

INSTITUTIONAL POLICY: 1010

Institutional Mission Statement

Category: Mission and Governance
Subject: Institutional Mission Statement
Effective Date: March 7, 2025
Updated: N/A

Authority

COCA 1.1.4

Policy

The mission of the Niazee College of Osteopathic Medicine (NCOM) is to:

- Attract, educate, and nurture osteopathic medical students across a cross section of society.
- Graduate physicians that take pride in the osteopathic profession and deliver compassion, understanding, and high-quality whole person healthcare to patients and communities across our society.
- Develop world-class osteopathic physicians that deliver the best of traditional and modern osteopathic medicine with a strong sense of fundamental humanitarian values and high standards of integrity and professionalism.
- Identify and ignite pioneering research enhancing osteopathic medicine and beyond.



NOCM PROCEDURE FOR INSTITUTIONAL POLICY B1010: INSTITUTIONAL MISSION STATEMENT

1. PURPOSE

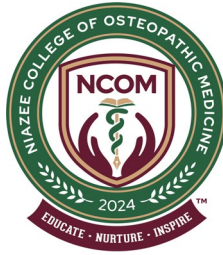
The purpose of this procedure is to provide specific guidance to assist the Niazee College of Osteopathic Medicine (NCOM) with implementation of and ensure institutional compliance with NCOM's Institutional policy B1010: Institutional Mission Statement

2. APPLICABILITY

- 2.1 This procedure applies to institutional members as it relates to the institutional mission statement.
- 2.2 NCOM reserves the right to amend this procedure at any time, as necessary or appropriate

3. GENERAL PROVISIONS

- 3.1 NCOM will develop and maintain a mission statement that explains the overall purpose of its program and serves as a guide for program planning and assessment.
- 3.2 The institutional mission statement must be reviewed at least once every five (5) years.
- 3.3 The institutional mission statement should be revised, as appropriate, in consideration of the college's growth and continued development. Input from staff, faculty and students must be considered in the review and revision of the institutional mission statement.



INSTITUTIONAL POLICY B1011

Vision Statement

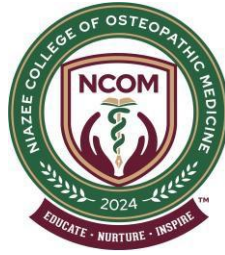
Category:	Mission and Governance
Subject:	Vision Statement
Effective Date:	March 7, 2025
Last Revision Date:	N/A

Authority

COCA 1.1.2

Policy

NCOM aspires to be a transformational institution of osteopathic medicine that educates, nurtures and inspires tomorrow's community of compassionate, structurally competent and care-centered osteopathic physicians dedicated to serving patients and communities across society.



INSTITUTIONAL POLICY B1012

Core Values

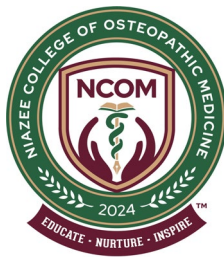
Category: Mission and Governance
Subject: Core Values
Effective Date: March 7, 2025
Last Revision Date: N/A

Authority

COCA 1.1.2

General Core Values to the NCOM Community

- Compassionate and Whole Person Approach
- Excellence and Accountability
- Community Representation and Accessibility
- Selfless & Patient-first Mentality based on Sensitivity and Structural Competency
- Ethics, Professionalism, and Humanitarian Values
- Research, Innovation, and Integration



NCOM INSTITUTIONAL POLICY: B1030

Discrimination and Harassment Prohibited

Category	Mission and Governance
Subject:	Discrimination and Harassment in the Workplace and Educational Environment Prohibited
Effective Date	January 3, 2025
Updated:	March 11, 2025

1. Authority

COCA 1.4.1

2. Purpose and Scope

2.1 This policy sets forth how discrimination, harassment, stalking, certain consensual relationships, and retaliation will be addressed by the Niazee College of Osteopathic Medicine (NCOM)

2.2 This policy applies to conduct that does not fall under Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 (“Title IX”). For conduct falling under Title IX, see Institutional Policy GA-10: Title IX, Sexual Harassment and Discrimination.

2.3 The prohibitions contained in this policy apply to other conduct for which jurisdiction under Title IX does not apply that occurs on NCOM premises or in connection with a NCOM education program or activity; off-campus conduct that unreasonably interferes with the educational or orderly operation of the NCOM community, its mission, or its objectives as determined by a reasonable person; any off-campus conduct that, in light of all of the facts and circumstances, would endanger the health and safety of the NCOM community. As a result, any individual found to have committed these acts against another is subject to appropriate disciplinary action.

3. Nondiscrimination Policy

3.1 NCOM is committed to fostering a diverse and inclusive culture by promoting diversity, inclusion, equality, intercultural and intercommunity outreach. Accordingly, NCOM does not discriminate on the basis of race, ethnicity, color, religion, sex (including pregnancy), gender,

gender identity, sexual orientation, national origin, age, marital status, veteran or military status, disability, genetic information, or other category that is protected under federal, state, or local anti-discrimination laws, in the administration of any of its education programs or activities, or with respect to admission or employment.

3.2 NCOM prohibits discrimination, harassment, stalking, and retaliation as defined in this policy (collectively referred to as “prohibited conduct”) by or against any member of the NCOM community.

3.3 NCOM employees and students are responsible for maintaining a discrimination and harassment free work and educational environment. The Office of Human Resources and the Office of Student Affairs are responsible for the promotion and implementation of this Policy and respond to all complaints of violations of this policy.

4. Definitions

4.1 “Consensual Relationship” means a mutually acceptable romantic, dating, or sexual relationship between individuals.

4.2 “Discrimination” means conduct that is based upon an individual’s race, ethnicity, color, religion, sex (including pregnancy), gender, gender identity, sexual orientation, national origin, age, marital status, veteran or military status, disability, genetic information, or other category that is protected under federal, state, or local anti-discrimination laws and excludes an individual from participation, denies the individual the benefits of, treats the individual differently or otherwise adversely affects a term of condition of an individual’s employment, education, or participation in a NCOM program or activity. This includes failing to provide reasonable accommodation, consistent with state and federal law, to persons with disabilities. It does not, however, include programs or activities specifically exempt by law. *See, e.g.,* 20 U.S.C. § 1681(a) (2015).

4.3 “Education Program or Activity” includes, for purposes of this policy, locations, events, or circumstances over which NCOM exercises substantial control over both the respondent, as defined below, and the context in which the prohibited conduct occurs, and also, includes any building owned or controlled by a student organization officially recognized by NCOM.

4.4 “Harassment” means conduct that creates a hostile environment, as defined below, and is based upon an individual’s race, ethnicity, color, religion, sex (including pregnancy), gender, gender identity, sexual orientation, national origin, age, marital status, veteran or military status, disability, genetic information, or other category that is protected under federal, state, or local anti-discrimination laws. Harassment may take Various forms, including name-calling, graphic or written statements (including social media, text messages, e-mail, or other similar forms), or other conduct that may be physically threatening, harmful, or humiliating. Harassment does not necessarily have to include intent to harm, be directed at a specific target, or involve repeated incidents.

4.5 “Hostile Environment” means a situation where an individual is subjected to any conduct based on the reasons set forth in Section 4.4 above and that conduct is sufficiently severe or pervasive, or so objectively offensive, to unreasonably interfere with an individual’s educational experience, work or academic performance or deny or limit the individual’s ability to participate in or benefit from NCOM’s programs, services, opportunities, or activities.

4.5.1 A hostile environment can be created by anyone involved in a NCOM education program or activity (e.g., employees, students, volunteers, vendors, and visitors). Mere offensiveness is not enough to create a hostile environment. Although repeated incidents increase the likelihood that harassment has occurred and has created a hostile environment, a serious incident, even if isolated, can be sufficient to create a hostile environment.

4.5.2 In determining whether harassment has created a hostile environment, consideration will be made not only as to whether the conduct was unwelcome to the person who feels harassed, but also whether a reasonable person in a similar situation would have perceived the conduct as sufficiently severe or pervasive, or objectively offensive. Also, the following factors will be considered:

- (i) The degree to which the conduct affected one or more student’s education or individual’s employment;
- (ii) The nature, scope, frequency, duration, and location of the incident or incidents;
- (iii) The identity, number, and relationships of persons involved; and
- (iv) The nature of higher education, and specifically medical education.

4.6 “Member of the NCOM Community,” for purposes of this policy, means an individual engaged in any NCOM education activity or program, whether on or off campus, or any individual lawfully on NCOM or NCOM affiliate property, including, but not limited to, any person who is an employee, student, volunteer, vendor, or visitor.

4.7 “Respondent” means, for purposes of this policy, an individual who has been reported to be the perpetrator of conduct prohibited by Section 3 above. Any “individual” can be a respondent, whether such individual is an employee, student, or other person with or without any affiliation with NCOM.

4.8 “Stalking” means:

4.8.1 engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- (i) Fear for the person’s safety or the safety of others; or
- (ii) Suffer substantial emotional distress.

4.8.2 For the purposes of this definition:

- (i) “Course of conduct” means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person’s property.
- (ii) “Reasonable person” means an individual with an ordinary degree of reason, prudence, care foresight, or intelligence under similar circumstances and with similar identities to the victim.
- (iii) “Substantial emotional distress” means significant mental suffering or anguish that may, but not necessarily, require medical or other professional treatment or counseling.

5. Consequences and Corrective Action

5.1 Violators of this policy are subject to appropriate disciplinary action that may include but not be limited to sanctions such as warning, suspension, or termination of employment of an employee, suspension or expulsion of a student, or other action depending on the circumstances.

5.2 Violations of this policy will be addressed through applicable NCOM policies and procedures, including but not limited to the Employee Handbook, Faculty Handbook, Student Handbook, Institutional Policy D 7 0 0 0 : Employees, Institutional Policy D 7 0 0 1 : Faculty, and Institutional Policy D5000: Academic and Professional Standards.

5.3 Prohibited conduct that constitutes a criminal law violation will be referred to the appropriate authorities for prosecution.

5.4 Although certain conduct may not violate this policy, it may still be prohibited by NCOM under a different policy or standard of behavior. Accordingly, in such cases, NCOM reserves the ability to take any necessary action.

6. Consensual Relationships

6.1 Although consensual relationships are within the purview of individual privacy, those engaging in such relationships that occur between persons in inherently unequal and closely related positions at NCOM or employees within the same reporting line, including those between supervisors and supervisees, must remain aware that such relationships could lead to circumstances that result in harassment or sexual or domestic misconduct.

6.2 In any consensual relationship case falling under those described in Section 6.1 above, the individuals shall notify their immediate supervisor or other appropriate

administrator. The supervisor or administrator shall be responsible for making arrangements to eliminate or mitigate any conflict of interest or other legitimate occupational interest related to employment, the consequences of which might prove detrimental to NCOM or to either party in the relationship. In some instances, if no suitable way to eliminate or mitigate the conflict is reasonably feasible, one or both individuals may be separated from employment at NCOM.

6.3 The types of consensual relationships described in Section 6.1 above may also result in a hostile or offensive environment affecting other employees or students. For example, others may perceive a person involved in the consensual relationship as receiving favorable treatment in employment or educational decisions and actions.

7. Prohibited Relationships with Students

7.1 NCOM administrative leadership, members of the Board of Directors, staff, faculty, instructors, or other employees are prohibited from engaging in a consensual relationship with a student whom they may instruct, evaluate, supervise, or advise (formally or informally).

7.2 Where there is a pre-existing consensual relationship, the administrative leadership, members of the Board of Directors the staff, faculty, instructor, graduate teaching assistant, or other employee shall forthwith notify his or her immediate supervisor or another appropriate administrator. The supervisor or other appropriate administrator shall be responsible for making arrangements to eliminate or to mitigate any conflict, the consequences of which might prove detrimental to NCOM or to either party in the relationship.

7.3 Although NCOM cannot prohibit consensual relationships between the administrative leadership, members of the Board of Directors, employees, faculty and students whom they do not instruct, evaluate, supervise, or advise, NCOM strongly discourages such relationships. In addition, nothing contained in this policy would otherwise prohibit a complaint being made by either party against the other party.

8. Reports of Misconduct & Complaints

8.1 Equal Opportunity and ADA Coordinator

The NCOM Dean/CAO shall appoint an administrator to serve as NCOM's Equal Opportunity and ADA Coordinator ("Coordinator") to handle all reports of prohibited conduct and complaints under this policy. The Coordinator will oversee all complaints filed under this policy generally and identify and address any patterns or systemic problems that arise during the review of such complaints. The Coordinator is further responsible for coordination of training, education, communications, and administration of complaint procedures for employees, students, and other members of the NCOM community. The Coordinator may also appoint deputy coordinators to assist NCOM in investigating complaints and furthering this policy.

8.2 Reporting

8.2.1 Any member of the NCOM community who believes someone has been subject to any of the prohibited conduct set forth in Section 3 above or has witnessed or is aware of such prohibited conduct is encouraged to report this information.

8.2.2 Reports of violations of this policy should be made to:

Equal Opportunity and ADA Coordinator (Information to be included once hired)

Address:

Phone:

Email:

8.2.3 Reports of violations of this policy involving the Coordinator should be made to the NCOM Dean.

8.3 Filing a Complaint

Any member of the NCOM community who believes someone has been subject to any of the prohibited conduct set forth in Section 3 above or has witnessed or is aware of such prohibited conduct may file a complaint, in writing, to the Coordinator. Complaints involving the Coordinator should be filed, in writing, to the NCOM President.

8.4 Responding to Complaints

8.4.1 The Coordinator or their designee(s) shall investigate and respond to all written complaints regarding alleged prohibited conduct in violation of this policy.

8.4.2 Complaints will be handled in such a manner to achieve a prompt and equitable resolution.

8.4.3 NCOM will take appropriate steps to end the misconduct, prevent any further misconduct or retaliation, remedy the effects of misconduct to the extent possible, and eliminate any hostile environment that has been created.

8.4.4 Any investigation resulting from a written complaint will be separate from and in addition to any criminal investigation that may result.

8.5 Disclosure and Confidentiality

NCOM respects the privacy of those reporting prohibited conduct and will try to respect requests for confidentiality as permissible by law. However, NCOM has certain legal obligations to address this conduct and to prevent its recurrence and, as a result, cannot guarantee confidentiality to a complainant in all cases.

8.6 Dishonest or Frivolous Complaints

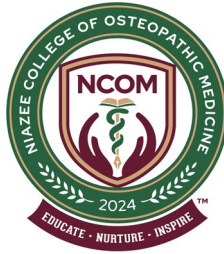
If a party is found to have intentionally or maliciously been dishonest, reckless, or frivolous in making allegations of a violation under this policy, that party shall be subject to appropriate disciplinary action, up to and including termination of employment or expulsion, as applicable.

9. Retaliation Prohibited

9.1 No NCOM employee, student, volunteer, vendor, visitor, or any other person may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by this policy, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation or proceeding under this policy. Intimidation, threats, coercion, or discrimination for the purpose of interfering with any right or privilege secured by this policy constitutes retaliation. Complaints alleging retaliation may be filed with the Coordinator in writing in the same manner as provided in Section 8 above.

9.2 The exercise of rights protected under the First Amendment does not constitute retaliation prohibited under Section 9.1 above.

9.3 Charging an individual with a violation for making a materially false statement in bad faith during an investigation under this policy does not constitute retaliation prohibited under Section 9.1 above; provided, however, that a determination regarding responsibility, alone, is not sufficient to conclude that any party made a materially false statement in bad faith.



NCOM INSTITUTIONAL POLICY B1040 CONFLICT OF INTEREST FOR BOARD MEMBERS, EMPLOYEES AND EMPLOYED FACULTY

Category:	Mission and Governance
Subject:	Conflict of Interest
Effective Date:	November 1, 2024
Updated	March 20, 2025

1 Authority

COCA 1.3.3a
COCA 12.1.4

2 Policy:

All Niazee College of Osteopathic Medicine (NCOM) board members, professional and non-professional full time employees, and all credentialed instructional staff shall disclose and avoid any conflicts of interest pertaining to any decisions or matters before the organization in which a member of his or her immediate family has a conflict of interest, financial or otherwise.

2.1 A conflict of interest is defined as any contract, transaction, or other matter between NCOM and one or more of its board members, professional and non-professional full time employees, or credentialed instructional staff, or between the NCOM and any other corporation, firm, association, or other entity in which one or more of NCOM's employees are officers, directors, or members and are financially or otherwise interested in this other entity.

2.2 NCOM employees are not permitted to participate in any discussions of any matters other than to disclose a conflict or decide on any matters before NCOM when such matters would result in a conflict of interest or financial gain or loss to the member or the NCOM member's immediate family.

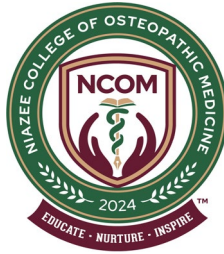
2.2.1 Such matters would include, but not be limited to, contracts to furnish goods and/or services, leases, or purchase agreements of real or personal property, or such like matters which would result in conflict of interest or a financial gain or loss.

2.3 Upon learning that a matter before NCOM would create a conflict of interest to an employee, that employee must make a full disclosure to NCOM's next chain of command of his or her financial interest in such manner, and the employee shall not further participate in any discussion of or decision on such matter.

2.4 The failure of an employee to make a disclosure as described herein may result in the avoidance of such agreement, contract, lease, or other matter at the discretion of NCOM of this relationship, product, or service.

2.5 For the purpose of this policy, the term "immediate family" shall mean a member's spouse, significant other, child/children, grandchild/grandchildren and the brothers, sisters, parents, grandparents, nieces, or nephews of a member of the family of their spouse.

2.6 All Board Members and Employees will be required to complete a Conflict of Interest Disclosure annually.



NCOM INSTITUTIONAL POLICY B1040 CONFLICT OF INTEREST FOR BOARD MEMBERS, EMPLOYEES AND EMPLOYED FACULTY

Category:	Mission and Governance
Subject:	Conflict of Interest
Effective Date:	November 1, 2024
Updated	March 20, 2025

1 Authority

COCA 1.3.3a
COCA 12.1.4

2 Policy:

All Niazee College of Osteopathic Medicine (NCOM) board members, professional and non-professional full time employees, and all credentialed instructional staff shall disclose and avoid any conflicts of interest pertaining to any decisions or matters before the organization in which a member of his or her immediate family has a conflict of interest, financial or otherwise.

2.1 A conflict of interest is defined as any contract, transaction, or other matter between NCOM and one or more of its board members, professional and non-professional full time employees, or credentialed instructional staff, or between the NCOM and any other corporation, firm, association, or other entity in which one or more of NCOM's employees are officers, directors, or members and are financially or otherwise interested in this other entity.

2.2 NCOM employees are not permitted to participate in any discussions of any matters other than to disclose a conflict or decide on any matters before NCOM when such matters would result in a conflict of interest or financial gain or loss to the member or the NCOM member's immediate family.

2.2.1 Such matters would include, but not be limited to, contracts to furnish goods and/or services, leases, or purchase agreements of real or personal property, or such like matters which would result in conflict of interest or a financial gain or loss.

2.3 Upon learning that a matter before NCOM would create a conflict of interest to an employee, that employee must make a full disclosure to NCOM's next chain of command of his or her financial interest in such manner, and the employee shall not further participate in any discussion of or decision on such matter.

2.4 The failure of an employee to make a disclosure as described herein may result in the avoidance of such agreement, contract, lease, or other matter at the discretion of NCOM of this relationship, product, or service.

2.5 For the purpose of this policy, the term "immediate family" shall mean a member's spouse, significant other, child/children, grandchild/grandchildren and the brothers, sisters, parents, grandparents, nieces, or nephews of a member of the family of their spouse.

2.6 All Board Members and Employees will be required to complete a Conflict of Interest Disclosure annually.



INSTITUTIONAL POLICY B1050

Governance and Program Confidentiality

Category: Mission and Governance
Subject: Governance and Program Confidentiality
Effective Date: March 11, 2025
Last Revision Date: J u n e 2 4 , 2 0 2 5

1. Authority

COCA 1.3.3c candidacy
COCA 1.4.3c preaccreditation

2. Policy

2.1 The Niazee College of Osteopathic Medicine (NCOM) shall ensure the confidentiality and privacy of all records containing personal or confidential information and comply with all federal and state laws and regulations regarding the security and privacy of all non-public information including student information, employee information, financial information, and other confidential information of the College.

2.2 Definition(s):

2.2.1 Confidential Information: any non-public information protected by federal, state, or local statute, College policy, procedure, or applicable regulations. Additionally, confidential information includes, but is not limited to, information that identifies or describes an individual and the disclosure of which would constitute an unwarranted invasion of personal privacy. Examples of confidential employee and business information include home address and telephone number; medical information; birth date; citizenship; social security number; spouse/partner/ relative's names; income tax withholding data;

performance evaluations; proprietary/ trade secret information; and academic peer review information.

2.2.2. Confidential information (either hard copy, electronic, or verbal) associated with medical records, human resources, performance improvement, quality/risk management, research, financial, or organizational of any kind is strictly confidential and any request for release of such information should be directed to the source department for proper release.

2.2.3. Employees cannot use confidential employee or business information for personal reasons. For example, employees cannot use someone's address to seek political contributions.

2.2.4. A federal law, Family Educational Rights and Privacy Act (FERPA), classifies most student record information as private. This information cannot be released to third parties (including parents) without signed consent from the student.

2.2.5. Personal health information created or used by employee-sponsored health plans has special protection under the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

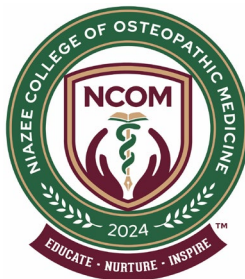
2.3 Upon request, an employee or their designated representative will have timely access to all information found in the employee's own personnel and medical files.

2.4 Employees are to follow all applicable federal, state and local law as well as any additional policies and procedures specific to their position.

2.5 All students, employees and Board of Trustees members shall receive training regarding the confidentiality of records. They will subsequently sign a confidentiality agreement.

2.6 Any breach of confidential information, whether in verbal, hard copy or electronic form shall be reported to the Office of Compliance.

2.7 The failure to comply with NCOM policies or applicable laws and regulations regarding the use and safeguarding of sensitive information, or to protect other confidential information not specifically covered by such policies, laws, or regulations, may result in disciplinary action including termination of employment or administrative withdrawal.



INSTITUTIONAL POLICY B1060

Title IX, Sexual Harassment and Discrimination

Category: Mission and Governance
Subject: Title IX, Sexual Harassment, and Discrimination
Effective Date: November 1, 2024
Updated:

1. Authority

COCA 1.4.1

2. Title IX Nondiscrimination Policy Statement

The Niazee of Osteopathic Medicine (NCOM) does not discriminate on the basis of sex in the education program or activity that it operates. NCOM, as a recipient of federal financial assistance, is required by Title IX of the Education Amendments of 1972 (“Title IX”) and 34 C.F.R. § 106 (“Title IX regulations”) not to discriminate in such a manner. The requirement not to discriminate in NCOM’s education programs or activities extends to admission and employment, and inquiries about the application of Title IX and the Title IX regulations to NCOM may be referred to NCOM’s Title IX Coordinator or the Assistant Secretary, Office of Civil Rights, U.S. Department of Education, or both.

3. Applicability

- 3.1 This policy applies to applicants for admission and employment, students, and employees of NCOM concerning sexual harassment in an education program or activity of NCOM whether on or off campus.
- 3.2 The requirements set forth in this policy apply only to sex discrimination occurring against a person in the United States.

4. Definitions

- 4.1 “Actual knowledge” means notice of sexual harassment or allegations of sexual harassment to NCOM’s Title IX Coordinator or any official of NCOM who has authority to institute corrective measures on behalf of NCOM. As used in this policy, “official of NCOM who has authority to institute corrective measures on behalf of NCOM” includes the President, and Dean/Chief Academic Officer of NCOM. Imputation of knowledge based solely on vicarious liability or constructive notice is insufficient to constitute actual knowledge. This standard is not met when the only official of NCOM with actual knowledge is the respondent. The mere ability or obligation to report sexual harassment or to inform a student about how to report sexual harassment, or having been trained to do so,

does not qualify an individual as one who has authority to institute corrective measures on behalf of NCOM. “Notice” as used in this paragraph includes, but is not limited to, a report of sexual harassment to the Title IX Coordinator as described in the Title IX regulations at § 106.8(a).

- 4.2 “Appeals Officer” means the Compliance and Community Response Administrator of NCOM.
- 4.3 “Complainant” means an individual who is alleged to be the victim of conduct that could constitute sexual harassment.
- 4.4 “Consent” means knowing, voluntary and clear permission by word or action, to engage in mutually agreed upon sexual activity.
- 4.5 “Education program or activity” means locations, events, or circumstances over which NCOM exercised substantial control over both the respondent and the context in which the sexual harassment occurs, and also includes any building owned or controlled by a student organization that is officially recognized by NCOM.
- 4.6 “Formal complaint” means a document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that NCOM investigate the allegation of sexual harassment. At the time of filing a formal complaint with NCOM, a complainant must be participating in or attempting to participate in the education program or activity of NCOM. A formal complaint may be filed with the Title IX Coordinator in person, by mail, or by e-mail, by using the contact information listed for the Title IX Coordinator, and by any additional method designated by NCOM. As used in this paragraph, the phrase “document filed by a complainant” means a document or electronic submission (such as by e-mail) that contains the complainant’s physical or digital signature or otherwise indicates that the complainant is the person filing the formal complaint. Where the Title IX Coordinator signs a formal complaint, the Title IX Coordinator is not a complainant or otherwise a party under the Title IX regulations, part § 106, or under § 106.45, and must comply with the requirements of the Title IX regulations, part § 106, including § 106.45(b)(1)(iii).
- 4.7 “Respondent” means an individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment.
- 4.8 “Sexual harassment” means conduct on the basis of sex that satisfies one or more of the following:
 - 4.8.1 An employee of NCOM conditioning the provision of an aid, benefit, or service of NCOM on an individual’s participation in unwelcome sexual conduct;
 - 4.8.2 Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the NCOM’s education program or activity; or
 - 4.8.3 “Sexual assault” as defined in 20 U.S.C. 1092(f)(6)(A)(v), “dating violence” as defined in 34 U.S.C. 12291(a)(10), “domestic violence” as defined in 34 U.S.C. 12291(a)(8), or “stalking” as defined in 34 U.S.C. 12291(a)(30).
- 4.9 “Supportive Measures” means non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant or the respondent before or after the filing of a formal complaint or where no formal

complaint has been filed. Such measures are designed to restore or preserve equal access to NCOM's education program or activity without unreasonably burdening the other party, including measures designed to protect the safety of all parties or NCOM's educational environment, or deter sexual harassment. Supportive measures may include counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, campus escort services, mutual restrictions on contact between the parties, changes in work or housing locations, leaves of absence, increased security and monitoring of certain areas of the campus, and other similar measures. NCOM must maintain as confidential any supportive measures provided to the complainant or respondent, to the extent that maintaining such confidentiality would not impair the ability of NCOM to provide the supportive measures. The Title IX Coordinator is responsible for coordinating the effective implementation of supportive measures.

5. Title IX Coordinator

- 5.1 NCOM will designate and authorize one employee as Title IX Coordinator to coordinate its efforts to comply with its responsibilities under Title IX, 34 C.F.R. § 106, and other federal and state sex discrimination and sexual harassment laws. The Title IX Coordinator's contact information is as follows: (to be inserted upon hire)

Campus office address: 1300 Woodfield Road, Schaumburg, IL 60173

E-mail address:

Title IX report/complaint email address:

Office telephone number:

- 5.2 NCOM may designate and authorize designee(s) to serve as Title IX Coordinator in the absence of the Initial Coordinator. In such event, notice of such designation and authorization, along with name(s)/title(s), office address(es), e-mail address(es), and office telephone number(s) will be provided to the applicable groups set forth in Section 3 above.

6. Publication Requirements

- 6.1 NCOM shall prominently display the contact information for the Title IX Coordinator set forth in Section 5 above and the nondiscrimination policy statement set forth in Section 2 above on the NCOM website and in the NCOM Catalog and NCOM Student, Faculty, and Employee Handbooks.
- 6.2 NCOM shall not use or distribute a publication stating that NCOM treats applicants, students, or employees differently on the basis of sex except as such treatment is permitted by Title IX or the Title IX regulations.

7. Adoption of Grievance Procedures

- 7.1 NCOM shall adopt and publish grievance procedures that provide for the prompt and equitable resolution of student and employee complaints alleging any action that would be prohibited by the Title IX regulations and a grievance process that complies with the Title IX regulations, § 106.45 for formal complaints as defined in this policy.
- 7.2 NCOM shall provide to its applicants for admission and employment, students, and employees notice of NCOM's grievance procedures and grievance process, including the following:
- 7.2.1 How to report or file a complaint of sex discrimination,
- 7.2.2 How to report or file a formal complaint of sexual harassment, and

7.2.3 How NCOM will respond.

8. Reporting of Sex Discrimination Generally

Any person may report sex discrimination, including sexual harassment (whether or not the person reporting is the person alleged to be the victim of conduct that could constitute sex discrimination or sexual harassment), in person, by mail, by telephone, or by e-mail, using the contact information listed for the Title IX Coordinator, or by any other means that results in the Title IX Coordinator receiving the person's verbal or written report. Such a report may be made at any time (including during non-business hours) by using the telephone number or e-mail address, or by mail to the office address, listed for the Title IX Coordinator.

9. Response to Sexual Harassment

9.1 Sexual harassment is prohibited.

9.2 Should NCOM have actual knowledge of sexual harassment in an education program or activity of NCOM against a person in the United States, NCOM shall respond in a manner that is not deliberately indifferent. NCOM would be deliberately indifferent only if its response to sexual harassment is clearly unreasonable in light of the known circumstances.

9.3 NCOM's response must treat complainants and respondents equitably by offering supportive measures to a complainant, and by following a grievance process that complies with the Title IX regulations, § 106.45, before the imposition of any disciplinary sanctions or other actions that are not supportive measures against a respondent.

9.4 Reports of violations of this policy should be made promptly as follows:

9.4.1 Reports of sexual harassment or other violations of this policy falling under Title IX should be made to the Title IX Coordinator;

9.4.2 Reports of violations of this policy involving the Title IX Coordinator should be made to the Dean/CAO;

9.4.3 Reports of violations of this policy involving the Dean/CAO should be made to the President of NCOM;

9.4.4 Reports of violations of this policy involving the President of NCOM should be made to the Chair of the NCOM Board of Governors; and

9.4.5 Reports of violations of this policy involving the Chair of the NCOM Board of Governors should be made to the Illinois Board of Higher Education.

9.5 If a reporting individual believes that an immediate threat of harm exists to self or others or that an individual has violated federal, state, or local law, the reporting individual should immediately contact law enforcement.

9.6 The Title IX Coordinator, or other applicable administrator listed in Section 9.4 above or his/her designee, shall promptly contact the complainant to:

9.6.1 Discuss the availability of supportive measures,

9.6.2 Consider the complainant's wishes with respect to supportive measures,

9.6.3 Inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and

- 9.6.4 Explain to the complainant the process for filing a formal complaint.
- 9.7 Although reports of violations of this policy should be made promptly, there is no time limitation on the filing of reports, as long as the accused individual remains subject to NCOM's jurisdiction.
- 9.8 Additional information on reporting options can be found on NCOM's website, at <http://www.ncomchicago.org>.
- 9.9 The U.S. Department of Education may not deem NCOM to have satisfied their duty to not be deliberately indifferent under the Title IX regulations, part 106, based on NCOM's restrictions of rights protected under the U.S. Constitution, including the First Amendment, Fifth Amendment, and Fourteenth Amendment.

10. Response to a Formal Complaint

- 10.1 In response to a formal complaint, NCOM shall follow a grievance process that complies with the Title IX regulations, § 106.45.
- 10.2 With or without a formal complaint, NCOM must comply with Section 9 above.
- 10.3 The Assistant Secretary, Office of Civil Rights, U.S. Department of Education, will not deem NCOM's determination regarding responsibility to be evidence of deliberate indifference by NCOM, or otherwise evidence of discrimination under Title IX by NCOM, solely because the Assistant Secretary would have reached a different determination based on an independent weighing of the evidence.

11. Emergency Removal and Administrative Leave

- 11.1 *Emergency removal.* NCOM may remove a student respondent from its education program or activity on an emergency basis, provided that NCOM undertakes an individualized safety and risk analysis, determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal, and provides the respondent with notice and an opportunity to challenge the decision immediately following the removal. This provision may not be construed to modify any rights under the Individuals with Disabilities in Education Act, Section 504 of the Rehabilitation Act of 1973, or the Americans with Disabilities Act.
- 11.2 *Administrative leave.* NCOM may place a non-student employee respondent on administrative leave during the pendency of the grievance process for formal complaints of sexual harassment. This provision may not be construed to modify any rights under Section 504 of the Rehabilitation Act of 1973 or the Americans with Disabilities Act.

12. Grievance Process for Formal Complaints of Sexual Harassment

Requirements for Grievance Process. NCOM's grievance process shall:

- 12.1 Treat complainants and respondents equitably by providing remedies to a complainant where a determination of responsibility for sexual harassment has been made against the respondent, and by following its grievance process set forth in this section before the imposition of any disciplinary sanctions or other actions that are not supportive measures against a respondent. Remedies must be designed to restore or preserve equal access to

- NCOM's education program or activity. Such remedies may include the same individuals services described in the definition of "supportive measures" above; however, remedies need not be non-disciplinary or non-punitive and need not avoid burdening the respondent.
- 12.2 Require an objective evaluation of all relevant evidence – including both inculpatory and exculpatory evidence – and provide that credibility determinations may not be based on a person's status as a complainant, respondent, or witness.
 - 12.3 Require that any individual designated by NCOM as a Title IX Coordinator, investigator, or decision-maker, not have a conflict of interest or bias for or against complainants or respondents generally or an individual complainant or respondent.
 - 12.3.1 NCOM shall ensure that the Title IX Coordinators, investigators, and decision-makers receive training on the definition of sexual harassment set forth in Section 4.8 above, the scope of NCOM's education program or activity, how to conduct an investigation and grievance process including hearings and appeals, and how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias.
 - 12.3.2 NCOM shall ensure that decision-makers receive training on any technology to be used at a live hearing and on issues of relevance of questions and evidence, including when questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant, as set forth in Section 13.5.
 - 12.3.3 NCOM must ensure that investigators receive training on issues of relevance to create an investigative report that fairly summarizes relevant evidence as set forth in the Title IX regulations, § 106.45(b)(5)(vii).
 - 12.3.4 Any materials used to train Title IX Coordinators, investigators, and decision-makers must not rely on sex stereotypes and must promote impartial investigations and adjudications of formal complaints of sexual harassment.
 - 12.4 Include a presumption that the respondent is not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the grievance process.
 - 12.5 Include reasonably prompt time frames for conclusion of the grievance process, including reasonably prompt time frames for filing and resolving appeals, and a process that allows for the temporary delay of the grievance process or the limited extension of time frames for good cause with written notice to the complainant and the respondent of the delay or extension and the reasons for the action. Good cause may include considerations such as the absence of a party, a party's advisor, or a witness; concurrent law enforcement activity; or the need for language assistance or accommodation of disabilities.
 - 12.6 Describe the range of possible disciplinary sanctions that NCOM may implement following any determination of responsibility.
 - 12.7 State that the standard of evidence to be used to determine responsibility is the preponderance of the evidence standard and apply the same standard of evidence for formal complaints against students as for formal complaints against employees, including faculty, and apply the same standard of evidence to all formal complaints of sexual harassment.
 - 12.8 Include the procedures and permissible bases for the complainant and respondent to appeal.

- 12.9 Describe the range of supportive measures available to complainants and respondents.
- 12.10 Not require, allow, rely upon, or otherwise use questions or evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege.

13. Notice of Allegations

- 13.1 Upon receipt of a formal complaint, NCOM must provide the following written notice to the parties who are known:
- 13.1.1 Notice of NCOM's grievance process that complies with § 106.45 of the Title IX regulations and this policy.
 - 13.1.2 Notice of the allegations of sexual harassment potentially constituting sexual harassment as defined in Section 4.8 of this policy, including sufficient details known at the time and with sufficient time to prepare a response before any initial interview.
 - (i) Sufficient details include the identities of the parties involved in the incident, if known, the conduct allegedly constituting sexual harassment as defined in Section 4.8 of this policy, and the date and location of the alleged incident, if known.
 - (ii) The written notice must include a statement that the respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the grievance process.
 - (iii) The written notice must inform the parties that they may have an advisor of their choice, who may be, but is not required to be, an attorney, under Section 16.4 of this policy, and may inspect and review evidence under Section 16.6 of this policy.
 - (iv) The written notice must inform the parties of any provision of NCOM's code of conduct, handbook, or policy or procedure that prohibits knowingly making false statements or knowingly submitting false information during the grievance process.
- 13.2 If, in the course of an investigation, NCOM decides to investigate allegations about the complainant or respondent that are not included in the notice provided pursuant to Section 13.1 above, NCOM must provide notice of the additional allegations to the parties whose identities are known.

14. Dismissal of a Formal Complaint

- 14.1 NCOM must investigate the allegations in a formal complaint.
- 14.1.1 If the conduct alleged in the formal complaint would not constitute sexual harassment as defined in Section 4.8 of this policy even if proved, did not occur in NCOM's education program or activity, or did not occur against a person in the United States, then NCOM must dismiss the formal complaint with regard to that conduct for purposes of sexual harassment under Title IX or the Title IX regulations.
 - 14.1.2 Such a dismissal does not preclude action under another provision of NCOM's code of conduct, handbook, or policy or procedure.

- 14.2 NCOM may dismiss the formal complaint or any allegations therein, if at any time during the investigation or hearing:
- 14.2.1 A complainant notifies the Title IX Coordinator in writing that the complainant would like to withdraw the formal complaint or any allegations therein;
 - 14.2.2 The respondent is no longer enrolled or employed by NCOM; or
 - 14.2.3 Specific circumstances prevent NCOM from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein.
- 14.3 Upon a dismissal required or permitted pursuant to Sections 14.1 or 14.2 above, NCOM must promptly send written notice of the dismissal and reason(s) therefore simultaneously to the parties.

15. Consolidation of Formal Complaints

- 15.1 NCOM may consolidate formal complaints as to allegations of sexual harassment against more than one respondent, or by more than one complainant against one or more respondents, or by one party against the other party, where the allegations of sexual harassment arise out of the same facts or circumstances.
- 15.2 Where a grievance process involves more than one complainant or more than one respondent, reference in this policy to the singular “party,” “complainant,” or “respondent” include the plural, as applicable.

16. Investigation of a Formal Complaint

When investigating a formal complaint and throughout the grievance process, NCOM must:

- 16.1 Ensure that the burden of proof and the burden of gathering evidence sufficient to reach a determination regarding responsibility rest on NCOM and not on the parties, provided that NCOM cannot access, consider, disclose, or otherwise use a party’s records that are made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in the professional’s or paraprofessional’s capacity, or assisting in that capacity, and which are made and maintained in connection with the provision of treatment to the party, unless NCOM obtains that party’s voluntary, written consent to do so for a grievance process under Section 7 above (if a party is not an “eligible student” as defined in 34 C.F.R. § 99.3, then NCOM must obtain the voluntary, written consent of a “parent,” as defined in 34 C.F.R. § 99.3).
- 16.2 Provide an equal opportunity for the parties to present witnesses, including fact and expert witnesses, and other inculpatory and exculpatory evidence.
- 16.3 Not restrict the ability of either party to discuss the allegations under investigation or to gather and present relevant evidence.
- 16.4 Provide the parties with the same opportunities to have others present during any grievance proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice, who may be, but is not required to be, an attorney, and not limit the choice or presence of advisor for either the complainant or respondent in any meeting or grievance proceeding; however, NCOM may establish restrictions regarding the extent to which the advisor may participate in the proceedings, as long as the restrictions apply equally to both parties.

- 16.5 Provide, to a party whose participation is invited or expected, written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings, with sufficient time for the party to prepare to participate.
- 16.6 Provide both parties an equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in a formal complaint, including the evidence upon which NCOM does not intend to rely in reaching a determination regarding responsibility and inculpatory or exculpatory evidence whether obtained from a party or other source, so that each party can meaningfully respond to the evidence prior to conclusion of the investigation.
 - 16.6.1 Prior to completion of the investigative report, NCOM must send to each party and the party's advisor, if any, the evidence subject to inspection and review in an electronic format or a hard copy, and the parties must have at least 10 days to submit a written response, which the investigator will consider prior to completion of the investigative report.
 - 16.6.2 NCOM must make all such evidence subject to the parties' inspection and review available at any hearing to give each party equal opportunity to refer to such evidence during the hearing, including for purposes of cross-examination.
- 16.7 Create an investigative report that fairly summarizes relevant evidence and, at least 10 days prior to a hearing or other time of determination regarding responsibility, send to each party and the party's advisor, if any, the investigative report in an electronic format or a hard copy, for their review and written response.

17. Hearings

- 17.1 NCOM's grievance process must provide for a live hearing.
- 17.2 At the live hearing, the decision-maker(s) must permit each party's advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility.
 - 17.2.1 Such cross-examination at the live hearing must be conducted directly, orally, and in real time by the party's advisor of choice and never by a party personally, notwithstanding the discretion of NCOM under Section 16.4 above to otherwise restrict the extent to which advisors may participate in the proceedings.
 - 17.2.2 Only relevant cross-examination and other questions may be asked of a party or witness.
 - 17.2.3 Before a complainant, respondent, or witness answers a cross-examination or other question, the decision-maker(s) must first determine whether the question is relevant and explain any decision to exclude a question as not relevant.
 - 17.2.4 If a party or witness does not submit to cross-examination at the live hearing, the decision-maker(s) must not rely on any statement of that party or witness in reaching a determination regarding responsibility; provided, however, that the decision-maker(s) cannot draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the live hearing or refusal to answer cross-examination or other questions.
- 17.3 At the request of either party, NCOM must provide for the live hearing to occur with the parties located in separate rooms with technology enabling the decision-maker(s) and parties to simultaneously see and hear the party or the witness answering questions.

- 17.4 If a party does not have an advisor present at the live hearing, NCOM must provide without fee or charge to that party, an advisor of NCOM's choice to conduct cross-examination on behalf of that party.
- 17.5 Questions and evidence about the complainant's sexual predisposition or prior sexual behavior is not relevant, unless such questions and evidence about the complainant's prior sexual behavior are offered to prove that someone other than the respondent committed the conduct alleged by the complainant, or if the questions and evidence concern specific incidents of the complainant's prior sexual behavior with respect to the respondent and are offered to prove consent.
- 17.6 Live hearings may be conducted with all parties physically present in the same geographic location or, at NCOM's discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually, with technology enabling participants simultaneously to see and hear each other.
- 17.7 NCOM must create an audio or audiovisual recording, or transcript, of any live hearing and make it available to the parties for inspection and review.

18. Determination Regarding Responsibility

- 18.1 The decision-maker(s), who cannot be the same person(s) as the Title IX Coordinator or the investigator(s), must issue a written determination regarding responsibility.
- 18.2 To reach a determination, NCOM must apply the preponderance of the evidence standard.
- 18.3 The written determination must include the following:
 - 18.3.1 Identification of the allegations potentially constituting sexual harassment as defined in Section 4.8 above;
 - 18.3.2 A description of the procedural steps taken from the receipt of the formal complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held;
 - 18.3.3 Findings of fact supporting the determination;
 - 18.3.4 Conclusions regarding the application of NCOM's code of conduct, handbooks, and/or policies and procedures to the facts;
 - 18.3.5 A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility, any disciplinary sanctions NCOM imposes on the respondent consistent with Section 18.4 below, and whether remedies designed to restore or preserve equal access to NCOM's education program or activity will be provided by NCOM to the complainant; and
 - 18.3.6 NCOM's procedures and permissible bases for the complainant and respondent to appeal.
- 18.4 Sanctions may be imposed upon any person under NCOM's jurisdiction who is found to have violated this policy. Any employee or student who is found to have violated this policy will be subject to administrative action, up to and including termination of employment or dismissal from NCOM, as applicable.
 - 18.4.1 Typical student sanctions that may be imposed singly or in combination include, but are not limited to the following:

- (i) Admonition
- (ii) Warning
- (iii) Disciplinary Probation
- (iv) Restitution
- (v) Suspension
- (vi) Expulsion

18.4.2 Typical employee sanctions that may be imposed singly or in combination include, but are not limited to the following:

- (i) Discussion
- (ii) Verbal Warning
- (iii) Written Warning
- (iv) Suspension
- (v) Termination of Employment

18.4.3 Any person found responsible for violating the sexual harassment prohibitions in this policy will likely face a sanction ranging from admonition/discussion to expulsion/termination of employment, depending on the severity of the incident, and taking into account any previous disciplinary violations.

18.4.4 The range of sanctions may be broadened or lessened in the case of serious mitigating circumstances or egregiously offensive behavior. N C O M will not deviate from the range of recommended sanctions unless compelling justification exists to do so.

18.5 N C O M must provide the written determination to the parties simultaneously.

18.6 The determination regarding responsibility becomes final either on the date that NCOM provides the parties with the written determination of the result of the appeal, if an appeal is filed, or if an appeal is not filed, the date on which an appeal would no longer be considered timely.

18.7 The Title IX Coordinator is responsible for effective implementation of any remedies.

19. Appeals

19.1 NCOM must offer both parties an appeal from a determination regarding responsibility, and from NCOM's dismissal of a formal complaint or any allegations therein, on the following bases:

19.1.1 A procedural irregularity that affected the outcome of the matter;

19.1.2 New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; and

19.1.3 The Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

19.2 As to all appeals, NCOM must:

- 19.2.1 Notify the other party in writing when an appeal is filed and implement appeal procedures equally for both parties;
- 19.2.2 Ensure that the Appeals Officer for the appeal is not the same person as the decision-maker(s) that reached the determination regarding responsibility or dismissal, the investigator(s), or the Title IX Coordinator;
- 19.2.3 Ensure that the Appeals Officer for the appeal complies with the standards set forth in Section 12.3 above;
- 19.2.4 Give both parties a reasonable, equal opportunity to submit a written statement in support of, or challenging, the outcome;
- 19.2.5 Issue a written decision describing the result of the appeal and the rationale for the result; and
- 19.2.6 Provide the written decision simultaneously to both parties.

20. Recordkeeping

- 20.1 NCOM must maintain for a period of seven years records of:
 - 20.1.1 Each sexual harassment investigation including any determination regarding responsibility and any audio or audiovisual recording or transcript required under Section 17 above, any disciplinary sanctions imposed on the respondent, and any remedies provided to the complainant designed to restore or preserve equal access to NCOM's education program or activity;
 - 20.1.2 Any appeal and the result therefrom;
 - 20.1.3 All materials used to train Title IX Coordinators, investigators, and decision-makers. NCOM must make these training materials publically available on its website.
- 20.2 For each response required under Section 9 through Section 11 above, NCOM must create, and maintain for a period of seven years, records of any actions, including any supportive measures, taken in response to a report or formal complaint of sexual harassment.
 - 20.2.1 In each instance, NCOM must document the basis for its conclusion that its response was not deliberately indifferent, and document that it has taken measures designed to restore or preserve equal access to NCOM's education program or activity.
 - 20.2.2 If NCOM does not provide a complainant with supportive measures, then it must document the reasons why such a response was not clearly unreasonable in light of the known circumstances.
 - 20.2.3 The documentation of certain bases or measures does not limit NCOM in the future from providing additional explanations or detailing additional measures taken.

21. Retaliation

- 21.1 Retaliation is prohibited.
 - 21.1.1 Neither NCOM nor other person may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX or the Title IX regulations, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under the Title IX regulations.

- 21.1.2 Intimidation, threats, coercion, or discrimination, including charges against an individual for code of conduct, handbook, or policy or procedure violations that do not involve sex discrimination or sexual harassment, but arise out of the same facts or circumstances as a report or complaint of sex discrimination, or a report or formal complaint of sexual harassment, for the purpose of interfering with any right or privilege secured by Title IX or the Title IX regulations, constitutes retaliation.
- 21.1.3 NCOM must keep confidential the identity of any individual who has made a report or complaint of sex discrimination, including any individual who has made a report or filed a formal complaint of sexual harassment, any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, and any witness, except as may be permitted by the FERPA statute, 20 U.S.C. § 1232g, or FERPA regulations, 34 C.F.R. part 99, or as required by law, or to carry out the purposes of 34 C.F.R. part 106, including conduct of any investigation, hearing, or judicial proceeding arising thereunder.
- 21.1.4 Complaints alleging retaliation may be filed according to the grievance procedures for sex discrimination required under Section 7 above.

21.2 Specific circumstances:

- 21.2.1 The exercise of rights protected under the First Amendment does not constitute retaliation prohibited under Section 21.1 above.
- 21.2.2 Charging an individual with a code of conduct, handbook, or policy or procedure violation for making a materially false statement in bad faith in the course of a grievance proceeding under the Title IX regulations does not constitute retaliation prohibited under Section 21.1 above; provided, however, that a determination regarding responsibility, alone, is not sufficient to conclude that any party made a materially false statement in bad faith.

22. False Reports

NCOM will not tolerate intentional false reporting of incidents. Deliberately false and/or malicious accusations of violations of this policy, as opposed to complaints which, even if erroneous, are made in good faith, are just as serious an offense as a violation of this policy and will subject the false reporter to appropriate disciplinary action. Intentionally false reports may also violate criminal and civil laws.

23. Federal Timely Warning Obligations

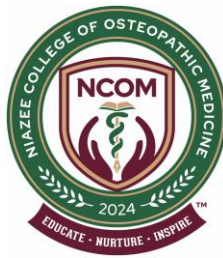
Victims of sexual harassment should be aware that NCOM administrators must issue timely warnings to the NCOM community for incidents reported to them that pose a substantial threat of bodily harm or danger to members of the campus community. No such warning will identify a victim or contain information that could do so unless permitted by the victim.

24. Prevention & Awareness Programs

NCOM will have educational programs and campaigns to promote the awareness of dating violence, domestic violence, sexual assault, and stalking. These programs can be found on the NCOM website.

25. Implementation of Policy

This policy will be implemented using applicable NCOM policies and procedures, and NCOM faculty, staff, and student handbooks. In the event the individual, name, title, or contact information changes for any of the individuals listed in this policy, the President of NCOM may revise such information within this policy without resubmittal of this policy through the rulemaking process.



Institutional Policy: B1080

Accreditation

Category	Mission and Governance
Subject	Accreditation
Effective	March 27, 2025
Updated	

1. Authority

COCA 1.2.2

2. Policy

2.1 NCOM shall comply with the accreditation standards/criteria prescribed by its institutional accreditor, Higher Learning Commission (“HLC”), and its programmatic/specialized accreditor, the American Osteopathic Association Commission on Osteopathic College Accreditation (“AOA COCA”) as well as its Statewide accreditor, the Illinois Board of Higher Education (IBHE)

2.2 NCOM will comply with the most current accreditation standards/criteria as prescribed in the appropriate agency’s documents as listed below. In all cases, the more stringent accreditation standards/criteria supersede all other accreditation standards/criteria.

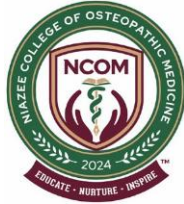
2.2.1 Higher Learning Commission: The Criteria for Accreditation
(<https://www.hlcommission.org/>)

2.2.2 Commission on Osteopathic College Accreditation: COM Accreditation Standards and Procedures (<https://osteopathic.org/accreditation/>)

2.2.3 Illinois Board of Higher Education (IBHE.org)

2.3 NCOM lists its relationships with its accreditors on its website at www.ncomchicago.org

2.4 The AOA COCA provides the public with a list of its accredited institutions and its next evaluation date on its webpage at Commission on Osteopathic College Accreditation - American Osteopathic Association



INSTITUTIONAL POLICY B1090

College Neutrality

Category: Governance and Leadership
Subject: College Neutrality
Effective Date: June 13, 2025
Updated:

1. Authority

2. Policy

2.1 The Niazee College of Osteopathic Medicine Board of Governors hereby adopts a policy on the neutrality of NCOM that makes a distinction between the official positions of the COM, including its schools, colleges, and departments, from the individual viewpoints of the institution's employees, contractors, students, and alumni.

2.2 This Statement of Policy on Institutional Neutrality (the “Policy”) is intended to establish a position of institutional neutrality, for NCOM.

2.3 This Policy limits the circumstances in which a COM employee or group of COM employees may establish an official institution, school, college, or department position on political, moral, religious, international, or ideological issues to only those circumstances that affect the core mission of the COM and the values of free inquiry, free expression, and intellectual diversity.

2.4 The Policy applies to the following members of the NCOMMUNITY (“COM Community Members”):

- 2.4.1 Any employees of the COM, including administrators, leadership, public information officers and official spokespersons, academic appointees, staff, part-time, and student employees;
- 2.4.2 All students and student organizations;
- 2.4.3 All COM campuses, schools, colleges, departments, and academic, and other operational units;
- 2.4.4 COM contractors;
- 2.4.5 COM alumni;
- 2.4.6 Any individual using COM resources or facilities or receiving funds administered by the COM; and

2.4.7 Volunteers and other representatives when speaking or acting on behalf of the COM.

3. NCOMMUNITY Members are free to express their views on a particular policy proposal or in a debate over a particular political or social issue provided that such views or concerns are expressed in a personal capacity and do not purport to be official statements of NCOM.

3.1 NCOMMUNITY Members shall refrain from taking an official institutional position on behalf of the COM which includes expressing opinions on political, moral, religious, international, or ideological issues that exceed the core mission of the COM and its values of free inquiry, free expression, and intellectual diversity.

3.2 NCOMMUNITY Members should assume that they are representing the COM when they conduct official and assigned functions, responsibilities, and duties, including but not limited to communicating in COM contexts, using COM email accounts, logos, seals, websites, social media channels, public fora, and related channels of communication.

3.3 When expressing individual viewpoints outside of their official and assigned functions, responsibilities, and duties, NCOMMUNITY Members should ensure their comments shall not be construed as comments made on behalf of or by the COM. This Policy applies to communications from official COM channels including, but not limited to, the examples of statements included above.

4. This Policy shall not be construed to limit the ability of the COM to communicate with NCOMMUNITY Members, public agencies and officials, and the public in accordance with local, state, federal and other applicable laws, rules, regulations, and orders of civil authorities during crisis and/or emergency situations.

5. This Policy shall not be construed to limit the COM's ability to advocate for state or federal funding or educational policies to the state or federal government. Furthermore, where proposed legislation or a regulatory proposal has a direct bearing on the COM's mission, operations, or fiscal affairs, the COM may elect to offer comment.

6. It is essential that NCOMMUNITY Members refrain from taking an official position on behalf of the COM which includes expressing opinions on political, moral, or ideological issues that exceed the core mission of the COM and its values of free inquiry, free expression, and intellectual diversity. NCOMMUNITY members shall use due diligence to make a distinction between the official position and statements of the COM, including its schools, colleges, and departments, from the individual viewpoints and opinions of the COM's employees, contractors, students, and alumni.

7. Nothing in this Policy may be construed to limit the free speech of any individual beyond any employment requirements established by the COM, or ability of the COM to advocate for state or federal funding or educational policies to the state or federal government.

7.1 This Policy is compatible with the COM's current policies addressing free speech and expressive activity. NCOMMUNITY members are prohibited from making a public statement in their official capacity with the COM unless the statement relates to the business or operation of NCOM or to an event sponsored by NCOM; or has been approved by the NCOM Board of Governors.

8. NCOM supports academic freedom, freedom of speech, and the free and equal expression of ideas.

8.1 All leadership, students, staff, and faculty are entitled to their own personal opinions and points of view.

8.2 Members of the NCOMMUNITY are free to express their own personal views on a policy proposal, political issue, social issue, or other area of personal interest as long as they do so ONLY as an individual and not as a representative either expressed or implied of NCOM or any other member of our NCOMMUNITY. It is the responsibility of leaders, students, and employees of NCOM to ensure that statements or actions are not construed to be NCOM policy.

8.3 Personal political opinions should not be made as part of official NCOM activities.

9. NCOM does not condone or allow discrimination and endorses the equal expression of all viewpoints that do not advocate illegal, unethical, or discriminatory actions or policies. All individuals are free to express their opinions as they see fit as long as they do not disrupt the educational process or represent themselves or their viewpoint as a policy or endorsement by NCOM.

10. NCOM always maintains institutional neutrality and does not take sides on political issues or any other issue not related to its core mission.

10.1 As a matter of policy NCOM does not express opinions or take actions that support or oppose any international action, political candidate, office holder, or political policy.

10.2 NCOM does not make political endorsements or endorse political demonstrations. It is the policy of NCOM to maintain impartiality and avoid influencing any national or international political processes or actions.

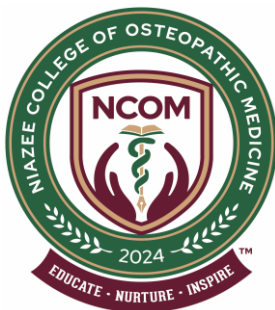
11. NCOM resources may NOT be used for political campaigns, or political fundraising.

11.1 The name Niazee College of Osteopathic Medicine, NCOM, its symbols, and logo may not be used in support of a political candidate, political issue, or political party.

11.2 Demonstrations which express personal opinions of any kind are not allowed on campus.

11.3 Professional advocacy is allowed on campus if all opinions are given the opportunity for expression and are professional and peaceful in nature.

11.4 Advocacy events which disrupt the educational process in any way are prohibited.



Institutional Policy B2010: Academic Freedom

Category: General Administration and Leadership
Subject: Academic Freedom
Effective Date: January 7, 2025
Updated: March 23, 2005

1. Authority

COCA 12.8

2 Introduction

NCOM is committed to the pursuit of truth and to its transmission. The integrity of the College as an institution of higher learning requires proper autonomy and freedom. This freedom is the freedom to examine data, to question assumptions, to be guided by evidence, to be a learner, and to be a scholar. Such freedom implies that any faculty member whose teaching is questioned should be subject to the judgment of one's peers only in accordance with the accepted rules of academic due process. It also implies the active, defined and recognized role of the faculty in those policy-making decisions which affect the educational program.

2.1 The obligation of the faculty is to distinguish in their teaching between personal and partisan opinion and convictions grounded in sources and methods appropriate to their respective disciplines. The faculty members should, to the best of their ability, present materials in a manner that respects the cultures and sensitivities of the students while reflecting reality and fundamental truths supported by facts and evidence.

2.2 The obligation of the student is to be a responsible participant in the academic activities of NCOM.

3 Policy

3.1 NCOM endorses the 1940 *Statement of Principles of Academic Freedom* of the American Association of University Professors.

3.2 Each faculty member is expected to uphold the goals, aims and mission of NCOM.

3.3 As members and citizens of an academic community, students also have academic rights that are extensions of, and complementary to, those academic freedoms accorded faculty.

3.3.1 The student has the freedom to learn. It is important that students engage in learning and recognize their role in scholarly activity and/or teaching is an extension of the academic freedoms accorded a faculty member.

3.3.2 In an academic institution, freedom to express one's opinions and positions should be recognized within the realm of professionalism as described in the Student Handbook and other guides of professional behavior (AOA, AMA, and others). However, academic freedom, freedom of expression/speech are not absolute, and differences of opinion should be approached with temperance and professionalism.

3.4 Academic freedom in research and publication

Faculty are entitled to the full freedom to engage in their research or creative activities and to professionally disseminate their work in scholarly and public venues, whether print or electronic. Research should be conducted in accordance with college policies and procedures, and faculty are also expected to fulfill their other academic duties.

3.5 Academic freedom and instruction

Faculty are entitled to the freedom to discuss their subject in the classroom or other academic and related settings. As teachers, faculty encourage the free pursuit of learning in their students. They hold before them the best scholarly, professional, and ethical standards of their disciplines. Professors demonstrate respect for students as individuals and adhere to their proper roles as intellectual guides and counselors.

3.6 Academic freedom as a citizen

When faculty speak or write as citizens, they should be free from institutional censorship or discipline, but their special position in the community imposes special obligations. As scholars, creative practitioners, and educational officers, they should remember that the public may judge their profession and their institution by their utterances. They should therefore at all times endeavor to be professional, accurate and fact based, exercise appropriate restraint, show respect for others, and should avoid creating the impression of speaking or acting for NCOM.

3.7 Academic freedom and its relationship to shared governance

NCOM adheres to the principle that "sound governance practice and the exercise of academic freedom are closely connected," as expressed in the AAUP statement On the Relationship of Faculty Governance to Academic Freedom (1994). The statement further defines the close relationship of these distinct concepts as follows: "A sound system of institutional governance is a necessary condition for the protection of faculty rights and thereby for the most productive exercise of essential faculty freedoms. Correspondingly, the protection of the academic freedom of faculty members in addressing issues of institutional governance is a prerequisite for the

practice of governance unhampered by fear of retribution.” Faculty maintain the right to criticize and seek revision of NCOM policies in a professional and fact-based manner.

3.8 Academic freedom and disciplinary action

Disciplinary action will not be used to restrain faculty members in their exercise of true academic freedom. If a faculty member believes a disciplinary action, including denial or delay of promotion, or termination of contract, violates their right to academic freedom, the faculty member may appeal, as outlined in the Faculty Handbook.



INSTITUTIONAL POLICY: B2055

Social Media/Networking

Category: General Administration and Leadership
Subject: Social Networking
Effective Date: January 22, 2025
Updated: June 18, 2025

1. Authority

2. Introduction

Social media/networking is becoming increasingly popular in businesses, personal communication/branding for individuals, and with the public in general. It is a useful tool for the communications and marketing department of many institutions. While social media/networking can be useful, if improperly used, it can result in a variety of adverse consequences, such as disclosure of sensitive or confidential information, copyright violations, and potential damage to the professions or school's reputation.

2.1 This policy covers faculty, staff, contractors, and students when they are understood to be officially representing the Niazee College of Osteopathic Medicine (NCOM) on a social media website or blog. This includes sites representing School of Medicine departments, programs, research centers, institutes, offices, graduate programs, and labs.

2.2 Social media websites include, but are not limited to, Facebook, Instagram, X (formerly known as Twitter), Bluesky, Threads, and YouTube, but may also include any other website not listed with a social media component. This policy also covers print media such as newspapers and magazines.

2.3 This policy does not apply to the personal social media websites of faculty, staff, contractors, and students, or to personal online social networking where the individual does not purport to speak on behalf of NCOM.

2.3.1 Faculty and staff may not use NCOM resources for personal social media posting.

2.3.2 Faculty and staff may not post non-public information learned as part of their NCOM employment on personal social media accounts.

3. Policy

3.1 This policy applies to all types of social media/networking activity (a) using the College's computers, mobile devices, or other technology, and (b) using personal devices when linked to the NCOM's systems.

3.2 When engaged in social media/networking on personal devices that are not linked to the College's systems, students, faculty, and staff should use this policy as a guide.

3.3 Use of NCOM's IT systems for social networking must comply with NCOM's IT policy. Use of the handheld devices may be prohibited in some circumstances. In all cases, NCOM-issued technology must be used in accordance with all applicable rules. Use of NCOM's Faculty and staff employees who have been approved to manage blogs or participate in social media/networking sites on NCOM's IT systems for work-related reasons should confirm approval of the site(s) by the Dean/CAO if Faculty or staff, or the Associate/Assistant Dean of Student Affairs if a Student. Those faculty and staff members may access the approved site(s) as necessary for the performance of their duties.

3.4 Personal use of NCOM's IT systems to access social media/networking sites is permitted, but should be limited, not interfere with or impact normal business operations, comply with all NCOM policies, not compromise the security or reputation of NCOM or the reputation of the profession of osteopathic medicine, not burden the College with unreasonable incremental costs, and comply with all other provisions of this policy.

3.5 Anyone participating in a social media/network for any reason is responsible for reading, understanding, and complying with the site's terms of use. Any concerns about the terms of use for a site should be reported to the IT Director.

3.6 Many social media/networking sites permit users to search for or import contact information from the user's contact list. Due to confidentiality and privacy concerns, users are prohibited from importing or uploading any of NCOM's contacts to any networking sites where the information may be used beyond name recognition software purposes.

3.7 Users are personally responsible for all content they post on social media/networking sites. Remember that it is difficult to delete content once posted to a site, so be cautious when writing any posting. If a user has a question about the propriety of any posting, they should consult the Associate/Assistant Dean of Student Affairs (student) or Dean/CAO (faculty/staff).

4. Guidelines Users must follow these guidelines for all postings

4.1 Individuals who manage NCOM social media sites or contribute to them as representatives of NCOM should:

4.1.1 Protect and enhance the value of NCOM brand by maintaining positive interactions with all those you encounter while representing NCOM online.

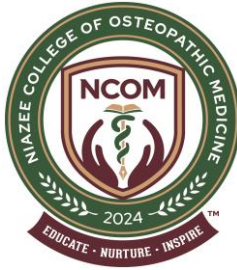
- 4.1.2 Ensure that social media content representing the school is in compliance with applicable privacy laws, including the Health Insurance Portability and Accountability Act (HIPAA) and the Family Educational Rights and Privacy Act (FERPA).
- 4.1.3 Refrain from revealing private information about students, staff, faculty and patients except in the rare instances where you might have that person's express permission to do so. In the case of students or patients, written consent is required.
- 4.1.4 Be certain to use the correct name when referring to the school: The Niazee College of Osteopathic Medicine (NCOM).
- 4.1.5 Contact the office of the Dean/CAO for guidelines on using the NCOM logo on your site.
- 4.1.6 Refrain from making derogatory remarks online.
- 4.1.7 Be honest about your affiliations. If you have a vested interest in the topic you are discussing, do not try to hide those connections.
- 4.1.8 Be helpful and offer advice in your area of expertise, but only where appropriate.
- 4.1.9 Do not post content that is unrelated to your page topic or inappropriate for your target audience. (Keep your personal content on your personal pages or profiles.)
- 4.1.10 Refrain from spam. Sites representing the school should not be used to sell products or services.
- 4.2 Post only content that you would be comfortable with your professional colleagues, NCOM's audience, and the general public reading, hearing, or seeing.
- 4.3 Do not post anything that would potentially embarrass you, the osteopathic profession, or NCOM, or call into question your, the professions, or NCOM's reputation, including photographs or other images.
- 4.4 Do not discuss NCOM's business, unless authorized to do so.
- 4.5 Be careful to identify all copyrighted or borrowed material with appropriate citations, links, or permissions.
- 4.6 Obtain approval from NCOM's legal counsel before responding to an inaccurate, accusatory, or negative comment about NCOM's employees, students, its broadcasts, its guests, or an inquiry about any other legal matter.
- 4.7 Don't use NCOM's network or email lists to influence polls, rankings, or web traffic.
- 4.8 Show good judgment when "friending" someone within a social network.

4.9 Monitor your site regularly and promptly remove any inappropriate content.

4.10 Obey the law. Refrain from posting any information or conducting any online activity that may violate applicable local, state, or federal laws and regulations.

5. Violations of This Policy

Due to the importance of this policy, NCOM will not tolerate violations. All students and NCOM personnel, including managers and staff, are subject to sanctions for violations of this policy. Consequences may include such measures as immediate termination of employment and dismissal from the college, or any other action deemed appropriate by NCOM under the circumstances.



NCOM INSTITUTIONAL POLICY: D4010

Visitors on Campus

Category: Facilities, Health and Safety
Subject: Visitors on Campus
Effective Date: November 1, 2024
Updated: N/A

1. Authority

2. Introduction

2.1 The Niazee College of Osteopathic Medicine (NCOM) is an institution of higher education and, as such, welcomes visitors to campus. To protect the safety of visitors, as well as college personnel and facilities, certain restrictions apply.

2.2 A visitor to campus is defined as one who is not currently enrolled as a student of NCOM or its cooperating institutions or currently employed by NCOM or its cooperating institutions.

3. Visitors and Activities

Visitors are welcome to the campus to participate in:

- 3.1 An activity to which they have been specifically invited.
- 3.2 A school-sponsored activity to which the public has been invited.
- 3.3 Legitimate business with the College and/or its cooperating institutions.
- 3.4 An activity sponsored by an external organization for which the College has assumed co- sponsorship.
- 3.5 An activity of an external organization which has rented or received prior approval to use school facilities for a specific purpose and for which proper liability coverage has been provided.
- 3.6 Activities which support the emergency needs of the College.
- 3.7 Activities of regulatory or accrediting agencies.

3.8 Activities in the Student Center which are defined and controlled by policies in the Student Handbook.

3.9 Other activities which are reasonably related to school business.

4. Children on Campus

4.1 Visitors to campus who are accompanied by minor children are expected to provide direct supervision for the minor(s) at all times.

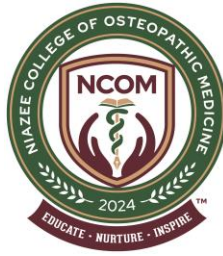
4.2 Employees and students are restricted from having minor children on campus except under the circumstances listed above or in other exceptional, short term, non-daily recurring situations which must be approved by the immediate supervisor or responsible faculty member. Short-term exceptions will be granted only until alternate arrangements can be made for the care of the minor. During these exception periods, the sponsoring adult is expected to provide direct supervision/control of the minor at all times.

4.3 Examples of exceptional, short term, non-daily recurring situations are emergency school closings or opening delays, or physician/dental appointments.

5. Trespassers

5.1 Persons on campus involved in activities which are not college-related or sponsored as identified above, may be directed to leave the campus. Repetitive unauthorized presence or activities may result in further action, including notification that such activities are considered trespassing and subject to legal action.

5.2 College personnel observing unauthorized occupancy or activities should report the occurrence to one of the following: the security officer on duty or other senior administrators. If no responsible school officer is present, any activity for which there is an immediate potential for injury or significant damage should be reported to the Schaumburg Village Police, Cook County Sherriff, or the Illinois State Police.



NCOM INSTITUTIONAL POLICY: D4030

Safety and Security

Category: Facilities, Health and Safety
Subject: Safety and Security
Effective Date: January 22, 2025
Updated: June 10, 2025

1. Authority

34 C.F.R. § 668.46

2. Policy

NCOM shall work with appropriate emergency response agencies to maintain a safe and secure environment for faculty, staff, students, and visitors to the campus and its operated facilities. This includes disaster preparedness that provides for ongoing business operations including delivery of the Doctor of Osteopathic Medicine degree program.

2.1 The College shall maintain physical access control for NCOM's campus as well as its operated facilities. Access rights are granted based upon an individual's status and job responsibilities.

2.2 NCOM shall maintain plans for emergency preparedness and provide public access to those plans.

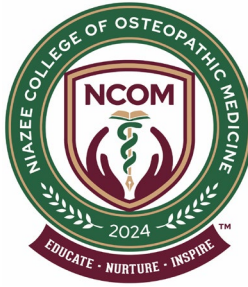
2.2.1 All students and employees of NCOM receive periodic training or orientation to the campus emergency preparedness plan as appropriate for their responsibilities.

2.2.2 NCOM will provide information to students and employees regarding safety and security policies and procedures, security awareness and crime prevention annually.

2.3 NCOM shall maintain a disaster preparedness plan that enables business and educational continuity.

2.4 Students and employees shall be provided access to timely warnings and notifications regarding threats to the health or safety of the NCOM community.

2.5 NCOM shall create an Annual Safety and Security report to comply with Clery Act requirements



Institutional Policy D4040 Firearms

Category: Facilities, Health and Safety
Subject: Firearms
Effective Date: January 22, 2025

1 Authority

2 Policy:

All members of the NCOM community, as well as visitors, are prohibited from possessing firearms on the premises of NCOM, regardless of whether a federal or state license to possess the same has been issued to the possessor, unless the possessor qualifies under one or more of the following exceptions:

- 2.1. A Peace Officer;
- 2.2. Security personnel authorized by NCOM;
- 2.3. A person conducting or participating in a college-approved program, class or other activity involving the carrying of a Firearm; or
- 2.4. A person older than nineteen years of age on NCOM premises in a private automobile or other private means of conveyance, for lawful protection of the person's or another's person or property.

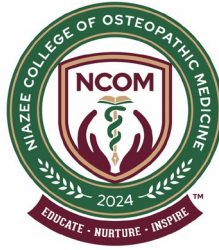
22.3 Whoever commits unlawful carrying of a firearm on the NCOM campus is subject to disciplinary action including filing of a criminal complaint through federal, state, and/or local law enforcement.

22.4 Definition of Firearm:

4.1 Any device that shoots a bullet, pellet, flare, tranquilizer, spear dart, or other projectile, whether loaded or unloaded, including those powered by CO₂.

4.2 This includes but is not limited to guns, air guns, dart guns, pistols, revolvers, rifles, shotguns, cannons, plastic firearms made with 3D printers or copying technology, and

any ammunition for such device.



INSTITUTIONAL POLICY: D5000

Academic and Professional Standards

Category: Learning Environment
Subject: Academic and Professional Standards
Effective Date: December 27, 2024
Updated: May 16, 2025

1 Authority

COCA 5.1.1

2. Introduction

2.1 The Niazee College of Osteopathic Medicine (NCOM) evaluates students pursuing the D.O. degree as thoroughly as possible for their cognitive and non-cognitive abilities, their academic and professional knowledge and skills, their integrity, and their suitability for the practice of osteopathic medicine. NCOM expects osteopathic medical students to behave as mature, adult, self-directed, independent learners, and as early professionals.

2.2 Osteopathic medical students must behave with a primary concern for patients' welfare and respect for the rights of patients. In addition, they must adhere to the highest standards of integrity and honesty in their interactions with patients, staff, colleagues, faculty and administrators. Students are expected to adhere to the standards set forth in policies, rules and procedures set forth by NCOM and relevant professional guidelines. NCOM's degree of Doctor of Osteopathic Medicine may only be conferred on a candidate who, in addition to other requirements, "has demonstrated ethical, personal, and professional qualities deemed necessary for the continued successful study and practice of Osteopathic Medicine."

2.3 The preservation of order and discipline on a campus shall be the concern of all those who function within the campus community. Admission to NCOM implies an agreement between the student and institution. The institution provides the opportunity to participate in its programs and privileges. The student agrees to comply with the expectations, policies, rules, and regulations of NCOM to protect those programs and privileges, and to consistently demonstrate the maturity, integrity, and professional qualities deemed necessary for the continued study and practice of osteopathic medicine. Students are expected to exhibit responsible professional behavior regardless of time or place. Failure to do so may result in disciplinary action by NCOM. Responsible professional behavior is a standard of conduct which reflects the public's higher expectations of physicians.

2.4 It is the responsibility and expectation of faculty to mentor and monitor student professionalism and to counsel students who demonstrate unprofessionalism. Faculty are also expected to complete and submit professionalism forms for both positive and negative conduct.

2.5 Students shall have the right to appeal such faculty and administrative actions as grades (only failing grades in Years 3 & 4), dismissal, or other academic or professionalism sanctions. Note: Placement on Academically-at-Risk status is not considered to be an academic sanction, but is a status designated because of receiving a failing grade or grade point average.

2.6 Any member of the campus community may bring charges of misconduct or unprofessionalism against any student and the Academic Integrity, Conduct, and Professionalism Committee (ACPC), if engaged, may recommend sanctioning a student for such charges (if found to have committed them). These sanctions may include Professionalism Probation and ultimately dismissal from the college. The term "campus community" shall refer to all faculty, staff, or students both on the NCOM campus and at contracted teaching sites. This may also include medical and support personnel at contracted teaching sites. The charges against a student must be detailed in writing including date, time, and witnesses, if any, to the Chair of the ACPC. Charges of complaint must be filed within thirty (30) days of knowledge of the event, unless good cause is shown why the charges were not filed within that period.

2.7 A file containing a report or reports, and any other written materials pertaining to an incident involving professionalism will be kept by the ACPC for seven (7) years from the date of a student's matriculation.

3. Standards of Student Conduct

3.1 All students at the institution are subject to, and are required to comply with, observe and obey the following:

- 3.1.1 The laws of the United States;
- 3.1.2 The laws of the State of Illinois;
- 3.1.3 Local municipal and county ordinances; and
- 3.1.4 The policies, rules, and regulations of the institution.

3.2 Prohibited conduct includes, but is not limited to:

- 3.2.1 Disorderly conduct;
- 3.2.2 Theft; and
- 3.2.3 Disruption.

The appendix sections of the ACPC and Student Promotion Committee (SPC) Policies and Procedures as well as the Procedure for Appeal of Final Course Grades contain additional information on prohibited conduct.

4. Standards of Professional Conduct

4.1 All NCOM students are personally responsible for their behavior and conduct at all times in all settings, whether on campus or off campus. Students must follow the published and signed Professionalism Contract, Code of Conduct and Academic Integrity Policy provided upon matriculation of each year of study.

4.2 Since physicians are held to a higher standard by the general public, the following standards are expected to be maintained by NCOM students:

4.2.1 Behaves in a responsible, professional, reliable and dependable manner, e.g., demonstrates appropriate personal control, manages time well, is on time for assignments, meetings, and appointments; responds to communication/inquiries from NCOM in a timely manner (usually within 2 business days), attends required activities, takes tests on the scheduled day; takes on tasks that he/she/they can manage; plans ahead and follows through with commitments; cooperates with person(s) in charge of programs; and takes responsibility for absences or missed assignments. Indicates no evidence of participating in academic or clinical endeavors at NCOM or its affiliated institutions while under the influence of alcohol, cannabis, a controlled substance, or illicit drugs. The student has not shown evidence of use, possession, or distribution of illegal drugs at any time.

4.2.2 Is consistent and truthful; honest in reports and self-evaluations.

4.2.3 Projects a professional image in manner, dress, grooming, speech, and interpersonal relationships that is consistent with the osteopathic medical profession's accepted contemporary community standards, e.g., maintains awareness of personal hygiene, adheres to site or activity-specific dress codes, notifies faculty members, associate dean, preceptor, or other leader (whomever is appropriate for the circumstance) in case of emergency absence or calls to apologize if unable to notify in advance; is respectful of other students and patients when doing physical examination or treatment.

4.2.4 Recognizes their personal limitations and biases, whether they are intellectual, cultural, physical, or emotional and strives to correct them, e.g., overcomes negative behaviors such as procrastination, learns to be a team member, and adapts to new situations.

4.2.5 Demonstrates the professional and emotional maturity to manage tensions and conflicts which occur among professional, personal, and family responsibilities, seeking professional help, if necessary, meets with supposed antagonists to resolve misunderstandings, gets needed help from faculty advisors, tutors, counselors, learning assistance professionals and other qualified persons, shows ability to appropriately prioritize personal, professional, and academic expectations and activities.

4.2.6 Demonstrates the ability to exercise sound judgment and to function under pressure, e.g., does not endanger others or place patients at risk; respects the difference between the medical student and doctor; remains focused on the task at hand; and remembers that as a student they represent NCOM. Students must be able to concentrate, analyze and interpret data, make decisions and behave professionally under a time limit and do so under a reasonable amount of stress.

4.2.7 Demonstrates ability to learn from mistakes and failures and heeds admonitions and warnings from administration and faculty of NCOM and from clinical supervisors. Is responsive to feedback and constructive criticism regarding professionalism and attitude, understands the seriousness of academic and disciplinary warnings.

4.2.8 Demonstrates compassion and respect toward others. Avoids discriminatory conduct (verbal and non-verbal), speech (including e-mails), and harassment. Avoids harm, abuse, damage, or theft to any person or property.

4.2.9 Consistently demonstrates respect for administration, faculty, staff, and fellow students at NCOM, e.g., maintains a respectful learning attitude in the classroom and labs; responds promptly to necessary academic requests, or business inquiries made by staff at the institution. Additionally, recognizes all fellow students as peers who have earned the right to be in the educational process.

4.2.10 Has not utilized NCOM or any hospital/clinic facilities without authorization and gives no indication of treating patients without authorization by the clinical staff and with supervision.

4.2.11 Demonstrates compassion and respect toward others. Is not disruptive in any way; does not participate in harassment, fights, or any form of violent behavior including abusive/foul language. Has not been reported as having a conviction of a criminal offense other than a traffic offense. Obeys the laws of the country, state, and city.

4.2.12 Remains in compliance with the published policies, procedures, catalog, handbooks, syllabi, and regulations of the Niazee College of Osteopathic Medicine and its governing board.

4.2.13 Adheres to appropriate standards of confidentiality with respect to information about patients or fellow students.

4.2.14 Treats patients and their families with dignity and respect both in their presence and in discussions with other members of the health care team.

4.2.15 Honest in interactions with clinical and research colleagues and in record keeping.

4.2.16 Respects their limits of responsibility and activity set by supervisors.

4.2.17 Adheres to all NCOM, hospital, and clinic, policies, rules and procedures.

4.2.18 Follows and maintains the appropriate chain of command in all endeavors regarding NCOM and its affiliated sites.

5. Standards of Academic Integrity

5.1 The most fundamental value of any academic community is intellectual honesty: all academic communities rely upon the integrity of each and every member. Students are responsible not only for adhering to the highest standards of truth and honesty, but also for upholding the principles and spirit of the following standards of conduct described in this policy.

5.2 Activities that have the effect or intention of interfering with education, pursuit of knowledge, or fair evaluation of a student's performance are prohibited. Prohibited academic conduct for which a student is subject to discipline includes, but is not limited to, the following:

5.2.1 Cheating: using or attempting to use unauthorized assistance, material, or study aids in examinations or other academic work or preventing, or attempting to prevent another from using authorized assistance, material or study aids. Example: looking at the papers or computer screen of students in adjacent seats; secreting notes for use during a quiz or exam, whether on one's person, in the examination room, or any other room within the building; having someone else take an exam or portion thereof for the student; or altering a graded exam and resubmitting it for a better grade.

5.2.2 Plagiarism: using the ideas, data, or language of another without specific or proper acknowledgment. Example: copying another person's paper, article, SOAP Note or computer work and submitting it for an assignment; cloning someone else's ideas without attribution; or failing to use quotation marks where appropriate.

5.2.3 Fabrication: submitting contrived or altered information in any academic exercise. Example: submitting a false case report; making up data for an experiment; fudging data; citing nonexistent articles; or contriving sources.

5.2.4 Multiple submissions: submitting, without prior permission, any work submitted to fulfill another academic requirement.

5.2.5 Misrepresentation of academic records: misrepresenting or tampering with or attempting to tamper with any portion of a student's transcripts or academic record, either before or after coming to NCOM. Example: forging a change of grade slip; tampering with computer records; or falsifying academic information on one's application.

5.2.6 Facilitating academic dishonesty: knowingly helping or attempting to help another violate any provision of this policy. Example: letting others see your answers to an exam; letting students who take an exam later than you do know the contents of that exam; or working together on a take-home exam.

5.2.7 Unfair advantage: attempting to gain unauthorized advantage over fellow students in an academic exercise. Example: tampering or unauthorized use of computers; gaining or providing unauthorized access to examination materials; obstructing or interfering with another student's efforts in an academic exercise; lying about a need for an extension for an exam or paper; continuing to write even when time is up during an exam; or destroying or keeping library materials for one's own use.

5.2.8 Upon signing the Professionalism Contract, Code of Conduct, and NCOM Academic Integrity Policy the student will acknowledge that such academic and professional standards exist and agree to abide by these standards while at NCOM or in the community.

6. Penalties and Sanctions

Students found in violation of any of the standards of student conduct, professional conduct, or academic integrity shall be subject to institutional disciplinary action, which may result in probation, suspension, dismissal, or other sanction, whether or not there is prosecution for such actions or conduct in local, state, or federal courts. The penalties/sanctions listed are available to the ACPC for recommendation and the administrative authority (see Section 7.1) of the school to impose when the circumstances indicate that such action is appropriate. Penalties/ sanctions for a violation may be one or a combination of the following:

6.1 Verbal Warning:

An oral statement to the student offender that he/she has violated standards of conduct or integrity, and that continuation or repetition of the conduct found wrongful may be cause for more severe disciplinary action.

6.2 Written Warning:

Written notice to the student that continuation or repetition of the conduct found wrongful, may be cause for more severe disciplinary action.

6.3

A lower grade or failure of the course or graded activity (e.g., quiz, exam) in which the violation occurred.

6.4 Restitution:

Reimbursement for damage to or misappropriation of property. Reimbursement may take the form of an appropriate service to repair or otherwise compensate for damage.

6.5 Discretionary Sanctions: Work assignments, essays, services to NCOM, or other related discretionary assignments.

6.5.1 Submittal of letter of apology to complainant/victim.

6.5.2 Educational sanction: these may include attending a program, counseling, developing a program, writing a paper, or other educational sanction. Students may be charged a fee to attend an educational program.

6.5.3 Loss of ability to hold any national or NCOM office or position, either by election, petition, or appointment, in any recognized student organization or group for a specified amount of time.

6.5.4 Loss of membership in clubs, and/or officially recognized organizations.

6.5.5 A lower grade or failure of the course or exam in which the violation occurred.

6.5.6 No contact order in cases where it is warranted.

6.5.7 Other sanctions deemed appropriate as per the Academic Integrity, Conduct, and Professionalism Policy.

6.6 Disciplinary (Academic or Professionalism) Probation:

Exclusion from the use of all NCOM property and facilities and exclusion from all NCOM student and institutional activities including Clinical facilities, Library, and classrooms (depending upon the severity of the violation). The time limit shall be set forth in the notice of disciplinary probation and shall not be less than one (1) month nor exceed six (6) months.

6.7 Suspension:

Temporary interruption of student status. Exclusion from the use of all NCOM property and facilities and all NCOM student and institutional activities. The time limit shall be set forth in the notice of suspension and shall not be less than two (2) weeks nor exceed one (1) year. For students in Year 1 or Year 2, due to the nature of the program, the time limit shall be developed to coincide with the course the student was on when suspended and when the same course is taught during the next academic year. Conditions for reinstatement, if any, may be stated in the order.

6.8 Dismissal:

Termination of student status includes any remaining right or privilege to receive some benefit or recognition or certification.

6.9 Revocation of Admission and/or Degree:

Admission to or a degree awarded from NCOM may be revoked for fraud, misrepresentation, or other violation of NCOM standards in obtaining the degree, or for other serious violations committed by a student prior to graduation.

6.10 Students who fail to sign the Professionalism Contract, Code of Conduct, and Academic Integrity Policy during Orientation will not be allowed to complete matriculation.

7. Authority to Impose Penalties and Sanctions

7.1 The authority to impose penalties and sanctions for violations of student conduct, professional conduct, or academic integrity resides with the Academic and Professionalism Committee (ACPC), the Student Promotions Committee (SPC), the Associate Dean for Academic Affairs for Years 1 and 2, the Associate Dean for Clinical Affairs for Years 3 and 4 and the Dean/CAO (i.e., the “administrative authority”).

7.2 The appropriate Associate Dean, with or without a recommendation from the Student Promotions Committee or ACPC can administratively impose any penalty/sanction as listed in Section 6 above with the exception of dismissal and revocation of admission and/or degree, which can only be imposed by the Dean/CAO.

7.3 The recommendation or imposition of penalties/sanctions shall be made in consideration of the nature of the violation and the student's previous record. The consideration of the imposition of sanctions in a matter does not preclude the review and imposition of penalties for other failures to adhere to policies, rules, or procedure while a case is pending.

7.4 The appropriate Associate Dean or designee shall review all reports of violations (academic, behavioral, professional) as to whether the matter can be administratively decided or whether the matter includes disputes of material facts and requires independent findings of fact by the ACPC or SPC. The Associate Dean refers matters to the ACPC or SPC (depending on the type of issue) which will report its findings and recommendations to the Associate Dean for determination of action regarding the matter in question.

7.5 The Dean/CAO must be notified in writing of all sanctions against a student with the exception of verbal warnings. A student on suspension must petition the administrative authority that imposed the sanction for reinstatement. The administrative authority shall review the petition, make a determination as to whether the terms and conditions of the suspension have been met, make a determination that the student possesses the potential to pursue the DO degree successfully, and make a determination as to whether and when the student should be reinstated.

7.6 If a matter warrants findings of fact, the Associate Dean handling the case shall inform the accused student of the charges in writing within ten (10) business days and submit the case to the ACPC or SPC.

7.7 Within ten (10) business days following receipt of the written report from the ACPC or the SPC the Associate Dean shall either review the facts of the case and take such action as may be appropriate or refer the matter back to the ACPC or SPC for consideration.

7.8 Within ten (10) business days following receipt of the written report from the ACPC or SPC, the Associate Dean shall review recommendations for the disposition of the case and take such action as may be appropriate. In the case of dismissal, the Associate Dean will forward the recommendation of the ACPC or SPC along with their independent recommendation to the Dean/CAO for disposition of the case.

7.9 If the Associate Dean's or Dean's decision, or any part thereof, is averse to the student, the Associate Dean or Dean, usually within five (5) business days of notifying the student of the decision, shall advise the student of their rights to appeal and appropriate appeal procedures. The student and other appropriate NCOM employees/faculty shall be notified in writing of the decision.

8. Academic Integrity, Conduct, and Professionalism Committee (ACPC)

8.1 The ACPC investigates alleged violations of policy or any other matter as directed by an Associate Dean or the Dean where disputes of material facts exist that require independent findings of fact. The jurisdiction and authority of the ACPC shall be to (1) hear evidence and (2) make findings of fact from the evidence presented. The Committee issues a written report on its conclusions and recommendations to the Associate Dean or Dean that referred the matter. The

Committee may reconsider a matter under certain circumstances (e.g., new evidence) if so directed by an administrative authority.

8.2 The ACPC is a faculty committee. The procedure for and composition of the committee are specified in a separate document, *Academic Integrity, Conduct and Professionalism Committee Bylaws, Policies and Procedures*.

9. Academic Integrity, Conduct, and Professionalism Committee or Student Promotions Committee- Hearings

9.1 The ACPC or SPC shall conduct a hearing on the case within ten (10) business days after receipt of the charges to make a determination of the facts of the case and make recommendations.

9.2 Hearings by the ACPC or the SPC are closed to the public and the press.

9.3 The hearing shall be conducted in such a way as to allow substantial justice and shall not be unduly restricted by the rules or procedure of evidence.

9.4 The conduct of hearings is specified in separate documents: Academic Integrity, Conduct, and Professionalism Committee Bylaws, Policies, and Procedures or Student Promotions Committee Bylaws, Policies, and Procedures

9.5 No absolute determination may be based solely upon the failure of the accused student to answer the charges or to appear at the hearing. At the discretion of the ACPC or the SPC Chair, the hearing may proceed if the accused student fails to appear. In such a case, the evidence in support of the charges shall be presented and considered. In any event, all findings of fact and recommendations shall be based solely upon the evidence in the case as a whole. In hearings involving more than one student, in which one or more, but not all, requests a private hearing, severance shall be allowed.

9.6 After the hearing, the ACPC shall, within a reasonable time [usually five (5) business days] make findings of fact, if any, according to the standard of “more likely than not”, adopt them by majority vote and forward a written report with recommendations to the referring Associate Dean or Dean, as appropriate. The Associate Dean or Dean, as appropriate, will review the findings of fact of the case and will decide the case based upon these recommendations.

9.7 The procedures for Academic Integrity, Conduct, and Professionalism Committee Hearings are specified in a separate document, Academic Integrity, Conduct, and Professionalism Committee Bylaws, Policies, and Procedures.

10. Student Promotions Committee – Hearings on Appeal of Final Course Grades

10.1 If the Dean determines the matter includes disputes of material facts and requires independent findings of fact, the matter may be referred to the SPC. The SPC conducts hearings, reviews the case and forwards all findings to the Dean.

10.2 SPC investigations and any hearings are limited to consideration of the following:

10.2.1 Assignment of a grade that is malicious and/or discriminatory: i.e., in determining the grade, the same standard will be used for grading the appealing student as for other members of the class whose work and behavior were similar to those of the appealing student.

10.2.2 Assignment of a grade that is arbitrary and/or capricious: i.e., the person assigning the grade apparently had no discernible rationale for arriving at the grade given.

10.2.3 Assignment of a grade that has resulted from human error: i.e., an incorrect grade was reported as the consequence of a mistake in computation, in recording or in some other mechanical aspects of the grading process.

10.3 The procedures for Student Promotions Committee Hearings are specified in a separate document, *Student Promotions Committee Procedures*.

11. Academic Integrity, Conduct, and Professionalism Committee

11.1 The ACPC considers cases referred by the Associate Dean for Academic Affairs, Associate Dean for Clinical Affairs or Dean for recommendation of penalties/sanctions for violations of standards of conduct, academic integrity, professional conduct and failure to meet professional standards.

11.2 If there is a conclusion that a violation has occurred, the Associate Dean may forward the case to the ACPC for recommendations of penalties/sanctions. Consideration of a matter by the ACPC does not preclude the review and imposition of penalties for other failures to adhere to policies, rules, or procedure while a case is pending.

11.3 The penalties/sanctions as listed in Section 6 and in the ACPC Policies and Procedures are available to the ACPC for consideration and may be recommended in consideration of the nature of the violation and the student's previous record.

11.4 The ACPC is a faculty committee. The procedure for and composition of the committee are specified in a separate document, *Academic Integrity, Conduct and Professionalism Committee Procedures*.

11.5 The Academic Integrity, Conduct, and Professionalism Committee shall conduct a hearing on the case within ten (10) business days after receiving the case from an administrative authority.

11.6 Hearings by the SPC are closed to the public and the press.

11.7 The hearing shall be conducted in such a way as to allow substantial justice and shall not be unduly restricted by the rules or procedure of evidence.

11.8 The conduct of hearings is specified in a separate document, Student Promotions Committee Procedures.

11.9 No determination may be based solely upon the failure of the accused student to appear at the hearing. At the discretion of the Committee Chair, the hearing may proceed if the accused student fails to appear. In such a case, the facts of the case shall be presented and considered. In hearings involving more than one student, in which one or more, but not all, requests a private hearing, severance shall be allowed.

11.10 After the hearing, the Committee shall, within a reasonable time [usually five (5) business days] make conclusions and recommendations for penalties/sanctions based upon the evidence in the case as a whole and the student's previous record, adopt them by majority vote and forward a written report to the referring Associate Dean or Vice President for Academic Affairs and Dean, as appropriate.

11.11 The procedures for Student Promotions Committee Hearings are specified in a separate document, Student Promotions Committee Procedures.

12. Student Promotions Committee – Failure to Meet Academic Standards

12.1 Years 1 and 2

12.1.1 A grade of less than 75% for any course in any portion of the academic program constitutes a failure. A student with a failure in a course will be placed on Academically-at-Risk Category 2 by the Dean after being notified by the Registrar's Office and their academic record will be sent to the Student Promotions Committee at the appropriate time for review.

12.1.2 If a student fails a course, the Student Promotions Committee will review the student's performance and make recommendations to the Associate Dean for Preclinical Education. These recommendations may include:

- (i) remediation of the failure;
- (ii) repeating a portion of the curriculum;
- (iii) repeating the entire academic year; or
- (iv) dismissal.

12.1.3 In addition, the Student Promotions Committee may include other recommendations to improve the students' performance.

12.1.4 In the case of dismissal, the Associate Dean for Academic Affairs will forward the recommendation of the Student Promotions Committee along with their independent recommendation to the Dean for disposition of the case.

12.1.5 While the Student Promotions Committee must meet to discuss all Year 1 and Year 2 failures, the Associate Dean for Academic Affairs will make recommendations to the Student Promotions Committee regarding the appropriate time that the student's performance should be reviewed.

12.2 Year 3 and Year 4 failures are addressed in Institutional Policy D6021: Grading Policies and Procedures – Clinical Rotations.

12.3 Failure to pass an OSCE is addressed in Institutional Policy D6050.

12.4 Standards for professional conduct are discussed in Section 4 of this policy and are referred to the ACPC.

12.4.1 A student may fail a course or OSCE as a result of unprofessionalism.

12.4.2 If a student is remanded to the ACPC due to a finding of unprofessionalism in a course or OSCE, the Committee will review the case and make appropriate recommendations to the appropriate Associated Dean which may include:

- (i) repeating a portion of the curriculum;
- (ii) repeating the entire academic year;
- (iii) suspension;
- (iv) dismissal; or
- (v) sanctions based on the ACPC Policies

12.4.3 In addition, the ACPC may include other recommendations to improve the student's professionalism.

12.4.4 In the case of dismissal, the appropriate Associate Dean will forward the recommendation of the ACPC along with their independent recommendation to the Dean/CAO for disposition of the case.

12.5 Promotion and Graduation

12.5.1 The Student Promotions Committee reviews the academic and professional performance of each student and grants promotion to the next academic year.

12.5.2 The SPC will review student ACPC files as a part of the student promotion process. The chair of the ACPC will provide a summary report to the SPC on the student's professional behavior.

12.5.3 Students may engage in any part of a subsequent curriculum year only after they have successfully completed all academic and non-academic requirements of the current year as determined by the SPC. To be promoted from Year 1 to Year 2, Year 2 to Year 3, or Year 3 to Year 4, a student must pass all courses, OSCEs, and any remediation presented during those respective years. Promotion from Year 2 to Year 3 also requires compliance with Institutional Policy D6055: Promotion Requirement National Board Examination - Passage of the COMLEX. For each portion of the curriculum, the student must demonstrate ethical, personal, and professional qualities deemed necessary for the continued successful study and practice of Osteopathic Medicine.

12.5.4 The Committee recommends students for graduation based upon the contingency of successful completion of all requirements and upon adherence to all professional standards of behavior. For its review, the Committee has access to each student's entire record.

13. Appeals

13.1 The primary purpose of an appeal is to ascertain whether the sanctions under appeal were imposed in a manner consistent with institutional policy. The student may appeal the decision of the Associate Dean to the Dean/CAO. Within five (5) business days of receipt of notification of a decision by the Associate Dean, a written appeal must be submitted to the Dean/CAO, with a copy sent to the Associate Dean. The Dean/CAO must respond in writing within a reasonable time, usually ten (10) business days. Except in cases of expulsion or dismissal, the decision of the Dean/CAO shall be final.

13.2 The consideration of an appeal by the Dean/CAO should include, but not be limited to, examination of the pertinent facts and any previous deliberations which resulted in the decision or imposition of a sanction for areas in which they might have been in error, might have contained violations of due process, or might have been made without knowledge of pertinent facts.

13.3 Failure to notify the administrative authority (i.e., the Associate Dean or Dean who made a decision), ACPC or Student Promotions Committee of pertinent facts known at the time of the administrative decision or committee hearing is not grounds for an appeal. If the appeal is based on new information that has become available or was not known prior to the decision to impose sanctions or committee hearing, the matter will be returned to the administrative party for reconsideration of the original decision. The matter may also be sent to the ACPC and/or Student Promotions Committee for consideration.

13.4 The accused student may not graduate during the process of an appeal.

13.5 Appeals of Dismissal or Expulsion

13.5.1 The primary purpose of an appeal of dismissal or expulsion is to ascertain whether the sanction was imposed in a manner consistent with institutional policy. In the case of dismissal or expulsion, the student may appeal their case to the Dean/CAO. The decision of the Dean is considered final.

13.5.2 The accused student may not graduate during the process of the appeal.

13.6 Appeals – Role of a possible Ad Hoc, Independent Fact-Finding Committee

13.6.1 The administrative authority considering an appeal may refer the matter to an independent ad hoc Fact-Finding Committee for consideration of the merits of the appeal. Committee hearings are limited to examination of previous deliberations that resulted in the decision of dismissal or imposition of sanction for:

- (i) areas in which they might have been in error,
- (ii) areas that might have contained violations of due process,

(iii) relevant, new information discovered after the decision of the administrative authority to impose sanctions.

13.6.2 The Independent Ad Hoc Fact-Finding Committee will make findings of fact from the evidence presented. The Committee may forward one of the following conclusions to the referring administrative authority.

- (i) Rejection of the appeal if it does not meet one of the three criteria listed above.
- (ii) The appeal meets the criteria set forth for consideration and warrants further consideration. Furthermore, the Committee shall, if so directed by the referring administrative authority, investigate alleged violations of policy or any other matter where disputes of material facts may exist. The Committee shall issue a written report on its findings of fact and conclusions to the Associate Dean or Dean who referred the matter.

13.6.3 Committee Hearings are conducted as described in a separate document, Independent Ad Hoc Fact Finding Committee Procedures.

13.7 Appeals – Role of the ACPC or SPC

The administrative authority considering an appeal may refer the matter to the ACPC or Student Promotions Committee to consider the appropriateness of sanctions against a student given the circumstances of the case. Committee Hearings are conducted as described in separate documents, ACPC or SPC Procedures.

14. Appeal of Final Grades

14.1 Only the final grade of a course may be appealed. In order to appeal a final grade in a course, a student must offer convincing evidence that good cause exists for mandating a change of grade. A request for a grade appeal is not automatically granted.

14.2 Only the following three (3) circumstances, if supported by sufficient evidence, shall constitute "good cause" for the purposes of appealing a final course grade.

14.2.1 Assignment of a grade that is malicious and/or discriminatory: i.e., in determining the grade, the same standard used for grading the appealing student as for other members of the class whose work and behavior were similar to those of the appealing student.

14.2.2 Assignment of a grade that is arbitrary and/or capricious: i.e., the person assigning the grade apparently had no discernible rationale for arriving at the grade given.

14.2.3 Assignment of a grade that has resulted from human error: i.e., an incorrect grade was reported as the consequence of a mistake in computation, in recording or in some other mechanical aspect of the grading process.

14.3 The procedures for the appeal of a final course grade are specified in a separate document, Procedures for the Appeal of a final Course Grade.

14.4 None of the following shall constitute "good cause" for the purposes of appealing a final course grade.

14.4.1 Disagreement with the course requirements established by the faculty member.

14.4.2 Disagreement with the grading standards established by the faculty member.

14.4.3 Disagreement with the judgment of the faculty member in applying grading standards—so long as he/she has made a reasonable effort in good faith to be fair and consistent in exercising that judgment. Good faith on the faculty member's part shall be assumed unless the student can offer convincing evidence to the contrary.

14.4.4 The student's desire or "need" for a particular grade, while compelling to the individual on the personal level, shall not be considered "good cause" for purposes of appeal.

14.5 Appeal of Final Grades – Years 1 - 4

14.5.1 After discussing the grade assignment with the appropriate Associate Dean, the student may appeal to the Dean/CAO. Only failing grades may be appealed in Years 3 & 4.

14.5.2 The Dean/CAO can administratively decide the matter if the facts of the case are not in dispute. If the Dean/CAO determines the matter includes disputes of material facts and requires independent findings of fact, he/she may refer the matter to an Independent Ad Hoc Fact-Finding Committee. The Independent Ad Hoc Fact-Finding Committee shall investigate the matter, conduct hearings as appropriate, review the case and forward its findings and conclusions to the Dean/CAO.

14.5.3 The decision of the Dean/CAO on a grade appeal is final. The Dean/CAO may request the appropriate Associate Dean to make appropriate grade changes. If not done, the Dean/CAO can administratively make the change.



INDEPENDENT AD HOC FACT-FINDING COMMITTEE PROCEDURE

1. Purpose

The purpose of this procedure is to give specific guidance to assist the Niazee College of Osteopathic Medicine (NCOM) with implementation of, and ensure institutional compliance with, Institutional D5000: Academic and Professional Standards regarding the independent Ad Hoc Fact-Finding Committee (FFC).

2. Applicability

2.1 This procedure applies to the function of the FFC.

2.2 NCOM reserves the right to amend this procedure at any time, as necessary or appropriate.

3. General Provisions

3.1 Any member of the campus community may bring charges of misconduct or unprofessionalism against any student.

3.2 Standards of student conduct, professional conduct, academic performance, and academic integrity are defined in Institutional Policy ST-01. Standards of conduct are further defined in the Appendix of this Procedure.

3.3 Incident reports must be detailed in writing including date, time, who was involved, witnesses and any other pertinent information.

3.4 Incident reports shall be processed as described in the Procedure for ST-01: Reporting Student Professional Behavior. If deemed necessary, the Associate Dean is responsible for informing (a) member(s) of the campus community of a possible violation of school policies and/or local, state, or federal laws by a student.

4. Referral Of a Matter to The Independent Ad Hoc Fact-Finding Committee

4.1 Negative professional behavior reports will be investigated as described in the Procedure for ST-01: Reporting Student Professional Behavior.

4.2 The Associate Dean may refer an issue to the FFC if they determine the matter includes disputes of material facts and requires independent findings of fact.

4.3 Pending hearing and resolution, a student's status shall not be altered unless there are exceptional circumstances in which the health or safety of the accused or other campus community personnel is in jeopardy. In such cases, immediate suspension may be authorized by the appropriate administrative authority. If referred to the FFC, a hearing will be scheduled within a reasonable time, usually within five (5) business days of the incident.

5. Composition Of the Independent Ad Hoc Fact-Finding Committee

5.1 Eight (8) faculty members (minimum of three (3) from the Department of Biomedical Sciences and three (3) from the clinical departments) shall be duly elected by the faculty to serve on the FFC. These eight (8) shall elect one (1) member to serve as Chair for the academic year. The Chair shall only vote in the event of a tie.

5.2 Five (5) members of the Committee including two (2) clinicians, shall constitute a quorum.

5.3 Each class of the first- and second-year student body shall elect three (3) students to serve on the FFC.

5.3.1 In cases of cheating or other non-academic matters (e.g., misconduct) referred to the Committee:

- a. The Chair shall select two (2) students to include on the FFC to consider the matter.
- b. Five (5) faculty including two (2) clinicians plus two (2) students, shall constitute a quorum

5.3.2 Except in cases of cheating, student members of the FFC may not participate in matters concerning academics.

6. Convening The Fact-Finding Committee

6.1 When an alleged violation of a statement of policy, rule or regulation is referred to the FFC, the NCOM Academic and Professional Standards policy (ST-01) and Fact-Finding Committee Procedures will be delivered by hand or by e-mail to the student and FFC Chair by the Associate Dean.

6.2 The date, time and place of the hearing and statement of student's rights to an advisor will be delivered to the student by the FFC Chair. These shall be delivered by hand or email usually within five (5) business days of the decision of the administrative authority to send the matter to the FFC.

6.3 Meetings of the FCC are called by the Chair. The hearing should occur usually within ten business days after receipt of the charges to determine the case's facts.

6.4 It shall be expressly provided that service of charges and notice of hearing by the student's NCOM email account shall not be defective if student shall have refused to read or otherwise maintain access to their NCOM email account and the hearing may proceed without hindrance or delay

7. Hearing Procedure

7.1 Investigative hearings are the principal method by which the Committee collects information on a matter in question.

7.1.1 The Assistant Dean for Multicultural and Student Affairs shall present cases at the hearing. The appropriate Associate Dean may select another designee to present a case to the FFC.

7.1.2 The committee shall investigate as it deems appropriate and call witnesses as necessary to investigate the matter in question and make a determination.

7.1.3 Hearings shall be conducted to allow substantial justice and shall not be unduly restricted by the rules or procedure of evidence.

7.1.4 Hearings by the FFC are closed to the public and the press.

7.2 A member of the FFC involved as a witness or having a conflict of interest with the matter under consideration may not serve as a member of the hearing panel.

7.3 Advisors

7.3.1 The accused student has the right to have one (1) advisor of their choosing present in the hearing. An advisor may consult with the accused student but may not speak on behalf of the student or otherwise participate directly in the proceedings unless given specific permission to do so by the Chair of the hearing. The advisor may be a member of the NCOM community (i.e., faculty, staff, or student) or external to NCOM (e.g., parent, guardian, or legal counsel).

7.3.2 The School may have legal counsel present, but counsel may not address the FFC unless given specific permission to do so by the Chair of the hearing.

7.4 There shall be a complete and accurate record of the hearing in the form of an audio recording.

7.4.1 Deliberations of the Committee will not be recorded.

7.4.2 Copies of audio recordings, together with copies of the exhibits, shall be furnished to the student upon request at no charge.

7.5 All material and relevant evidence may be presented subject to the right of cross-examination of the witnesses.

7.6 The student shall be advised of her/his rights by the Chair.

7.7 The accused student shall be entitled to be present throughout the testimony of witnesses, presentation of evidence and arguments of the parties; to know the identity of and content of testimony of the witnesses against him/her and to have them present at the hearing at appropriate times; and to present witnesses and any evidence on their behalf as may be relevant and material to the case.

7.8 In hearings involving more than one student, in which one or more, but not all, requests a private hearing, severance shall be allowed.

7.9 Witnesses will be called one at a time but will not be present during the testimony of other witnesses.

7.10 Neither the accused nor any witnesses will be permitted in the hearing room during the deliberations of the FFC.

7.11 An accused student or witness who disrupts the normal progress of the hearing may be dismissed by the Chair and the hearing will proceed.

7.12 The Chair may postpone the hearing for any reason if she/he deems it necessary for fairness to all parties involved. No more than thirty (30) calendar days, however, may pass between the time of the student's official notification of charges and the date of the hearing.

7.13 In the event the student or any witness fails to be present at the hearing, it shall take place as scheduled if sufficient information and documentation are available to make a decision or shall be rescheduled if additional documentation is needed by the FFC.

7.14 No finding on a policy and/or procedure violation may be based solely upon the failure of the accused student to answer charges or appear before the FFC. In such a case, the evidence in support of the charges shall be presented and considered. In any event, all conclusions shall be based solely upon the evidence in the case.

8. Post-Hearing

After the hearing, the Committee shall, within a reasonable time [usually five (5) business days] make findings of fact that a policy, rule or regulation was or was not been violated according to the standard of "more likely than not", adopt them by majority vote and forward a written report of their findings to the referring Associate Dean or Dean, as appropriate. The referring Associate Dean will consider the committee's findings and decide whether to impose sanctions, refer to the SPC, or take no further action.

9. Appeal Of a Decision for Dismissal or Other Sanction

9.1 Following the written decision of an administrative authority to dismiss or impose other sanctions on a student, the student may appeal the decision except as otherwise noted. The decision of an Associate Dean may be appealed to the Dean. The appeal must be submitted in writing to the Dean setting out the reasons an appeal should be granted.

9.2 The procedures for grade appeals are detailed in the document Procedure for Appeal of Final Course Grades.

9.3 The appropriate administrative authority will make a final decision on the appeal. This decision is final and cannot be appealed further by the student.

9.4 If referred to the FFC, the Committee may consider the merits of the appeal and will hear such proof of facts as may be deemed proper and reasonable and make such investigation and enter such recommendations as the facts justify and the circumstances may require. The investigations and hearings should include, but are not limited to, examination of the previous deliberations which resulted in the decision of dismissal (or imposition of sanction) for areas in which they might have been in error or might have contained violations of due process.

9.5 Committee hearings on an appeal will be conducted as described in the Hearing Procedure section above.

9.6 The Committee will determine if any added information submitted as part of the appeal was known prior to or after the decision to dismiss or impose sanctions. The Committee may consider as part of the appeal any relevant, added information discovered after the decision to dismiss or impose sanctions. Information known but not disclosed by the student prior to the decision to dismiss or impose sanctions may not be entered as new evidence supporting an appeal.

9.7 The Committee may recommend the appeal be allowed to move forward or be rejected based on the criteria listed in Institutional Policy D5000: Appeals – Role of the Fact-Finding Committee. A recommendation must specifically identify and address the areas in the decision being appealed and why the appeal does or does not meet the criteria for the appeal to proceed.



STUDENT PROMOTIONS COMMITTEE PROCEDURE

1. Purpose This procedure establishes specific guidance for Niazee College of Osteopathic Medicine (NCOM) to implement and maintain compliance with Institutional Policy D5000: Academic and Professional Standards as it relates to the function of the Student Promotions Committee (SPC).

2. Applicability

2.1 This procedure applies to any situation where matters are brought before the Student Promotions Committee.

2.2 NCOM reserves the right to amend this procedure at any time, as necessary or appropriate.

3. General Provisions

3.1 The function of the SPC is to review student academic performance and professionalism history from the Academic Integrity, Conduct, and Professionalism Committee to recommend promotion, remediation, or dismissal.

3.2 The SPC is responsible for reviewing the academic performance and professionalism history from the Academic Integrity, Conduct, and Professionalism Committee of each student and grants promotion to the next academic year, as well as approval for graduation.

3.3 The SPC may propose student academic policy to the faculty for adoption.

3.4 The SPC is advisory to the Associate Dean Academic Affairs, Associate Dean for Clinical Affairs, and Dean/CAO (i.e., the administrative authority), as appropriate. The SPC considers cases referred by an administrative authority for recommendation of penalties/sanctions for violations of policy including but not limited to the following as outlined in Institutional Policy D5000:

3.4.1 Standards of Conduct

3.4.2 Academic Integrity

3.4.3 Failure to Meet Academic Standards.

3.5 Standards of conduct are further defined in the Appendix of this policy.

3.6 Pending hearing and resolution, a student's status shall not be altered unless there are exceptional circumstances in which the health or safety of the accused or other campus community personnel is in jeopardy. In such cases, immediate suspension may be authorized by the appropriate administrative authority. If referred to the SPC, a hearing will be held within a reasonable time, usually within ten (10) business days after receipt of the case from an administrative authority.

4. Composition of the Student Promotions Committee

4.1 The Committee is composed of nine (9) faculty members-at-large elected by the faculty with at least four (4) members from the Clinical Science Department/Divisions and four (4) from the Biomedical Science Department. Faculty shall serve on the SPC for a three-year term, with no more than two consecutive terms.

4.2 The Committee Chair and Vice-Chair shall be elected annually at the first meeting of the academic year. The Chair shall only vote in the event of a tie.

4.3 Five (5) members of the Committee including two (2) clinicians, shall constitute a quorum.

5. Convening the Student Promotions Committee

5.1 An administrative authority may refer a matter to the SPC for review and recommendation of penalties/sanctions. When an alleged violation of a statement of policy, rule or regulation is referred to the SPC, the NCOM Academic and Professional Standards policy (ST-01) and Student Promotions Committee Procedures will be delivered by hand, certified USPS mail, or by e-mail with return receipt requested to the student and SPC Chair by the administrative authority.

5.2 The date, time and place of the hearing and statement of student's rights to an advisor will be delivered to the student by the SPC Chair. These shall be delivered by hand or email usually within five (5) business days of the decision of the administrative authority to send the matter to the SPC.

5.3 Meetings of the SPC are called by the Chair and scheduled by the Registrar's office. The hearing should be scheduled to occur usually within ten (10) business days after referral of a case to make a recommendation.

5.4 It shall be expressly provided that service of charges and notice of hearing by the student's NCOM email account shall not be defective if student shall have refused to read or otherwise maintain access to their NCOM email account and the hearing may proceed without hindrance or delay.

6. SPC Meeting Procedure

6.1 SPC meetings shall be conducted to allow substantial justice and shall not be unduly restricted by the rules or procedure of evidence.

6.1.1 The committee shall investigate as it deems appropriate and call witnesses as necessary to consider the matter in question and make a determination.

6.1.2 SPC meetings are closed to the public and the press.

6.2 A member of the SPC involved as a witness or having a conflict of interest with the case under consideration must recuse themselves from consideration of the matter.

6.3 Advisors

6.3.1 The student has the right to have one (1) advisor of their choosing present at the SPC meeting. An advisor may consult with the student but may not speak on behalf of the student or otherwise participate directly in the proceedings unless given specific permission to do so by the Chair of the meeting. The advisor may be a member of the NCOM community (i.e., faculty, staff, or student) or external to NCOM (e.g., parent, guardian, or legal counsel who may only attend after a FERPA release is signed).

6.3.2 The School may have legal counsel present, but counsel may not address the SPC unless given specific permission to do so by the Chair of the meeting.

6.4 There shall be a complete and accurate record of the meeting in the form of an audio recording.

6.4.1 Deliberations of the Committee will not be recorded.

6.4.2 Copies of audio recordings, together with copies of the exhibits, shall be furnished to the student upon request at no charge.

6.5 All material and relevant evidence may be presented subject to the right of cross-examination of the witnesses.

6.6 The student shall be advised of her/his rights by the Chair.

6.7 In matters referred to the SPC concerning misconduct, the student shall be entitled to be present throughout the testimony of witnesses, presentation of evidence and arguments of the parties; to know the identity of and content of testimony of the witnesses against him/her and to have them present at the meeting at appropriate times; and to present witnesses and any evidence on her/his behalf as may be relevant and material to the case.

6.8 In meetings involving more than one student, in which one or more, but not all, requests a private hearing, severance shall be allowed.

6.9 Witnesses will be called one at a time but will not be present during the testimony of other witnesses.

6.10 Neither the student nor any witnesses will be permitted in the meeting room during the deliberations of the SPC.

6.11 A student or witness who disrupts the normal progress of the meeting may be dismissed by the Chair and the meeting will proceed.

6.12 The Chair may postpone the hearing for any reason if she/he deems it necessary for fairness to all parties involved. No more than thirty (30) calendar days, however, may pass between the time of the student's official notification of referral to the SPC and the date of the SPC meeting.

6.13 In the event the student or any witness fails to be present at the meeting, it shall take place as scheduled if sufficient information and documentation are available to make a recommendation or shall be rescheduled if additional documentation is needed by the SPC.

6.14 No recommendation for imposing penalties/sanctions may be based solely on the student's failure to appear before the SPC. In such a case, the evidence in support of the charges shall be presented and considered. In any event, all conclusions shall be based solely upon the evidence in the case as a whole and the student's previous record. A failure to appear must be reviewed by the ACP Committee for professionalism violations.

6.15 Consideration of a matter by the SPC does not preclude the review and recommendation for other failures to adhere to policies, rules, or procedures while a case is pending.

7. Recommendations and Approval of Minutes

7.1 After the meeting, the Committee shall, within a reasonable time [usually five (5) business days] make conclusions and recommendations for penalties/sanctions based upon evidence in the case as a whole and the student's previous record, adopt them by majority vote and forward a written report to the referring Associate Dean or the Dean, as appropriate. For hearings related to professional standards, the report will also be sent to the Associate Dean for Student Affairs.

7.2 Within five (5) business days of the meeting, minutes will be reviewed by the Chair and sent to SPC members via email (documents should be password protected). Members will have three (3) working days to review and submit changes to the Chair. If no changes are submitted, the meeting minutes will be considered approved. If comments on meeting minutes are received by the Chair, the minutes will be approved at the next Committee meeting.

8. Failure to Meet Academic Standards

8.1 Course Failures

8.1.1 In the event of a course failure or clinical rotation course failure, the SPC will review the student's academic record, performance, and professionalism record and make a recommendation to the Associate Dean for Academic Affairs for Years 1 and 2 in accordance with Institutional Policy D5000 or the Associate Dean for Clinical Affairs for Years 3 and 4 in accordance with Institutional Policies.

8.1.2 Recommendations may include:

- a.** Remediation. If the student has no other failures and/or issues of unprofessionalism, the committee may recommend remediation without a full meeting in the student's presence.

- b. Repeating the entire year
- c. Repeating a portion of the curriculum
- d. Dismissal

8.1.3 The Committee may include other recommendations to improve the students' performance.

8.2 Failure to Pass OSCEs

8.2.1 In the event a student is referred to the SPC for failure of an OSCE, the Committee will review the student's academic record, performance, and professionalism record and make a recommendation to the Associate Dean Clinical Education in accordance with Institutional Policies.

8.2.2 Recommendations include, but are not limited to:

a. Retention In the case of retention, the SPC must recommend any corrective actions or conditions for retention. Recommendations include, but are not limited to, the following:

- i. Completing a study period, followed by retaking the OSCE
- ii. Completing specific learning activities
- iii. Repeating OSCE re-education
- iv. Repeating the preceding academic year
- v. Other disposition appropriate to the case

b. Dismissal

8.3 Course Failure Due to Unprofessionalism

8.3.1 If a student is remanded to the SPC for failure of a course due to unprofessionalism, the SPC will review the student's academic record, performance, and professionalism record, ACPC recommendations, and make a recommendation to the appropriate Associate Dean in accordance with Institutional Policies.

8.3.2 Recommendations may include:

- a. Repeating a portion of the curriculum including repeating the failed course
- b. Repeating the entire academic year
- c. Suspension
- d. Dismissal

8.3.3 The Committee may include other recommendations to improve the students' performance.

8.4 Course Remediation Failure

8.4.1 In the event of a failure of the remediation of a course or clinical rotation course, the SPC will review the student's academic record, performance, and professionalism record and make a recommendation to the Associate Dean for Academic Affairs for Years 1 and 2 in accordance with Institutional Policy D5000 or the Associate Dean for Clinical Affairs for Years 3 and 4 in accordance with Institutional Policies.

8.4.2 Recommendations may include:

- a. Repeating the entire year.** If the student has no other failures and/or issues of unprofessionalism, the committee may recommend repeating the entire year without a full meeting in the student's presence.
- b. Dismissal**

8.4.3 The Committee may include other recommendations to improve the students' performance.

8.5 Failure of COMLEX Readiness Tracks

8.5.1 In case of a Readiness Track failure, the SPC will review the student's academic record, performance, and professionalism record and recommend it to the Associate Dean for Academic Affairs. The SPC may recommend one of the following actions to the Dean in accordance with Institutional Policies:

- a. Retention** In the case of retention, the Student Promotions Committee may recommend any corrective actions or conditions for retention.
- b. Dismissal**

8.6 Associate Dean Review of SPC Recommendations

8.6.1 The appropriate Associate Dean will review the student's academic record, performance, professionalism record, recommendation from the SPC and meet with the student, as appropriate, to discuss their situation. If the student reveals any added information to the Associate Dean that was not provided to the SPC, the Associate Dean may refer the matter back to the SPC for reconsideration of their recommendation.

8.6.2 The Associate Dean shall render a decision based on the available information and notify the student in writing (usually within five (5) business days of receiving the SPC recommendation) with a copy to the Dean.

8.6.3 The Associate Dean may only recommend dismissal to the Dean/CAO. If dismissal is recommended, the Dean/CAO will make the final decision in the matter.

9. Student Transfer to NCOM In accordance with Institutional Policies, the SPC will review the applicant's file to determine compatibility with the curriculum and, if appropriate, specify any deficiencies to be addressed. If found acceptable, the transfer application file and a list of deficiencies will be returned to the Admissions Committee. If the applicant's records are found incompatible with the curriculum, the file will be returned with the recommendation to deny transfer.

10. Promotion to the Next Academic Year The committee will review student files and make recommendations deemed appropriate. This may include promotion to the next year, promotion

to the next year with listed expectations going forward, or denial of promotion. A denial should include the Committee's reasoning for the recommendation.

11. Approval of Graduates

11.1 A list of candidates for graduation will be submitted to the SPC five times each year, in a timely manner so that the candidates may be approved/disapproved by the Board of Governors at their meetings held in May, June, September, January and March.

11.2 The SPC and Associate Deans will review the list of candidates to determine if there are any outstanding issues. Recommendations may include the following:

11.2.1 Approve - The list of graduates may be approved in whole or in part for submission to the Dean/CAO and Board of Governors.

11.2.2 Delay - May be recommended for an individual student. The reason(s) for the recommendation should be included along with conditions that should be met to be eligible for graduation

11.2.3 Deny - May be recommended for an individual student. The deficiencies and rationale leading to the recommendation must be noted.

11.3 The list of approved graduates will then go to the faculty for approval.

12. Appeal of a Decision for Dismissal or Other Sanction

12.1 Following the written decision of an administrative authority to dismiss or impose other sanctions on a student, the student may appeal the decision except as otherwise noted. The decision of an Associate Dean may be appealed to the Dean/CAO. The decision of the Dean/CAO is final in all cases.

12.2 The appropriate administrative authority will meet with the student and make a final decision on the appeal, usually within ten (10) business days of the appeal. In the event the appropriate administrative authority is not available in the office within ten (10) business days, the timeline will start when they return to the office. The timeline may also be delayed if in the student's best interest. This decision is final and cannot be appealed further by the student.

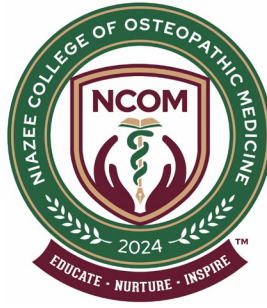
12.3 If the initial decision was not recommended by the SPC, the appropriate authority may refer to the SPC for a recommendation on the appeal. The Committee will consider the appropriateness of sanctions against a student given the circumstances of the case. The Committee may consider the merits of the appeal and will hear such proof of facts as may be deemed proper and reasonable and make such an investigation and enter such recommendations as the facts justify and the circumstances may require.

12.4 The investigations and hearings should include, but are not limited to, examination of the previous deliberations which resulted in the decision of dismissal (or imposition of sanction) for

areas in which they might have been in error or might have contained violations of due process. The Committee may consider as part of the appeal any relevant added information discovered after the decision to dismiss or impose sanctions. Information known but not disclosed by the student prior to the decision to dismiss or impose sanctions may not be entered as new evidence supporting an appeal.

12.5 A recommendation to reverse all or part of the decision being appealed must specifically identify and address the areas in the decision being appealed which are flawed or relevant, added information discovered after the decision that provides grounds for reversal.

12.6 Committee hearings on an appeal will be conducted as described in the SPC Meeting Procedure section above.



Procedure for Reporting Student Professional Behavior

1. Purpose

The purpose of this procedure is to give specific guidance to assist the Niazee College of Osteopathic Medicine (NCOM) with implementation of, and ensure institutional compliance with, Institutional Policy D5000: Academic and Professional Standards, in regard to reporting student professional behavior.

2. Applicability

2.1 This procedure applies to all NCOM students.

2.2 NCOM reserves the right to amend this procedure at any time, as necessary or appropriate.

3. Preamble

Medical education is a period of intense student learning. Much as they must learn the scientific foundations underlying medical practice, they must also learn what behavior is expected of them as medical students and, ultimately, practicing physicians. The stated goal of NCOM is to approach lapses in professional conduct as mentoring opportunities. NCOM reserves the right to impose sanctions, when necessary, but our overriding goal is to help students learn what is expected of them and to remediate unprofessional conduct.

4. Standards of Professional Conduct

4.1 The standards of professional conduct for NCOM students are provided in Policy D5000: Academic and Professional Standards, Section 4, the Professionalism Contract, the Honor Code, and the Academic Integrity, Conduct, and Professionalism Policy.

4.2 Examples of areas of exemplary behavior that would prompt the completion of an observed positive “Professional Behavior Report” include, but are not limited to:

- (1) Behavior that is above and beyond what is expected of a student at their level of training
- (2) Maintaining professional demeanor and respect for others during times of stress
- (3) Going out of their way to support other members of the healthcare team
- (4) Gives credit to their peers and colleagues freely and appropriately

4.3 Examples of areas of concern that would prompt the completion of a negative “Professional Behavior Report” if they are observed as an enduring pattern include, but are not limited to:

- (1) Failure to complete assignments on time

- (2) Failure to complete required evaluations and surveys
- (3) Excessive tardiness
- (4) Lack of response to official communications
- (5) Unprofessional communication

4.4 Examples of uncommon but serious areas of concern that would prompt the completion of a negative “Professional Behavior Report” if they are observed even in isolation include, but are not limited to:

- (1) Mistreatment of others
- (2) Dishonest Practice
- (3) Violation of patient privacy
- (4) Failure to complete required hospital credentialing procedures
- (5) Failure to complete COMLEX exam(s) by the required deadlines

5. Filing A Professional Behavior Report

5.1 Any member of the NCOM community who observes a student behave in a way that is considered to be an example of exemplary professional behavior or that raises concerns about professionalism is expected to address the behavior by doing one or both of the following, depending upon the nature of the behavior and what would be most helpful to the student:

5.1.1 Provide verbal or written feedback to the student with specific suggestions for improvement or, when appropriate, praise for exemplary conduct.

5.1.2 Complete a “Professional Behavior Report” which is available online, under the Faculty/Staff link. Reports submitted via the website portal will be automatically routed to the Chair of the Academic Integrity, Conduct, and Professionalism, Committee (CACPC) and appropriate Associate Dean.

5.2 Any professionalism concern must be reported within a timely manner to support an environment where student learning is paramount

6. Response to Negative Professional Behavior Reports

6.1 Upon receipt of a negative Professional Behavior Report, the appropriate Associate Dean or designee, will review the reported lapse in professionalism and, if deemed the report warrants further investigation, will meet with the student to discuss strategies for addressing the reported lapse and preventing future lapses. Students receiving more than one negative Professional Behavior Report are required to meet with the appropriate Associate Dean, CACPC, or designee to discuss expected standards of behavior.

6.1.1 Students who feel they have been unfairly reported for a professionalism concern may contest this report by reviewing it with the appropriate Associate Dean, who may choose to affirm or retract the report after consultation with both parties.

6.1.2 If the appropriate Associate Dean determines the student committed a violation of the Standards of Professional Conduct, they may take such action as may be appropriate including administratively imposing any penalties and sanctions for violations of student professional conduct listed in Section 6 of Policy D5000 with the exception of dismissal and revocation of admission and/or degree, which can only be imposed by the Dean/CAO.

6.2 Should there be any question as to the veracity of the complaint filed against a student, the appropriate Associate Dean may, at their discretion, request that the Independent Ad Hoc Fact-Finding Committee investigate the concern.

6.2.1 The appropriate Associate Dean shall inform the accused student of the charges in writing within ten (10) business days and submit the case to the ACP Committee. The ACP Committee will report its findings and recommendations back to the referring Associate Dean for determination of action regarding the matter in question.

6.3 The appropriate Associate Dean may at any time request that the ACP Committee offer a recommendation regarding appropriate sanctions for students deemed to be guilty of unprofessional conduct.

6.3.1 Within ten (10) business days following receipt of the written report from the ACP Committee, the Associate Dean shall review recommendations for the disposition of the case and take such action as may be appropriate. In the case of dismissal, the Associate Dean will forward the recommendation of the ACP Committee along with his/her independent recommendation to the Dean/CAO for disposition of the case

6.3.2 Any student receiving more than two negative Professional Behavior Reports will be reviewed by the ACP Committee who may make a recommendation for sanctions to the appropriate Associate Dean.

6.4 If any part of the Associate Dean's or Dean/CAO's decision is adverse to the student, the Associate Dean or Dean, usually within five (5) business days of notifying the student of the decision, shall advise the student of his/her rights to appeal and the appropriate appeal procedures. The student and other appropriate NCOM employees/faculty shall be notified in writing of the decision.

7. Appeals

7.1 Students may appeal the decision of the Associate Dean to the Dean/CAO. The decision of the Dean/CAO shall be final.

7.2 The complete appeals process is set out in Policy D5000, Section 13.

8. Medical Student Performance Evaluations (MSPE)

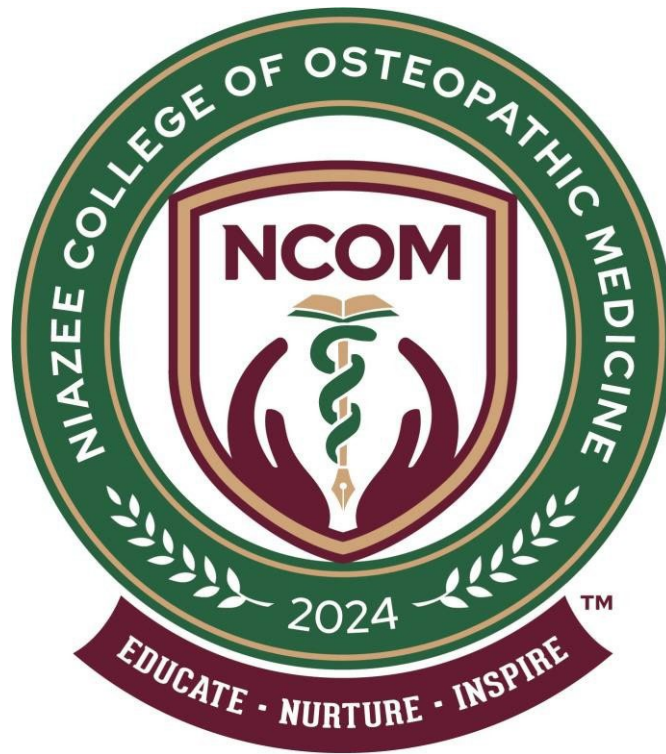
8.1 All negative Professional Behavior Reports may be disclosed in the Medical Student Performance Evaluation at the discretion of the Dean/CAO. Generally, the first two negative

Professional Behavior Reports should trigger the formative mentoring process outlined above. A third negative Professional Behavior Report should be reported on the MSPE as guided by the following standards:

8.1.1 Isolated concerns in the Preclinical Curriculum that are not deemed egregious will be reported only if there are additional concerns reported in the Clinical Curriculum.

8.1.2 Concerns in the Clinical Curriculum that are not deemed egregious will be reported only if there are two or more such concern reports submitted.

8.2 Positive Professional Behavior Reports may be reported in the MSPE at the discretion of the Dean.



ACADEMIC INTEGRITY POLICY

Revised March 10, 2025

TABLE OF CONTENTS

Statement on Academic Integrity	2
Violations of Academic Integrity	4
Plagiarism	4
Intentional Plagiarism	4
Unintentional Plagiarism	5
Cheating on Examinations and Other Class/Fieldwork Assignments	5
Research Misconduct.....	6
Other Unethical Conduct	6
Misleading or Fraudulent Behavior	6
Tampering	7
Copyright Violations.....	7
Sanctions.....	7
Procedures in Response to Violations of Academic Integrity	8
Reporting a Case of Suspected Plagiarism or Cheating	9
Resolution of Academic Integrity Violations	9
Informal Resolution	9
Formal Resolution	10
Appeal Process	11
Status of Student Pending Action	12
Recordkeeping	12
Best Practices in the Promotion of Academic Integrity.....	13
By Faculty.....	13
Training Faculty and Staff	13
Training Students.....	14
Testing Procedures.....	14
Test Preparation	14
Test Duplication and Storage.....	14
Test Administration: Paper Examinations	15
Test Administration: Online Tests.....	15
Post-Test Procedures.....	15
Detecting Plagiarism.....	15
Best Practices in the Promotion of Academic Integrity in Online Education	15
Guidelines for Faculty	16
Multiple Assessment Strategies and Prevention of Plagiarism	16
Examinations	17

NCOM STATEMENT ON ACADEMIC INTEGRITY

NCOM is a community of educators, researchers, and students committed to the highest standards of integrity in all aspects of professional and academic endeavors. Intellectual integrity is a hallmark of ethical, scholarly, and scientific inquiry. Students and faculty are expected to engage in a mutual respect for teaching, learning and the acquisition/dissemination of knowledge. They are expected to adhere to the loftiest standards of honesty, fairness, and professional conduct in their work/studies and respect all NCOM and professional community members.

Academic and professional dishonesty undermines our shared culture and our ability to trust each other. Faculty, staff, and leaders bear a significant responsibility for promoting a climate of integrity, in the clarity with which they state their expectations, the behavior in which they mentor to members of the NCOM community and in the diligence with which they monitor students. Students, Faculty, and Staff must avoid all acts of dishonesty, including, but not limited to, cheating, fabricating, tampering, lying, plagiarizing, and utilizing AI tools without acknowledgment of such, as well as facilitating or tolerating the dishonesty of others. Academic and Professional dishonesty diminishes scholarly quality and defrauds those who depend on the knowledge and integrity of our graduates. Furthermore, it misrepresents student efforts and mastery of course material.

NCOM views violations of academic and professional integrity with the utmost gravity. Any such violations will lead to appropriate sanctions, up to and including dismissal from NCOM.

The NCOM policy on academic and professional integrity outlined in this document, is designed to guide students, faculty, and staff as they prepare assignments, take exams, engage in research, and perform work necessary to complete degree requirements, and to provide a framework for faculty/staff in fostering a professional environment based on the principles of academic integrity and professionalism. It is presented here in order to educate the faculty and staff on the parameters of and the enforcement of the policy.

The International Center for Academic Integrity (ICAI), of which NCOM is a member, lists six fundamental values: honesty, trust, fairness, respect, responsibility, and courage, to allow institutional scholarship to flourish with integrity.¹ To sustain these values, NCOM's Academic Integrity Policy, requires that a student, faculty/staff member or researcher:

- Properly acknowledge and cite all use of the ideas, results, or words of others, including the use of AI tools and other emerging technologies;
- Properly acknowledge all contributors to a given piece of work;
- Make sure that all work submitted as their own in a course or other academic activity is produced without the aid of unsanctioned materials or unsanctioned collaboration;
- Treat all other students in an ethical manner, respecting their integrity and right to pursue their educational goals without interference. This requires that a student neither facilitate academic dishonesty by others nor obstruct their academic progress.

Adherence to these principles is necessary in order to ensure that:

- Everyone is given proper credit for their own ideas, words, results, and other scholarly accomplishments;
- All student work is fairly evaluated and no student has an inappropriate advantage over others;
- The academic and ethical development of all students are fostered;
- The reputation of NCOM for integrity in its teaching, research, and scholarship is maintained and enhanced.

Failure to uphold these principles threatens the reputation of NCOM, but also the value of the degree awarded by the institution. All members of the NCOM community share the responsibility for ensuring that the highest standards of academic integrity and professionalism are upheld.

NCOM works with faculty, staff, and students to promote a culture of integrity and professionalism, provides effective training that creates a commitment to each, and establishes

clear procedures to deal with allegations of violations of academic integrity or professionalism and monitoring the adherence thereto.

VIOLATIONS OF ACADEMIC INTEGRITY

The following are considered to be violations of academic integrity and are prohibited by NCOM. Students, staff, faculty, and other members of the NCOM community who commit any of the offenses (or similar) listed below, or those who assist in the commission of such offenses, may be subject to sanctions (i.e. classed as A, B, or C, as described below in the section “Procedures in Response to Violations of Academic Integrity”).

PLAGIARISM

Plagiarism is defined as the unauthorized use of the writings, ideas and/or computer-generated material of others without appropriate acknowledgement, and the representation of them as one’s own original work. It also includes the unauthorized use of computer-generated material via artificial intelligence (AI) and other emerging technologies without appropriate acknowledgement and the representation of them as one’s own original work. Plagiarism encompasses acts of inadvertent failure to acknowledge sources, as well as improper attribution due to poor citation.

When using ideas/words from other sources, the student, faculty, or staff member must clearly define the sources using standard methods of citation. Plagiarism can occur even when one does not use the exact words of another author. Paraphrasing written material by changing or rearranging words without the proper attribution is still considered plagiarism (even if it eludes identification by plagiarism detection software). It is therefore critically important that students understand how to cite appropriately. If students have any questions about the proper use and citation of material from other sources, they should seek help from faculty, staff, or leaders.

INTENTIONAL PLAGIARISM

Plagiarism takes many forms. **Flagrant forms**, or **intentional plagiarism**, include, but are not limited to:

- Purchasing a paper;
- Commissioning another to draft a paper on one’s behalf;
- Intentionally copying a paper regardless of the source and whether or not that paper has been published;
- Copying or cutting and pasting portions of others’ work (whether a unique phrase, sentence, paragraph, chart, picture, figure, method or approach, experimental results, statistics, etc.) without attribution;
- Using computer-generated material via artificial intelligence (AI) and other emerging technologies without attribution;
- In the case of clinical documentation, copying/pasting clinical notes/materials without personally performing the patient history/examination each and every time. This includes one’s own previous notes.

Plagiarized sources may include, but are not limited to, print material, digital and media resources including social media and blogs, as well as assignments completed by other students at NCOM or elsewhere. A more subtle, but equally flagrant, form is paraphrasing or attempting to put in one’s own words the theories, opinions or ideas of another without proper citation.

Additionally, students, staff, or faculty may not reuse their own previous work without appropriate citation. This is a form of plagiarism called self-plagiarism and may mislead the reader or grader into the erroneous belief that the current submission is new work to satisfy an assignment.

If students are unsure as to whether a fact or idea is common knowledge, they should consult their faculty, staff or librarian, or else provide appropriate citations.

UNINTENTIONAL PLAGIARISM

Plagiarism is not only the failure to cite, but the failure to cite sources properly. If a source is cited but in an inadequate way, the student/staff/faculty may still be guilty of unintentional plagiarism. It is therefore crucial that students understand the correct way to cite. The rules are relatively simple:

- For exact words, use quotation marks or a block indentation, with the citation
- For a summary or paraphrase, indicate exactly where the source begins and exactly where it ends

In its policies and disciplinary procedures, NCOM will seek to differentiate between intentional plagiarism, and failure to cite sources properly (unintentional plagiarism). While both forms are violations of this policy, a student's first instance of unintentional plagiarism may only be penalized with a Class C sanction (see sanctions below).

CHEATING ON EXAMINATIONS AND OTHER CLASS/FIELDWORK ASSIGNMENTS

Cheating is defined as improperly obtaining and/or using unauthorized information or materials to gain an advantage on work submitted for evaluation. Providing or receiving assistance unauthorized by the instructor is also considered cheating.

Examples of cheating include, but are not limited to:

- Giving or receiving unauthorized assistance to or from another person on quizzes, examinations, or assignments;
- Using another learner's audience response device/i-clicker;
- Using materials, devices, or tools not specifically authorized during any form of a test or examination;
- Exceeding the restrictions put in place for "take home" examinations, such as unauthorized use of library sources or internet sources, unauthorized use of computer-generated material via artificial intelligence (AI) and other emerging technologies, or unauthorized collaboration on answers;
- Sitting in for someone else or permitting someone to sit in for a student on any form of test or examination;
- Working on any form of test or examination beyond the allotted time, which includes any extra time resulting from a documented accommodation (unless the instructor provides explicit permission);
- Hiding, stealing or destroying materials needed by other students;
- Altering and resubmitting for re-grading any assignment, test or examination without the express written consent of the instructor;

- Copying from another individual's examination or providing information to another student during an examination;
- Soliciting, obtaining, possessing or providing to another person an examination prior to the administration of the examination.
- Bringing into the examination room notes in any format and/or paper, electronics, writings, drawings, etc. that could be used to aid in taking a closed notes/book exam.

Examples of unauthorized assistance include:

- Giving or receiving assistance or information in any manner, including person-to-person, notes, text messages, or e-mails, during an examination or in the preparation of other assignments without the authorization of the instructor;
- Receiving assistance via artificial intelligence (AI) and other emerging technologies without the authorization of the instructor;
- Using crib sheets or unauthorized notes (unless the instructor provides explicit permission);
- Copying from another individual's exam.

Failure to comply with any and all NCOM testing procedures will be considered a violation of the Academic Integrity Policy.

RESEARCH MISCONDUCT

The integrity of the scientific enterprise requires adherence to the highest ethical standards in the conduct of research and research training. Therefore, students, faculty, staff and other affiliated trainees conducting research are bound by the same ethical guidelines that apply to faculty investigators, based on the Public Health Service regulations dated May 17, 2005. Research misconduct is defined in the United States Public Health Service (USPHS) Policy as "fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results."² These terms are defined as follows:

- (a) *fabrication* - making up data or results and recording or reporting them;
- (b) *falsification* - manipulating research materials, equipment or processes, or changing or omitting data or results such that the research is not accurately represented in the research record;
- (c) *plagiarism* - the appropriation of another person's ideas, processes, results, or words without giving appropriate credit.

Research misconduct does not include honest error or honest differences of opinion.

Please refer to NCOM's Research Misconduct Policy R-03 for more information.

OTHER UNETHICAL CONDUCT

MISLEADING OR FRAUDULENT BEHAVIOR

Misleading or fraudulent behavior, put simply, is lying, and includes acts contributing to or associated with lying. It takes on any form of fabrication, falsification or misrepresentation. Examples include, but are not limited to:

- Reporting false information to gain an advantage;
- Omitting information or data resulting in misrepresenting or distorting findings or conclusions;

- Providing false information to explain lateness or to be excused from an assignment, class or clerkship function;
- Signing in another person's name on any attendance sheet/roster representing them as present when they are not;
- Falsely accusing another of misbehavior, or otherwise misrepresenting information about another;
- Providing false information about oneself, such as on an application or as part of some competition;
- Taking credit for accomplishments achieved by another person or computer-generated material via artificial intelligence (AI) and other emerging technologies;
- Omitting relevant information about oneself.

TAMPERING

Tampering is the unauthorized removal or alteration of college documents (e.g., library resources, official institutional forms, correspondence), software, equipment, or other academic-related materials, including other students' work. It should be noted that tampering as a form of cheating may also be classified as criminal activity and may be subject to criminal prosecution.

Examples include, but are not limited to:

- Intentionally sabotaging another student's work;
- Altering a student's academic transcript, letter of recommendation, or some other official college document;
- Electronically changing another student's or colleague's files, data, assignments, or reports.

COPYRIGHT VIOLATIONS

Academic integrity prohibits the making of unauthorized copies of copyrighted material, including software and any other non-print media. Individuals, under the legal doctrine of "fair use," may make a copy of an article or copy small sections of a book for personal use, or may use an image to help teach a concept. Examples of copyright violations include:

- Making or distributing copies of a copyrighted article for a group (on paper or electronically);
- Disseminating an image or video of an artist's work without permission, including those found on the internet;
- Copying large sections of a book.

The "fair use doctrine" regarding use of copyrighted materials can be found at the following link: <https://www.copyright.gov/fair-use>. Also see the library's guide on frequently asked copyright questions.

SANCTIONS

The following sanctions may be imposed for violation of this Policy. Informal resolution of violations can be accompanied by Class C sanctions only. Formal resolution can be accompanied by any combination of sanctions from Class A, B, and C. Except in the case of a student's expulsion or dismissal, any student found to have violated this Policy may be required to take additional ethics tutorials.

Class A Sanctions:

- Expulsion/dismissal
- Revocation of awarded degree in the event that the violation is identified after graduation

Class B Sanctions:

- Suspension (up to twenty-four months)
- Indication of the violation in a letter of reprimand, in reference letters, licensure and regulatory forms, etc.
- Notification of the violation to the other schools in a shared/combined degree program
- Indication of 'disciplinary action for academic integrity violation' on the permanent transcript

Class C Sanctions:

- Placement on Academic/Professionalism Probation
- Failure in the course, with consequences as determined by the individual Department's rules and regulations
- Reduction of the grade for a particular submitted piece of work, segment of work required for a course/clerkship, or the entire course/clerkship with or without the option of redoing the work or the course/clerkship
- Requiring the student to redo the assignment or to do an alternative assignment, which may include a grade reduction

PROCEDURES IN RESPONSE TO VIOLATIONS OF ACADEMIC INTEGRITY

This Academic Integrity Policy applies to all NCOM students. Any act in violation of this Policy or any allegation of misconduct related to this Policy involving a student, faculty, or staff member must be reported and addressed in accordance with the adjudication procedures outlined below.

The Dean/CAO shall designate a member of the school's administration as Chair of the Academic Integrity, Conduct, and Professionalism Committee to oversee the adjudication of violations and to maintain appropriate documentation. The Chair will maintain written records of all violations and recommendations, both informal and formal. The Chair must be an assistant dean or higher, or another appropriate responsible individual approved by the Dean/CAO of NCOM.

The Dean/CAO of NCOM shall designate a Committee that will adjudicate violations of academic integrity via a formal Hearing process.

The Dean/CAO will appoint an Associate Dean to be responsible for hearing formal resolution appeals (herein referred to as the "Appeals Dean"). The Chair and the Appeals Dean cannot be the same individual.

REPORTING A CASE OF SUSPECTED PLAGIARISM OR CHEATING

Faculty, staff, or students may report an alleged incident to: Department Chair, Department Vice Chair, Program Director, Course Coordinator, Department Director, Division/Section Chief, Assistant Dean, Associate Dean, Dean/CAO, or ACPC Chair directly.

For the sake of clarity, the faculty member's supervisor for these infractions will be the appropriate Associate Dean.

Faculty members, students, or other members of the NCOM community who encounter suspected academic integrity violations should contact the relevant Associate Dean. The appropriate Associate Dean will consult with the faculty member, and if a violation is identified, the faculty member will inform the student. The Associate Dean (when the infraction is not handled at the Associate Dean level/meets criteria for immediate review by the ACPC) will report all suspected violations in writing (using the *Academic Integrity Violation Reporting Form*) to the ACPC Chair, who will advise the Associate Dean on whether to pursue an informal or a formal resolution. For first-time suspected violations, the Chair, Associate Deans, and faculty are strongly encouraged to seek an informal resolution with the student (unless the infraction meets criteria for a formal resolution). No permanent grade may be entered onto the student's record for the course in question before the issue is resolved.

If an instructor/proctor strongly suspects cheating during an exam, the instructor/proctor should stop the student's exam and collect all evidence of cheating. The incident should be immediately reported to the Associate Dean of Academic Affairs who will investigate and report in writing to the Committee Chair.

RESOLUTION OF ACADEMIC INTEGRITY VIOLATIONS

Incidents of academic integrity violations are reported to the Associate Dean, and a report by the Associate Dean is submitted to the Chair for those that meet criteria under the ACPC Bylaws, Policies, and Procedures. The method of resolution of the violation may be either informal or formal. Students who are found to have violated NCOM's Standards of Academic Integrity are subject to the sanctions listed above.

Should a student action be of such a serious nature that it is felt that he/she may be considered a danger in an academic or clinical setting, the Chair or the Associate Dean may remove such a student from the academic setting or a clinical assignment, not to exceed fourteen (14) days pending the outcome of a formal resolution. A student shall not be removed from virtual access to a didactic course while an allegation of an academic integrity violation is ongoing. It is the responsibility of the student to work with the Associate Dean to make up any time missed from an academic or clinical assignments.

INFORMAL RESOLUTION

After consulting with the Associate Dean and the Academic Conduct and Professionalism Committee (ACPC) Chair (as per "Reporting a Case of Suspected Plagiarism or Cheating"), the Associate Dean or faculty member may attempt to resolve the issue informally with the student. Once an informal resolution is agreed to between the Associate Dean, faculty member, and the student, the faculty member must present such resolution to the Associate Dean for approval. The faculty member, in consultation with the Associate Dean, may impose any range of Class C sanctions, but must include requiring the student to take additional ethics tutorials intended to assist

that student to avoid future misconduct. Once accepted by the student, the informal resolution is binding on both the student and faculty member, and cannot be appealed by the student.

If the student is found to have committed an academic integrity violation, the outcome of the informal resolution should be reported in writing by the Associate Dean to the Chair, who will maintain the record for the duration of the student's academic career. NOTE: NCOM may be required to report the violation to outside licensing agencies.

The informal resolution process is not available to individuals who have previously committed an academic integrity violation.

FORMAL RESOLUTION

In the event that (1) the accused student denies the charge, (2) the student, Associate Dean or faculty member do not agree to informal resolution, (3) the student has been previously found guilty of a similar infraction, or (4) for any other reason for which informal resolution is not appropriate as determined by the Chair, then the matter shall be submitted for formal resolution.

To institute formal resolution, the following procedures shall be followed:

- The Chair receives a written statement from the instructor, proctor, student, or any other complainant, as the case may be
- The written statement must include the name of the involved student(s), the name and position of the reporting person, and the nature of the alleged act
- The Chair shall arrange a hearing which, generally speaking, should take place no earlier than five (5) calendar days and no later than twenty (20) calendar days after notification that informal resolution was unsuccessful or not pursued.
- The hearing shall take place before the full ACPC
- The ACPC shall receive the written statement, and any documents submitted by the student or reporting person
- All persons involved in a hearing shall be given notice of all hearing dates, times and places (including virtual/digital meetings). Such notice, which will be sent by e-mail will be given at least two (2) business days prior to any hearing, unless waived by the parties involved.
- Postponements of ACPC hearings may be made at the discretion of the Committee Chair. Either party may be granted a postponement only if pertinent information or interested parties cannot, for good cause, be present at the appointed time. Any postponement may not extend beyond a thirty (30) business day period and any delay may affect the student's ability to progress in the program
- The accused student and the accuser will be afforded the following opportunities:
 - To review, but not copy, all pertinent information to be presented to the ACP Committee. The length of time for review shall be reasonable, as determined by the Committee Chair.
 - To present fully all aspects of the issue before the ACP Committee.

Committee Hearings will proceed under the following guidelines:

- All ACP Committee hearings and meetings are closed to the public
- The ACP Committee may hear the student, the faculty member or proctor, and any other individual who may be knowledgeable or may have information to share with the Committee regarding the suspected offense. Each person will meet with the ACP Committee on an individual basis

- The ACP Committee may consider relevant written reports, discussions with involved parties, examinations, videos, papers, screen shots, social media posts, or other related documents
- The ACP Committee must be comprised of a minimum of three people, who must be present either in person or via video-conference, and may not be the faculty member of the course in question
- All decisions shall be made by majority vote. The Chair only votes in the event of a tie
- The student has the right to appear before the ACPC, in person or via video conference, in order to present his/her case, but, after proper notice of a hearing, the ACPC may proceed, notwithstanding the student's absence
- The hearing is academic/professional in nature and non-adversarial. Student representation by an attorney or other representative at the hearing is not permitted. However, the student may bring a support person to accompany them and be present, but not participate, in the hearing
- Audio or video recordings of the hearing are not permitted and transcripts are not required but minutes will be taken
- All information supporting the charges made against a student shall be presented first. Following this presentation, the student who has been accused of a violation will present their side of the matter by submitting to the ACPC information that they choose to submit to support their stance or position. The Chair or their designee, Office of Institutional Compliance or other members of the faculty and Administration may also meaningfully participate in this information exchange. Pursuant to the NCOM Code of Conduct/professionalism, the student is expected to conduct themselves harmoniously so as not to obstruct the investigation or proceedings
- The student, their accuser, the ACPC and/or NCOM's representatives may raise questions about the information under review so that all aspects of the case are clarified

The ACPC shall reach a decision using the following guidelines:

- The ACPC will meet in closed session to reach a decision, including recommended sanctions, if applicable. Such meeting shall generally be held immediately after the hearing or within one NCOM business day
- If the ACPC seeks additional information following commencement of its deliberations, it will notify the parties within two (2) NCOM business days, and reconvene the hearing within five (5) NCOM business days of the conclusion of the original hearing. The ACPC's final decision must then be made and referred to the Associate Dean for final disposition
- The Committee may recommend an imposition of a range of Class A, B, or C sanctions

The Committee's decision must be based solely on the evidence presented at the hearing and will be sent as findings and recommendations to the Associate Dean for final disposition of the issues involved, including sanctions. The decision of the Committee will be presented in writing to the CHAIR, the student, and the Associate Dean. The Committee's letter will contain the following elements: Charge; Hearing Date; Findings; List of recommended sanctions; and the Associate Dean to whom final adjudication was deferred. In the event the case involved a student in a dual-degree or joint- degree program each relevant school should be informed of the decision.

APPEAL PROCESS

- Following a Formal Resolution Hearing and notification of the Associate Dean's final decision, either party may appeal the decision. An appeal may only be granted on the basis of: 1) evidence of bias of one or more of the members of the ACP Committee or the deciding

Associate Dean; 2) new material documenting information that was not available at the time of the decision; 3) procedural error

- The appellant has three (3) business days within which to submit a formal written appeal of the decision to the Appeals Dean for NCOM. The appeal should be accompanied by the ACP Committee's and Associate Dean's letter and both by narrative explaining the basis for the student's appeal. The narrative should fully explain the appellant's position and substantiate the reason(s) for their appeal
- The Appeals Dean may request to meet with the student involved.
- After consideration of the Appeal, the Appeals Dean may accept, reject or modify the Committee's recommendations and Associate Dean's decision, and will notify the student in writing of the decision
- The Appeals Dean, when notifying the student of the decision, shall inform the student of their right to appeal an adverse decision to the Dean/CAO

A copy of the Appeals Dean's final decision will be transmitted to the Chair and Associate Dean.

A student has three (3) business days from receipt of written notification to submit a formal written appeal of the decision, that is discretionary in nature, to the Dean/CAO or their designee. In the event the Dean/CAO decides to consider the matter, the Dean/CAO may only sustain the appeal on the basis of one of the following:

- Evidence of bias of one or more of the members of the ACPC, Associate Dean, or of the Appeals Dean
- New material documenting information that was not available to the Committee, Associate Dean, or the Appeals Dean at the time of the initial decision
- Procedural error

The Dean/CAO may, at their discretion, conduct interviews and review materials. The Dean/CAO will notify the student, the Chair, the Appeals Dean, and the Associate Dean in writing of the appeal decision. The decision of the Dean/CAO shall be final.

STATUS OF STUDENT PENDING ACTION

Pending resolution on charges, the status of the student will not be altered except in cases where the student may be considered a danger in an academic or clinical setting. Such a student may be suspended from the academic (but will be allowed virtual access to the curriculum) or clinical aspect of their program pending the outcome of a formal resolution. If a student is suspended for any reason, all as-yet-undisbursed financial aid may be withheld unless or until the action is fully resolved and the student is reinstated. If reinstated, the financial aid funds can be released to the student. If the student is dismissed, the funds will be returned to the proper agency or lender.

RECORDKEEPING

The ACPC Chair and Associate Dean will maintain records of all violations and resolutions, both informal and formal. On an annual basis, the Chair will submit data on academic integrity violations to the Dean/CAO.

Such records shall be kept in accordance with the Record Retention Policy as it relates to student records. A student may see their file in accordance with NCOM regulations concerning inspection of records per the policy of Student Privacy.

BEST PRACTICES IN THE PROMOTION OF ACADEMIC INTEGRITY

BY FACULTY

Academic integrity and professionalism are the responsibility of all members of the NCOM community. As educators, researchers, and clinicians, faculty are obligated to demonstrate by word and action the importance of this core value. As members of NCOM community, faculty and staff members are committed to the ethical pursuit of truth, the primacy of patient welfare, and advancement of knowledge, tasks that can be realized only in an environment fully expecting and modeling academic integrity and professionalism. Faculty members and staff are therefore expected to participate fully in establishing an academic or clinical environment in which the principles of integrity and professionalism are understood and practiced by themselves and their students or other learners.

Faculty and staff members are expected to promote academic integrity and professionalism in the following ways in their classes:

- Describe academic integrity and professionalism policies on the first day of orientation, and refer, in each first day of a course/rotation, to the policy of NCOM, including the appeal processes
- Include a clear statement in each course syllabus with a reference to the NCOM academic integrity, conduct, and professionalism policy (including the website where the policy may be found)
- Require that all writing assignments be submitted electronically, preferably through the LMS, and notify students that the submitted material will be checked for plagiarism
- Professors may choose to add an honor pledge at the start of each written assignment and exam for students to sign
- Faculty can engage in meaningful collective conversations with students about the importance of academic integrity, conduct, and professionalism not only in their educational endeavors, but as a key development for their future work as professionals in their respective fields

TRAINING FACULTY AND STAFF

Since promoting academic integrity, conduct, and professionalism is a shared responsibility, it is important that appropriate training and support be offered to faculty and staff throughout the year.

- Faculty development shall include training about and the dissemination of resources to promote academic integrity, conduct, and professionalism among faculty, staff, and their students, including articles/case studies, websites and tutorials
- Faculty development shall also include training in examination security, the NCOM proctoring policy and plagiarism prevention, including how to detect different types of plagiarism and awareness of proper citation
- Orientation, Faculty Development Days, and Faculty Meetings shall include opportunities to disseminate the policies and disciplinary procedures of Academic Integrity, Conduct, and Professionalism at NCOM as well as the sharing of best practices in promoting each of these

- Some best practices include creating process-based or plagiarism-proof assignments (examples are abundant and available, if needed), requiring up-to-date references, and assigning oral reports

TRAINING STUDENTS

Factors that may influence cheating and plagiarism among students include grade pressure, time pressure, task pressure, negative personal attitude, lack of awareness, test anxiety, lack of professional identity development, and lack of competence. It is, therefore, important to provide adequate training of students regarding all relevant parts of this Academic Integrity, Conduct, and Professionalism Policy as well as instruction in best practices to enable students to produce academic work with integrity and professionalism. Students should be provided with as much education and as many opportunities as possible to learn about citation styles, proper writing skills, and plagiarism avoidance.

Faculty should keep in mind the importance of establishing a positive relationship with students and getting to know them and their writing style. A foundational component of higher education is for students to develop their own voice, reflected in their writing. Establishing a relationship of trust between faculty and students can be very helpful in developing a common understanding of expectations on student writing as a component of their intellectual and professional development.

Student Orientation programs shall include sessions on NCOM's Academic Integrity Policy, and each student shall be provided with a copy of the policy at that time. Furthermore, each student must sign an honor statement, which can be distributed to students in the LMS. Since NCOM is mission-based and profession-oriented, the ethical values of the NCOM mission should be referenced in the statement. Students will also be required to complete a library- developed session or sessions that demonstrate research method, information literacy, and ethical and legal use and acknowledgment of sources, including AI.

TESTING PROCEDURES

In order to reduce the opportunity for cheating on examinations, faculty members should employ the following best practices whenever possible:

TEST PREPARATION

- Modify or replace a significant portion of the exam questions each time an exam is re-administered in a course or administered in a separate section
- For courses with large numbers of students and close seating, prepare multiple versions of an exam for that section
- Prepare different versions of multiple-choice exams for use in each section of a course, and two separate exams for very large sections
- Develop, to the extent possible, "cheat proof" essay or problem-solving questions.
- Prepare a different version of the exam for make-up exams

A copy of each examination is to be filed with the Associate Dean of Academic Affairs so that he/she/they can maintain a historical file on exams used in the course.

TEST DUPLICATION AND STORAGE

- Type exams on a secure computer. Do not use NCOM computer labs, where students, work/study students and/or lab technicians can access the files

- Use Exam Soft Software whenever possible
- Print and copy exams on secure printers and copiers
- When duplicating examinations, do the copying yourself, or have a trustworthy administrative assistant do the copying for you. Ensure that all original copies are removed from the copiers and copy room
- Store exams in a secure place, such as the department office or the faculty member's paper or computer files. All exams must be stored in locked file cabinets and secured computers

TEST ADMINISTRATION: PAPER EXAMINATIONS

- Be present or arrange for a proctor as per NCOM proctoring policy during examinations and actively proctor examinations. NCOM may supplement the proctoring by assigning extra proctors
- Do not permit students to have any electronic devices (including cell phones, smart watches, smartphones, iPads, laptops, or other tablet computers, and flash drives) or personal belongings (purses, backpacks) in the room during the examinations
- Separate students by at least one seat, if space permits
- Maintain control of the paper (including scrap) used during the exams

TEST ADMINISTRATION: ONLINE TESTS

- Use appropriate web-browser lock-down software, and a web-cam, as appropriate
- Limit the amount of time students have to complete the exam
- In LMS Quizzes, randomize questions and shuffle answers. Also, in LMS Quizzes, show only one question at a time without the option to go back after answering

POST-TEST PROCEDURES

- If students are permitted to review their exams, conduct the post-exam review in a secure manner, just as you administered the test
- All exams must be collected at the end of the review period

DETECTING PLAGIARISM

NCOM offers Turnitin, a plagiarism detection system accessed through the LMS. Turnitin helps faculty prevent plagiarism by detecting unoriginal content in students' written assignments, including the detection of text potentially generated by AI. It is important to understand that Turnitin must be activated before students submit work in a LMS assignment. Note: Turnitin can only be used for assignments where online submission of file uploads or text entry is required. Though not 100% foolproof, particularly in instances of paraphrase or translation, Turnitin does act as a plagiarism deterrent, and has features designed to help educate students about plagiarism and the importance of proper attribution of any "borrowed" content.

BEST PRACTICES IN THE PROMOTION OF ACADEMIC INTEGRITY IN ONLINE EDUCATION

NCOM is particularly sensitive to the challenges of academic integrity in online education because of the physical separation between faculty members and students. The online teaching environment

poses specific difficulties regarding the administration of examinations and the assessment of student work. These challenges require NCOM to be conversant with developments and best practices in the field of online education, and to be receptive to both new opportunities and challenges associated with emerging technologies as they are developed and implemented.

Following is a number of best practices for promoting academic integrity in online education:

GUIDELINES FOR FACULTY

- A secure student login, personalized password, and two-factor authentication (meeting identity management system standards) is required to access online courses and related resources, discussions, assignments and assessments. Information gathered as part of the identity management system for these purposes must be safeguarded carefully to protect student privacy
- Online faculty should be made aware of general NCOM policies and procedures on academic integrity, conduct, and Professionalism and the reporting procedure. In the instance that suspected violations of academic integrity, conduct, or professionalism are discovered, the Associate Dean of Academic or Clinical Affairs (depending upon which years the student is in) must be notified. For asynchronous online courses, the Director of Distance Education must also be notified. These violations will be addressed according to the NCOM ACPC policies
- The link to the NCOM Academic Integrity, Conduct, and Professionalism Policy –within this document and ST-01 must be incorporated by faculty in their course homepage, course syllabi and course outlines. Faculty should give students the opportunity to discuss the Academic Integrity, Conduct, and Professionalism Policy using the course discussion board or chat room
- For each course taken in an online environment, students are required to read and check a box in the LMS indicating that they will abide by the NCOM Academic Integrity, Conduct, and Professionalism Policy

MULTIPLE ASSESSMENT STRATEGIES AND PREVENTION OF PLAGIARISM

- Ensuring academic integrity in the assessment of student learning is an essential faculty responsibility. Therefore, faculty must be actively involved in structuring appropriate course assessments. Faculty may choose to use multiple assessment techniques in place of, or to lessen reliance on, midterm and final examinations. Assessments should be designed to be frequent, varied, and directly relevant to course learning objectives. One suggestion is to make assignments cumulative (students turn in parts of a project or paper throughout the semester) to minimize opportunities for fraudulent submissions. Examples of learning and assessment activities include: interactive threaded discussions, writing assignments, quizzes, capstone projects, group work, and online exams
- Assessment activities should be modified from semester to semester
- Plagiarism detection software should be used for written assignments
- Student submission of work that was not written by the student (e.g., material created by ChatGPT, Bard, or other AI tools) and without appropriate attribution, is a violation of academic integrity
- Faculty may, at their discretion, permit or assign work using AI tools to promote student learning. If a faculty member explicitly permits students to use AI tools, then use of this material would not be considered a violation of academic integrity. As AI technology

continues to develop, each individual program at Touro, as well as the Touro Department of Online Education, may suggest creative ways of using AI for student learning and make additional recommendations regarding avoiding academic integrity violations

EXAMINATIONS

- Exams in asynchronous courses are delivered online using a remote proctoring solution.
- Exams in synchronous online courses may be delivered remotely or on campus, depending upon the course needs and the policies of each school
- Students should be informed in the course syllabus regarding how and where exams will be administered
- The instructor has primary responsibility for proctoring, whenever that is possible. For both undergraduate and graduate courses, the assignment of any proctor other than the instructor must be at the direction of the dean of the respective college, graduate school, or professional school
- When taking an online exam, students will be asked to provide a Touro ID or government-issued photo ID, a requirement of most remote proctoring solutions. Students should be informed of this requirement in the syllabus and reminded when the examination is scheduled
- In the instance that an examination is given online, faculty must be aware of academic integrity issues in the administration of these exams and take appropriate steps to minimize these issues, such as those described below:
 - Use test banks with large numbers of questions and pull a smaller number of questions from the test bank
 - Randomize the order of answers for multiple-choice questions, so that, for example, the correct answer for a particular question might be “a” for one student and “b” for another
 - A Web browser lock-down service must be used during testing and students cannot leave the exam once they have started

A variety of technological solutions to minimize the potential for cheating on online examinations are emerging, including online proctoring services and biometric measuring devices. Touro will continue to monitor new proctoring technology. Any such technology that might be adopted by individual units, must be done in coordination with the Dean/CAO.



INSTITUTIONAL POLICY: D6005

Credit Hours

Category: Curriculum
Subject: Assignment of Credit Hours
Effective Date: January 10, 2025
Updated:

1: Authority

COCA 12.5

2: Purpose

The Credit Hour Policy defines how credit hours are calculated for each year of NCOM's curriculum according to guidelines established by the Department of Education.

3: Pre-Clinical Courses (OMS 1 & OMS 2)

3.1 Lecture / Presentation: To determine credit hours, contact hours are assigned to each hour of lecture or hour designated to online presentations. Each contact hour is expected to be followed by one to two hours of outside study. The lecture or presentation contact hour per credit hour is based upon the Carnegie Unit Calculation:

Carnegie calculation is $\text{Credit Hours} \times (\text{Weeks/Sessions}) \div 30$.

3.2 Labs, Small Group Activities, Independent Study, and Workshops: One credit hour is assigned for 30 hours of contact time.

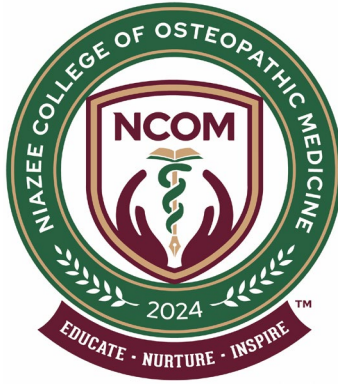
4: Clinical Rotation Curriculum Credit Hours (OMS 3 and OMS 4):

4.1 Four credit hours are awarded for the approximate 160-180 contact hours students spend on each four-week required clinical rotation or clinical research experience.

4.2 The contact hours awarded on a clinical rotation are estimated to have a 1 to 1 ratio as preparation for the study is usually spent while on the rotation. Therefore, the following formula is used in the clinical setting:

- 40-50 contact hours (1 week) = 1 credit hour,
- 80 – 90 contact hours (2 weeks) = 2 credit hours, and
- 160-180 contact hours (4 weeks) = 4 credit hours.

The above includes clinical modules, case presentations, reading assignments, and all other activities during each clinical rotation.



Institutional Policy D7085

Code of Conduct for Faculty, Staff and Administration

Category: Faculty and Staff
Subject: Code of Conduct for Faculty, Staff and Administration
Effective Date: July 3, 2025
Updated:

1. Authority

2. Introduction

2.1 NCOM is committed to exacting standards of professionalism in osteopathic medicine in patient care, research, education, and related activities that support these standards among our faculty, staff, and learners. We expect our NCOMMUNITY to maintain these standards while present on campus, online, or during travel representing NCOM.

2.2 Professionalism is integral to our mission of improving health and education. This includes demonstrating excellence, equity, respect, integrity, compassion, altruism, accountability, honesty, and service in all endeavors and creating an environment supportive of diversity in ideas, perspectives, and experiences. All individuals in the NCOMMUNITY are responsible for creating an inclusive environment where every person is valued and honored.

3. Definitions

3.1 Professionalism in clinical practice settings: includes adherence to the NCOM faculty/student handbooks and the clinical rotations manual. This includes but is not limited to:

3.1.1 safeguarding the privacy and confidentiality of patient information,

3.1.2 communicating effectively in an interprofessional environment,

3.1.3 observing established standards for patient safety and timely completion of medical records,

3.1.4 participating in quality improvement initiatives,

3.1.5 exercising cultural humility,

3.1.6 reporting errors or violations,

3.1.7 following rules for billing and compliance, and

3.1.8 accurate reporting of clinical and educational work hours, patient outcomes, and clinical experience data.

3.2 Professionalism in the conduct of research: includes but is not limited to fostering a collaborative environment, and employing collegial, non-threatening, and fair treatment of research team members which include faculty, staff, subjects, and learners.

3.2.1 Research should be undertaken and conducted in a manner that is inclusive of diverse opinions and ideas.

3.2.2 Research studies should include participants from traditionally underrepresented groups (e.g., race, ethnicity, gender) as appropriate to the scientific question under study and supporting the NCOM commitment to identify and eliminate health disparities.

3.3 Professionalism in education: includes but is not limited to creating an inclusive environment respectful of diverse experiences and perspectives, fostering discussions that respect the dignity and humanity of all members, a commitment to the highest standards of scholarship, innovation in teaching, and leadership through modeling of life-long learning.

3.4 Professionalism in administration: includes but is not limited to respecting the culture and values of the NCOM community, committing to collegial partnerships with co-workers one is responsible for and responsible to, supporting the work of collaborative teams, fostering an environment that supports speaking up and respects diversity of thought, recognizing the needs of patients and our professional community, and showing dedication to the mission of NCOM.

3.5 Ethics in decision-making and relationships: means ensuring decisions are free of bias or influence, guaranteeing that personal and professional relationships do not present a conflict that threatens (or is perceived to threaten) the integrity of the decision, and removing oneself from decisions where fairness may be compromised (or perceived to be compromised), especially decisions made in the context of supervisory relationships, promotions, hiring, and contract issues.

3.6 Ethical business practices: means the wise and fair use of resources and practices that comply with laws, regulations, and policies governing conflicts of interest, sponsored research, and the delivery of and reimbursement for healthcare services.

3.6.1 Business practices should be transparent and fair. A continuous evaluative process should examine and address how practices may be exclusionary and/or perpetuate disparities.

3.7 Ethical research practices: means practicing intellectual integrity, ensuring the welfare of human and animal research subjects, exercising diligent and unbiased acquisition, evaluation, and reporting of scientific information and adhering to NCOM regulations for the conduct of research.

3.8 Unprofessional behavior: means behavior that violates laws or rules regarding discrimination and harassment, and/or violates rules of professional ethics (including professionalism in clinical, educational, research or business practices), or is bullying, disrespectful, retaliatory, and/or destructive.

4. Values:

4.1 All members of the NCOMMUNITY should seek opportunities to acknowledge, promote, and celebrate professionalism in our environment. Leaders in the NCOMMUNITY are especially accountable for creating a culture of professionalism in their own units by exhibiting professionalism, recognizing individuals and teams that exhibit best practices and demonstrate core principles, finding opportunities to convey the importance of professionalism in our shared work, and being available for collaborative, inclusive dialogue around challenging issues.

4.2 To ensure that the professionalism standards are upheld, those aware of unprofessional behavior are responsible for raising their concerns within a reasonable time frame so that the behavior can be addressed and remediated as appropriate.

5. Incorporating the principles of professionalism:

NCOM departments should incorporate the values and principles in this policy as appropriate into their policies, procedures, and practices. Professionalism expectations should be included in offer letters, merit evaluations and promotion criteria. Expectations and any available measures of professional behavior should be specifically highlighted in annual performance reviews, and in documents that relate to situations where the evaluator becomes aware of substantiated acts of unprofessional behavior.

6. Supervisor responsibility:

6.1 Supervisors, including healthcare/research leaders, and faculty, are expected to exhibit professional behavior, set clear expectations, and manage performance in accordance with professionalism standards through regular communication and timely performance reviews.

6.2 Supervisors must confront unprofessional behavior effectively and engage in conversations that may be difficult or uncomfortable. In these challenging situations, supervisors should draw on existing resources including their own supervisors, administrative leadership, and human resources.

6.3 Supervisors are expected to respect diversity of opinions and will not retaliate against members of the NCOM team. Finally, supervisors are expected to address professionalism concerns and deficiencies through routine performance evaluations, counseling, discipline, or other action as appropriate in accordance with policies and procedures within NCOM.

7. Faculty/Staff responsibility:

7.1 Faculty, staff, and learners are expected to maintain the highest standard of professional behavior in all aspects of training and education.

7.2 Faculty and staff are expected to provide role modeling that will enhance the learners' ability to incorporate appropriate behaviors into their professional development by emulating the behavior we wish to see in our learners and following university rules and regulations.

8. For individuals engaged in travel to locations outside NCOM (e.g., conferences, sites of practice, clinical teaching sites, off-site research environments): Professionalism standards as described should be maintained in all settings.

9. For individuals using personal social media communication: Individuals should refer to the NCOM social media policy.

10. Mechanisms for addressing unprofessional behavior:

10.1 NCOM does not condone or tolerate unprofessional behavior, and individuals who engage in such behavior may be subject to disciplinary action up to and including termination.

10.2 Supervisors are expected to address unprofessional behavior as described above via existing processes for addressing student conduct issues outlined in the Academic Integrity, Conduct, and Professionalism policy, contract and bylaws.

10.3 There are processes for addressing faculty members' rights to resolve or adjudicate issues in the faculty handbook and current HR policies. Individuals should contact their supervisor for help in determining whether a particular behavior is covered by an established procedure.

10.4 Members of our community seeking to raise concerns may seek advice from within the member's administrative structure, supervisory chain of command or one of the offices responsible for addressing conduct in violation of NCOM policies.

10.5 Avenues to raise concerns include but are not limited to the following:

10.5.1 informal and collegial one-on-one resolution;

10.5.2 bringing the issue to a supervisor or the next highest individual of authority, if the concerns involve the supervisor;

10.5.3 following applicable grievance procedures;

10.5.4 Human Resources;

10.5.5 the NCOM Compliance and/or Title IX officer(s)

10.6 NCOM is committed to investigating, monitoring, and addressing concerns in a timely manner.

11. Respect and Civility

11.1 The NCOMMUNITY is entitled to work in an environment that is free of harassment, bullying, retaliation, and discrimination. When interacting with others, expectations are:

11.1.1 Treat others the way you want to be treated

11.1.2 Listen and interact with others and be receptive to different points of view

11.1.3 Speak candidly and truthfully

11.1.4 Promote an environment free of harassment, bullying, and abusive conduct-whether physical, verbal, or visual

11.1.5 Promote conflict resolution

11.1.6 Respect the decisions that have been made in the best interests of NCOM

11.1.7 Respect the property of NCOM and others, whether material or intangible

12. Accountability

12.1 The NCOMMUNITY has an obligation to act with integrity, honesty, transparency, and objectivity, treat others with respect, adhere to legal and regulatory requirements and uphold moral and ethical standards when making decisions on behalf of NCOM. Expectations are:

12.1.1 Protect and maintain the confidentiality and privacy of personal and institutional information

12.1.2 Exhibit conduct that promotes a safe environment

12.1.3 Seek help as needed and take responsibility for ones' actions

12.1.4 Be engaged and productive while contributing to collective successes

12.1.5 Ensure personal relationships do not interfere with the performance of work or the management of human or financial resources

12.1.6 Avoid individual or institutional conflicts of interest and promptly disclose real or potential conflict of interest to your supervisor or the Office of Compliance

12.1.7 Report for work fit for duty, free from all substances that impair the ability to perform job duties in a safe, secure, productive, and effective manner

12.1.8 Refrain from taking unfair advantage of another person through harassment, manipulation, abuse of privileged information, misrepresentation of material facts, or any other unfair practice

12.1.9 Protect and properly use NCOM's assets, property, information, facilities and equipment

12.1.10 Act in a reliable and dependable manner

13. Ethical Standards, Integrity and Compliance with Laws, Rules and Regulations

13.1 Ethical conduct is a fundamental expectation for the NCOMMUNITY. Obeying the law, in letter and in spirit, is the foundation on which NCOM's ethical standards are built.

13.2 In practicing and modeling ethical conduct, the expectations are:

13.2.1 Act according to the highest ethical and professional standards of conduct

13.2.2 Be personally accountable for individual actions

13.2.3 Conscientiously fulfill obligations and perform duties as part of the NCOMMUNITY

13.2.4 Communicate ethical standards of conduct through instruction and example

13.2.5 Maintain an ongoing dedication to honesty, responsibility, and trustworthiness

13.2.6 Condone no form of dishonesty, such as fraud, theft, cheating, or plagiarism

13.2.7 Be good stewards of NCOM resources which are reserved for business purposes on behalf of NCOM and are not used for personal gain

13.2.8 Maintain confidentiality by protecting the integrity and security of NCSOM information

13.2.8 Report, inquire, or seek guidance, in good faith, suspected violations of the Code of Conduct, laws, regulations, or NCOM policy

14. Anti-retaliation

14.1 NCOM does not tolerate retaliatory action of any kind against anyone for reporting or inquiring, in good faith, about potential violations of the Code of Conduct, laws, regulations, or NCOM policy or for seeking guidance with respect to suspected violations.

14.2 Retaliatory actions include, but are not limited to:

14.2.1 verbal or non-verbal hostility

14.2.2 exclusion

14.2.3 undue criticism

14.2.4 any behavior that could discourage individuals from exercising their rights

14.2.5 adverse action against any employee regarding the terms and conditions of employment (such as termination, demotion, or suspension) or threats related to such actions

14.3 NCOM will strictly enforce this prohibition.

14.4 An employee who has engaged in conduct or performance that warrants disciplinary action or other employment consequences will not be insulated from the consequences of those actions because he or she had made a report of wrongdoing, as long as such disciplinary action is not taken because of the allegation of wrongdoing.

14.5 Reports that are knowingly false, made with reckless disregard for, or in willful ignorance of facts that would tend to disprove the allegation, are not good-faith reports, are prohibited and may subject the reporter to disciplinary action.

15. Accountability for Violations

15.1 If it is determined, after appropriate investigation, that this Code has been violated, including (without limitation) by failure to report a violation or by withholding information relating to a violation, the offender may be disciplined, with penalties up to and including removal from office or termination of employment.

15.2 Violations of this Code may also constitute violations of law and may result in criminal and/or civil liability for the offender and NCOM. The NCOMMUNITY is required to cooperate with internal investigations of possible misconduct.

16. Reporting Known or Suspected Violations

16.1 The NCOMMUNITY shall contact the NCOM Compliance Services Office via email to:

16.1.1 Report known or suspected violations of this Code of Conduct, laws, regulations, or policies;

16.1.2 Seek appropriate guidance when faced with ethical dilemmas, observed or suspected violations of this Code, any law, or NCOM policy.

17. Guidance

17.1 The NCOMMUNITY must work together to ensure prompt and consistent enforcement of this Code of Conduct. In some situations, it may be difficult to know if a violation has occurred.

17.2 Because it is impossible to anticipate or address every situation that may arise, it is important to be able to approach a new questions or problem with confidence. If there are questions or concerns concerning the applicability of this Code, the legality of your or others' conduct, or you do not find the information you are looking for, you should consult with your supervisor or the Office of Compliance Services.

17.3 Breach of this Code of Conduct, laws, regulation, and/or NCOM Policies and Procedures, may give rise to disciplinary action up to, and including, dismissal.

18. Professional Appearance

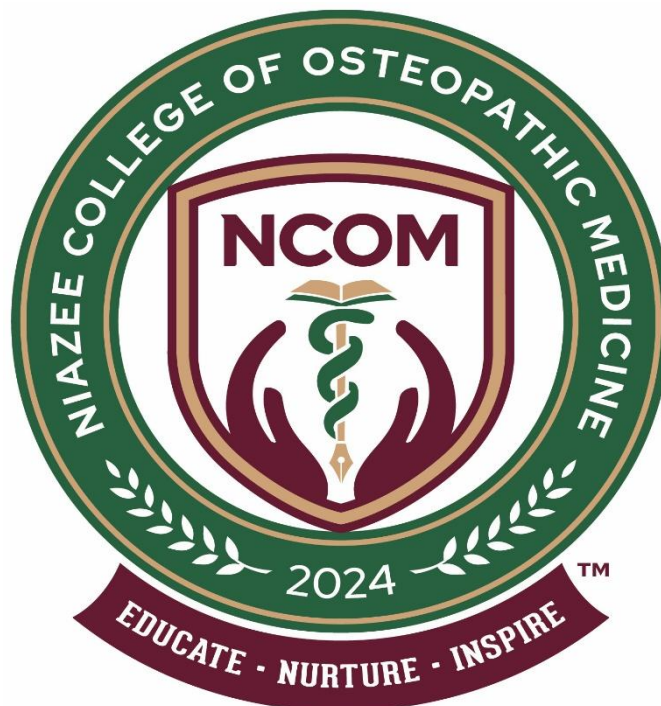
18.1 All faculty and staff are NCOM representatives and should dress appropriately in a professional work environment. "Dress for your day" is intended to be business relaxed when at work. The expectation is that employees will wear clothing that is appropriate for the type of work they perform (e.g., housekeeping, security, etc., other than faculty or administrative staff). No athletic wear, shorts, T-shirts, torn or soiled clothing (e.g., jeans with tears) and excessively revealing clothing. Closed-toe, clean and well-maintained shoes are generally recommended. Maintaining good personal hygiene is crucial and part of the professional dress code expectations. It is also recommended that perfumes, colognes, etc. be kept at a bare minimum, understanding that these may cause allergic/sensitivity reactions to patients, visitors or other employees. It is our collective responsibility to project a professional, businesslike image to our community, visitors, and the public.

18.2 Inappropriate Attire/Appearance. Reasonable professional judgment should be used when selecting clothes for work. Unacceptable attire in these situations includes, but is not limited to, jeans, tee-shirts, flip flops, "Vivo" like toe shoes, slides, short shorts, poor fitting or unclean attire, clothing that exposes one's upper torso or midsection, see-through clothing,

sweat suits, gym clothing, hats/caps that are not religious in nature, and clothing displaying vulgar language or logos (except NCOM log/attire).

The Niazee College of Osteopathic Medicine

Strategic Plan, 2025-2035



1. TABLE OF CONTENTS 2

2. LETTER FROM THE BOARD OF GOVERNORS CHAIR..... 3

3. STRATEGIC PRIORITIES 4

 1 Achieve or surpass all Commission on Osteopathic College Accreditation (COCA),
 Higher Learning Commission (HLC), and Illinois Board of Higher Education (IBHE)
 standards to secure full accreditation and approval.....4

 2 Create a learning environment that fosters student academic, clinical, and research
 excellence.....4

 3 Value, encourage, and inspire faculty, staff, and leadership to recognize achievement,
 provide mentorship to others, and encourage professional growth. 6

 4 Create a program that is committed to community responsiveness and cultural
 understanding for all faculty, students, staff, and partners. 7

 5 Intentionally integrate our college into the surrounding community, academic
 partners, the region, and healthcare systems.....8

 6 Intentionally create a Granting, Fundraising, and Philanthropy structure for the early,
 ongoing, and long-term success of the COM, its students, faculty, partners, and
 community.....9

4. APPENDIX 1 – STRATEGIC PLANNING COMMITTEE MEMBERS..... 11

Introduction by the Board of Governors Chair

Our NCOM strategic planning group engaged in the Strategic Planning process (see Appendix 1 and 2) with full understanding that our primary role through 2032 is to lay the foundations of, and successfully launch, the Niazee College of Osteopathic Medicine (NCOM).

These early years are foundational for NCOM, when we will create every facet of this institution from the ground up and expect high quality excellence throughout. Unlike any other time in our near future, we are tasked with the profound work of simultaneously constructing and launching a curriculum, a business structure, a physical facility, a technological structure, a research infrastructure, a fundraising infrastructure, a newly minted administration/faculty/staff, and early student cohorts.

This document will serve as a basic guide to assist our faculty, staff, and leadership in making outcome-focused choices aligned with the mission of NCOM. The measures included in this plan must evolve over time and, as such, this document is considered a living document and allows us to measure our progress toward meeting our goals while allowing them to evolve as NCOM develops.

We at NCOM are quite excited to welcome and matriculate our first osteopathic medical student classes and join with our community partners in making an ever-growing positive impact within our local/regional communities and the healthcare workforce in Chicagoland, Illinois, the Greatlakes, and the Midwest.

Regards,

OVERALL STRATEGIC PRIORITIES

1. Achieve or surpass all Commission on Osteopathic College Accreditation (COCA), Higher Learning Commission (HLC), and Illinois Board of Higher Education (IBHE) standards to secure full accreditation and approval.

- A. Use COCA, HLC, and IBHE requirements and standards as a continuous guide to meet each milestone.

Strategies:

- 1. Develop a Standard Review working group tasked with ongoing review of COCA, HLC, and IBHE standards and use their findings to guide planning and programmatic change.
 - 2. Conduct regular training and progress assessments with the working group to reinforce understanding and adherence to COCA, HLC, and IBHE standards
- B. Progress to full accreditation from the COCA, the HLC, and approval by the IBHE by providing ongoing reporting reflective of adequate progress and compliance.

Strategies:

- 1. Ongoing assessment of standards by working group used to inform change in NCOM processes.
 - 2. Orientation of faculty, staff, and students regarding the COCA, HLC, and IBHE site visit process.

2. Create a physical and learning environment that fosters academic, clinical, professional, and research excellence.

- A. Develop a technologically advanced, osteopathically integrated, clinically based curriculum that employs effective andragogy for adult professional learners and cultivates self-directed, mature, critical thinking, and lifelong learning skills based on a fundamental understanding of research and scholarly work that is essential for future osteopathic physicians.

Strategies:

1. Curricular mapping to programmatic learning outcomes
 2. Regular evaluation and enhancement of curriculum
 3. Faculty development to enhance knowledge and skills surrounding technologically advanced, problem based, case-based and team-based learning.
 4. Incorporate advanced learning technologies, OPP, and clinical skill development throughout the four-year curriculum
 5. Introduce and systematically develop understanding of research principles and techniques throughout the four-year curriculum with foundational science and clinical research facilities.
 6. Integrate professional identity development throughout the four-year curriculum
- B. Provide an adult, self-directed, professional, and mature learning environment that accommodates individual students' needs while upholding the level of academic and professional excellence expected of a COM and future practicing osteopathic physicians.

Strategies:

1. Formation of a student success team who monitors student progress and provides early intervention for students facing academic or professionalism challenges.
2. COM based learning specialists, academic advisors, coaches, and counselors to mentor students to achieve academic and professional excellence.
3. Develop peer tutoring programs.

3. Develop faculty, staff, students, and leadership to recognize achievement, provide mentorship to others, and encourage professional growth.

- A. Set expectations, and provide resources, for faculty, students, and staff to continue to learn, grow and pursue professional development opportunities.

Strategies:

1. Professional development plans for faculty, students, and staff.
 2. Track and celebrate professional growth and achievement.
- B. Establish a culture of excellence, compassion, professionalism, transparency, and quality communication as expectations in all NCOM endeavors.

Strategies:

1. Conduct in person/virtual town halls and open forums on a regular basis
 2. Regular NCOM community updates highlighting accomplishments, ongoing projects, partnerships, opportunities, and upcoming events.
 3. Departmental meetings to discuss common projects, challenges, and areas of concern.
- C. Mentorship of students is a clear expectation for all faculty, staff, student leaders, and NCOM administration.

Strategies:

1. Clearly express this expectation as part of the onboarding and ongoing training process for all faculty, staff, student leaders, and administration
2. Create avenues for students, faculty, and staff to give feedback on and recognize those who have provided them with mentorship.

4. Create a program that is responsive to the NCOM and greater community, promotes structural competency, is compassionate, welcoming, and promotes health for all individuals across society

A. Model our commitment to fostering belonging within the COM.

Strategies:

1. Develop and implement processes that ensure students, faculty, staff, and leadership feel supported, valued, and heard.
2. Provide support services responsive to the unique needs of the NCOM community.

B. Design and implement communication and outreach efforts to attract a broad applicant pool focusing on medically underserved populations in osteopathic medicine and create clinical partnerships that will expect our students to work with heterogenous patient populations.

Strategies:

1. Development of pathway programs.
2. Development of early acceptance programs targeting varied student populations.
3. Target advertising and outreach to assure heterogeneous pools of candidates when hiring faculty, staff, and administrators.
4. Recruitment of a varied population of preceptors across a wide range of healthcare settings.

5. Intentionally integrate our college into the surrounding community, our partners, Chicagoland and the surrounding regions.

- A. Develop strategies to foster community trust and partnership involving leadership, faculty, staff, and students.

Strategies:

1. Align NCOM processes and policies with those of our partners whenever possible.
2. Establish pathways to NCOM for students from Chicagoland institutions and the Midwestern/Greatlakes regions.
3. Interdisciplinary initiatives in research, clinical experiences, and curriculum development/delivery.
4. Involvement of members from NCOM, regional healthcare partners, Chicagoland, and the greater osteopathic community on the college board of governors.
5. Faculty, student, and staff involvement in community organizations, partnerships, and service.
6. Partner with local, regional, and national healthcare systems to develop and support graduate medical education.

- B. Prepare NCOM students to proactively respond to the needs of the communities they will serve.

Strategies:

1. Develop a curriculum which includes the foundations of population health, nutrition, structural competency, and research.

- C. Foster and sustain confidence in our students' education and abilities, faculty expertise, and staff engagement across these communities.

Strategies:

1. Develop social media, communication, and marketing plans.
2. Engage in ongoing communication with preceptors to gauge student performance and to highlight student achievements.

3. Build community confidence in programming and students through ongoing opportunities for communication and engagement.
4. Create an integrated NCOM practice plan between NCOM and our clinical partners
5. Encourage community engagement opportunities for NCOM staff

6. Intentionally create a granting, fundraising, and philanthropy structure for the early, ongoing, and long-term success of the COM, its students, faculty, partners, and community.

A. Recognizing the Rabia Institute of Medical Sciences not-for-profit Corporation as the superseding organization

1. To support the long-term financial sustainability and growth of the Niazee College of Osteopathic Medicine (NCOM), we have established the RIMS not-for-profit Corporation. The RIMS NFP C Corporation will serve as the primary entity for fundraising, securing grants, and managing philanthropic contributions. The key components of its creation included the following strategies:

a. Legal Formation & Governance

- i. Established the RIMS C Corporation as a 501(c)(3) nonprofit entity.
- ii. Develop bylaws and governance structures, including a Board of Trustees comprising community leaders, medical professionals, and institutional stakeholders.
- iii. Ensure alignment with COCA, HLC, IBHE accreditation requirements and institutional goals.

b. Fundraising & Development Strategy

- i. Launch a capital campaign to secure start-up funding for equipment, endowments, and facilities development and later to include funding for scholarships, faculty support, and research initiatives.
- ii. Continue to establish partnerships with healthcare organizations, corporations, and philanthropic entities to enhance funding opportunities.

- iii. Create an annual giving program and planned giving opportunities to engage eventual alumni, donors, partners, and the broader community.

c. Grants & Research Funding

- i. Develop a structured grant-seeking program/office to pursue funding from federal, state, and private sources.
- ii. Hire or designate a grants officer to oversee proposal development, application submissions, and compliance tracking.
- iii. Support faculty and student research initiatives through targeted seed funding programs.

d. Community Engagement

- i. Host fundraising events, donor recognition programs, partner recognition programs, and community outreach initiatives.
- ii. Leverage digital platforms, marketing, and public relations for donor engagement, transparency, and impact reporting.

e. Financial Oversight & Compliance

- i. Implement transparent financial management practices, including regular audits and reporting.
- ii. Ensure compliance with all nonprofit regulations and COCA/HLC/INHE accreditation requirements.
- iii. Establish an endowment strategy for long-term financial sustainability.

- B. By establishing the RIMS not-for-profit C Corporation, we have created a sustainable financial support system to advance the mission of the Niazee College of Osteopathic Medicine and ensure long-term success in medical education and research.

APPENDIX 1 – STRATEGIC PLANNING COMMITTEE MEMBERS

The RIMS Board of Trustees, the NCOM Board of Governors, along with NCOM administrative leadership and staff, and MCP Consulting, served as the planning group for this Strategic Planning process.

M.T. AliNiazee, PhD – President RIMS Board of Trustees, President/CEO NCOM

Mateen AliNiazee, MD – Chair – NCOM Board of Governors

Kareem Irfan, JD – EVP/CSO/CCO - NCOM

K. Scott Whitlow, DO, CS, FAAEM – Dean/CAO - NCOM

Gail Feinberg, DO, M.Ed., FACOFP (Dist.) - Assoc. Dean Acad. Affairs – NCOM

Howard Feinberg, DO, MACOI, FACR- Assoc. Dean Clinical Affairs – NCOM

Kathryn Valentine, PMP, CFE, CGFM – CFO – NCOM

Julianne McAuliff – Chief of Staff to the Dean/CAO - NCOM

Mohammed Quadri – Director of Finance - NCOM

Strategic Planning Committee Facilitator: Martin Pearce, MA - MCP Consulting