1. **STATEMENT OF POLICY**

**This Policy applies to all university policies that cross campus constituents (students, faculty, staff, vendors, visitors).**

All university policies must be developed, reviewed, approved, and published in accordance with the standards outlined in this Policy on Policies unless otherwise indicated.  University policies approved under the Policy on Policies will be published and available in the University Policy Repository (“Repository”).  The Policy on Policies and the Repository were established with the following goals in mind that all relevant university policies will:

1. Flow through the proper channels of review and approval prior to being implemented.
2. Be consistent in structure and aesthetics.
3. Be effectively and efficiently communicated to affected constituents on a timely basis.
4. Be reviewed and updated (if necessary) on a regular basis.

Overall, the Policy on Policies ensures consistency, transparency, and clear communication with respect to the university policy process and resulting documents.

It is recognized that many policies do not (and will not) fall under the scope of the Policy on Policies.  This may include more narrow and detailed policies relating only to a specific division, college, school or department that are not intended for the broader university community.

This Policy on Policies is required for the effective communication of university policies and for the ease of use and identification of approved university policies. University policies must be kept current and made available to all constituents within our community. Policies are maintained at policies.lmu.edu. All communications should be sent to policies@lmu.edu.

1. **DEFINITIONS**

## Appendices: Contain laws, regulations, and checklists that may pertain to the policy.

# Approver: The University Officer(s) who approve(s) a university policy.

# Contacts: Names the university office(s) that can answer specific questions regarding the policy or approve exceptions.

#

# Definitions: Lists the terms used in the document alphabetically; defines unfamiliar terms that have specialized meaning in the policy.

# Division/College/School/Department Policy: A policy that does not have a broad impact on the university community and is limited in its scope and application to a specific area.

# Forms/Instruction: Forms the reader must use to comply with the policy, explains the purpose of each form and may provide a hyperlink to the applicable form(s).

# Procedures: Describe the means by which policies are implemented.

# Reason for Policy/Purpose: States the legitimate interests of all parties, describes the problem or conflict the policy addresses, and cites any legal or regulatory reasons for the policy.

# Responsible University Office within a Division: Under the direction of the Responsible University Official, the Responsible University Office within a division develops and administers a particular policy and procedures and will be accountable for the accuracy of its subject matter, its issuance and timely updating.

# Responsible University Official: The Policy Owner. The individual charged with the responsibility for creating, implementing, training if required, and updating university policies in his/her area of jurisdiction. Once a policy has been approved, the Responsible University Official must ensure that it is communicated to the university community.

1. Stakeholders: Members of the university community who are affected by and/or have an interest in the policy.
2. University Policy: A formally approved statement or principle with broad

application that: promotes operational efficiencies; enhances the university’s mission; addresses issues of behavior and interaction; governs use of university resources; helps ensure coordinated compliance with applicable laws, regulations and reduces institutional risk. As such, university policies impose binding obligations on students, faculty and/or staff as applicable.

1. University Policy Committee (“UPC”): The UPC is a standing committee of the university which serves in an advisory capacity to the Vice President of Internal Audit, who serves as UPC Chair. The UPC will provide consultation and support to the UPC chair in the review of new and/or significant changes to existing university policies review of new and/or existing university policies as needed. The UPC will be called to meet by the UPC Chair as needed, but at minimum, on an annual basis.
2. University Policy Committee Chair (“UPC Chair”): The Vice President for Internal Audit serves as the UPC Chair, with the responsibility for reviewing new university policies and for maintaining and updating the repository of university policies. The UPC chair will be supported in these tasks by the UPC.

1. The UPC chair is responsible for ensuring that new or revised university policies

follow an approved format and process, including evidence that appropriate consultation with stakeholders has occurred and they are approved by the respective Responsible University Official prior to submission to the Executive Vice Presidents. The UPC chair will submit policies for final approval to the Executive Vice Presidents and has the authority to call a meeting of the UPC as needed for consultation and review of new and/or significant changes to existing university policies. review of new and/or existing policies.

# POLICIES/PROCEDURES

1. Policies are carried out through a set of processes and procedures
	1. A process is a series of high-level activities or tasks to obtain a desired outcome that conforms to policy. A well-developed process assigns roles and responsibilities and specifies what needs to be done.
	2. A procedure is a particular way of accomplishing a process. Procedures define

the “how to” and are the step-by-step instructions for implementing the

process. They are specific, factual and to the point. The university’s policy

process is guided by these principles:

1. The policy formulation is well defined, understandable, transparent, and easy to navigate;
2. The process sets out and follows a timeline for each policy;
3. Stakeholder input and feedback are broadly sought, valued, and used;
4. Policy ownership lies with the responsible institutional unit.

1. Criteria used in determining if a policy is necessary

As the need for compliance arises or establishing a common understanding, process, and/or procedure emerge university policy may either need to be created or amended.

Issues that need to be addressed through the university policy process share a number of characteristics that may include but are not limited to the following: support the university’s mission, vision and values; apply broadly across the institution; endure across time and administrations, change infrequently and set the course for the foreseeable future; establish the university’s position across a range of matters; support equity and integrity in practices across the institution; promote quality and operational efficiency, reduce bureaucracy, and provide guidance for managing the institution; ensure compliance with applicable laws and regulations; are consistent with the university’s bylaws, rules, regulations and other policies; manage institutional risk.

1. All policies that meet the above criteria of the need for university policy are governed by this Policy, should be developed and approved in accordance with this Policy on Policies
	1. The Policy Scope Document must be submitted for review and input.

 (Appendix A)

* 1. The Policy Template must be followed and will be included in the Repository.

 (Appendix B)

Use of the standard policy template facilitates the adoption of clear, concise policies and procedures at all levels of the organization. All policies should be in the standard University Policy Template, and all sections must be included. If a section does not contain any information or is not applicable, the drafter should put “N/A” under the section heading.

* 1. See the definitions above for the distinction between a policy and a procedure. Many division, college, school or departmental policies and procedures do not meet the above definition. They are not governed by this document. However, these local policies should be clearly written and well communicated. It is suggested that the Policy Template of this Policy on Policies be used as a guide for content for local policies.
	2. The Responsible University Office under the direction of the Responsible University Official will develop and administer policies and procedures; be accountable for the accurate formulation, issuance, communication and training, if required; and the timely updating and implementation of the policy. Policies should be drafted so that they are clear and concise. Policies should contain sufficient information on the subject without being excessive in length.
1. Categories of policy changes
2. **New Policies** are subject to the full vetting process according to the procedures established in the Policy on Policies.
3. **Edits** take one of two forms: (1) are style, format, grammar changes, and/or corrections of error, or (2) are changes required to bring the policy into compliance with existing law. Edits to policies are coordinated by the Responsible University Official within a division, who is responsible for notifying the UPC of the changes and updating the Policy Repository. The UPC reserves the right to request a more in-depth review of the policy changes.
4. **Conformity to Practice** refers to changes to policies that are made to bring a policy into conformity with existing practices. Such changes require that the Responsible University Office submit a Policy Scope Document to the appropriate divisional policy committee or Responsible University Official and to the UPC. The divisional policy committee or Responsible University Official and the UPC may determine that the changes constitute a policy revision and are thus subject to the full vetting process, according to the procedures established in the Policy on Policies.
5. **Revision** means the policy will undergo substantial content changes. Substantive revisions to university policies are subject to the full vetting process, according to the procedures established in the Policy on Policies.
6. **Review** means the policy was reviewed and confirmed that the content was found to be current. Review is expected to occur minimally every five years.
7. Policy Development Process
	1. Predevelopment
8. **Identify issue** Issues may emerge from trends within a division, through federal state, or local legislation or regulation, from changes in best practices, as a result of an incident on campus, or in a variety of other ways.
9. **Identify Responsible University Official** This position is responsible for the content and accuracy of a policy. Different offices can own pieces of the policy or procedures, but one Responsible University Official carries the overall responsibility. If disputes arise, this individual is the one who ultimately decides the outcome or the process that will be used for resolution.
10. **Assemble a team** Involve individuals with topical and process expertise, policy users, those impacted by the policy, and others. Be explicit about member roles, expectations, etc.
11. **Prepare a Policy Scope Document** in which you identify the issue, briefly describe the policy to be developed, and identify the stakeholders to be consulted for input and feedback.
12. **Submit the Policy Scope Document to the appropriate divisional policy committee (Academic Affairs Policy Committee, Student Affairs Policy Committee, etc.)**  The divisional policy committee will decide if the issue requires a formal policy or can be addressed in other ways. If the divisional policy committee determines that a policy is necessary, it will refer the policy development to the appropriate body, having ensured that the appropriate stakeholders will be consulted.
13. **Upon determining that policy development is required, the divisional policy committee, departmental committee or the Responsible University Official submits the Policy Scope Document to the UPC Chair.**  In case of questions, the VP for Internal Audit will follow-up with the individual or committee that submitted the Policy Scope Document for review.

2. Development of Policy Statement

1. **Solicit input from key stakeholders** Discuss major policy changes with stakeholders prior to proposing them. Solicit input from all constituents that are affected by and/or have responsibilities as a result of the policy, as well as the Faculty Senate (for policies that apply to faculty) and/or the Staff Senate (for policies that apply to staff).
2. **Draft Policy Statement** Keep policy statement as short and succinct as possible. Define terms clearly and use terminology in a manner consistent with existing policies and throughout the statement. Ensure that the draft policy statement is consistent with federal and state law and regulation; university bylaws, rules, and regulations; other university policies; current practices; and any established benchmarking and best practices.
3. **Solicit and integrate feedback** Request feedback from all stakeholders identified on the approved Policy Scope Document (additional stakeholders can be added), in addition to the Faculty Senate (for policies that apply to faculty) and/or the Staff Senate (for policies that apply to staff). Integrate feedback into a revised Policy Statement. Determine if a legal review is necessary and, if so, consult with the senior vice president of the appropriate area.
4. **Prepare implementation and communication plan**  Determine an effective date for the policy. Develop an implementation plan to ensure that the policy and its requirements will be implemented by the individuals and groups to whom it applies, including a plan for training as appropriate. Develop a communications and training plan for the policy roll-out, which should include communications to all stakeholders, individuals and groups affected by the policy, administrators, etc.
5. **Submit draft Policy Statement to the appropriate divisional policy committee** The Responsible University Official submits a draft Policy Statement to the appropriate divisional policy committee, if applicable, for review. For policy revisions, provide redline and clean versions.
6. **Integrate feedback from the divisional policy committee and resubmit revised Policy Statement** For policy revisions, provide redline and clean versions.
7. **Submit to UPC Chair** After the policy has been reviewed and approved by the appropriate bodies, the Responsible University Official submits the policy to the UPC Chair. The UPC Chair reviews the policy to ensure that the process was followed, that appropriate stakeholders were consulted, and that the Policy Statement conforms to style guidelines. If needed, the UPC Chair will call a meeting of the UPC for additional review and consultation.
8. **Final Approval** The UPC Chair submits the approved policy or policy revision to the Executive Vice Presidents for final review and signature.

3. Implementation

1. **Post current policy to the website and archive superseded policy** The UPC Chair posts the approved new or revised policy to the University Policy Website. The superseded policy, policy approval and signature form, and all supplemental documents are sent to the Repository, which is maintained by the Office of Internal Audit.
2. **Inform stakeholders and affected individuals of the new or revised policy** The Responsible University Official/Office communicates and disseminates the policy according to the communication plan.
3. **Implement policy** The Responsible University Official/Office implements the policy according to the implementation plan, including conducting online and/or face-to-face training as appropriate as well as ensuring that the tools needed to implement the policy are available to those individuals who are expected to carry out or enforce the policy.

1. **Monitor compliance** The Responsible University Official/Office monitors compliance, reviews audit and investigation findings, and implements accountability measures to address performance issues.
2. **Encourage feedback** The Responsible University Official/Office should encourage and collect feedback about their policies for use in the next policy revision.

**Review policy** Policies should be reviewed and updated or confirmed current on a five year cycle. Pending the outcome of the review, the policy is either confirmed as current or follows established procedures depending on whether edits, conformity to practice changes, or revision are required.

The Responsible University Officials will review each policy in the institutional unit every five years or more frequently as necessary. The period of review should be identified in the document when the policy is approved and implemented. The Last Amended Date must be included and maintained. Responsible University Officials will submit updated documents to the UPC Chair in accordance with these identified timelines.

1. Interim Policy

Policies may be put into place on an interim basis in situations where a university policy must be established in a time period too short to enable the completion of the process delineated in this policy. An interim policy shall remain in force for up to six months from the date of issuance. At that point it is required that the policy be finalized using the policy process outlined in the POP. Interim policies must be approved by the Executive Vice Presidents or a Senior Vice President prior to going into effect.

1. Issuing a Policy

The Responsible University Official will communicate newly released or substantially revised policies to the community at large via targeted e-mail messages and/or other means as appropriate. The UPC Chair is responsible for placing the Policy in the Repository.

1. Decommissioning A Policy

The Responsible University Official proposes that a policy be decommissioned when it is no longer needed or is more effectively combined with another policy. Steps in this process include consultation with the UPC and approval of the Responsible University Official, with additional approval as needed by the Executive Vice Presidents. When the approval process is complete, it is removed from the Repository. The Responsible University Official communicates the change in status to the university community.

**APPENDIX A**

**POLICY SCOPE DOCUMENT**

**APPENDIX B**

Policy Template: (1) Reviewed by the University Policy Committee 11/17/15

(2) Reviewed and approved by the Executive Vice President and Provost 11/18/15

(3) Revised and updated by the University Policy Committee 01/07/20

**APPENDIX C**

**POLICY WORKFLOW**

