



## Frederick Community College Board of Trustees

### President's Baseline Insight Report

#### EL 5 – Organization Culture

Report Date: 3/19/2025

Compliance Status: F / (P) / N Compliant



**Note: Board Policy is indicated in bold typeface throughout the report.**

I am submitting this baseline insight report to the Frederick Community College Board of Trustees, focusing on the Board's Executive Limitation Policy: "EL-5 Organization Culture." This report is submitted for your review. I confirm that the information provided is accurate and establishes a baseline for compliance with the policy as approved by the Board, unless noted otherwise.

A handwritten signature in blue ink, reading "Annesa Cheek".

3/19/2025

Annesa Cheek, Ed.D.  
President

Date

**Note: Board Policy is indicated in bold typeface throughout the report.**

**The President shall not permit an organizational culture that lacks a high degree of integrity at all levels of the organization.**

**Further, without limiting the scope of the above by the following list, the President shall not:**

- 1. Operate without an enforced internal Code of Conduct, of which all employees are made aware, that clearly outlines the rules of expected behavior for employees.**

INTERPRETATION:

EVIDENCE:

Compliance will be demonstrated when:

- a. There is evidence that the College has an Employee Code of Conduct policy that is current and accessible.
- b. Employment contracts for active employees include an acknowledgement by the employee to abide by the Employee Code of Conduct policy.

- a. On 3/7/2025, the VP for Talent and Culture verified that the [Employee Misconduct Policy and Procedures](#) is available to all employees on the College website. Currently, the [Employee Misconduct Policy](#) acts as FCC's code of conduct. A new FCC Code of Conduct Policy is in development. Once finalized, all FCC employees will be required to review the policy annually.
- b. Beginning on July 1, 2024, the following language was adopted into annual employee contracts, and all active employees signed the same:  
"acknowledgement by signature affixed hereto of agreement to abide by FCC's Code of Conduct through adherence to FCC's [Employee Code of Ethics Policy](#), [Employee Misconduct Policy](#), and other related FCC policies and procedures."

This interpretation is reasonable because it follows industry best practices and aligns with Maryland state law.

**2. Permit employees and others to be without a mechanism for confidential reporting of alleged or suspected improper activities, without fear of retaliation.**

INTERPRETATION:

EVIDENCE:

Compliance will be demonstrated when:

- a. There is a mechanism for confidential reporting to the Board Chair, Vice Chair or Board Attorney, of alleged or suspected improper activities that implicate the CEO or a Trustee.
- b. An anonymous reporting system is available to employees for the reporting and investigation of suspected improper activities, which can include financial irregularities, as well as acts that are dishonest, deceitful, fraudulent, or criminal, in addition to other violations of federal and/or state laws. In situations where a conflict arises in a direct-reporting relationship, employees have access to an anonymous reporting system that is independent of the College.
- c. A policy and supporting documentation are in place notifying employees of the consequences of making false claims or allegations that prove to be unsubstantiated, or which prove to have been made maliciously or are knowingly false. These claims shall be viewed as a serious offense and shall be subject to

- a. The College adheres to the requirements in [GP-12 Handling Operational Complaints](#), [GP-13 Handling Alleged Policy Violations](#), and [BCD-4 Monitoring President Performance](#).

- b. On 3/12/2025, the VP for Talent and Culture confirmed that there are clear processes for employees to present complaints and wrongful conditions, including harassment and bias. The following policies and procedures are available to all employees on the College website:

- [Complaint Policy and Procedures for Employees](#)
- [Employee Code of Ethics](#)
- [Employee Misconduct](#)
- [Non-Discrimination](#)
- [Code of Conduct for Visitors, Guests and Volunteers](#)
- [Expressive Activity](#)
- [Title IX](#)

Notwithstanding this, the College does not currently have an anonymous reporting system, independent of the College, in place. The College will begin providing this resource to employees in partnership with a third-party vendor by the end of FY25.

- c. The FCC Code of Conduct Policy, currently in development, will reflect that the violations of this policy may result in disciplinary action, up to and including suspension with pay or termination of employment. This policy will be effective by the end of FY25.

**2. Permit employees and others to be without a mechanism for confidential reporting of alleged or suspected improper activities, without fear of retaliation.**

INTERPRETATION:

EVIDENCE:

disciplinary action, which may include termination from employment.

- d. A policy and supporting documentation are in place to ensure that no employee will be adversely affected because the employee refuses to carry out a directive which would result in an improper, illegal, immoral, or unethical act.

- d. On 3/10/2025, the VP for Talent and Culture verified that the [Complaint Policy and Procedures for Employees](#) prohibits any employee, student or other person under the College's control from engaging in retaliation against any person who exercises in good faith, their own rights under College policy or other law.

This interpretation is reasonable because it follows Human Resources and industry best practices.

**3. Cause or allow research involving either human subjects or animals that does not adhere to generally accepted ethical principles and policy or federal and state regulations.**

INTERPRETATION:

EVIDENCE:

I interpret “research involving human subjects” to mean research conducted by an investigator (whether professional or student) on living individuals which:

- Obtains information through intervention or interaction with the individual, and uses, studies, or analyzes the information; or
- Obtains, uses, studies, analyzes, or generates identifiable private information.

I interpret “research involving animals” to mean the use of non-living vertebrate animals for examination and/or dissection for teaching and learning purposes.

Compliance will be demonstrated when:

- a. The College has a published policy and guidelines in place to distribute to individuals wishing to conduct research regarding the use of human subjects.
- b. Any animal specimens used for instructional purposes are verified as ethically sourced and disposed of properly.

- a. On 3/6/2025, the Chief Foresight and Decision Support Officer confirmed that a copy of the [Institutional Review Board Policy](#) and application for research is published on Frederick Community College's website.
- b. On 3/7/2025, the Provost and VP for Teaching Learning and Student Success confirmed that the College procures all animal specimens used for instructional purposed (dissections) through verified biological supply companies who are regulated under relevant laws and guidelines to ensure ethical treatment and proper sourcing of animals. The specimens are disposed of through Environmental Enterprises, Inc., an environmental services agency specializing in industrial and hazardous waste management contracted by the College.

This interpretation is reasonable because such practices are consistent with common methods employed in the higher education and research community.

**3.1. Permit potential researchers to be without readily available guidelines for ethical research and assistance in identifying and solving ethical problems.**

INTERPRETATION:

EVIDENCE:

Compliance will be demonstrated when, in such cases where research is conducted at FCC, prior approval includes submission of ethical guidelines for all research work.

On 3/6/2025, the Chief Foresight and Decision Support Officer confirmed the storage of approved and pending research applications that includes information regarding compliance with ethical guidelines.

This interpretation is reasonable given this practice is consistent with common methods employed in the higher education and research community.

**3.2. Permit research that has not been subject to independent ethical review.**INTERPRETATION:EVIDENCE:

Compliance will be demonstrated when the College has an established Institutional Review Board which is used for independent, ethical review of all research work involving humans.

On 3/6/2025, the Chief Foresight and Decision Support Officer confirmed that the College has an established Institutional Review Board as required by policy, and it is used for independent, ethical review of all research involving humans.

This interpretation is reasonable because it establishes standard higher education and research internal controls to ensure adherence to policy and associated guidelines.