

Augusta University

Policy Library

Policy on Policies

Policy Owner: Office of Compliance and Risk Management

POLICY STATEMENT

This policy addresses how policies are formally approved, issued, and maintained in a consistent format in an official central policy library. Individuals engaged in developing and maintaining University policies must follow the requirements outlined in this document for drafting, approving, revising, and withdrawing University policies. University policies must be thoroughly reviewed, maintained, and made available to the University community to promote awareness, practicality, compliance, and accountability.

AFFECTED STAKEHOLDERS

Indicate all entities and persons within the Enterprise that are affected by this policy:

- Alumni Faculty Graduate Students Health Professional Students
 Staff Undergraduate Students Vendors/Contractors Visitors
 Other:

DEFINITIONS

- **Executive Sponsor:** The senior leader accountable for the substance of policy documents, namely the provisions and requirements of, and compliance with policies under his or her area of responsibility. The senior leader should be a Vice President, or any leader who reports to the President/CEO or an Executive Vice President.
- **Stakeholder:** Those that will be affected by the provisions established in a policy.
- **Policy Owner:** Accepts responsibility for following a policy through process and acts as point of contact for questions; and accepts responsibility for requests for actions regarding the policy.
- **PolicyTech:** policy management software which streamlines the process of authoring, approving and distributing University policies and capturing attestation. PolicyTech uses rules-based workflows and alerts to streamline policy life-cycle process, alerting compliance managers about unread policies, and reminding policy owners when to update or retire policies. Any new policy or a revision to an existing policy must be submitted through PolicyTech. The link to the University PolicyTech website can be accessed at: <https://gru.policytech.com>.
 - On-line training has been developed and can be accessed via the University Workforce Learn Online website at train.gru.edu. All Document Owners and/or those required to review a policy must complete training in order to be given full access to PolicyTech.
- **Major revisions:** Any change in policy impacting the scope and or effect on stakeholders of the entity.

Office of Compliance and Enterprise Risk Management Use Only

Policy No.: 594

Policy Sponsor: Type the title of the Executive Leader of the department.

Originally Issued: Not Set

Last Revision: 04/15/2016

Last Review: 06/09/2017

- **Review Groups:** Review will be determined based on the content of the policy under consideration. Policies may be reviewed by a Review Group which could include:
 - University Senate
 - President's Cabinet
 - Provost's Operations Management
 - Team (POMT)
 - Provost's Cabinet
 - Dean's Cabinet
 - Other University Senate Committees
- **Policy Management Group (PMG):** The PMG will be comprised of representatives from each of the following units: Academic Affairs, Business Operations, Human Resources, Legal Affairs, Compliance, Medical Center, Student Services, and University Senate. Each unit will develop its own method of selecting or designating its representative to the PMG, and each representative shall be approved by the unit leadership. The PMG, either by consensus or by majority vote, shall make the determination which Review Groups will be required for review of draft policies submitted by a Policy Owner and/or Unit Leadership. The Policy Owner or Unit Leadership may elect to solicit input from additional Review Groups at its discretion, but such additional review will not be required under this Policy.

PROCESS & PROCEDURES

1. Development

Any individual or unit may identify the need for a new policy. Proposals for new policies and major policy revisions must be presented to respective unit leadership for review and consideration before proceeding further. Upon approval of unit leadership, a proposal for a new policy must first be presented to the Office of Compliance and University Risk Management (CERM). CERM should make an initial determination whether this policy has been properly vetted.

The Executive Sponsor or Policy Owner will apprise CERM of his/her sponsorship of a proposed policy. The Policy Owner will submit a standardized policy document (rough draft) of the proposed policy to the CERM/Chief Integrity Officer and to the appropriate Legal Department, along with the list of required Review Groups. To achieve this, the Policy Owner must propose the draft to CERM by entering the draft within PolicyTech, (not via email to CERM) and the appropriate Legal Department will review the policy prior to the policy proceeding further in the approval process.

On-line training for PolicyTech is available for all Policy Owners, Executive Sponsors, and others deemed appropriate to review policies, at "Workforce Learn Online" at <http://www.train.gru.edu>, under "Assignments" tab. Each Executive Sponsor should require Policy Owners and those required to participate in the policy process to complete the training.

2. Use of Policy Review Groups

University Approval of Policies:

With the responsible executive's approval, and after any suggested changes from CERM or the appropriate Legal Department, the draft of the policy document will be distributed to the identified Review Groups for their consideration during a 14 day review/comment period. If there are substantive changes/comments made, it is returned to the responsible executive to review and change if necessary. If changes are made, it is re-vetted to the same groups, with a shortened review time frame of 5 days.

After the review period, the policy will then again be distributed to the CERM who will review and forward to the relevant legal office depending on the source & scope of the policy.

After the review process is complete, the policy will then be forwarded to the respective EVP(s) for approval.

Faculty Review of Policies:

Many policies benefit from faculty feedback. Certain policies will require University Senate or faculty review. Generally, these fall within the categories related to curriculum, student affairs, and faculty affairs.

The review period for policies is 21 days wherever possible. The University Senate or the appropriate Faculty Group(s) shall determine the procedure for faculty review and comment on draft policies, and shall complete that effort within the 21 day time period wherever possible. If there are substantive changes/comments made it is returned to the originator to review and change if necessary. If changes are made it is re-vetted to the same Faculty Group(s), by the next scheduled meeting.

After the review period, the policy will then again be distributed to the CERM who will review and forward to the relevant legal office depending on the source & scope of the policy.

After the review process is complete, the policy will then be forwarded to the respective EVP(s) for approval.

3. Approval EVP to Provost and President

The respective EVP(s) will receive a final document in official format for review and presentation to the Provost and President. Any change proposed or comments by the EVP, Provost, or President will be forwarded to the Responsible Officer for consideration and/or actions. Upon approval by the Provost and President, the policy will be considered in effect as of the date of his/her signature.

4. Standard Communication Plan to University

The CERM is responsible for ensuring that any new policy and/or major revision of an existing policy is communicated to the University, collaborating with the Office of Communications and Marketing. The responsible office will deliver any additional communication or training, and will assist the responsible executive to establish any support systems necessary to achieve ongoing compliance. Currently, newly approved policies or those which have undergone major revisions shall be communicated via JAGWIRE and on the Policy Management website at <http://www.augusta.edu/compliance/policyinfo/> If a Policy Owner or Executive Sponsor wishes to have an alternate means of communication, then it is up to them to provide that.

5. Compliance

The responsible office assists compliance through the establishment of normal business practices some of which will be outlined in the policy's procedures, which support implementation of the policy. Routine human resources procedures also may assist compliance. The University Audit Office employs policies as a measurement tool in regular assessments of University operations. In addition, communications with and training of the University community will facilitate compliance.

6. Revisions

Minor changes to existing policies are proposed to the Responsible Officer for that policy. The Responsible Officer will communicate those changes to CERM. If approved by the CERM/CIO and Legal Departments, then the minor change may be made without further approval.

7. Major Changes to Existing Policies

Major changes to existing policies will follow the same procedure as that of a new proposal.

8. Review

Policies shall be normally reviewed at a minimum on a triennial basis beginning with a staggered term. The review will include a determination of the ongoing relevance of the policy and if any modifications to the policy are required.

9. Decommissioning of a Policy

Policies recommended for decommissioning must undergo the same process as a new policy.

REFERENCES & SUPPORTING DOCUMENTS

Policy Routing Workflow

- Policy Template (attached)
- PolicyTech

RELATED POLICIES

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APPROVED BY:

President, Augusta University and CEO, AU Health System Date: 06/09/2017