the risks and rewards associated with each, and then developed a plan to address their concerns. This generally resulted in them directing the Ombuds to take action: rehearsing difficult conversations with faculty, reviewing and commenting on their documents, researching Villanova's policy or practice on an issue, making inquiries to stakeholders while keeping the identity of the faculty anonymous (unless specifically authorized by faculty to provide context or identity), relaying messages between faculty and stakeholders (again, either anonymously or as authorized by faculty), and facilitating mediations. The Ombuds Office continued to consult with faculty throughout the implementation of their plans, although occasionally faculty provided the Ombuds Office with information for it to proceed on alone. Once faculty achieved desired outcomes, their matters were closed. For others, they continued in a professional coaching relationship and consulted with the Ombuds on successive concerns throughout the duration of the academic year. The Ombuds Office continues to monitor the effectiveness of all resolutions and to offer support to faculty and assistance as needed.

Specifically, the Ombuds Office provided the following services in 2022-2023 at the direction of faculty:

- served as a sounding board in all 46 matters,
- engaged in professional coaching in 12 matters.
- rehearsed conversations in 25 matters
- in 29 of the matters, reviewed and commented on documents,
- conducted policy and practice research for faculty in 32 matters.
- met with multiple stakeholders in 27 matters,
- in 14 matters, conducted shuttle diplomacy, and
- · facilitated four mediations between parties.

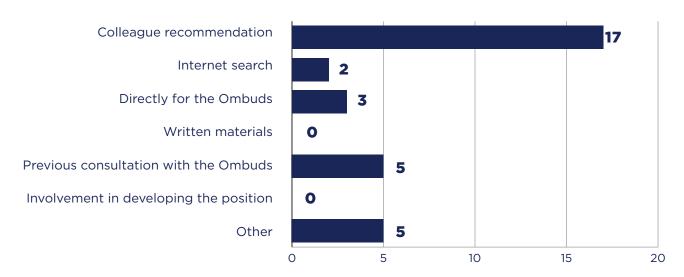
# **Ombuds Services Provided to Faculty in 2022-2023**



The timeframe for resolution ranged from one day to 274 days, with the median of 69, and an average of 112. Over half (55%) of the matters resolved in under 90 days. Another 17% resolved in under 180 days. The remainder, 28%, were engaged for the entirety of the academic year for professional coaching.

In their feedback, faculty overwhelmingly reported learning of the Ombuds Office through a colleague. The Ombuds Office also conducted outreach to raise awareness of this resource, including presenting information in meetings and orientations. It also presented a session on conflict resolution for Villanova's annual Freedom School, available to faculty, staff and students. The Ombuds webpage contains the principles of the Ombuds Office and is accessible from the web pages of Faculty Congress and the Office of the Provost. The Ombuds Office also consulted with DEI and VISIBLE subgroups, and it assisted both Faculty Congress and the Provost's Office with projects, as requested.

# **Faculty Awareness of the Ombuds Office**



At the close of the academic year, most responding faculty highly agreed that the Ombuds assisted them with identifying their concerns, developing options to address them, implementing a plan to resolve their concerns, and following up to ensure that their plan had been effective. Most indicated that the Ombuds Office improved their situation and resolved their concerns. For those who still have concerns pending, most reported making progress toward resolution. They widely indicated that they would utilize the Ombuds Office to address a concern that arises in the future. All respondents reported that they planned to recommend the resource to their colleagues who have concerns, with some stating that they had already done so. All faculty reported understanding how the Ombuds Office operated, and they resoundingly reported that they experienced the process to be informal, impartial, independent and confidential.

# ADDENDUM A

As addressed above, the International Ombuds Association developed the Uniform Reporting Category, a classification system that Ombuds utilize to categorize concerns presented to them. An explanation of each of the nine broad categories and their subcategories is contained in the document below.



# INTERNATIONAL OMBUDSMAN ASSOCIATION Uniform Reporting Categories

# 1. Compensation & Benefits

Questions, concerns, issues or inquiries about the equity, appropriateness and competitiveness of employee compensation, benefits and other benefit programs.

- **1.a Compensation** (rate of pay, salary amount, job salary classification/level)
- Payroll (administration of pay, check wrong or delayed)
- 1.c Benefits (decisions related to medical, dental, life, vacation/sick leave, education, worker's compensation insurance, etc.)
- **1.d Retirement, Pension** (eligibility, calculation of amount, retirement pension benefits)
- Other (any other employee compensation or benefit not described by the above subcategories)

# 2. Evaluative Relationships

Questions, concerns, issues or inquiries arising between people in evaluative relationships (i.e. supervisor-employee, faculty-student.)

- 2.a Priorities, Values, Beliefs (differences about what should be considered important – or most important – often rooted in ethical or moral beliefs)
- 2.b Respect/Treatment (demonstrations of inappropriate regard for people, not listening, rudeness, crudeness, etc.)
- 2.c Trust/Integrity (suspicion that others are not being honest, whether or to what extent one wishes to be honest, etc.)
- 2.d Reputation (possible impact of rumors and/or gossip about professional or personal matters)
- **2.e Communication** (quality and/or quantity of communication)
- **2.f Bullying, Mobbing** (abusive, threatening, and/or coercive behaviors)
- 2.g Diversity-Related (comments or behaviors perceived to be insensitive, offensive, or intolerant on the basis of an identity-related difference such as race, gender, nationality, sexual orientation)
- **2.h Retaliation** (punitive behaviors for previous actions or comments, whistleblower)
- **2.i Physical Violence** (actual or threats of bodily harm to another)
- Assignments/Schedules (appropriateness or fairness of tasks, expected volume of work)
- 2.k Feedback (feedback or recognition given, or responses to feedback received)
- 2.1 Consultation (requests for help in dealing with issues between two or more individuals they supervise/teach or with other unusual situations in evaluative relationships)

2.m	Performance Appraisal/Grading
	(job/academic performance in formal or
	informal evaluation)

- Departmental Climate (prevailing behaviors, norms, or attitudes within a department for which supervisors or faculty have responsibility.)
- Supervisory Effectiveness (management of department or classroom, failure to address issues)
- 2.p Insubordination (refusal to do what is asked)
- 2.q Discipline (appropriateness, timeliness, requirements, alternatives, or options for responding)
- 2.r Equity of Treatment (favoritism, one or more individuals receive preferential treatment)
- 2.s Other (any other evaluative relationship not described by the above sub-categories)

### 3. Peer and Colleague Relationships

Questions, concerns, issues or inquiries involving peers or colleagues who do not have a supervisory—employee or student—professor relationship (e.g., two staff members within the same department or conflict involving members of a student organization.)

- 3.a Priorities, Values, Beliefs (differences about what should be considered important – or most important – often rooted in ethical or moral beliefs)
- 3.b Respect/Treatment (demonstrations of inappropriate regard for people, not listening, rudeness, crudeness, etc.)
- 3.c Trust/Integrity (suspicion that others are not being honest, whether or to what extent one wishes to be honest, etc.)
- **3.d Reputation** (possible impact of rumors and/or gossip about professional or personal matters)
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- 3.h Retaliation (punitive behaviors for previous actions or comments, whistleblower)
- **3.i** Physical Violence (actual or threats of bodily harm to another)
- **3.j Other** (any peer or colleague relationship not described by the above sub-categories)

# 4. Career Progression and Development

Questions, concerns, issues or inquiries about administrative processes and decisions regarding entering and leaving a job, what it entails, (i.e., recruitment, nature and place of assignment, job security, and separation.)

- 4.a Job Application/Selection and Recruitment Processes (recruitment and selection processes, facilitation of job applications, short-listing and criteria for selection, disputed decisions linked to recruitment and selection)
- 4.b Job Classification and Description (changes or disagreements over requirements of assignment, appropriate tasks)
- 4.c Involuntary Transfer/Change of Assignment (notice, selection and special dislocation rights/benefits, removal from prior duties, unrequested change of work tasks)
- 4.d Tenure/Position Security/Ambiguity (security of position or contract, provision of secure contractual categories)
- **4.e Career Progression** (promotion, reappointment, or tenure)
- 4.f Rotation and Duration of Assignment (non-completion or over-extension of assignments in specific settings/countries, lack of access or involuntary transfer to specific roles/assignments, requests for transfer to other places/duties/roles)
- 4.g Resignation (concerns about whether or how to voluntarily terminate employment or how such a decision might be communicated appropriately)
- 4.h Termination/Non-Renewal (end of contract, non-renewal of contract, disputed permanent separation from organization)
- 4.i Re-employment of Former or Retired Staff (loss of competitive advantages associated with re-hiring retired staff, favoritism)
- 4.j Position Elimination (elimination or abolition of an individual's position)
- 4.k Career Development, Coaching, Mentoring (classroom, on-the-job, and varied assignments as training and developmental opportunities)

<b>4.</b> I	Other (any other issues linked to recruitment,
	assignment, job security or separation not
	described by the above sub-categories)

# 5.Legal, Regulatory, Financial and Compliance

Questions, concerns, issues or inquiries that may create a legal risk (financial, sanction etc.) for the organization or its members if not addressed, including issues related to waste, fraud or abuse.

- 5.a Criminal Activity (threats or crimes planned, observed, or experienced, fraud)
- 5.b Business and Financial Practices (inappropriate actions that abuse or waste organizational finances, facilities or equipment)
- 5.c Harassment (unwelcome physical, verbal, written, e-mail, audio, video psychological or sexual conduct that creates a hostile or intimidating environment)
- 5.d Discrimination (different treatment compared with others or exclusion from some benefit on the basis of, for example, gender, race, age, national origin, religion, etc.[being part of an Equal Employment Opportunity protected category – applies in the U.S.])
- 5.e Disability, Temporary or Permanent,
  Reasonable Accommodation (extra time on
  exams, provision of assistive technology,
  interpreters, or Braille materials including
  questions on policies, etc. for people with
  disabilities)
- **5.f** Accessibility (removal of physical barriers, providing ramps, elevators, etc.)
- **5.g** Intellectual Property Rights (e.g., copyright and patent infringement)
- 5.h Privacy and Security of Information (release or access to individual or organizational private or confidential information)
- Property Damage (personal property damage, liabilities)
- 5.j Other (any other legal, financial and compliance issue not described by the above sub-categories)

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# 6. Safety, Health, and Physical Environment

Questions, concerns, issues or inquiries about Safety, Health and Infrastructure-related issues.

- 6.a Safety (physical safety, injury, medical evacuation, meeting federal and state requirements for training and equipment)
- 6.b Physical Working/Living Conditions (temperature, odors, noise, available space, lighting, etc)
- **6.c Ergonomics** (proper set-up of workstation affecting physical functioning)
- **6.d Cleanliness** (sanitary conditions and facilities to prevent the spread of disease)
- 6.e Security (adequate lighting in parking lots, metal detectors, guards, limited access to building by outsiders, anti-terrorists measures (not for classifying "compromise of classified or top secret" information)

- 6.f Telework/Flexplace (ability to work from home or other location because of business or personal need, e.g., in case of man-made or natural emergency)
- 6.g Safety Equipment (access to/use of safety equipment as well as access to or use of safety equipment, e.g., fire extinguisher)
- **6.h** Environmental Policies (policies not being followed, being unfair ineffective, cumbersome)
- 6.i Work Related Stress and Work–Life Balance (Post-Traumatic Stress, Critical Incident Response, internal/external stress, e.g. divorce, shooting, caring for sick, injured)
- 6.j Other (any safety, health, or physical environment issue not described by the above sub-categories)

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### 7. Services/Administrative Issues

Questions, concerns, issues or inquiries about services or administrative offices including from external parties.

- 7.a Quality of Services (how well services were provided, accuracy or thoroughness of information, competence, etc.)
- 7.b Responsiveness/Timeliness (time involved in getting a response or return call or about the time for a complete response to be provided)
- 7.c Administrative Decisions and Interpretation/Application of Rules (impact of non-disciplinary decisions, decisions about requests for administrative and academic services, e.g., exceptions to policy deadlines or limits, refund requests, appeals of library or parking fines, application for financial aid, etc.)
- 7.d Behavior of Service Provider(s) (how an administrator or staff member spoke to or dealt with a constituent, customer, or client, e.g., rude, inattentive, or impatient)
- 7.e Other (any services or administrative issue not described by the above sub-categories)

# 8. Organizational, Strategic, and Mission Related

Questions, concerns, issues or inquiries that relate to the whole or some part of an organization.

- 8.a Strategic and Mission-Related/ Strategic and Technical Management (principles, decisions and actions related to where and how the organization is moving)
- 8.b Leadership and Management (quality/capacity of management and/or management/leadership decisions, suggested training, reassignments and reorganizations)

- 8.c Use of Positional Power/Authority (lack or abuse of power provided by individual's position)
- 8.d Communication (content, style, timing, effects and amount of organizational and leader's communication, quality of communication about strategic issues)
- 8.e Restructuring and Relocation (issues related to broad scope planned or actual restructuring and/or relocation affecting the whole or major divisions of an organization, e.g. downsizing, off shoring, outsourcing)
- 8.f Organizational Climate (issues related to organizational morale and/or capacity for functioning)
- 8.g Change Management (making, responding or adapting to organizational changes, quality of leadership in facilitating organizational change)
- 8.h Priority Setting and/or Funding (disputes about setting organizational/departmental priorities and/or allocation of funding within programs)
- 8.i Data, Methodology, Interpretation of Results (scientific disputes about the conduct, outcomes and interpretation of studies and resulting data for policy)
- 8.j Interdepartment/Interorganization Work/Territory (disputes about which department/organization should be doing what/taking the lead)

8.k	<b>Other</b> (any organizational issue not described by the above sub-categories)

### 9. Values, Ethics, and Standards

Questions, concerns, issues or inquiries about the fairness of organizational values, ethics, and/or standards, the application of related policies and/or procedures, or the need for creation or revision of policies, and/or standards.

- 9.a Standards of Conduct (fairness, applicability or lack of behavioral guidelines and/or Codes of Conduct, e.g., Academic Honesty, plagiarism, Code of Conduct, conflict of interest)
- Values and Culture (questions, concerns or issues about the values or culture of the organization)
- Scientific Conduct/Integrity (scientific or research misconduct or misdemeanors, e.g., authorship; falsification of results)
- 9.d Policies and Procedures NOT Covered in Broad Categories 1 thru 8 (fairness or lack of policy or the application of the policy, policy not followed, or needs revision, e.g., appropriate dress, use of internet or cell phones)
  9.a Other (Other policy, procedure, other or

.0	standards issues not described in the above sub-categories)