Title: *Policy on Policies*

History:

Date:	Action:
1/8/2021	*PRC membership updated, Appendices re-formatted, Waiver authority clarified*
8/17/2020	*University Policy definition clarified; Appendix E added*
02/11/2020	*Originally Issued*

Policy Owner: Provost and Dean of the Faculty, Office of the Provost

Stakeholder(s):   Chief Financial Officer, Chair of the Faculty Senate, Chair of the Staff Council, Vice President of Marketing and Communications

Policy Applicability and Scope

This Policy on Policies applies to all University Units and involves the creation, communication, implementation, review, revision, and withdrawal of all University Policies.

Policy Statement and Purpose

Norwich University promotes the creation of policy documents that clarify institutional expectations and standards, ensure compliance with the law, mitigate risk, support productivity, and further the University's mission.

University Policy shall be accessible, up-to-date, understandably written, and internally consistent. Accordingly, individuals engaged in developing and maintaining University Policies must follow this Policy on Policies and the procedures and templates outlined in this document. Internal Documents may not conflict or create inconsistencies with University Policy.

This Policy on Policies ensures University Policy is accessible, current, understandably written, internally consistent, and compliant with University and legal standards.

Definitions

Accessible –

Clearly and concisely written, easily found within the University's website and on the Policy Library webpage, and formatted in a user-friendly layout for all user types.

Amendment –

A Policy Change whereby a University Policy is modified or revised.

Archived Policy –

A University Policy version that is no longer effective or a University Policy that has been withdrawn.

Existing Non-Conforming Policy –

Policy officially adopted by the University, which pre-dates the originally issued date of this Policy on Policies.

Interim Policy –

A temporary policy recommended by the Provost and approved by the President, issued by the Policy Review Commission in an expedited manner in accordance with the procedures of this Policy.

 Internal Documents –

Unit-specific, internal documents created to further implement University Policies and Procedures or define courses of action and requirements not elevated to University Policy. For example, Internal Documents could be in the form of practice, protocol, and procedures.

Policy Change –

The creation, amendment, or withdrawal of University Policy. This does *not* include Updates as defined below.

Policy Library –

A digital, publically accessible location for University Policy documents organized in a user-friendly format.

Policy Owner (PO) –

    An officially designated position, often at the director or senior staff level, responsible and accountable for the maintenance and development of a particular University Policy or Policies within the person's authority and expertise. The Policy Owner serves as a point of contact for the policy and guides the Policy Change and Stakeholder process for policies within their purview. Their specific duties under this Policy are delegable, but the Policy Owner remains responsible and accountable.

Policy Review Commission (PRC) –

    A review, coordination, recommendation, and maintenance authority over all University Policies.

Policy Statement and Purpose –

    A concise statement describing *what* is required and *why*. This may include specific regulatory or legal requirements.

Procedure –

    A section of a University Policy, as applicable, that describes *how* to implement a policy.

Proposed Policy –

    A policy draft within the review and editing process prior to receiving final approval.

Stakeholder –

    An individual, often a director or senior level staff (other than the Policy Owner) who, based on their University duties and role, may provide substantive knowledge and practical input to the Policy Change process for a particular policy.

Unit –

    A subdivision of the University (e.g., an individual college, department, business unit, or team).

University –

    Norwich University and all its subdivisions.

University Policy –

A broadly applicable, official document of management philosophy and direction established to guide the conduct of the University community that has been approved in accordance with the procedures outlined within this Policy on Policies. *See,* definition of Existing Non-Conforming Policy. Notwithstanding the foregoing, the Norwich University Faculty Manual and any policies within the legislative purview of the Faculty Senate incorporated therein shall *not* be required to adhere to this Policy on Policies, however, Faculty Manual revisions cannot result in policies otherwise inconsistent with University Policy. Policies within the legislative purview of the Faculty Senate related to the educational interests of the University shall continue to be reviewed in accordance with the procedures of the Faculty Manual.

Updates –
> Correction of typographic errors and non-substantive changes related to keeping documents current and accurate (e.g., hyperlinks, email addresses, title changes, and references).

Withdrawal –
> The removal of a University Policy previously in existence.

Procedures

Proposing a Policy Change

Any individual or Unit may identify the need for a Policy Change (creation of new policy, policy amendment, or withdrawal), however a Policy Owner (PO) must agree to sponsor its development and be accountable for the content. A PO may also be charged with the development of a Policy Change by their supervisor, the Policy Review Commission (PRC), the Provost, or the President. The Board of Trustees, by majority decision, may also require a Policy Change.

Drafting and Developing Policy Changes

Policy Changes cover the creation, amendment, or withdrawal of University Policy. The PO, or their designee, will direct the Policy Change process and ensure the process is properly implemented.

The PO may determine the timeline of this process and expand any review based on the scope of the Policy Change proposed. For instance, minor changes to an existing

University Policy may involve a few individuals (including all Stakeholders) over a relatively short timeframe, whereas major changes or the development of a new policy may result in the involvement of broader University community input over an extended timeframe. This allows for flexibility depending on the actual Policy Change under consideration.

Regardless of the extent and specific type of process chosen by the PO, all Policy Changes must, at minimum, go through the steps outlined below:

1. *Assess.*
   When determining whether to sponsor a Policy Change, the PO shall initially determine, as applicable, whether:

   (A) a new policy is needed or another document type (such as an Internal Document including a procedure, protocol, or written practice) may suffice;

   (B) an Amendment to an existing University Policy sufficiently addresses the need; and/or

   (C) withdrawal of a policy is necessary or required.

   Unless directed otherwise by a supervisor, the PRC, the Provost, or the President, the PO has the authority to continue or terminate the development of a Policy Change at any time.

2. *Identify.*
   The PO shall identify the list of Stakeholders as follows:

   For a Policy Change affecting existing University Policy, the Stakeholders will already be listed on the University Policy.

   For a Policy Change where a list of Stakeholders does not yet exist or the current list is insufficient for the change being proposed (i.e., creation of new policies or amendments expanding the policy scope), the PO shall identify and recommend *potential* stakeholders to the PRC, who will then designate an official list of Stakeholders in a timely manner.

   Additional Stakeholders may be identified and designated during the Policy Change process as warranted through coordination between the PO and the PRC in accordance with this process.

3. *Notify.*
   At the commencement of the Stakeholder process the PO shall notify, via email, the Stakeholders and the PRC that the PO is considering a Policy Change. The email shall follow the Notice Email Template in **Appendix A** and at minimum include sufficient information for each section. The PRC will make the Notice Email accessible from the University Policy Library webpage for University awareness.

4. *Seek Guidance.*
   The PO is encouraged to seek guidance or consultation from the PRC or from legal counsel as approved by the Chief Financial Officer at any point during the Policy Change process.

5. *Consult.*
   Following email notice, the PO shall consult with Stakeholders for substantive and practical input throughout the Policy Change process. The PO determines the length and extent of Stakeholder input, and should strive to involve all Stakeholders in a meaningful way to achieve the purposes of this Policy. The PO may choose to broaden input to University Community members beyond the identified Stakeholders.

6. *Consider and Draft.*
   The PO shall consider the practical implications on all Stakeholders of the proposed Policy Change, then initiate a draft of the proposed Policy Change document in accordance with the Policy on Policies, these Procedures, and the Policy Template (**Appendix B**). The PO may find it helpful to consider the suggestions in the Policy Development Guidance (**Appendix C**).

   If the Policy Change is a complete withdrawal, there will be no drafting necessary.

   When drafting new policy, the PO shall include relevant Procedures in the Policy document in accordance with the template, as applicable.

7. *Review.*
   The PO shall coordinate review by all Stakeholders of the proposed Policy Change document(s) as drafts develop to ensure thorough substantive and grammatical editing of the document(s).

   Additionally, the PO may, at their discretion, post a key draft or drafts of the Policy Change document(s) to an internal location (e.g., SharePoint) to invite broader

University Community input. The PRC shall create that internal location for the posting of drafts and make it accessible from the University Policy Library. The drafts will not be accessible by the general public. At the conclusion of the process, all drafts will be deleted from the internal location.

8. *PO Review.*
The PO shall incorporate necessary feedback, provide final review of the proposed Policy Change document(s), and ensure the documents conform to the University Policy on Policies, this Procedure, and the Policy Template (**Appendix B**).

The PO shall ensure Policy Change document(s) are Accessible as defined by this Policy.

9. *Distribute.*
The PO shall distribute the final proposed policy using the Policy Template (**Appendix B**) and a Policy Change Coversheet (consistent with **Appendix D**) to the PRC for review and consideration. Ultimately, the PO, unless directed otherwise by a superior, determines when the proposed Policy Change documents are final and ready for review by the PRC.

PRC Review, Consideration, and Recommendation

The PRC will post the proposed Policy Change document(s), upon receipt, as an internally accessible link on the Policy Library webpage for University awareness. Within 20 business days of submission of the coversheet and proposed Policy Change document(s), the PRC will hold an internal meeting(s) to review the final proposed Policy Change document(s). The PRC will review the documents based on their consistency with the Policy on Policies, this Procedure, and the University Policy template. The PO will provide consultation and subject matter expertise to the PRC. The PRC may seek outside legal review as necessary and as approved by the University's Chief Financial Officer.

Within 15 business days of the review meeting(s), the Commission will reach a consensus decision that may:

(1) Recommend the proposed Policy Change as drafted to the Provost;

(2) Request changes to the proposed Policy Change and, as necessary, require re-submission to the PRC after further revision by the PO and any Stakeholders prior to making a recommendation to the Provost;

(3) Deny the proposed Policy Change with a brief explanatory statement; or

(4) Provide any other reasonable decision as the PRC may determine. The PRC will promptly communicate its written decision to the PO, Stakeholders, Provost, and President. [1]

Provost Review

After the PRC recommends a proposed Policy Change to the Provost, the Provost shall review the proposed Policy Change, and within 10 business days (or within the closest practicable timeframe) either:

(1) Recommend the President approve the Policy Change, or

(2) Deny the Policy Change by returning the Policy Change document(s) to the PO and PRC with directive comments. Based on the comments received, the PRC shall work with and require the PO to either renew the process, revise the proposal, or terminate the process.

President's Approval

After the Provost recommends a proposed Policy Change for approval to the President, the President shall review the proposed Policy Change, and within 10 business days (or within the closest practicable timeframe) either:

(1) Approve the Policy Change by initialing the Policy Change title page and returning to the PRC, or

(2) Deny the Policy Change by returning the Policy Change document(s) to the PO and PRC with directive comments. Based on the comments

---

[1]The Provost, President, or Board of Trustees (by majority vote) may, in their sole discretion, overrule any recommendation of the PRC. However, it is the intent of this Procedure to encourage all parties to this process to communicate any concerns promptly and work collaboratively in the best interest of the University.

received, the PRC shall work with and require the PO to either renew the process, revise the proposal, or terminate the process.

Once initialed, the Proposed Policy becomes University Policy. If the Policy Change is a Withdrawal, the University Policy will be noted as withdrawn and archived after being initialed by the President. The PRC will notify the Office of Communications of any approved Policy Change, for purposes of Publication.

Publication

The Office of Communications will maintain a Policy Library webpage located at: https://www.norwich.edu/policy-library. By direction of the PRC, the Office of Communications will publish all University Policy on the University's Policy Library webpage and maintain links forwarded to it from the PRC. All University Policy will be accessible to the public and the greater University community.

Archived and Withdrawn Policies

Previous versions of University Policy shall be made available upon request of the PRC, and the versions shall be maintained by the PRC. Each Archived Policy shall clearly indicate its status as "*Archived*". If an Archived Policy has been withdrawn, it shall clearly indicate its status as "*Withdrawn*".

Implementing Internal Documents

After the President's final approval and publication, Units may develop Internal Documents to implement a University Policy with more specificity, however any implementing document must be entirely consistent with University Policy and the incorporated Procedure section.

Communication and Training

For newly published University Policy, Amendments, Updates, or Withdrawals, the PRC shall announce the Policy Change to the entire University community.

The PO will ensure delivery of any additional communication or trainings to the University Community or relevant Unit, and the PO will establish any support systems necessary to achieve ongoing compliance and maintenance of the University Policy.

For this Policy on Policies, PO (Provost) shall collaborate with the PRC to disseminate information and trainings about this Policy's implementation and ongoing use to all identified POs on an annual basis. A similar information session will also be made available to the broader University community on a biennial basis (every odd year).

Biennial Review

The PO shall ensure University Policy within their purview is reviewed, at minimum, no later than *November 1st of every even year*. This biennial review shall be coordinated with input from other Stakeholders and include an assessment of the University Policy's:

> (1) continued relevance;
> (2) compliance with underlying law;
> (3) consistency with the Policy on Policies; and
> (4) content for identification of any non-substantive or typographic errors (including accuracy and functionality of all hyperlinks, email addresses, position titles, and references).

The PO shall file a memo summarizing these findings, any Policy Updates required, and any proposed Policy Change document(s) (as applicable) to the Unit's internal file and shall file the documents with the PRC by *December 15th of every even year*. Any resulting action taken to ensure consistency with the Policy on Policies should be implemented in due course.

Changes in law affecting a University Policy may necessitate more frequent review and the biennial review process shall not limit a necessary Policy Change prior to a review date.

All Existing Non-Conforming Policy remain University Policy and through the biennial review process or prior will become compliant with this Policy. The PRC has the authority to initiate a process to update Existing Non-Conforming Policy prior to the initial biennial review.

Updating Policy

As the result of a biennial review memo, by notice of the PO, or at any other time at its own discretion, the PRC may update University Policy. Updates shall be limited to the following: correction of typographic errors and non-substantive changes related to keeping the document current or in an accessible format (i.e., hyperlinks, email addresses, title changes, references, etc.) and modifications or additions to the Appendices of this Policy necessary to properly implement this Policy. All Updates shall be noted as a revision on the policy document, communicated to Stakeholders via email, and published in accordance with this Policy on Policies. The PRC shall be the final authority on what changes constitute an Update, shall not unnecessarily withhold Updates, and shall issue Updates brought to its attention promptly.

Interim Policy Development

POs are strongly encouraged to go through the process outlined above. However, in rare instances where a University Policy is needed only temporarily or is required within an accelerated timeframe that does not allow for a complete review process as outlined above, then the PRC, at its discretion, *may* determine that an Interim Policy is needed and may make a recommendation for approval of an Interim Policy on an accelerated basis. The PRC's review must be based on conformance with this Policy, Procedure, and templates with due consideration to time constraints.

To initiate a draft Interim Policy, any University community member may submit a Policy Change Coversheet (**Appendix D**) with a draft Interim Policy attached using the Policy Template (**Appendix B**) to the PRC. The Policy Change Coversheet must indicate the reason for the accelerated or limited timeframe.

If approved, the Interim Policy will be effective for six months and may be extended by PRC recommendation in three month increments up to a maximum of 12 months. All Interim Policy shall receive recommendation from the Provost and final approval by the President. All publication requirements shall remain in effect during this expedited process.

Use of Policy Language

When incorporating language from a University Policy into another document, such as a static document (print or digital) or a webpage, it is preferable to link directly to the University Policy within the University Policy Library. In addition, the version date of the University Policy must be referenced for any static document created.

Administration

Construction of the Policy Review Commission.

The membership of the PRC shall consist of the following members of the University community (or their designee as approved by the Provost) representing a broad spectrum of subject matter expertise:

Associate Vice President of Administration, CGCS
Chair of the Faculty Senate
Chair of the Staff Council
Director of Human Resources
Director of Provost Communications and Operations
Regulatory Compliance Officer- CGCS
Senior Vice President for Student Affairs and Technology
Chief Financial Officer
AVP International Education

PRC Duties and Authority.

In addition to those duties outlined within the Policy Change process, the PRC shall perform the following functions: (1) through the Provost Office, maintain and manage a repository of all University Policy (both active and archived) which shall be maintained in perpetuity, (2) send notice to the University Community of biennial review deadlines, (3) initiate a schedule for review of Existing Non-Conforming Policy, and (4) designate POs and Stakeholders as necessary and as requested.

Designation of a Policy Owner and the Stakeholder(s).

All existing University Policy shall indicate the PO and Stakeholder(s).

The PRC shall have the authority to designate POs and Stakeholders for all University Policy, Policy Change proposals, and Existing Non-Conforming Policy.

For proposed Policy Changes that would result in the identification of new or previously unidentified Stakeholders or PO (such as a new University Policy or Amendments that involve new subject matter areas), the PO or individual seeking a new policy shall identify potential Stakeholders or PO to the PRC, then the PRC will designate an official list of Stakeholders (and PO as needed) in a timely manner.

Additional Stakeholders may be identified and designated during the Policy Change process as warranted through coordination between the PO and the PRC in accordance with this process.

Waivers.

With approval of the Provost and President, the PRC has the authority to grant waivers, in total or in part, to this Policy and Procedure where impracticality or legal necessity dictate.

Appendix A

Notice of Proposed Policy Change Template

Open the link below to create an email notice to Stakeholders and the required individuals:

Notice of Proposed
Policy Change prop

Appendix B

Policy Template

<mark>Contact the PRC at **policies@norwich.edu** for a fillable word version of this template.</mark>

Title: [*Name of policy*]

History:

Date:	Action:
[*TBD*]	[*Brief description*]

Policy Owner: [Title, Office]

Stakeholder(s):   [Title]

Policy Applicability and Scope

[*Applicability and Scope*]

Policy Statement and Purpose

[*Statement and Purpose*]

Definitions

[*Term – discrete definition.*]

Procedures

Procedural Section 1: Communication and Training

<mark>This is a required procedural section.</mark>

> *[To ensure proper implementation of the policy, outline the communication and training plan for the policy. The plan shall:*
>
> - *Describe a regularly-scheduled (at least biennial in odd years) training session;*
> - *Identify relevant audience and Stakeholders; and*
> - *Promote ongoing compliance.*
>
> <mark>*Designate additional procedural sections as necessary*</mark>*. Create numbered lists within sections (as applicable) of procedures needed to implement the policy.]*

Appendix C

Policy Development Guidance

1. Use the Google search query: "site:edu *your term policy*" to find related university policies as examples and models. However, be sure to also research Norwich's compliance or regulatory obligations; do not rely on other Universities in this respect.

2. Seek guidance from the Policy Review Commission or University counsel (as approved by the CFO).

3. Avoid redundancy. Ask: "is this policy needed, could it be added to existing policy, or should it be an Internal Document?" Note: Any Internal Document may not be inconsistent with University Policy.

4. Define key terms and be consistent with their usage throughout the document.

5. Keep the Policy Statement clear and concise.

6. Use short declarative statements. Use the active voice.

7. Keep policy and procedure distinct. Policy answers the "what" and "why". Procedure answers the "how".

8. Create numbered lists for linear procedures.

9. Where appropriate, add a flowchart for process.

10. Proofread, Proofread, Proofread!

Appendix D

Policy Change Coversheet

Policy Change Type:

☐ New Policy
☐ Amendment to Existing Policy
☐ Withdrawal of Existing Policy
☐ Seeking Interim Policy Approval (limited use)

Submitted by:

[*Name of Policy Owner and/or designee.*]

Proposed or Existing Policy Title:

[*Proposed Policy Title (not necessary to use the word "policy" in title).*]

Reason for Policy Change:

[*Tie the policy to University mission, productivity, risk minimization, or legal compliance. Provide legal or regulatory requirement and citation of authority as applicable.*]

Stakeholders Involved:

[*List stakeholders involved in policy development by unit or department, name, and title. Include any additional University Community involvement including the PRC and University Counsel.*

If existing policy, list Stakeholders from existing policy document as identified.]

Proposed Effective date:

[*Proposed date and why. Specify any regulatory requirements or other reason the policy change should have a delayed or accelerated effective date.*]

Appendix E

Policy Review Commission – Roles, Responsibilities, Terms

Members of the Policy Review Commission (PRC) shall review Policy Changes; identify gaps, inconsistencies, or efficiencies to be gained in University Policy structure, and perform other duties as assigned by the Chair.

The **Chair** of the Policy Review Commission (PRC) shall preside over meetings of the PRC, represent the PRC to the Provost, the President, and the University community, and direct the general operations of the PRC. The Chair shall manage all PRC meeting agendas and materials for review. The Chair shall additionally be the primary liaison between the PRC and University Policy Owners regarding biennial policy review and Policy Changes.

The **Vice Chair** of the PRC is the Commission's primary liaison to the Office of Communications, ensuring that the University's external policy library is accurate, current, and compliant. The Vice Chair additionally assumes the duties of the Chair in the event of the Chair's absence as well as other duties as delegated by the Chair.

The **Secretary** of the PRC shall be responsible for maintenance and currency of the Commission's SharePoint site, and with support from the Administrative Assistant shall maintain all official records of the Commission on that site. The Secretary shall be responsible for any campus-wide communications between the PRC and the larger University community, such as posting notice of policies under review by the PRC. The Secretary assumes additional duties as delegated by the Chair.

Administrative assistance shall be provided to the PRC by the Office of the CFO. The Administrative Assistant shall keep minutes of all deliberations and decisions made by the PRC, including a record of all motions made, all votes taken, and the substance of any questions, concerns, and/or deliberations undertaken, for the purposes of keeping the University community apprised of policy review and status. The Administrative Assistant shall support the Vice Chair and Secretary in ensuring content on both the Commission's SharePoint site and the University's Policy Library is accessible and current by maintaining the University's official policy archive. This person will assume any additional administrative tasks as directed by the Chair, Vice Chair, and Secretary in the discharge of their duties.

Terms
The Provost shall appoint members of the PRC and its leadership for three year terms, except that the initial term for the Chair shall be three years, the initial term for the Vice Chair shall be two years, and the initial term of the Secretary shall be one year. Subsequent appointments (renewal or replacement) shall ensure staggered terms between the roles of Chair, Vice Chair, and Secretary. Rotation of duties is encouraged, but no term limits shall exist.