

Title: Policy for the Management of Administrative Policies (“Policy MAP”)

Approved by: Office of the President

Date approved by President or Board of Trustees: July 1, 2019

Effective date: July 1, 2019

Responsible Official: Office of the President

Responsible University Office: Compliance

Revision History: None

Related legislation and University policies: None

Review Period: 5 Years

Date of Last Review: July 1, 2019

Relates to: Faculty, Staff, Students

I. Summary of this Policy

Case Western Reserve University administrative policies are subject to a formal review and approval process. This document outlines the requirements for developing new policies and revising or terminating existing policies. This policy outlines a workflow that is intended to simplify, clarify, and streamline policy creation, management, and access.

II. Purpose(s) of this Policy

The University recognizes that well-written and properly vetted policies support transparency, accountability, and efficiency within an organization. The University works to establish and maintain effective policies by utilizing

a thorough review and approval process, supporting a consistent format for policies, and ensuring that the campus community has easy access to policies. Accordingly, this policy promotes:

- A. A consistent vetting process and format for University policies.
- B. An appropriate level, scope, and frequency of review and revision to University policies.
- C. Clarity, transparency, and a shared understanding of University policy protocols.

University policies support the University's Mission by establishing clear standards for individual conduct, clarifying institutional expectations, promoting legal compliance, supporting operational efficiency, and mitigating risk.

III. Definitions

University policies: University policies are high-level statements that support the University's Mission and Core Values by establishing its position across an array of specific topics. For example, University policies include policies relating to information technology use, sexual misconduct, and proper use of University funds. They apply generally across the University and its members, promoting integrity and consistency.

With regard to faculty appointments and tenure, faculty leaves of absence, faculty grievance procedures, and other policies relating only to faculty that typically are managed by the process set forth in the Faculty Handbook (see Faculty Handbook Chapter 3, PART ONE), such policies are not included in the definition of "University policies" described in this document. Because there is a separate process for those policies, this Policy on the Development of University-wide Administrative Policies is not intended to replace, modify, or override that process.

There are many other policies, standards, and guidelines created within departments, offices, and schools, but they are not subject to the procedure for policy creation, review, and revision described in this document because they do not have University-wide applicability. Such sub-unit standards and guidelines shall not override, or conflict with, University-wide policies.

Procedures: specific actions to implement established policies.

Responsible Official: the University Vice President or other person who manages or directs the Responsible University Office.

Responsible University Office: the University office, department, division, or unit with oversight of the subject-matter area affected by the policy. The Responsible University Office is in charge of sponsoring, implementing, enforcing and answering inquiries about a University policy. It may also be responsible for monitoring the effectiveness of, and ensuring compliance with, a University policy. In cases where it is unclear which office, department, division, or unit should have the role of the “Responsible University Office” for a specific policy, Compliance will work with the stakeholders, and the Office of General Counsel, to make the determination.

IV. Responsibility for Management of University Policies

All members of the University community shall follow University policies as applicable, including—but not limited to-- faculty, staff, students, postdoctoral scholars and fellows, and visitors. University community members may view current policies by going to the list on the website of the CWRU Compliance Office, <https://case.edu/compliance/university-policies>. In addition to the policies listed, the list also indicates the applicability of the specific policies to University community members.

Key faculty and administrators, including but not limited to department chairs, University officers, and others with supervisory and managerial authority, shall support adherence to established policies and procedures in the conduct of their area’s affairs, identifying areas of operation that are in need of new or

revised policies or procedures, and recommending appropriate changes to existing policies and procedures.

The University may amend, modify, delete, or add any policy at any time in order to meet the needs of the University community, in order to comply with law, or for any other reason the University may determine appropriate. Nothing in this Policy on the Development of University-wide Administrative Policies diminishes or interferes with the right of the University's Board of Trustees to create, amend, replace, or terminate any University policy.

V. Formatting of Policies

It is essential that University community members understand CWRU's policies. Therefore, policies should be clear and concise. They should contain information on the subject without being excessive in length or complexity.

When drafting policies, Responsible University Offices may use this policy as a model when formatting new policies. The heading should be included, as should the sections on Summary, Purpose(s), Definitions (if needed), and the content of the policy.

VI. Procedure to create or a revise a University policy:

The President or a Responsible University Office shall identify the need for a new or revised policy. Additionally, any member of the University community may communicate the need for a new policy, or for a policy change, by contacting the Responsible University Office. In such case, the Responsible University Office shall investigate and evaluate the basis for the need and determine whether the University needs a new or revised policy. In doing so, the Responsible University Office should work thoroughly but with an appropriate sensitivity to the University's need for urgency. The Responsible University Office shall keep the requestor informed of the progress made on the request. If the Responsible University Office declines to create or revise the policy per the request, it shall inform the requestor, the Compliance Office, and the Office of General Counsel regarding the reason(s).

When a Responsible University Office determines that a new or revised policy is needed, it shall submit a proposed new or revised policy draft to the University Compliance Office, the Office of General Counsel, and to those individuals who, in the judgment of the Responsible University Office, should be involved in reviewing and finalizing the draft policy, including the Responsible Official or their designee. For new or revised policies that may affect faculty members, the Responsible University Office shall notify the Faculty Senate and provide it with the option of participating in the policy vetting process in a consultative role. If the Faculty Senate opts not to participate, it may elect to receive updates on the Responsible University Office's progress.

The Responsible University Office shall present the content of the proposed new or revised policy to Faculty Senate and Staff Advisory Council, and other appropriate University groups, to obtain their input regarding the policy.

Reasons for the review of a proposed new or revised policy shall include, but are not limited to operational need, potential conflicts between the proposed policy/revisions and other University policies, consistency with laws and other external regulations germane to the policy, and organization and clarity of policy text. The reviewers will share proposed revisions with the Responsible University Office for consideration.

The Responsible University Office shall then finalize the proposed policy draft and submit it to the Compliance Office and the Office of General Counsel. The Compliance Office shall submit it to the President for consideration and approval and/or transmittal to the Board of Trustees. Once the new or revised policy is approved, the Responsible University Office should appropriately publish the policy; the Compliance Office shall send a copy to Archives for permanent retention. The Compliance Office also shall include a link to the policy on its web page of University Policies, <https://case.edu/compliance/university-policies> .

VII. Periodic Review and Amendment of Policies

Each Responsible University Office shall periodically review all policies for which it is responsible to determine whether a policy requires revision, replacement, or termination because of a change in applicable law, University need, or business process. This review should occur as frequently as needed and at least once every five years.

VIII. Procedure to terminate an existing policy:

The President or a Responsible University Office may identify a need to terminate an existing policy. For example, the subject matter of the policy may no longer be applicable to the University activities or operations. Any member of the University community may communicate the need for a policy termination by contacting the Responsible University Office. The Responsible University Office shall then investigate, evaluate the issue, and decide whether to identify the need to terminate the policy. The Responsible University Office shall keep the person requesting termination informed of the progress made on the request. If the Responsible University Office declines to terminate the policy per the request, it shall inform the requestor, the Compliance Office, and the Office of General Counsel regarding the reason(s).

If a Responsible University Office identifies the need to terminate an existing policy, it shall prepare a statement explaining why the policy is no longer of benefit to the University.

The Responsible University Office shall submit the statement, along with a copy of the subject policy, to the University Compliance Office, the Office of General Counsel, and to those individuals who, in the judgment of the Responsible University Office, should be involved in considering the termination of the existing policy, including the Responsible Official or their designee. For policies that may affect faculty members, the Responsible University Office shall notify the Faculty Senate and provide it with the option of participating in the process in a consultative role. If the Faculty Senate opts not to participate, it may elect to receive updates on the Responsible University Office's progress.

The Responsible University Office shall present the content of the statement to Faculty Senate and Staff Advisory Council, and other appropriate University groups, to obtain their input regarding it.

The Responsible University Office shall consider the responses and revise the statement accordingly. Assuming the Responsible University Office continues to recommend that the policy should be terminated, the statement will be sent to the Compliance Office and the Office of General Counsel. The Compliance Office shall submit the termination statement to the President for consideration and approval and/or transmittal to the Board of Trustees.

The Compliance office shall work with University Archives so that Archives will retain the terminated policy for reference purposes. The Responsible University Office shall remove the terminated policy from its website, and the Compliance Office shall remove the policy reference and link from its web page of University Policies.