Standard IV.C - Governing Board

Standard IV.C.1

1. The institution has a governing board that has authority over and responsibility for policies to assure the academic quality, integrity, and effectiveness of student learning programs and services and the financial stability of the institution. (ER 7)

Evidence of Meeting the Standard
The Foothill-De Anza Community College District Board of Trustees is charged by California Education Code, Section 70902, with responsibility for establishing academic standards, approving courses of instruction and educational programs, and determining and controlling the operating and capital budgets of the District. Board policy and administrative procedures outline the role of the board [REF: BP/AP manual]. Board policy 2200 explicitly states the board, “carries out the philosophy, mission and priorities of Foothill-De Anza Community College District” [REF: BP 2200]. These responsibilities identifies students and their progress as the central purpose, and where the district is to support a climate that prioritizes teaching and learning. Additionally, the board has authority for the financial stability of the district. This responsibility includes adopting principles of sound fiscal management and requires, at a minimum, quarterly reports on the District’s financial and budgetary condition that are included as standing items on the Board’s adopted meeting calendar each year [REF: BP 3000; BP 3112].

In its support of the district mission and continuous improvement at the college, the governing board consults collegially with the academic senates on academic and professional matters and to ensure the joint development of policies in critical areas such as educational program development and program review. Following the recommendation of the Academic and Professional Matters Committee, which includes leaders of the college and district academic senates and administration, the board adopts policies on a wide range of matters, including curricular offerings, graduation requirements, and program discontinuance [REF: BP 2223].

The adoption of the 2022-23 budget is one example where the governing board ensures the financial stability of the District. Adhering to policy, the process starts with analysis of the Governor’s Proposed Budget, continued with the approval of the tentative budget, and concluded with a public hearing and the Board’s adoption of the budget. The presentations to the governing board that accompanied the tentative and adopted budgets provided detailed information and multi-year projections that allowed trustees and the public to understand the factors affecting funding and to consider planning strategies [REF: BP 3100; BP 3110; Tentative Budget Approval; FY23 Budget Adoption].

Analysis and Evaluation
Foothill College meets the Standard. As established in policy and documented in practice, the Foothill-De Anza Community College District Board of Trustees has authority over and responsibility for regularly reviewed policies that ensure the
academic quality, integrity, and effectiveness of student learning programs and services and the financial stability of Foothill College.

**Standard IV.C.2**

2. **The governing board acts as a collective entity. Once the board reaches a decision, all board members act in support of the decision.**

**Evidence of Meeting the Standard**

The Board of Trustees pledges in its philosophy statement, “to work together on behalf of our community in a spirit of cooperation and collaboration.” The pledge is underscored in the Board’s code of ethics policy, which requires trustees to “work with fellow Board members in a spirit of harmony, respect and cooperation, acknowledging that differences of opinion will arise,” “base personal decisions upon all available facts in each situation, vote honest conviction in every case, and respect the final majority decision of the Board,” and “remember at all times that an individual Board Member has no legal authority outside the meetings of the Board and conduct all relationships with the college staff, students, local citizenry and media on the basis of that fact.” [REF: BP 2200; BP 2715]

While the governing board does not always vote unanimously, trustees accept and support the decision of the majority. The Board’s own self-evaluation reflects an unanimous opinion that trustees are adhering to the philosophy statement and to the code of ethics statements that relate to collective action [REF: Board Self-Eval Agenda Item; Board Self-Eval Summary 2021-22]. The Board’s commitment to this ethos is reflected in the adoption of a resolution changing from at-large to trustee area elections and the approval of a final trustee area map plan and sequence of elections. The minutes of the meeting reflect debate over the final map plan and sequence of elections. The final vote was not unanimous; however, following the vote, individual trustees have acted in support of the Board’s collective decision [REF: Transition to Area Elections; ADD 02/14/2022 MINUTES SCREENSHOT (ITEM 14)—ALREADY UPLOADED INTO CANVAS].

**Analysis and Evaluation**

The governing board has adopted policies that acknowledge its responsibility to act as a collective entity. The Board demonstrates support for its policies and decisions and meets the high standards set for the conduct of its members included in its philosophy and code of ethics.

**Standard IV.C.3**

3. **The governing board adheres to a clearly defined policy for selecting and evaluating the CEO of the college and/or the district/system.**

**Evidence of Meeting the Standard**

The Board has clearly defined policies for the selection and evaluation of the District chancellor. Board policy 2431 states that, “in the event of a Chancellor vacancy the Board shall establish a search process to fill the vacancy” [REF: BP 2431]. When a chancellor vacancy does occur, the governing board will adopt a timeline for a
nationwide search; and approve the search committee composition, the committee charter, and the search profile [REF: Search Timeline & Committee Charter; Search Committee Roster; Search Profile].

Board policy requires that the chancellor be evaluated at least annually based on criteria established by board policy, the chancellor job description, and performance goals and objectives developed jointly between the chancellor and Board [REF: BP 2435]. Institutional performance is a key indicator of the chancellor’s success in performance of duties. An example of this expectation is the requirement that the chancellor align goals with the Board’s equity and student success priorities and report to the Board on progress in meeting the goals at least twice per year.

The governing board meets in closed session at the beginning of each fiscal year to conduct a written evaluation of the chancellor and to set performance objectives related to the goals and mission of the district. A mid-year evaluation is generally scheduled in February. The chancellor’s annual and mid-year evaluations and progress reports related to the Board’s priorities are included as part of the Board’s comprehensive meeting calendar approved in August of each year [REF: BOT Calendar: Feb & Sept ; BOT Minutes 08/02/21 – REPLACE LANDING PAGE LINK WITH MINUTES—ALREADY UPLOADED IN CANVAS; BOT Minutes 02/14/22 – REPLACE LANDING PAGE LINK WITH MINUTES—ALREADY UPLOADED IN CANVAS].

Analysis and Evaluation
Foothill College meets the Standard. The governing board has clearly defined policies for the selection and evaluation of the chancellor. In keeping with the chancellor selection policy, a comprehensive, fair, and open process is established followed by the Board to select the next chancellor. A process for evaluating the chancellor is defined in policy, and the chancellor’s evaluation, which includes annual goal setting, is conducted in accordance with policy in the most recent academic year.

Standard IV.C.4

4. The governing board is an independent, policy-making body that reflects the public interest in the institution’s educational quality. It advocates for and defends the institution and protects it from undue influence or political pressure. (ER 7)

Evidence of Meeting the Standard
The Foothill-De Anza Community College District Board of Trustees is an independent, policy-making that reflects the public interest in the institution’s educational quality. The governing board consists of five publicly elected trustees selected by voters from five geographic areas, known as trustee areas, within the district’s boundaries and two student trustees, one from Foothill College and one from De Anza College, selected annually by the student body [REF: Trustee Area Map Adoption]. Citizens of the district are appointed to the Board’s Audit and Finance Committee and Citizens’ Bond Oversight Committee, and the Board has also taken the initiative to include community members on major search committees of the district, such as those for the chancellor and college presidents [REF: Chancellor Search Committee members].
The governing board has regularly reviewed policies that address conflict of interest, expectations for ethical behavior, political activity, and communication among board members [REF: BP 2710; BP 2712; BP 2715; BP 2716; BP 2720]. The conflict of interest policy requires trustees to disclose potential conflicts and prohibits trustees from financial interest in any contracts made by the Board. Trustees annually file a Statement of Economic Interests form required by the Fair Political Practices Commission and kept on file with the Santa Clara County Clerk of the Board of Supervisors and the District Chancellor’s Office.

**Analysis and Evaluation**

Foothill College meets the Standard. The Board of Trustees regularly encourages and enables citizens’ participation in board meetings and on appropriate committees. The Board is a strong advocate for the colleges, and trustees are actively involved in local, state, and national efforts to improve student success, strengthen legislation, and increase funding for community colleges. The Board is independent, with members elected by eligible voters who reside within five trustee areas, and it works to shield the colleges from undue influence and political pressure.

**Standard IV.C.5**

5. The governing board establishes policies consistent with the college/district/system mission to ensure the quality, integrity, and improvement of student learning programs and services and the resources necessary to support them. The governing board has ultimate responsibility for educational quality, legal matters, and financial integrity and stability.

**Evidence of Meeting the Standard**

Board policy 4020 regarding program, curriculum, and course development states that “programs and curricula of the District shall be of high quality, relevant to community and student needs, and evaluated regularly to ensure quality and currency.” [REF: BP 4020]. Board policies related to fiscal management, preparation of the budget, and reports on the District’s financial condition further define the governing board’s responsibility to safeguard the financial integrity and stability of the district [REF: BP 3000; BP 3110; BP 3112].

The District Strategic Plan includes priorities related to student achievement, learning and support services, and fiscal responsibility [REF: District Strategic Plan 2017-2023]. The plan incorporates priorities derived from the district mission and supported by goals and strategies aligned with the colleges’ educational master plans.

Minutes of governing board meetings provide evidence that the district adheres to its policies to ensure the quality, integrity, and improvement of student learning programs and services and the resources necessary to support them board policy and that the Board bears ultimate responsibility for educational quality, legal matters, and financial integrity and stability. Curriculum and fiscal matters appear on agendas with regularity, conferences with legal counsel are included on closed session agendas when necessary,
and the governing board seeks and acts on the advice of legal experts in matters such as bond issuance and the California Voting Rights Act.

Analysis and Evaluation
Foothill College meets the Standard. The District’s governing board has established policies consistent with the District mission to ensure the quality, integrity, and improvement of student learning programs and services and the resources necessary to support them. Regular in-depth discussions regarding student achievement and resource allocation are conducted at governing board meetings, and institutional plans are approved by the Board. Board policies and meeting minutes provide proof that the governing board retains ultimate responsibility for educational quality, legal matters, and financial integrity and stability.

Standard IV.C.6

6. The institution or the governing board publishes the board bylaws and policies specifying the board’s size, duties, responsibilities, structure, and operating procedures.

Evidence of Meeting the Standard
The governing Board publishes an online Board Policy and Administrative Procedures Manual available to the public that is displayed prominently on the Board of Trustees section of the district website [REF: BP/AP Manual; BOT Website – ALREADY UPLOADED SCREENSHOT INTO CANVAS]. Chapter 2 of the manual includes policies specifying the Board’s size, duties, responsibilities, and operating procedures [REF: BP 2010; BP 2015; BP 2110; BP 2200; BP 2305; BP 2310; BP 2330; BP 2340; BP 2640].

Analysis and Evaluation
The Board makes its policies available to the public in an online Board Policy and Administrative Procedure Manual that includes policies defining the Board’s size, duties, responsibilities, structure, and operating procedures.

Standard IV.C.7

7. The governing board acts in a manner consistent with its policies and bylaws. The board regularly assesses its policies and bylaws for their effectiveness in fulfilling the college/district/system mission and revises them as necessary.

Evidence of Meeting the Standard
Foothill College meets the Standard. Minutes from each meeting of the Board of Trustees are posted on the governing board’s website and document decisions and actions that align with board policies. Examples include adherence to fiscal, public participation, and student services policies.

Board Policy 2410 indicates “policies of the Board may be adopted, revised, added to or amended at any regular board meeting by a majority vote. Proposed changes or additions shall be introduced not less than one regular meeting prior to the meeting at which action is
recommended.” The governing board conducts an annual self-evaluation assessing its efforts to support the district mission, uphold ethics and behave in manner consistent with policy and bylaw [REF: Board Self-Eval Agenda Item; Board Self-Eval Summary 2021-22].

The District has long held a contract with the Community College League of California (CCLC) for its policy and procedure service. The CCLC’s service provides policy and procedure templates that are vetted by legal counsel and updated twice per year to reflect changes in laws and regulations. Because the District’s policy numbering system and base policy structure differ significantly from the CCLC system, efforts at keeping policies and procedures up-to-date and relevant have met with limited success. For this reason, the District is in the process of systematically reviewing all policies and procedures [DO WE NEED TO CITE EVIDENCE HERE? MAYBE JUST A LIST OF THE BP/AP REVIEWED THIS YEAR?]. Despite consistent progress, the full review of all policies and procedures has been delayed by limited staff in the Chancellor’s Office, turnover of key personnel and committee members involved in policy review, and competing priorities.

Analysis and Evaluation

Foothill College meets the Standard. The governing board acts in a manner consistent with its policies as evidenced by meeting minutes. The Board has a process for the regular assessment of its policies in fulfilling the mission and revises them as necessary. Even with challenges faced with limited staff and personnel turnover, the District is prioritizing the review of all policies and procedures by methodically bringing each up for review at Chancellor’s Advisory Council, sharing with key constituencies for feedback, and seeking board approval on any revisions and updates.

Standard IV.C.8

8. To ensure the institution is accomplishing its goals for student success, the governing board regularly reviews key indicators of student learning and achievement and institutional plans for improving academic quality.

Evidence of Meeting the Standard

The governing board regularly reviews key indicators of student learning and achievement and institutional plans for improving academic quality. Progress reports on achieving these metrics that include numbers of College Promise Grant recipients, Pell Grant recipients, AB 540 students, associate degrees and credit certificates, four-year college and university transfers, completers of transfer-level math and English within the first year, completers of nine or more career education units, and alumni who have attained the regional living wage, are provided at the Board of Trustees retreat [REF: BOT Retreat Metrics Review].

Board policy 3250 charges the chancellor to seek board approval of institutional plans, a process that requires an examination of multiyear trends, institutional goals, and discussions about student learning and achievement data [REF: BP 3250; SEP 2019 BOT Approval; BOT Agenda SEP 2.0; BOT Agenda SEP 2022 – UPLOAD PDF OF BOT MINUTES FROM 12/12/22 IN PLACE OF LINK, ALREADY UPLOADED TO CANVAS]

Analysis and Evaluation
Foothill College meets the Standard. The governing board regularly reviews and discusses student performance data and sets aside time for in-depth examination of college plans for improving academic quality and student success.

Standard IV.C.9

9. The governing board has an ongoing program for board development, including new member orientation. It has a mechanism for providing for continuity of board membership and staggered terms of office.

Evidence of Meeting the Standard

The Board of Trustees has an ongoing program for board development that includes regularly scheduled study sessions; attendance at conferences, workshops and webinars related to effective trusteeship and advocacy; participation in college and districtwide professional development; and a comprehensive new trustee orientation. Governing board members complete sexual harassment and discrimination prevention training every two years and complete ethics training as part of orientation [REF: Discrimination/Harassment Training Email; 9/5/18 New trustee orientation email https://foothilldeanza-my.sharepoint.com/:b:/g/personal/20139018_fhda_edu/EUOWjLcL0ChMiIkfX3AZa2UBE5qSr1XoBmMVRNi9LQvng?e=Baq1qj –THIS LINK DOES NOT WORK].

The annually approved meeting calendar includes scheduled retreats, and conference calendar, which lists conferences trustees are authorized to attend each year without separate advance approval [REF: BP 2740; BOT 2023 Calendar; BOT Conference Calendar]. Trustees provide a report of workshops and conferences attended during regular meetings [REF: BP 2735]. Trustees regularly participate in professional development opportunities offered by the colleges and district, including opening day activities and workshops. A special meeting was held for board members to learn about its role and responsibilities related to accreditation [REF: BOT ACCJC Training; ADD PDF OF ACCJC TRAINING MINUTES—ALREADY UPLOADED TO CANVAS].

Other ongoing training for board development include the opportunity for two trustees to participate in a yearlong Trustee Fellowship as well as the Trustee Fellowship Intersession Project, designed by the California Community Colleges Chancellor’s Office in partnership with the Aspen Institute College Excellence Program and Foundation for California Community Colleges [REF: 6/19/20 Trustee Fellowship agenda Trustee Fellowship Participant Agenda June 19 - IVC9.pdf; 7/24/20 Trustee Fellowship agenda Trustee Fellowship Participant Agenda - July_IVC.docx].

All governing board candidates are provided with publications prepared by the Community College League of California related to California community college governance and a list of online resources to help them learn more about the District and its two colleges. Candidates are also invited to an orientation session that covered the mission of the District, opportunities and challenges, roles and responsibilities of the trustee, and district and college governance. The Board president, executive administrators, and faculty, staff, and student leaders gave brief presentations and answered questions.
during the orientation session, which was filmed and made available online to candidates unable to attend in person.

When a new trustee is elected, the orientation begins immediately upon confirmation and requires attendance at the Community College League of California’s Effective Trustee Workshop; completion of sexual harassment and discrimination prevention, ethics, and accreditation trainings; and review of materials relevant to the role of a trustee [REF: Candidate Orientation Invitation; New Trustee Orientation Email]. New student trustees are encouraged to attend the Community College League of California’s Student Trustee Workshop each August and other conferences throughout their terms of office.

Board members are elected to four-year terms pursuant to board policy 2100 Board Elections [REF: BP 2100]. In keeping with the policy providing for staggered terms, trustee areas 2 and 4 were elected in November 2022, and elections to fill trustee areas 1, 3, and 5 will be held in 2024.

Analysis and Evaluation
Foothill College meets the Standard. The governing board has a comprehensive process for trustee orientation and a documented commitment to board development. Formal policies provide for staggered terms of office and continuity of membership.

Standard IV.C.10

10. Board policies and/or bylaws clearly establish a process for board evaluation. The evaluation assesses the board’s effectiveness in promoting and sustaining academic quality and institutional effectiveness. The governing board regularly evaluates its practices and performance, including full participation in board training, and makes public the results. The results are used to improve board performance, academic quality, and institutional effectiveness.

Evidence of Meeting the Standard
Board policy 2745 defines the governing board’s commitment to and process for annual self-evaluation [REF: BP 2745]. The Board has a consistent record of conducting its annual self-evaluation with full participation from all elected members. The evaluation instrument asks trustees to measure individual and collective performance related to the Board’s philosophy, mission, and ethics statements and to identify strengths, weaknesses, and ways to improve [REF: Board Self-Eval Agenda Item; Board Self-Eval Summary 2021-22]. In odd years, the governing board solicits feedback into its performance from the Chancellor’s Advisory Council, public members of the Citizens’ Bond Oversight Committee and Audit & Finance Committee, and the executive committee of the Foothill-De Anza Foundation Board of Directors. In 2021, feedback from the student trustees who served during the evaluation period was also included for the first time. When improvement suggestions are received, board retreat dates are scheduled to increase board effectiveness.

Analysis and Evaluation
Foothill College meets the Standard. The governing board has a defined process for board evaluation that is consistently applied. The evaluation includes assessment of the board’s effectiveness in promoting and sustaining academic quality and institutional effectiveness, both from the perspective of trustees and from stakeholders. Results of the annual self-evaluation are shared with the public during the July regular meeting, prior to the development and adoption of Board priorities in August.

Standard IV.C.11

11. The governing board upholds a code of ethics and conflict of interest policy, and individual board members adhere to the code. The board has a clearly defined policy for dealing with behavior that violates its code and implements it when necessary. A majority of the board members have no employment, family, ownership, or other personal financial interest in the institution. Board member interests are disclosed and do not interfere with the impartiality of governing body members or outweigh the greater duty to secure and ensure the academic and fiscal integrity of the institution. (ER7)

Evidence of Meeting the Standard
The Board of Trustees has a long-standing code of ethics policy that clearly outlines the standards expected of all governing board members [REF: BP 2715]. The Foothill-De Anza Community College District is a public institution formed under state law and governed by a locally elected board of trustees. In accordance with state law and board policy, board members are prohibited from employment with the district and may not hold an incompatible office [REF: BP 2010].

The district’s governing board adopted the following conflict of interest policy that ensures governing board members disclose financial interests and do not financially benefit from decisions made by the governing board [REF: BP 2710; AP 2710]. Trustees routinely file annual statements of personal financial interest pursuant to the conflict of interest policy, the conflict of interest code, and the Political Reform Act. Statements of economic interest are kept on file in the district Chancellor’s Office and with the Santa Clara County Clerk of the Board of Supervisors.

Analysis and Evaluation
Foothill College meets the Standard. Trustees are elected by the public, prohibited from having employment or financial interest in the District, and disclose all potential conflicts. The governing board’s long-standing policies on both conflicts of interest and ethics demonstrate a deep and abiding commitment to the highest ethical standards. The governing body of the Foothill-De Anza Community College District complies with an established code of ethics, a conflict of interest policy, and relevant statutory law as to the conduct, notice and reporting of meeting actions and information.

Standard IV.C.12

12. The governing board delegates full responsibility and authority to the CEO to implement and administer board policies without board interference and
holds the CEO accountable for the operation of the district/system or college, respectively.

Evidence of Meeting the Standard
Consistent with Board Policy 2430 Delegation of Authority to Chancellor, the Board of The governing board delegates the district chancellor the executive responsibility for administering the policies adopted by the Board and executing all decisions of the Board requiring administrative action [REF: BP 2430]. The policy provides that the chancellor may delegate any powers and duties entrusted to them, including the administration of each college and center, but is specifically responsible to the Board for the execution of such delegated powers and duties. The chancellor is held accountable for the operation of the District through regularly scheduled performance evaluations [REF: BP 2435]. The chancellor is also empowered to reasonably interpret board policy. As such, board members will remind the public that the Board’s role is oversight, not creating plans for the colleges [REF: BOT Minutes – REPLACE THIS LINK WITH ACTUAL MEETING MINUTES WITH #18 HIGHLIGHTS—ALREADY UPLOADED INTO CANVAS].

Analysis and Evaluation
Foothill College meets the Standard. The governing board establishes policies that delegate authority to the chancellor to implement and administer Board policies and provide for a clearly defined separation between the roles of the governing board and CEO. The chancellor provides leadership for the District and implements and administers board policies without board interference. The governing board holds the chancellor accountable through an evaluation process documented in board policy and sets expectations for regular reports on institutional performance through policy and its adopted meeting calendar.

Standard IV.C.13

13. The governing board is informed about the Eligibility Requirements, the Accreditation Standards, Commission policies, accreditation processes, and the college’s accredited status, and supports through policy the college’s efforts to improve and excel. The board participates in evaluation of governing board roles and functions in the accreditation process.

Evidence of Meeting the Standard
The Board of Trustees recognizes the importance of accreditation and its participation in the process [REF: BP 3200]. Trustees are provided the Commission’s “Guide to Accreditation for Governing Boards,” and a board liaison is appointed as part of the process [REF: BOT Agenda Accreditation Liaison]. New trustees are encouraged to view the “Accreditation Basics” resources on the Commission’s website as part of their orientation [REF: New Trustee Email]. The governing board held a special meeting to receive training from the ACCJC regarding the roles and responsibilities of the governing board related to accreditation [REF: Accreditation BOT Roles ; UPLOAD SPECIAL MTG MINUTES FROM 09/16/21—ALREADY UPLOADED INTO CANVAS]. Trustees also participated in a comprehensive review of the accreditation process that covered the purpose of accreditation, the accreditation cycle, components of the Institutional Self Evaluation Report, and team roles and timelines [REF: BOT Minutes ISER Presentation Item 16 – REPLACE THIS LINK]
WITH PDF MINUTES—ALREADY UPLOADED IN CANVAS]. The Board of Trustees is informed of the College’s accredited status and related ACCJC communication, and also reviews and approves all institutional accreditation reports [REF: BOT Midterm Rprt Approval].

Analysis and Evaluation
Foothill College meets the Standard. The governing board is informed and actively involved in the accreditation process, reviews, and approves all institutional accreditation reports, and assesses its performance using accreditation Standards.

Conclusions on Standard IV.C. Governing Board
The Foothill-De Anza Board of Trustees has a clearly delineated role within the District. Board policies identify the governing board’s authority over and responsibilities for policies that ensure student learning and achievement as well as the financial stability of the College. The governing board supports the allocation of resources that reflect the District and College mission and adequately support and sustain the College. Additionally, the board is responsible for selecting and evaluating the chancellor. A regular process for board evaluation is established and feedback is used to assess its own effectiveness in promoting and sustaining academic quality and institutional effectiveness. Ongoing training for trustee development on- and off-site provides professional development to improve board performance and with its staggered terms of office ensures leadership continuity. Board members are provided orientation and trainings on accreditation-related requirements, policies, and process, including the trustees’ role in the accreditation process.

In exercising its authority, the Board ensures policy development reflects public and student interests in educational quality. The Board regularly reviews policies and revises them as necessary. Recent efforts are leading to a more regular continuous process of review, especially as district staffing are stabilizing. The governing board’s role also includes reviewing key indicators of student learning and achievement along with institutional goals and objectives aimed at improving academic quality. The Board works collaboratively with the College to enact policies and initiatives to support equitable outcomes for all students as it approves institutional-level planning documents, such as the Educational Master Plan, Strategic Vision for Equity, Student Equity Plan, and Facilities Master Plan.

The governing board functions as an independent body and operates with integrity. Trustees are expected to uphold a code of ethics and conflict of interest policy that list consequences should these policies be violated. Board member interests are disclosed and do not interfere with the impartiality of governing body members or outweigh the greater duty to secure and ensure the academic and fiscal integrity of the institution.