Procedures for Formulation and Issuance of University Policies

These Procedures are intended to guide the process for developing, issuing, revising and maintaining all University Policies. Policies promulgated by the American University Board of Trustees are not subject to these Procedures.

A. Policy Development

1. Once the need for a Policy or Policy revision has been identified and communicated to the Responsible Executive, the Responsible Executive shall consult with the President and Vice Presidents as appropriate and assign a Responsible Office to develop a draft Policy that is best aligned with the topical issue.

2. The Responsible Office will consult with Stakeholders and subject matter experts regarding the Policy's likely impact on the members of the university community and will format the draft Policy using the American University Policy Writing Guidance and Template Document.

B. Review and Approval

1. The Responsible Executive shall evaluate the draft Policy to determine if it meets the criteria of a University Policy and whether it is approved for submission by the Responsible Office to Office of General Counsel (OGC) for review.

2. OGC will review the draft Policy and submit feedback to the Responsible Office for legal changes to be incorporated as necessary.

3. The Responsible Executive will circulate the draft Policy to the President and Vice Presidents for review and discussion as needed.

4. The Responsible Executive will provide OGC with a revised draft of the Policy. OGC will then disseminate the draft Policy to the Stakeholder Groups to provide formal notice of the date that the draft policy is tentatively scheduled to be added to the Policy Library. Comments from Stakeholder Groups will be accepted within a minimum period of ten (10) business days; however, a shortened or extended period will be allowed at the discretion of the Vice President and General Counsel if the particular circumstances require it. Such exceptions will be granted only when practicable or required to ensure compliance with laws or regulations; however, mere failure to initiate the policy review process in a timely manner is not an acceptable justification. Comments received before the deadline shall be documented by OGC, summarized, and shared with the Responsible Executive. The Responsible Executive will review all comments and determine whether the draft Policy will be returned for revision or proceed to finalization for posting to the Policy Library.

5. Certain Policies that have broad institutional impact may require the preparation and submission of a decision memo to the President prior to finalization. The Responsible Executive (with the approval of the President), may decide to forego the formality of a decision memo so long as the changes are discussed with and supported by the President.

6. Certain Policies requiring Board of Trustee review and/or approval, will be forwarded by the Responsible Executive to the Board Secretary for to facilitate Board action.

7. Once the Policy is approved, the Responsible Executive will provide written notice of the approval to OGC. To promote efficiency and save resources, the University accepts electronic signatures and emails

from an authenticated American University account as handwritten signatures to signify approval. OGC will notify the Policy Stakeholder Groups and Responsible Executive for the Policy, place the final version in the Policy Library on the University Policy website, and appropriately archive the prior version of the new Policy. The Responsible Executive is expected to communicate the contents of the policy to other individuals and/or groups in their area who must be notified.

C. **Communication/Training and Compliance/Review**

1. **Communication.** The Responsible Office is responsible for coordinating any necessary supplemental communication about a new or revised Policy to specific Stakeholders.

2. **Training and Compliance.** The Responsible Office is responsible for coordinating any necessary training and education of Stakeholders and other members of the campus community as needed to comply with the Policy. As identified in the particular Policy, the Responsible Office will monitor compliance and facilitate remedies for noncompliance as directed by the Policy.

3. **Review.** Responsible Executives must monitor when particular policies are scheduled for review and may designate a Responsible Offices to conduct this monitoring function. Responsible Executives may also authorize Responsible Offices to initiate the review/revision process at any time as deemed necessary.

D. **Policy Format**

1. A standard Policy format ensures clarity and consistency. To maintain standardization, use the American University Policy Template Document.

2. All Policies should be written according to the most recent version of the American University Style & Usage guide. For matters which the AU guide does not refer, use the Chicago Manual of Style.

3. Although not all Policies will contain all of the format elements, University Policies will be written and maintained using the elements below.

- **Header Information.** Delineation of the University Policy name, Policy category, Subject, Responsible Executive, Responsible Office(s), Related Procedures, and Related University Policies.

- **Scope.** Identification of parties governed by the Policy.

- **Policy Statement.** Purpose of the Policy and the statement of philosophy, position, rule, regulation or direction.

- **Definitions.** Meaning and interpretation of terms used in the Policy.

- **Policy.** Description of the actual Policy in outline format, covering topics which include duties assigned to responsible parties and other parties as necessary; other information specific to a particular Policy subject as needed; and a description of the compliance review process and specific authority to impose penalties or other remedies when noncompliance occurs, if applicable.

- **Effective Date(s).** Initial effective date of the Policy and the latest revision date, if applicable.

E. **Location of Policies**

1. To ensure ready access to University Policies, American University will maintain an official University Policy Library web page with the most current approved version of all Policies, with links to applicable Procedures. The Policy Library will be maintained by OGC in a standard electronic format and will follow the structure described in Section F below. The documents in the Policy Library will constitute the official

electronic repository for institution-wide Policies for American University.

2. To maintain an organized system of change control, and to ensure consistency throughout the university, individual departmental web sites may not contain separate copies or versions of University Policies. Instead, departmental web sites that reference University Policies must use hyperlinks to the documents in the Policy Library. This does not preclude departments from maintaining related Procedures, forms and guidance documents, or other internal departmental policies and procedures on their web sites, provided the related documents and other internal departmental policies and procedures are not identified as official University Policies, and do not conflict with official University Policies.

F. Structure and Organization

The Policy Library web page will list all Policies by name and category and will provide links to related Procedures. Policies will be assigned to one of the following categories:

- *Academic*
- *Marketing and Communications*
- *Facilities*
- *Finance and Business*
- *AU Community*
- *Information Technology*
- *Personnel*
- *Research*
- *Safety and Risk Management*
- *Students*

G. Policy Rescission Process

1. Responsible Executive submits a memorandum to OGC, containing a written request to formally rescind the policy in question and providing a detailed explanation for the rescission of the respective policy.

2. OGC will review the request and provide advice regarding the overall impact of rescinding the policy and assist with the development of a plan for addressing any concerns related to rescission.

3. The policy is removed from the Policy Library by OGC with the rescission date noted and retained for archival purposes.

4. A policy rescission announcement containing the explanatory memorandum prepared by the Responsible Executive is disseminated to the policy process Stakeholder Groups by OGC. The Responsible Executive and/or Responsible Office conducts supplemental notification and communication to the broader University community as appropriate.