TITLE: OFFICIAL UNIVERSITY POLICIES

POLICY NUMBER: DU-01
EFFECTIVE DATE: February 11, 2021
REVISION DATE: April 30, 2021
SUPERSEDES: OGC-5 Authorizing Official University Policies, effective July 1, 2014
RESPONSIBLE EXECUTIVE: President

I. PURPOSE AND APPLICATION

Drexel’s **Official University Policies** support the integrity and fulfillment of its mission, vision, operations and reputation by setting expectations and clarifying best practices for the University community, managing institutional risk, and promoting compliance with laws and regulations at the local, state and federal level. All Official University Policies must be developed, vetted, approved, published and implemented in accordance with this Policy. Official University Policies must be reviewed on a regular basis and communicated to all relevant units in a timely manner.

This Policy establishes:
- defined processes for the effective and inclusive development of Official University Policies;
- defined processes for the ongoing maintenance, revision, and oversight of existing Official University Policies;
- a standardized template and forms for all Official University Policies; and
- defined processes for approval of all new and revised Official University Policies.

II. SCOPE

This Policy defines the conditions under which written directives that apply beyond a single unit are initiated, developed, reviewed, approved, published, and managed. Effective as of the date of this Policy’s publication, the review, revision, approval, publication, and decommissioning of Official University Policies is governed by this Policy and any supplemental documents issued to support its implementation.

Any procedures or other directives applicable within a single unit may be enacted through a process not covered by this Policy. Such directives may further limit or specify, but must not contradict, Official University Policies established under this Policy.
III. IMPLEMENTATION
The Office of the President is the Sponsoring Unit of the Policy.

The Office of Compliance, Privacy and Internal Audit (OCPIA) is responsible for implementing this Policy. For inquiries regarding this Policy, please contact the Director of Policy Compliance at policy@drexel.edu.

IV. STATEMENT OF POLICY AND PROCEDURES
A. Development and Approval of Official University Policies
When a unit of the University wishes to propose a new University-wide policy, or materially change or revise an existing University-wide policy (“Proposed Policy”), the unit will prepare a draft of the Proposed Policy and designate an individual or other unit of the University to lead the policy’s development and guide it through the Policy Compliance Process (Appendix A), including the Stakeholder Engagement Process (Appendix B), as outlined in this Policy. This will be done in partnership with the Director of Policy Compliance who shall be responsible to ensure the Proposed Policy is reviewed in accordance with the Policy Compliance Process.

The unit that submits the Proposed Policy through these processes will be the Sponsoring Unit of the Proposed Policy. The Sponsoring Unit shall perform a review of current University policies to ensure that the Proposed Policy is not redundant and is consistent with existing policies, and a review of similar policies and procedures at relevant benchmark institutions to determine the most effective practice for the University.

The Sponsoring Unit shall notify the Director of Policy Compliance, in writing, of its intention to propose, change or revise a policy by completing the Policy Intake Form (Appendix D) and having the Policy Intake Form signed by the Executive or Senior Vice President who oversees the Sponsoring Unit. The submission of the Proposed Policy and Policy Intake Form will initiate the time-sensitive Policy Compliance Process. (The Policy Intake Form will be replaced with an automated system for the development, compliance, and approval of Official University Policies).

1) Policy Council
This Policy establishes a Drexel University Policy Council with broad and diverse representation from the Drexel University Community. The purpose of the Policy Council, as outlined in the Policy Council Charge (Appendix C) is to support shared governance; facilitate the development, review, approval and maintenance of University policies; make policies accessible to and gather feedback from all members of the University community; ensure an efficient and transparent policy development process from inception through approval; and foster collaboration by engaging stakeholders across the University.
2) **Policy Compliance Process, including Stakeholder Engagement Process**

The Sponsoring Unit shall ensure that the original Proposed Policy is drafted using the Drexel Official University Policy Template (“Template”) (Appendix E) and guides the Proposed Policy through the Policy Compliance Process, which includes the Stakeholder Engagement Process. The Sponsoring Unit shall also develop a communication plan describing how the Sponsoring Unit intends to inform the University Community of the new Official University Policy and document the plan using the **Policy Communication Plan** form (Appendix F). (Each form noted in this Policy will be replaced with will be replaced with an automated system for policy development, compliance and approval of Official University Policies).

The Sponsoring Unit assumes responsibility for shepherding the Proposed Policy through the Policy Compliance Process. The Sponsoring Unit shall be responsible for incorporating feedback and making revisions as necessary to address feedback from the University Community throughout the Policy Compliance Process.

During the Policy Compliance Process, identified University stakeholders will participate in review of the Proposed Policy. During the Stakeholder Engagement Process, identified stakeholders and members of the University Community, including students, faculty, and professional staff, will review the Proposed Policy and provide feedback to the Sponsoring Unit. Each stage of the Stakeholder Engagement Process is followed by **Reconciliation**, during which time the Sponsoring Unit incorporates feedback and recommendations about the Proposed Policy.

3) **Stakeholder Responsibilities**

a. Units within the University that are affected by the Proposed Policy, **Affected Units**, shall designate a representative to review the Proposed Policy, solicit feedback from a representative cross-section of their constituency, and provide written feedback to the Sponsoring Unit. Individual departments, Implementers, Faculty Senate, and
Student Government groups may fall into the category of Affected Units.

b. The **Academic Council** shall identify a representative who shall be responsible to share the Proposed Policy with its members and provide written feedback to the Sponsoring Unit.

c. The **Faculty Senate** shall identify a representative who shall be responsible to share the Proposed Policy with its members and provide written feedback to the Sponsoring Unit. Faculty Senate may designate a subcommittee to draft Proposed Policy, review the Proposed Policy, make recommendations to the Faculty Senate, prepare the written response, or discuss with the Sponsoring Unit whether any outstanding concerns remain following Reconciliation.

d. The **Office of General Counsel** (OGC) shall review and advise on any Proposed Policy or policy revision to ensure that the proposed language and purpose of the policy does not conflict with existing policies. OGC will provide comments and recommend revisions, if any, on the Proposed Policy or revision.

i. A designated representative of OGC shall review the Proposed Policy to ensure that it is compatible with all federal, state and local laws as well as the Charter of the University, providing a written response to the Sponsoring Unit, as noted in the Policy Compliance Process, indicating whether the proposed policy is acceptable.

ii. If a Proposed Policy is deemed not compliant, OGC shall meet with the Sponsoring Unit to identify what revisions are required to make the proposed Policy acceptable.

e. The **Implementer** of the Proposed Policy must anticipate issues that may arise during implementation and enforcement of a policy and provide feedback to the Sponsoring Unit accordingly.

Violations of this or any Official University Policy is grounds for disciplinary or corrective action. The Implementer identified in the Official University Policy shall ensure a fair review of any reported or suspected policy violations in coordination with OCPIA, OGC and Human Resources, as appropriate.

f. The Director of Policy Compliance stewards the policy development and compliance process; manages policy publication and education; maintains a repository of old versions of University Policies; manages the online policy website and ensures ease of use; receives inquiries and facilitates timely responses; arranges and monitors the policy review schedule; designs templates; supports the Policy Council by helping to ensure all policies undergo a diversity, equity
and inclusion lens; and undertakes such other responsibilities as may be necessary or assigned. The Director of Policy Compliance will be responsible for the implementation and oversight of the automated system for policy development, compliance, and approval of Official University Policies.

g. The University Community is responsible for reviewing Proposed Policies during the Public Comment Period and providing timely feedback during the 30-day window if they wish to have their comments taken into consideration.

4) Reconciliation
Reconciliation is the systematic process of incorporating the appropriate feedback of each stakeholder into the policy. All stakeholders are responsible for providing timely and clear written feedback to the Sponsoring Unit in the form of suggested revisions or objections to one or more aspects of the policy. The Sponsoring Unit, working closely with the Policy Council and Director of Policy Compliance, is responsible for incorporating accepted revisions, responding to concerns, resolving conflicts if possible, and documenting significant actions taken. The Sponsoring Unit will document significant changes to the Proposed Policy at each stage of the Stakeholder Engagement Process and provide clear written responses to stakeholders who provided feedback. Unresolved conflicts will go to the Policy Council for input and guidance or may be resolved at the President’s Cabinet (“Cabinet”) level.

5) Public Comment Period
During the Stakeholder Engagement Process, all Proposed Policies shall undergo a 30-day Public Comment Period, giving the University Community the opportunity to review and comment on the Proposed Policy. The Director of Policy Compliance shall post the Proposed Policy on a commonly accessible website for review and announce the beginning and end of the Public Comment Period to the University Community. The University Community shall be provided a mechanism for efficiently submitting and recording comments. At the end of the Public Comment Period, the Sponsoring Unit shall review the properly submitted comments and suggestions and shall determine whether minor or major revisions have been requested to the Proposed Policy. The Sponsoring Unit shall prepare a written summary of the comments and suggestions and provide a response to requests for major revisions. Members of the University community with meaningful contributions or significant concerns are encouraged to communicate these through their University representatives.

6) Approval
The Sponsoring Unit will submit the Proposed Policy and the associated Communication Plan to the Cabinet for consideration. The Cabinet will make its recommendation to the President of the University for final review and approval. These procedures shall also apply to any revisions made to existing policies.

7) **Posting and Communication**
Once a Proposed Policy is approved by the President, the Sponsoring Unit is responsible for publishing it in the form approved by the President in accordance with the approved Communication Plan. The text of the final approved policy must also be provided electronically to the Director of Policy Compliance for the inclusion in the central archive. Once the approved policy is posted on the University's website in accordance with the approved Communication Plan, it becomes an Official University Policy. Official University Policies are listed centrally on the [Drexel University Policy Directory](#). Policies for subsidiaries and affiliated entities will appear on those entities’ websites if separate from the University’s website.

The Sponsoring Unit is responsible for implementing the Communication Plan in consultation with the Director of Policy Compliance to announce the new or revised Official University Policy to the University Community. The posting and communication of the policy must be documented on the Policy Review Checklist (DPC will send to Sponsoring Unit when Intake Form is submitted).

8) **Expedited Process**
There may be times when it would be inefficient or there is insufficient time to put a Proposed Policy through the full Stakeholder Engagement Process. In such cases, the Sponsoring Unit may request – with written justification – an Expedited Process on the Policy Intake Form. The Policy Council, in consultation with OGC, shall determine whether to grant expedited status to any Proposed Policy.

9) **Interim Policies**
If external conditions (including, but not limited to, legal requirements), inconsistencies between existing policies, or pressing University needs or concerns require an expedited review of a Proposed Policy, the policy may be enacted as an *Interim Policy* while the permanent Official University Policy is developed via the Policy Compliance Process, including the Stakeholder Engagement Process. Such a change in procedure shall only occur under extraordinary circumstances and with the approval of the Sponsoring Unit’s Executive Vice President or Senior Vice President, and with notification to the Policy Council and President’s Cabinet. Interim Policies are expected to expire within 12 months of their effective date.
10) Decommissioning
If a Sponsoring Unit believes that an Official University Policy they oversee or implement is no longer useful, applicable, or is more effective if combined with another Official University Policy, the Sponsoring Unit should consult with any Affected Units and OGC prior to finalizing a request to decommission the Policy. If after such consultation the Sponsoring Unit determines that decommissioning is warranted, the Sponsoring Unit will provide a completed **Statement of Intent to Decommission an Official University Policy** (Appendix G), which will include a decommissioning communication plan, to the Director of Policy Compliance. Upon receipt, the Director of Policy Compliance will present the completed Statement of Intent to Decommission an Official University Policy with the included decommissioning communication plan to the Policy Council for review. The Policy Council will notify the Director of Policy Compliance of the result of its review. If decommissioning is recommended by the Policy Council, the Director of Policy Compliance and the Sponsoring Unit will present the duly noted Statement of Intent to Decommission an Official University Policy with the included communication plan to the President's Cabinet for review and recommendation to the President.

Upon final approval by the President, the Sponsoring Unit will notify the Director of Policy Compliance and implement the steps identified in the decommissioning communication plan. The Director of Policy Compliance will remove the decommissioned policy from the Policy Directory but will appropriately change the policy status to “Decommissioned” with a date of decommission and will archive the decommissioned policy in the appropriate systems.

B. Standardized Template and Supporting Documents
All Official University Policies are to be drafted using the Official Drexel University Policy Template. The Director of Policy Compliance is responsible for maintaining the Template and fielding questions about its use. All Proposed Policies must be accompanied by a Policy Review Checklist documenting each stage of the Policy Compliance Process, including the Stakeholder Engagement Process, and a Policy Communication Plan. When applicable, policies shall incorporate procedures, identify associated policies, and be accompanied by forms and other resources, such as guidelines, checklists, and other supplementary documentation that explain how the policy is to be implemented and followed.

C. Ongoing Maintenance and Oversight of Official University Policies
1) Review Cycle
All Official University Policies shall undergo an automatic review after the first year of initial policy implementation, and then recurring reviews at a minimum of every three years. More frequent reviews may be needed for certain policies, or a review outside of the regular cycle may
be triggered by internal or external circumstances (such as a change to other University Policies or federal, state or local regulations).

The Sponsoring Unit of each policy is responsible for conducting policy reviews in accordance with the Policy Compliance Process, including the Stakeholder Engagement Process outlined in this Policy. The Director of Policy Compliance is responsible for ensuring reviews are completed and documented in a timely fashion. After the Sponsoring Unit conducts its initial review and proposes whether to make revisions, the Policy Council shall be engaged to determine how extensive the Stakeholder Engagement Process needs to be for each Policy review, based on how substantive the proposed changes are.

Additionally, every three years after the implementation of this Policy, all Drexel Official University Policies will undergo an objective, equity lens-based external review to ensure the University meets its stated goal of promoting an anti-racist agenda.

2) **Non-Material Changes**

Minor, non-material changes to an Official University Policy, such as changes to position titles, contact information, dates, and changes made to clarify the intent of the Policy as written, may be made without going through the Stakeholder Engagement Process. Sponsoring Units should consult with or inform the Director of Policy Compliance and the Office of the General Counsel when making such changes.

3) **Archive**

The Director of Policy Compliance is responsible for maintaining a central archive of all Official University Policies, including all approved versions of those Policies.

V. **KEYWORDS AND DEFINITIONS (in alphabetical order)**

**Academic Council** means the group of leaders and members of schools and colleges, including Deans, faculty and others who report or are convened to address stake concerns upon the request of the Provost.

**Affected Unit** means any unit, department, group, etc. whose members or responsibilities are directly affected by a proposed Official University Policy. The Sponsoring Unit, in consultation with the Director of Policy Compliance and the Policy Council, is responsible for identifying which units are directly affected by the Proposed Policy.

**Cabinet** means the University’s most senior administrative leaders who recommend the approval of Official University Policies to the President of the University.
**Director of Policy Compliance** means the University professional staff member who is responsible for ensuring that the development and revision of Official University Policies are conducted in accordance with this Policy, that approved Policies are periodically re-evaluated in accordance with this Policy, and that the archive of Official University Policies is maintained.

**Faculty Senate** means the duly elected body of representatives of the University’s faculty. Faculty Senate may draft a Proposed Policy but must work with a Sponsoring Unit that has authority to propose, implement and enforce Official University Policies.

**Implementer** means the University unit(s) responsible for implementation and enforcement of the Official University Policy, if different from the Sponsoring Unit of the policy. The Implementer shall be identified in section II. IMPLEMENTATION of the Official University Policy.

**Interim Policy** means policy that is approved by the President on an interim basis in situations where Official University Policy must be established in a time period too short to permit the completion of the Stakeholder Engagement Process.

**Office of the General Counsel (OGC)** means the University Office, led by the Senior Vice President and General Counsel, that provides legal services to the University and each of its colleges and schools, as well as Drexel subsidiaries, at each of the campuses where the University operates.

**Official University Policy** means any University-wide policy that has been formally approved by the President via the process set forth in this Policy.

**Policy Communication Plan** means the documented plan that outlines how the Sponsoring Unit will ensure the Proposed Policy is communicated to the University Community and other key individual once it becomes an Official University Policy.

**Policy Compliance Process** means the seven-step University process for the review and approval of Official University Policies. The Policy Compliance Process includes the Stakeholder Engagement Process. Although policies that apply to a single unit are generally not reviewed under the Policy Compliance Process, such policies should use a consistent template, not conflict with any Official University Policy and reference the applicable, authoritative Official University Policy.

**Policy Council** means a diverse and inclusive committee of representatives, including among other considerations, students, faculty and professional staff who identify as Black, Indigenous, People of Color and members of similarly underrepresented groups that is responsible for supporting the implementation of this Policy, per the duties and membership structure detailed in the Policy Council Charge.
Reconciliation means the process of incorporating feedback during the Policy Compliance Process, including feedback from Stakeholders, to modify a draft proposed Official University Policy.

Sponsoring Unit means a University-level office with the authority to propose, implement, or enforce Official University Policies. Such offices may co-sponsor policies as needed.

Stakeholder Engagement Process means the step in the Policy Compliance Process in which all Official University Policies must be reviewed by key Stakeholders of the University.

Statement of Intent to Decommission an Official University Policy means a formal, written request by a Sponsoring Unit to decommission an Official University Policy that the Sponsoring Unit believes is no longer useful, applicable, or is more effective if combined with another Official University Policy. The Sponsoring Unit must detail the reason for the requesting policy decommissioning along with a plan to communicate the decommissioning of the Official University Policy to the University Community. Once an Official University Policy is decommissioned, it is no longer an active, Official University Policy.

Student Government means the recognized governing bodies for undergraduate (Undergraduate Student Government Association) and graduate (Graduate Student Association) students at the University.

University Community means all students, faculty and professional staff of the University.

VI. RELATED POLICIES, FORMS AND RESOURCES

A. Related Policies
   All Official University Policies shall be related to and conform to this Policy.

B. Forms and Resources
   1) Appendix A: Policy Compliance Process Flowchart
   2) Appendix B: Stakeholder Engagement Process Flowchart
   3) Appendix C: Policy Council Charge
   4) Appendix D: Policy Intake Form
   5) Appendix E: Official Drexel University Policy Template
   6) Appendix F: Proposed Policy Communication Plan
   7) Appendix G: Statement of Intent to Decommission an Official University Policy