Policy Creation, Revision, and Communication

<table>
<thead>
<tr>
<th>Policy Number:</th>
<th>Reserved for future use</th>
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<tbody>
<tr>
<td>Policy Web Address:</td>
<td>Policy.nku.edu</td>
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<tr>
<td>Responsible Official:</td>
<td>Senior Vice President, Division of Institutional Effectiveness</td>
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<tr>
<td>Effective date:</td>
<td>6/24/2014</td>
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<tr>
<td>Next review date:</td>
<td>2016</td>
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<tr>
<td>Supersedes policy dated:</td>
<td>5/8/2013</td>
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<td>Approved by:</td>
<td>President</td>
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I. Policy Statement

The purpose of this policy is to define the steps to create, revise, and communicate university policies. Using this consistent process and format will ensure that university policies are properly developed and regularly updated to remain compliant with the law, are easy to find, read, and understand, and are aligned with our academic mission as an institution of higher education. The policy process will be transparent, honor shared governance by seeking participation from stakeholders, have a mechanism for timely evaluation and improvement, and minimize gridlock.

II. Entities Affected

All employees, students, and divisions of the university

III. Authority

KRS 164.350

IV. Definitions

14 Day University Comment Period: As part of the policy development and review process, a period of 14 days (including weekends and holidays) will be allotted to allow the university community to comment on proposed policies. The President may shorten or extend this period if deemed necessary.

Drafting Team: The drafting team is a small workgroup formed for the purpose of writing and editing a policy draft, placing that draft in the policy template, and incorporating stakeholder and Responsible Official feedback into draft and revised policies.
**Policy:** A policy is a statement of management philosophy and direction, established to provide guidance and assistance to the university community in the conduct of university affairs. A university policy:

- Is a governing principle that mandates or constrains actions
- Has institution-wide application
- Changes infrequently and sets a course for the foreseeable future
- Helps ensure compliance with applicable laws and regulations
- Reduces institutional risk, and
- Is approved at the executive levels of the university (president, provost, vice presidents) or Board of Regents.

**Policy Initiator:** The Policy Initiator is any faculty, staff member, or student who identifies a university-level issue and submits a Policy Request Form, often at the direction of a Responsible Official. The Policy Initiator may work independently or with a Drafting Team to draft or revise a proposed policy.

**Procedure:** A procedure is a guideline or series of interrelated steps taken to help implement the policy. University procedures:

- Identify and link to the applicable university policy
- Are written in a format that is easy to follow, using numbers or bullets to delineate steps to be followed
- Are reviewed and updated as necessary to ensure agreement with the most recent revision to the policy, and
- Do not require formal approval by senior university officials.

**Responsible Official:** The Responsible Official is the appropriate university administrator (president, provost, vice president) whose authority covers the subject matter of the policy. If a proposed university policy (or substantive revision of an existing policy) involves matters within the purview of more than one Responsible Official, the Responsible Official initiating the policy proposal or revisions should consult and coordinate with other such official(s).

**Stakeholder:** Stakeholders are university community members who are affected by or have input regarding the university policy being developed.

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**V. Responsibilities**

A. **Responsible Official**
   1. Identifies the need for a university policy within his/her area of authority;
   2. Directs and supports a Policy Initiator through the policy creation/review process;
   3. Reviews and incorporates stakeholder comments as appropriate;
   4. Communicates and enforces the approved policy; and
   5. Ensures proper training is provided as needed.

B. **Policy Initiator/Drafting Team**
   1. Completes and submits the Policy Request Form with the support of the Responsible Official;
   2. Upon approval of the Policy Request Form, drafts or revises the proposed policy;
3. Incorporates stakeholder comments with the assistance of the Responsible Official; and
4. Participates in the communication, enforcement, and training of the new/revised policy as appropriate.

C. Office of Compliance and Institutional Ethics
   1. Informs Responsible Officials of the need for new/revised policies to comply with current laws, regulations, and best practice;
   2. Reviews all policies prior to 14 Day University Comment Period to ensure compliance with current laws, regulations, and best practice;
   3. Guides Policy Initiators and Responsible Officials through the request, drafting, review, and revision processes;
   4. Assists the Senior Vice President of Institutional Effectiveness in communicating policy additions, changes, and deletions; and
   5. Assists in the maintenance of current and archived policies and the university policy website.

D. Office of Legal Affairs and General Counsel
   1. Informs Responsible Officials of the need for new/revised policies to comply with current laws, regulations, and best practice;
   2. Reviews all policies prior to 14 Day University Comment Period to ensure compliance with current laws, regulations, and best practice; and
   3. Assists the Senior Vice President of Institutional Effectiveness in communicating policy additions, changes, and deletions.

E. Senior Vice President of Institutional Effectiveness ("Policy Administrator")
   1. Enforces this policy and makes a final determination regarding categorization of policies;
   2. Facilitates and enforces the 14 Day University Comment Period;
   3. Maintains the current and archived policies;
   4. Maintains the university policy website; and
   5. Coordinates the responsibility of the Executive Team in the policy development and revision process

F. Stakeholders: Engage in professional and meaningful participation in the 14 Day University Comment Period to best inform university decision-making regarding new and revised policies.

VI. Procedures * Note: Policies that predate this Policy have not been through the procedures outlined herein. They remain official university policies and, in time, are expected to complete this process.

A. There are four distinct procedures depending on the type of policy change; they are:
   1. Drafting of new policies;
   2. Review of an existing policy (either scheduled review or off-cycle review);
   3. Editorial Changes; and
   4. Retirement of a policy
B. **Drafting of New Policies:**

1. Consistent with the responsibilities detailed above, the Policy Initiator will work with the Responsible Official to complete the Policy Request Form.
2. The Responsible Official will use the Policy Request Form to initiate a discussion with the Executive Team regarding the need for the new policy/revision. The purpose of this discussion is to coordinate policy-making and avoid redundancies.
3. With the approval of the Executive Team and at the direction of the Responsible Official, the Policy Initiator, independently or with the assistance of a Drafting Team, will draft the proposed policy using the Policy Template.
4. When a draft of the policy is substantially complete, the Policy Initiator will forward the draft to the compliance officer and university counsel for concurrent review to be completed within ten business days.
5. The compliance officer and university counsel will advise the Responsible Official and Policy Initiator regarding suggested and required revisions. Required revisions will be completed by the Policy Initiator within ten business days and approved by the compliance officer and university counsel as soon as practical.
6. If no further revisions are required by the compliance officer or university counsel, the Responsible Official will present the draft policy in the next scheduled Executive Team meeting for discussion.
7. If revisions are requested from the Executive Team, the Responsible Official will make the necessary revisions within ten business days.
8. If no revisions are requested from the Executive Team, the policy will be posted online to the university policy website by the Policy Administrator for the 14 Day University Comment Period. If the comments are viewable by the university community, they will be moderated by the Policy Administrator.
9. After the 14 Day University Comment Period has expired, the comments received from stakeholders will be forwarded to the Responsible Official and Policy Initiator by the Policy Administrator. The Responsible Official will review the comments and decide if revisions are required based on the comments received.
10. If, at the discretion of the Responsible Official, revisions are needed based on comments received from stakeholders, the Responsible Official/Policy Initiator will revise the draft policy within 15 business days of receipt of the comments and will again forward the policy to the compliance officer and university counsel for concurrent review.
11. If, at the discretion of the Responsible Official, no revisions are needed or the revisions are complete, the Responsible Official will seek approval of the finalized policy in the next scheduled Executive Team meeting.
12. A policy approved by the President will be presented at the next Board of Regents meeting by way of a Presidential Report.
13. The President, at his/her discretion, may determine that a policy will be submitted to the Board of Regents for approval. Such policies will be placed on the consent agenda or submitted as a separate recommendation at the next Board of Regents meeting.
14. Approved policies will be uploaded to the policy website in the appropriate location(s) by the Policy Administrator.
C. **Review of an existing policy (either scheduled review or off-cycle review):**
   1. Scheduled reviews will be performed in accordance with the policy review schedule created by the office of Compliance and Institutional Ethics and located on the policy website.
   2. Off-cycle reviews will be initiated by the Responsible Official when he/she determines that revisions may be needed prior to the next scheduled review.
   3. All reviews will be documented on the Policy Request Form.
   4. The Responsible Official will forward the completed Policy Request Form to the Policy Administrator who will maintain storage of the form as well as note the review on the policy website.

D. **Editorial Changes:**
   On an as-needed basis, a Responsible Official may make routine changes (such as new contact names, position titles, email or web addresses, and correction of spelling or grammatical errors) to an existing policy. Such changes do not require vetting or final approval of the President. The Policy Administrator will record the details and dates of changes and the updated policy will be posted online to the university policy website.

E. **Retirement of a policy:**
   1. As university policies are superseded by new policies or revoked by Responsible Officials, these policies will be retired, removed from the policy website, and no longer govern university operations. The retired policy will be archived in the central repository by the Policy Administrator.
   2. When existing policies are revoked, the Responsible Official will discuss the reason(s) for revocation with the Executive Team and provide any necessary communication to appropriate stakeholders.
   3. The Board of Regents or President shall approve the retirement of a policy.

**VII. Exceptions**

A. **Adoption of Interim Policies:**
   1. Under extenuating circumstances, Responsible Officials may issue interim university policies when new or substantial revision to a policy is needed within a time-period that does not allow for complete drafting and review as outlined in this policy.
   2. Extenuating circumstances include external compliance deadlines, issues relating to the potential safety or well-being of the university community, or as needed to facilitate orderly and efficient campus operations.
   3. The Responsible Official may draft a policy and seek approval from the President on an interim basis after review by the compliance officer and university counsel.
   4. Interim policies will generally remain effective for up to six months, which may be extended by the President for good cause. Thus the Responsible Official will initiate the procedural steps outlined above to draft a new policy as soon as practical.

B. **Academic Policies:** Academic policies are policies which directly affect the educational and research mission of the university. Purely academic policies are not subject to this policy and will be created and approved within the policy structure already existing in Academic Affairs. Determination of whether an existing or proposed policy is an academic policy is made at the discretion of the Provost.
VIII. Communications

A. The Senior Vice President of Institutional Effectiveness will ensure that policy posting requirements are followed.

B. The University maintains the repository of current University Policies at: http://policy.nku.edu.

C. University web pages that incorporate or refer to any university policy will link directly to the site listed above and no department, division, or unit will post their own versions of any policies on any University web page.

D. Printed versions of policies may be included in the student handbook, faculty handbook, staff handbook, announcements and other publications, but will include a disclaimer that the official university policy website http://policy.nku.edu should be consulted for the current version.

References and Related Materials

References:
Related Policies:
Related Forms:
  Link to Guide to Creating and Revising Policy
  Link to Policy Request Form/Form Instructions
  Link to Policy Template/Template Instructions

Revision History: New Policy