

XAVIER UNIVERSITY Policy on Policies

Effective: May 25, 2023 Last Updated: N/A Last Review: N/A

Responsible University Office: Office of General Counsel

Responsible Executive: General Counsel

Policy Number & Name: ADMN-CPL-01, Policy Development

Scope: Faculty, Staff, and Students

A. REASON FOR POLICY

The purpose of this Policy is to ensure consistent approval, implementation, review, amendments, and maintenance of official University Policies. The standardization of University Policies helps to ensure the policies are accessible and understandable, clearly distinguished from procedure, widely and appropriately disseminated to the community, consistent, and approved in an appropriate way.

B. POLICY

Individuals drafting official University Policies must follow this standardized process for drafting, approving, reviewing, amending, communicating, implementing, and withdrawing University Policies. A University Policy is a policy with broad application throughout the university community and campuses that is related to the university's mission, operational efficiencies, risk reduction, legal or regulatory compliance, promotion of ethical standards and integrity, and is approved in accordance with this Policy. Policies that govern expectations for Xavier University student conduct and behavior are articulated primarily in the Student Handbook and the Course Catalogue, and those policies are managed through an annual review and revision process outside of this policy.

C. DEFINITIONS

Creation – Refers to the development of a new policy that will proceed through the review and approval process.

Departmental Procedures – Departmental procedures are written processes that apply to the operation of an individual department or specific units within the university, including program student handbooks. Departmental procedures may exist in order to promote operational efficiencies, enhance the mission of the department or unit, or supplement a University Policy but is not broadly applicable throughout the university. Departmental procedures could address subjects that are not addressed by University Policies, and must not be in conflict with a University Policy. In addition, departmental procedures could be related to a University Policy. For instance, specifying how the department should carry out the particular Policy. Procedures may have detailed instructions, definitions, and/or forms that facilitate Policy compliance.

Edits – Edits are merely stylistic, format, or grammatical changes, corrections of error, and/or procedural or exhibit modifications. Edits need not go through the review and approval process and can be coordinated with the Responsible University Office.

Policy Library – The online repository of all officially approved and recognized University Policies.

Policy Number – University Policies are assigned a numbering convention for organizational and user ease. The Policy numbers shall be assigned based upon the most appropriate policy category. In general, the university shall have the following policy categories: Academic (ACAD), Administrative (ADMN), Employment (EMPL), Finance (FIN), Information Technology (IT), and Student (STUD). For purposes of Policy Library organization, the policies shall be categorized based upon the following definitions and numbering conventions:

- **Academic Policies** Governs Xavier University's academic mission and/or the academic enterprise. The policy numbering convention for Academic Policies is ACAD-01, ACAD-02, etc.
- Administrative Policies Governs the day-to-day administrative and operations duties at Xavier. Given the breadth of the category, Administrative Policies are further subdivided by virtue of their subject matter into: Auxiliary Services (AUX) and Compliance (CPL). The policy numbering convention for Administrative Policies is: ADMN-AUX-01 and ADMN-CPL-01.
- Employment Policies Govern employment and/or support employees in their efforts to fulfill the mission of the University. The policy numbering convention for Employment Policies is EMPL-01, EMPL-02, etc.
- **Finance Policies** Govern the day-to-day operations at Xavier related to or impacted by the finance offices, including but not limited to accounting, budgeting, and financial planning. The policy numbering convention for Finance Policies is FIN-01, FIN-02, etc.
- **Information Technology Policies** Govern the use of Xavier University's technology throughout the campus and online. The policy numbering convention for Information Technology Policies is IT-01, IT-02, etc.

• **Student Policies** – Govern expectations for Xavier University student conduct and behavior. As stated above, Student Policies are managed through an annual review and revision process outside of this policy. Nonetheless, Student Policies should be retained in the Policy Library through the University's numbering convention, which for Student Policies is STUD-01, STUD-02, etc.

Policy Working Group – an ad hoc group of university employees from impacted department(s) or area(s) who work together to create or review a University Policy.

Responsible Executive - the member of Senior Leadership whose department(s) or areas of responsibility are responsible for the drafting, review, and upkeep of the University Policy.

Revision – Revisions are substantial content changes to an existing policy, which will proceed through the review and approval procedural phases.

University Policy - A University Policy is a written statement of policy with broad application throughout the university or significant impact to the university if not followed. University Policies may be developed by a department, unit, or by university administration in order to promote ethical standards, integrity and values of the university, ensure coordinated compliance with applicable laws and regulations, promote operational efficiencies, enhance the university's mission, and/or reduce institutional risk.

D. PROCEDURES

There are generally five phases to the development process for a new University Policy: Planning; Creation; Consulting; Approval; and Communication and Implementation. All these steps are important, but the time and effort required to complete each phase will vary between policies.

- I. **Planning Phase.** The Planning Phase steps ensure Xavier employees have given the policy sufficient planning and forethought before drafting a new policy.
 - a. **Review existing policies**. Determine if an existing University Policy addresses this subject matter; an existing University Policy can be modified to address this university need; or a new policy needs to be developed.
 - b. **Initial Consultation.** Consult with the Office of General Counsel and the Director of Audit and Compliance to further review existing policies for subject matter overlap.
 - c. **Identify the Responsible Executive.** Identify the appropriate senior leader to serve as the Responsible Executive to oversee the policy and engage the Responsible Executive or their designee in the planning of the policy.
 - d. **Conferral with Xavier University Council ("Council").** Confer with Council, in a formal meeting or through other communication, to ensure all perspectives have been considered in the Planning Phase.

II. Creation Phase

a. **Develop a plan of action**. The plan of action should include the groups with whom the employee will consult for feedback and/or approval of the policy.

- b. **Benchmark Best Practices**. Research and review best practices using policies, practices, and programs from public and private employers and benchmark institutions.
- c. **Form a Policy Working Group.** If a new policy or policy change is contemplated that will affect an operating procedure, it is imperative to involve any impacted department(s) or areas in the planning phase. Ensure that member(s) of the Policy Working Group check-in with the appropriate divisional leader(s) to ensure cross-department collaboration and the incorporation of differing viewpoints.
- d. **Draft.** Draft the initial revision or first draft of the proposed policy in the Policy Template. The Policy template is attached as an Exhibit to this Policy.
- e. **Share the draft.** Share the draft with the Policy Working Group and appropriate divisional leaders and make appropriate revisions based upon their feedback.
- **III.** Consultation Phase The purpose of this phase is to seek the feedback of Xavier community members that are not in the Policy Working Group.
 - a. **Summarize Key Points.** Create and send a "summary of key points" or a "summary of substantial changes" document with the policy draft to Xavier stakeholders outside of the Policy Working group. This document will assist those individuals and groups with reviewing the policy. It is recommended that these stakeholders include the Faculty Committee, the Staff Committee, and any departments who should be consulted such as Human Resources, General Counsel, Student Affairs, etc.
 - b. **Collect feedback.** After receiving feedback from the stakeholders, convene the Policy Working group (and any other necessary individuals) to discuss feedback and modify the policy, if necessary.
 - c. **Develop a Communication and Implementation Plan.** The Policy Working Group should create a Communication and Implementation Plan that includes a proposed timeline.
 - d. **Finalize Policy Draft.** Ensure the appropriate Responsible Executive has reviewed and approved the finalized policy and the communication and implementation plan.
- **IV. Approval Phase** The Approval Phase requires the policy drafter to present the proposed policy to the university president and senior leadership ("Senior Leadership").
 - a. **Prepare a President's Briefing Sheet ("Briefing Sheet").** Prepare and send a Briefing Sheet to Xavier's Senior Leadership for their review and consideration. The Briefing Sheet template is attached as an Exhibit to this Policy.
 - b. **Policy Approval Form.** Collect all necessary signatures by circulating the Policy Approval Form, attached as an Exhibit to this Policy.
 - c. **Email the Briefing Sheet.** Email the Briefing Sheet, the proposed policy draft, any exhibits, and the Policy Approval Form to the President's Executive Assistant (with a cc to the Responsible Executive) at least 3 weeks before the Senior Leadership meeting at which the policy may be discussed and considered.
 - d. **Be available.** Be available and ready to discuss the policy with Senior Leadership, if requested. **Note:** The Policy Working Group is responsible for educating the Senior Leadership.
 - e. **Decision.** Senior Leadership may approve, approve with modifications, or deny the policy's passage.

- f. **Finalize.** Make any policy language modifications required by Senior Leadership, if applicable.
- g. **Assign Policy Number.** Once approved and based up on the policy categories defined herein, the Director of Audit and Compliance will determine the most appropriate policy number category. After reviewing the Policy Library, assign the new policy with the next consecutive number for that policy category.

V. Communication and Implementation Phase

- a. **Communication Plan.** Implement the Communication Plan created by the Policy Working Group, making sure to consider the intended audiences (those departments/individuals most directly impacted by the policy), draft a communication message (the Office of Marketing and Communications is available to assist), and determine the timing for the most effective communication.
 - Note on Communication Type: All approved policies must be reported in Xavier Today and the on the employee or student HUB. You may consider providing additional messages in meetings or targeted emails.
 - **Note on Timing of Communication**: Consider when your intended audiences will be available. For example, it would not be effective to provide a communication in summer, if your intended audience includes faculty.
- b. **FAQs.** If applicable, update or create any FAQ or training that will be useful in policy implementation.
- c. Contact Director of Audit and Compliance. Provide the Director of Audit and Compliance with "impact factors." Impact factors (Reputational, Financial, Mission & Strategic, Compliance and Operational) are rated from one (low) to five (high) and are used to determine the policy's significance and review guidelines. Policies with a significance factor of high are scheduled to be reviewed more frequently than policies of lesser significance. The Director will use this information to assign the review period frequency for the Policy Review Schedule.
- d. **Policy Library Update.** Send the approved policy, any exhibits, and the Approved Policy Form to the Office of Marketing and Communications (MarComm) and request the policy be uploaded to the University Policy Library. Policies must exist in the Policy Library to be officially recognized by the University.
 - **Note:** Make sure the assigned Policy Number was added to the <u>University Policy Number</u> and the <u>Policy Review Schedule</u> before sending to MarComm.
- VI. **Policy Review Schedule**—Once a University Policy is created, it must be periodically reviewed and maintained. To facilitate this review, at the first XUC meeting of the academic year, the Director of Audit and Compliance will provide XUC with a list of University Policies to be reviewed that academic year. XUC will initiate the review process to ensure the correct departments and individuals are engaged in the policy review. After the appropriate individuals have reviewed the policy, XUC will discuss the modifications made and the university insight and feedback received. Modifications more substantive than Edits will be submitted by XUC with their advice and feedback to Senior Leadership for consideration.

This Review Schedule shall rotate annually to ensure University Policies are reviewed regularly. In addition, Senior Leadership may request the addition of a policy to the current review schedule when revisions would address a current university need.

After its review, the Responsible Executive or their designee shall ensure the Policy Library is updated accordingly.

- VII. **Withdrawing a University Policy** In the event a University Policy becomes obsolete or otherwise needs to be withdrawn, the following procedure will apply:
 - a. Consultation. The Responsible Executive (or designee) should consult with the Office of General Counsel or the Director of Audit and Compliance to discuss the need to withdraw the policy. This consultation must include an understanding and communication from the Director, Chair or Designee of any impacted departments, units or colleges.
 - b. **Communication and Review**. The Office of General Counsel or the Director of Audit and Compliance will facilitate communication between the potentially involved or impacted departments, units, and/or colleges to ensure the policy is appropriate for withdrawal across the university.
 - c. **Briefing Sheet.** The Responsible Executive or designee must email a policy Briefing Sheet to the President's executive assistant copying Office of General Counsel and the Director of Audit and Compliance, at least 3 weeks before the Senior Leadership meeting at which the policy may be discussed and considered for withdrawal.
 - d. **Decision.** Senior Leadership will approve or deny the withdrawal of the University Policy and provide the director, dean or designee email confirmation of their decision.
 - e. **Policy Library Update.** The Responsible Executive or designee must work with Marketing and Communications to have any withdrawn policy removed from the Policy Library.

E. EXHIBITS

Exhibits are a useful tool for providing the Policy's supporting documents, which might include, but is not limited to templates and procedures. Exhibits may be modified as needed by the Responsible Executive to the Policy.

For the Policy of Policies, the Exhibits are: Policy Template SLC Briefing Sheet Policy Approval Form

F. HISTORY

The History section should explain the policy history. Some examples include: Newly Approved; Reviewed without Significant Changes; Amended and Approved; and Revoked and Replaced. Each entry in the History section should be followed by the date of the action.

For the Policy on Policies, the History is: Newly Approved May 25, 2023; previously existed as a Policy Manual.

G. POLICY REVIEW SCHEDULE

The Policy Review Schedule shall include the next review date.

Next Review: Academic Year 2028

Other applicable policies and/or resources: