Policy Title: Policy on Policy Development

Policy Owner: Office of University Counsel

Effective Date: December 19, 2023
Last Updated: December 19, 2023

Scheduled Review December 19, 2025

Related Policies: Please see Section VII, below.

Related Forms: Official University Policy Template, Appendix A.

I. POLICY STATEMENT

This Policy on Policy Development ("Policy on Policies") sets out the requirements for developing and drafting University Policies. All University Policies (other than those the University deems purely administrative in nature) must be developed, amended, approved, and published in accordance with the standards outlined in this Policy on Policies, and must be published on the University's central "Policies" web page. University Policies must be kept current, reviewed on a regular basis, and made available to all community members in a timely manner, pursuant to the terms set forth below.

II. PURPOSE & BACKGROUND

Seattle University's mission and values are expressed in, supported by, and achieved through its written Policies. University Policies protect the integrity of the University's mission, reputation, and operations, and help the University manage major institutional risks. Because Policies play a vital role in University operations and governance, they must be developed pursuant to an intentional and consistent process, as described in this Policy on Policies.

III. APPLICABILITY/RESPONSIBILITY

This Policy on Policies prescribes the procedural and substantive requirements for developing, issuing, and maintaining all University Policies. It applies to all members of the University community and to all University Policies, as defined below.

IV. DEFINITIONS

Academic Policy: Policies that directly affect the pedagogical, service, and/or research work of the University faculty and students.

Policy: A statement of management philosophy and direction that changes infrequently and imposes requirements regarding the conduct of University affairs.

Policy Owner: The office, SME, or individual responsible for drafting, developing, adopting, implementing, and overseeing enforcement of a Policy. For the purposes of drafting the Policy and seeking community comments and input, the Policy Owner may also be a committee comprised of interested Stakeholders.

Senior Leaders: Those persons holding positions at the University that report directly to the President.

Stakeholders: The University President, the Office of University Counsel, the Senior Leaders, any SMEs, the Board of Trustees (if the Board of Trustees' approval or input on a Policy required), and any other University community members who will be significantly impacted by the Policy being developed.

Subject Matter Experts (SME): Faculty or staff with particular expertise in the pending Policy subject matter.

University Policy: Non-Academic Policies that apply broadly to more than one division of the University and have institution-wide application.

V. POLICY REQUIREMENTS

A. Structure and Organization of University Policies

All University Policies shall conform to the structure, substance, and format shown in the Official University Policy Template and contain the information in the Policy Content Checklist (see Appendices A & B).

B. Procedure for Developing Policies (see Appendix C for flowchart)

The following process will be used for all University Policies (other than those that are purely administrative in nature).

1. Draft Policy

- a. A University community member who identifies the need for a Policy shall present the need for the Policy to the President or a designee of the President for approval. If the President (or designee) approves development of the proposed Policy, the President or the President's designee shall appoint a Policy Owner, who may be the individual who identified the need for a Policy.
- b. Using the Official Policy Template and Content Checklist (see Appendices A and B), the Policy Owner and any SMEs, stakeholder, and/or designees they deem appropriate shall develop a draft Policy. Drafting should be clear and concise and contain sufficient information on the subject without being unnecessarily long. Additionally, Policy Owners should use inclusive language and consult with the Office of Diversity and Inclusion on how best to do so. Careful consideration should be given to the education and training needs of the University community as it relates to the Policy and/or Policy subject matter. The Office of University Counsel and Senior Leaders are available to assist the Policy Owner and other relevant parties with drafting the Policy and developing an implementation, education, and/or training plan once the Policy is approved.

2. Community Input and Comment

a. In developing the Policy draft, the Policy Owner shall proactively seek input from appropriate members of the University community and those knowledgeable about the subject by:

- i. Notifying University Marketing Communications ("MarCom") and requesting that MarCom post a notice on the "Policies" web page that the draft is being developed. MarCom shall ensure that such a notice is posted;
- ii. Notifying the President that the draft is being developed and requesting input on the draft;
- iii. Notifying the Vice President & University Counsel, who is also Secretary of the University corporation under the University's bylaws, who shall determine whether approval or input from the Board of Trustees is required. If approval or input from the Board of Trustees is required, the Vice President & University Counsel shall notify the Board of Trustees that the draft is being developed and manage the process of obtaining approval or input from the Board of Trustees; and
- iv. Notifying any other Stakeholders that the draft is being developed and requesting input.
- b. After the Policy Owner has notified Stakeholders about the Policy and created a draft Policy with their input, the Policy Owner shall provide the Policy draft to MarCom to post to the "Policies" web page for a 30-day comment period. In addition to the draft, MarCom shall post contact information for the Policy Owner for submission of comments. During the comment period, members of the University community shall be permitted to submit comments regarding the draft to the Policy Owner for consideration.
- c. After the comment period, the Policy Owner shall consolidate and organize the comments received and incorporate any comments into the draft that the Policy Owner deems appropriate.
- d. Once the Policy Owner incorporates all comments they deem appropriate, the Policy Owner shall send the draft Policy to all Stakeholders for additional review and comment.

3. Approval

After giving the Stakeholders a reasonable amount of time to review and comment on the revised Policy draft, the Policy Owner shall incorporate any additional comments they deem appropriate and provide a final draft of the Policy to the President or the President's designee, and Board of Trustees, if required, for approval.

C. Policy Implementation

Upon the President's (or Board of Trustees') approval, the Policy Owner shall work with MarCom to communicate, distribute, and publish the new Policy on the "Policies" web page and to advise faculty, staff, and/or students (as appropriate) on the existence of the new Policy and availability of education and training. The Policy Owner will direct the development and administration of procedures, communications, and training related to the Policy, as well as timely revisions. The Policy Owner shall finalize procedures and the implementation timeline for a given Policy in

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consultation with the President (or a designee) and Office of University Counsel. The Policy Owner will have ultimate responsibility for approving and implementing any necessary metrics for measuring and monitoring compliance with an approved Policy.

D. Location of Policies

To ensure University Policies are readily accessible and well-organized, the University shall maintain an official "Policies" web page with links to each of the most current approved versions of all University Policies. The Policies on the "Policies" web page shall constitute the official electronic repository for University Policies.

Individual departmental websites should not contain separate copies or versions of University Policies. Instead, departmental websites that reference University Policies should use hyperlinks to the official "Policies" web page. This does not preclude departments from maintaining internal Department Policies on their websites, provided the internal Department Policies are not identified as University Policies and do not conflict with University Policies.

E. Policy Conflicts

Administrative and academic departments or offices may not develop Policies that conflict with or override University Policies or contract terms. All non-University Policies must be compliant with any applicable University Policy. In the event a conflict exists or develops between a University Policy and another Policy, the University Policy will prevail.

F. Preexisting Policies

Policies that preceded the effective date of this Policy on Policies and that contain specific requirements for approval of amendments are exempt from the procedural requirements in this Policy on Policies. In these cases, the Policy Owner should adhere to the specific procedural requirements for approving amendments set forth in those Policies.

G. Decommissioning and Archiving

Previous versions of University Policies will be retained by the Office of University Counsel for a reasonable time period and future reference but will not be posted on the "Policies" web page. A responsible Policy Owner may decommission a Policy by notifying the Office of University Counsel after receiving the approval of the President to decommission the Policy when it is no longer applicable, where it has been changed into guidelines, or where it would be more effective to integrate into another policy.

H. Compliance

Faculty, staff, and students are responsible for knowing, understanding, and complying with Policies that relate to their position, employment, or enrollment at the University. Policy Owners are responsible for following the Policy development and implementation processes established by this Policy on Policies, communicating their Policies effectively, reviewing and updating their Policies regularly, and monitoring their Policies for compliance and effectiveness.

I. Exceptions

Exceptions to this Policy may be granted for good cause shown, such as unusual facts or circumstances that make adherence to it impossible or impracticable. An exception will be limited to the particular facts and circumstances giving rise to the request and may only be granted by the President or Provost, or their designee, in consultation with the Office of University Counsel.

J. Ongoing Policy Review

The Policy Owner is responsible for ensuring that each Policy for which they are responsible is reviewed at regular intervals to determine whether (a) it is still needed, (b) updates or other changes are needed, or (c) there are gaps that indicate a new Policy should be developed or the Policy should be supplemented. These regular reviews shall occur every two years from the effective date of the Policy, or every two years after the date the Policy was last updated, as applicable. If, on reviewing the Policy, the Policy Owner determines that the Policy should be changed or supplemented, or that a new Policy should be developed, the Policy Owner shall follow the procedure set out in Section V.B and use the approved Policy Template (see Appendix A).

VI. VIOLATIONS

University Community members who fail to abide by this Policy on Policies may be subject to corrective action in accordance with the University's Employment Policies, Faculty Handbook, or the Code of Student Conduct, as appropriate.

VII. RELATED INFORMATION

Item	Description
University Links	<u>University Employment Policies</u>
	Faculty Handbook
	Code of Student Conduct
Forms	Official University Policy Template
Related Links	N/A
Procedures	See Section V.B.



APPENDIX A

Official Policy Template

Italicized instructions provided in this template are for guidance in policy creation and should be deleted as policy content is inserted. Subsections may be added as needed, but the main sections should remain consistent with this template.

Policy Title: Select a policy title that clearly conveys the key policy

purpose and objective.

Policy Owner: Name of Department or Responsible Office

Effective Date: MM/DD/YYYY
Last Updated: MM/DD/YYYY

Scheduled Review *MM/DD/YYYY*Related Policies:

Related Forms:

I. POLICY STATEMENT

The policy statement is the governing principle, plan, or understanding that guides the action being taken through the policy. Usually, the policy statement begins with "Seattle University is committed to ..." or similar language. The policy statement states **what** to do, **not how** to do it. It should use strong, active language. It should not include background details, historical information, or procedural steps.

Example: "Seattle University is committed to providing for the safety, security, health, and welfare of the entire campus community. The University therefore requires all students, faculty, and staff to be fully vaccinated against COVID-19 with an authorized vaccine, unless the individual has an authorized exemption."

II. PURPOSE & BACKGROUND

Describe the purpose of the document, along with any background information that may be relevant to the reader. Background information may include why the policy exists, significant legal or regulatory references, a conflict or problem that the policy resolves, and/or the overall benefits of having a policy on the topic.

III. APPLICABILITY/RESPONSIBILITY

State those individuals, groups, units, and/or entities to which the policy applies or describe those who must comply with the policy. Summarize the applicable individuals' major responsibilities and use bullets to itemize multiple responsibilities clearly. List departments, units, offices, or individual job titles for those who are responsible for some aspects of the policy or process.

IV. DEFINITIONS

Define words or terms that: have a special meaning as used in the policy; are specific or unique to the policy and therefore add to the reader's understanding; are unfamiliar or technical. List

definitions in alphabetical order and include only terms that appear in the policy. A definition should <u>not</u> include the word that is being defined.

V. POLICY REQUIREMENTS

Explain requirements for complying with the policy in detail, including as many subsections as are necessary. This will likely be the longest section of the policy.

VI. VIOLATIONS

Explain any consequences of failure to comply with the policy.

VII. RELATED INFORMATION

Include additional information here that may be helpful to the reader in complying with the policy or understanding it.

Item	Description
University Links	Title and website link of university policy, procedure, document, or web location supporting the policy. Include any links to guidance or FAQs.
Forms	Title and link to internal and external forms related to the policy.
Related Links	Title and links to external websites, forms, or guidance that support the policy, including state and federal government websites.
Procedures	Link to any procedures that establish mandatory actions and processes required to comply with the policy, support compliance with applicable laws and regulations, and mitigate risks.



APPENDIX B

Policy Content Checklist

The chart below identifies the categories and information that must be included in Policies and provides a brief explanation for each section. This ensures consistency among Policies and increases clarity and uniformity of information.

Policy Title	Official title of the Policy
Policy Owner	The office, SME, or individual responsible for drafting, developing,
	implementing, and overseeing enforcement of a Policy
Effective Date	The date the Policy is approved and posted to the "Policies" web page
Last Updated	The date the Policy was last revised. If the Policy has never been revised, this
	is the same as the Effective Date.
Scheduled Review	The date the Policy will undergo review for whether it is still needed, updates
	are needed, or supplementation is needed. This date should be two years
	from the Effective Date of the Policy, or two years after the date the Policy
	was last updated, whichever is applicable.
Related Policies	A list of other Policies, if any, that are relevant to the Policy and that the
	reader should be familiar with
Related Forms	A list of any forms (with hyperlinks) the reader must use to comply with the
	Policy.
Policy Statement	A concise statement of the Policy's overarching requirements.
Purpose & Background	A concise description of the purpose of the Policy, and any relevant
	background information.
Applicability/	Description of those individuals, groups, units, and/or entities to which the
Responsibility	Policy applies.
Definitions	A glossary of terms that may be unfamiliar or have a specialized meaning in
	the Policy.
Policy Requirements	An explanation of the requirements for complying with the Policy. This is
	likely to be the longest section of the Policy.
Violations/Enforcement	An explanation of how the Policy will be enforced and any consequences of
	failure to comply with the Policy.
Related Information	Any additional information that may be helpful to the reader in reading or
	complying with the Policy.

APPENDIX C

Policy Development Flowchart

- Step 1: University Community member who identifies the need for a Policy presents the need to the President or a designee for approval.
- **Step 2:** President or President's designee appoints a Policy Owner.
- Step 3: Using Official Policy Template and Policy Content Checklist, the Policy Owner drafts Policy while contemporaneously seeking input from appropriate University Stakeholders.
 - **Step 3(a):** Policy Owner notifies MarCom of Policy in development.
 - **Step 3(b):** Marcom posts notice of Policy in development on "Policies" web page.
 - **Step 3(c):** Policy Owner notifies President, the Vice President & University Counsel/Corporation Secretary, SMEs, and any other Stakeholders that Policy is being developed and requests input.
 - Step 3(d): The Vice President & University Counsel/Corporation Secretary determines whether approval or input from the Board of Trustees is required. If approval or input from the Board of Trustees is required, the Vice President & University Counsel/Corporation Secretary notifies Board of Trustees and manages the process of obtaining approval or input from the Board of Trustees
 - Step 3(d): Policy Owner finalizes draft and provides to MarCom to post to the "Policies" web page for 30-day comment period.
 - Step 3(e): Policy Owner consolidates and organizes comments and incorporates those deemed appropriate.
 - Step 3(f): Policy Owner sends draft Policy to all Stakeholders for additional review and comment.
- Step 4: After giving Stakeholders reasonable time to review and comment on the revised Policy draft, Policy Owner incorporates any additional comments deemed appropriate and provides final draft to the President or the President's designee, and the Board of Trustees, if required, for final approval.