

Texas Christian University Policy

Policy Title: Formulation and Issuance of University Policies

Policy Subject: Policy on policies

Division: Division of Human Resources and the Office of Compliance

Policy Number:

I. Applicability

This policy applies to all divisions and departments within the university.

Exclusions: This does not supersede nor apply to the Student Handbook, the Undergraduate and Graduate Catalogs, or the Athletics Compliance Handbook.

II. Policy Statement and Purpose

TCU maintains university policies and supporting documents in order to promote and ensure compliance with applicable laws and regulations, reduce institutional risk, and to provide the University community and public with an explanation of the principles and limitations within which the university applies its business practices.

- **a.** University policies must be available to the University community to promote and communicate compliance and accountability.
- **b.** In an effort to promote transparency, collaboration and institutional integrity, individuals engaged in developing and maintaining university policies must adhere to the requirements outlined in this policy for drafting, revising, approving, and withdrawing university policies.

III. Definitions

Policy Definitions

a. Academic Policy

Academic Policies are policies that directly affect the pedagogical and research mission of the university. The process for the development of academic policies is the responsibility of the office of the Vice Chancellor and Provost of Academic Affairs.

1. Academic policies shall not conflict with applicable regulations, law, and University policies.

b. College, Department, or Unit/Division Policy

Policy that applies only to the operation of an individual college, department, or unit within the University.

1. College, Department, or Unit/Division policies shall not conflict with applicable regulations, law, and University policies.

c. Guideline

Guidelines provide advice, recommended best practice, or an administrative framework to implement procedures. They are not mandatory, allow for discretion in interpretation and implementation, and often are a governing document that may or may not relate to a university policy (e.g., Brand Standards style guide).

d. Policy

An official directive that mandates requirements of or provisions authorization for members of the TCU community.

1. Policies assist the university in achieving compliance with any applicable regulations and laws, in addition to reducing institutional risk and outlining accepted standards of conduct.

e. Policy Template

Standard format that University Policies must follow. This includes a title and subject; a policy statement and purpose; applicable definitions; the policy itself; additional information such as enforcement, related policies, and appendices; and a listing of the division/department/office responsible for administering and interpreting the policy.

f. Procedure

A procedure is a series of steps taken to assist with the implementation of and compliance with University policy.

1. Procedures outline the underlying processes and detailed requirements for a variety of university activities.

g. University Policy

A policy developed through the university policy process that:

- Has broad application throughout the university, across all colleges, divisions, units and departments of the University (including the TCU/UNTHSC School of Medicine).
- Assists the university in carrying out its mission through clear articulation of authority, while reducing institutional risk for errant or unauthorized activity.
- Has been reviewed and approved via the established <u>Policy</u> <u>Development Process.</u>
- Is sponsored by at least one university executive (Cabinet-level).

^{*}There are university polices that predate this policy and have not been through the outlined process. They remain official university polices and, in time, are expected to complete this process.

Roles and Responsibilities Definitions

h. Owner

A university administrator responsible for oversight of a university policy. The role of the Owner includes the duties and responsibilities as outlined on the Roles within PolicyTech.

i. Responsible Office

The university office responsible for developing and administering a policy, which includes development of procedures where appropriate, communications and training related to the policy, and timely review and updating of the policy.

j. Reviewer

Within the policy development process, a policy Reviewer is an individual identified by the Owner to review and edit the proposed policy or revisions for an existing policy.

k. Stakeholder

Within the policy development process, a Stakeholder is an individual identified by the Owner to receive a copy of the proposed policy or revision of an existing policy for review and feedback (e.g., subject matter expert, member of a governance group).

l. Writer

Within the policy development process, a Writer is an individual identified by the Owner to write or collaborate in writing a policy draft.

IV. Policy

The Chancellor's Cabinet formally approves, issues, and maintains in a consistent format, official university polices in a central policy repository system. Individuals engaged in developing and maintaining university policies must adhere to the requirements outlined in this document for drafting, revising, approving, withdrawing, and archiving university policies.

The procedures to initiate, review, and approve new or revised policies are outlined in the Procedures and Administrative Processes (see Appendix). Additionally, the Policy Development Process flowchart provides a systematic overview of the policy development phases.

The policy repository system includes policies that have broad application throughout the university, across all colleges, divisions, units and departments of the University. Matters pertaining only to the operations or functions of a given department or division are not considered within the scope of this policy.

V. Enforcement

Reports of possible violations of university policy are directed to the Responsible Office for review to be conducted in coordination with the Division of Human Resources and the Office of Compliance.

VI. Administrative Responsibility

The Office of General Counsel, Division of Human Resources, and the Office of Compliance are responsible for administering and interpreting this policy.

VII. Policy History

Issued: May 10, 2021

VIII. Related Policies or Related Documents

Policy Development Process Flowchart
Roles within PolicyTech
PolicyTech Manual
PolicyTecy FAQs

IX. Appendix

Formulation and Issuance of University Policies: Procedures and Administrative Processes

X. Approved By and Approval Date

Approved by Chancellor's Cabinet, May 10, 2021

Formulation and Issuance of University Policies: Procedures and Administrative Processes

The procedures to initiate, review, and approve new or revised University policies are as follows:

A. IDENTIFY and DRAFT & EDIT

Development and Formatting

Within the Identify phase, the Responsible Office identifies the need for a policy. After assessing the need and determining that the policy is broadly applicable through the University, the Owner within the Responsible Office shall initiate the policy development process by assigning a Writer(s) to draft the proposed policy using the standard policy template.

TCU has established a standard policy document (<u>Policy Template</u>) and development process to achieve consistency and clarity of content. All new and revised University policies must go through the policy development process prior to being issued or changed.

B. INTERNAL REVIEW, ENDORSEMENT, and CABINET APPROVAL Review and Approval

The designated Writer(s) within the Responsible Office drafts a policy using the standard policy template. The draft is reviewed by applicable stakeholders, subject matter experts and governance groups (if applicable). Additionally, the designated Reviewer(s) within the Responsible Office, review, edit, revise and approve the policy draft.

Once reviewed and approved by the appropriate Vice Chancellor (or designee) within the Responsible Office, the policy draft shall be distributed to the Chancellor's Cabinet in advance of a scheduled Cabinet meeting. The Vice Chancellor (or designee) will present the final policy draft to the Chancellor's Cabinet, where members will deliberate on final approval of the policy. The Responsible Office will make changes as directed by the Chancellor's Cabinet. For policies that require approval by the Board of Trustees, those will be presented in accordance with the By-Laws of Texas Christian University.

C. PUBLISH

Communication and Publication

The Responsible Office shall develop a communications plan to inform the campus community about the newly adopted policy. At a minimum, the plan shall include notification in *TCU Today*, an update on the <u>Policy page on the Office of Compliance website</u>, and the policy must be published and visible on the PolicyTech website. In addition to the standard communication plan outlined above, the Responsible Office shall determine if additional, targeted communication is needed based on the audience impacted and the revision context.

D. IMPLEMENTATION

Development and Training

As deemed appropriate, the Responsible Office will develop procedures, guidelines, and forms as necessary to implement the policy. Additionally, the Responsible Office shall develop and offer training to members of the campus community who are expected to comply and enforce the policy. Training shall include information on the business processes for enforcing, monitoring and reporting as required for regulatory compliance.

E. ADDITIONAL PROCEDURES

Monitoring and Enforcement

After a new policy has been approved and implemented, it may be necessary for the Responsible Office, in conjunction with a compliance official, to monitor compliance with the policy, assessing the effectiveness and noting any issues that arise as a result of its implementation. Policies are enforced through the corresponding procedures documents.

All campus community members must comply with any reporting and training requirements contained in the policy.

Policy Review

Policies published by TCU must be reviewed at least once every two years and revised as appropriate. The Policy Owner (or designee) is responsible for conducting the review and if there are any substantive changes to be made, they shall be completed in a manner consistent with this Policy. As policies are reviewed, the Last Review date should be updated in the Policy History section on the policy document to reflect the date of the latest review.

Revision and Archiving

The Responsible Office shall schedule regular review of its policies on no less than a biennial basis and also review specific policies when there are changes in applicable law that could affect provisions of the policy. Proposed revisions are subject to the provisions of this Policy where appropriate. Non-substantive and routine revisions (e.g., changes to email or web addresses, contact names, or titles) may be completed by the Responsible Office, with the date noted appropriately on the policy document.

A Responsible Office may deem it appropriate to withdraw or archive an existing University policy. The designated Cabinet-level executive and/or Chancellor's Cabinet must give approval to withdraw a University policy. If such approval is granted, announcement of the withdrawal or archival shall follow the same process for communication of a new policy.