

Approving University Official(s): Provost, Chief Operating Officer,

Chief Financial Officer

Responsible Office: Office of the Provost, University Compliance

Effective date: June 16, 2025 Next review date: March 1, 2028

DEVELOPMENT OF UNIVERSITY POLICY

Statement

Northwestern strives to create an environment that fosters innovation, excellence, and collaboration, seeking always to do so responsibly, ethically, and with integrity. University Policies are an important way to communicate the University's values and expectations to members of the Northwestern community, and to provide guidance as to their observance. To this end, the development, publication, and management of University Policies should be consistent with this policy. The development of school, department, or unit policies is not covered by this policy, but such policies may not conflict with University Policies.

Purpose

The purpose of this policy is to outline a process for the effective and consistent development, approval, publication, and management of University Policies, and to provide guidance on the elements of an effective policy. Accessible and well-developed policies will also promote efficiency and accountability and minimize institutional risks. This policy is designed to promote expeditious policy development, approval, and management while allowing for robust engagement by relevant constituencies in the policy development and revision process.

Audience

This policy applies to any member of the Northwestern community who develops, reviews, approves, publishes, manages, or otherwise engages in the promulgation and dissemination of University Policies.

Definitions

Approving University Official: a senior administrator whose approval is required to adopt or revise a University Policy, as recommended by the Policy Review Committee and determined by senior leadership. Approving University Officials may include the Provost, Vice Presidents, and other senior leaders or their designates.

Policy Review Committee: a standing University committee whose role is to advise the Northwestern community on policy development and implementation; to review and recommend approval of new and revised policies; to recommend the Responsible Office(s) for new and revised polices; to support the policy development process, including ensuring sufficiently robust engagement has occurred and, where necessary, to expedite the process; and to recommend the Approving University Official(s) whose approvals are required to adopt or revise University Policies. The Provost, in consultation with other University leaders, designates the Committee chair and members from academic and administrative units of the institution. These may include representatives from the following areas/offices: Provost, Compliance, General Counsel, Facilities, Research, Human Resources, Student Affairs, Faculty Senate, Information Technology, Finance, Office of Civil Rights and Title IX Compliance. The President, Provost, Chief Operations Officer, and/or Chief Financial Officer may designate one or more stakeholders to participate ad hoc in the Committee's work, including additional faculty representatives to participate in the development of policies that impact academics or otherwise directly affect the faculty. The Committee conducts its work in consultation with other offices, as appropriate.

Policy Sponsor: any Northwestern school, department, or unit that prepares a proposal for a new policy and works with the Policy Review Committee, the Responsible Office, and other stakeholders to develop and implement the policy.

Procedures: documents detailing the steps necessary to operationalize and implement policies. Procedures most often should reside outside of the University Policy and need not follow the development and approval requirements outlined in this policy. Procedures should, however, be developed in tandem with the policy development process and in consultation with the Policy Review Committee.

Responsible Office: the office that works with the Policy Sponsor(s) and the Policy Review Committee to develop and implement a policy. The Responsible Office is accountable for the accuracy of the policy and is responsible for the dissemination, timely review, and updating of the policy on a regular cycle and in alignment with the timelines established in the policy.

School, Department, or Unit Policy: a policy that applies only to the operation of an individual school, department, or unit within the University. The development of school, department, or unit policies is not covered in this policy. School, department, or unit policies may not conflict with University Policies, and may be more restrictive.

University Policy: a policy with broad application throughout the University that helps to ensure coordinated compliance with applicable laws and regulations, promotes operational efficiencies, enhances the University's mission, or reduces institutional risk. In contrast with school, department, or unit policies, University Policies must be followed throughout the University. Questions regarding (i) the difference between policies and procedures or (ii) the designation of a given policy (or proposed policy) as a school, department, unit, or University Policy should be directed to the Policy Review Committee. The development of and revisions to the Faculty Handbook, the Staff Handbook, or other employment-related handbooks are not subject to the guidelines outlined in this policy. Similarly, policies with narrow application, e.g., the Student Code of Conduct or academic policies, which the Office of the Provost governs, are not subject to the requirements of this policy.

Implementation

Proposing and developing policies

Any Northwestern school, department, or unit (referred to herein as a Policy Sponsor) may initiate a University Policy. After assessing the need for a policy and determining that the policy is broadly applicable throughout the University, the Policy Sponsor may initiate the policy development process through discussion with the Policy Review Committee (email policy@northwestern.edu. The Policy Review Committee may designate a representative to support the Policy Sponsor and Responsible Office through this process.

The Policy Sponsor should be prepared to (i) briefly explain the reasons for the proposed policy (indicating how it works with, conflicts with, or negates existing policy) (ii) attest to endorsement of the proposed policy by the relevant University leaders;

(iii) indicate the stakeholders from the Northwestern community who have been/will be consulted when developing the policy; (iv) outline implementation plans, or the approach to developing implementation plans; and (v) to the extent feasible, identify any cost or resource requirements of the proposed policy.

The Policy Review Committee, or representatives thereof, will provide feedback on the proposal, designate the Responsible Office, and recommend the Approving University Official(s) for each proposal.

Following initial consultation on the proposal, the Responsible Office drafts the proposed policy using the standard policy template.

Throughout the drafting process, the Responsible Office is responsible for proactively seeking input on and documenting policy development from the stakeholders identified in the proposal, along with other appropriate members of the Northwestern community. Representatives of the Policy Review Committee work with the Policy Sponsor and the Responsible Office to ensure that members of the Northwestern community who have an interest in the policy's subject matter have an opportunity to collaborate on policy development.

The Policy Review Committee may recommend reassignment of the Responsible Office or take other necessary measures to ensure that a proposed policy is expeditiously developed and approved.

Reviews and approvals

Once a draft of the proposed or substantively revised policy is ready for review, the Responsible Office will present the draft to the Policy Review Committee. The Responsible Office may request approval of the draft policy, which the Policy Review Committee may consider. More often, the Policy Review Committee will provide input. The Responsible Office is then charged with incorporating Policy Review Committee feedback and iterating with the Committee as needed. Once the Policy Review Committee recommends approval, proposed policies are subject to review and approval by the designated Approving University Official(s). For the full policy development process, see Policy Development Process
Flowchart.

Interim policies

The foregoing review and approval requirements are subject to the qualification that the Approving University Official, in his or her discretion, may determine a proposed policy should be subject to an expedited approval process and adopted as an interim policy. Interim policies generally are effective for up to six months, but in any event will continue in effect until a determination is made to adopt, revise, or deaccession the policy.

Distribution and publication

The Responsible Office must coordinate the announcement and distribution of new policies or policy revisions. Additionally, the Responsible Office should provide notice to stakeholders and other affected members of the Northwestern community when approved draft policies are posted to the University Policy website for review and comment.

University Policies are published on the <u>University Policy website</u>. Schools, departments, and units should not maintain outdated copies or versions of University Policies. When referencing University Policies, schools, departments, and units should hyperlink directly to the policy's URL on the University Policy website. If a University Policy is listed on the website of a school, department, or unit, care should be taken to ensure that the link to the policy on the University Policy website is current. Any amendments to the policy must be promptly shared with the Policy Review Committee. All University Policies should be formatted in a PDF document that conforms to the <u>standard policy template</u> and digital accessibility standards.

Updates and amendments

Each University Policy should indicate the policy's effective date as well as the date when the next policy review is due. The Responsible Office is responsible for reviewing the policy and ensuring it remains current. Policies remain in effect even if the review date has passed.

In most cases, the Responsible Office should conduct an initial assessment of any new policy or major policy revision one year after its effective date, and thereafter should review the policy a minimum of once every three years. These timelines will be established as part of the Policy Review Committee review process. The Responsible Office should monitor when policies are due to be assessed or reviewed. The Responsible Office is also responsible for updating the policy between scheduled review periods to respond to any changes in applicable law or business practice. When such updates are made, the Responsible Office must notify the Policy Review Committee.

The Policy Review Committee may charge a school, department, or unit with developing or revising a policy where necessary to ensure compliance with applicable law.

Amendments to existing policies generally are subject to the procedures outlined above for adopting new policies, except where the amendment procedure is provided within the policy document (in which case notice of any amendments must be promptly provided to the Policy Review Committee).

Routine revisions that do not change the substance of a policy (such as formatting the policy to the <u>Standard Policy Template</u>, correcting a typo, updating contact information, and updating URLs and sources) must go through the administrative updates process. These changes can be made without formal review and requested by contacting policy@northwestern.edu. See Guidelines for Administrative Updates for more information.

All updates, revisions, and/or amendments to University Policies require notification to the Policy Review Committee to ensure appropriate version control of University Policy documents.

Deaccessioning and archiving

The Responsible Office may request to deaccession a policy when it is no longer applicable, where it has been changed into guidelines or procedures, or where it would be more effective to integrate it into another policy. Requests to deaccession a policy must be submitted to the Policy Review Committee, which when deciding on the request will consider the impact of deleting the policy on other policies and on compliance with applicable law. The Policy Review Committee is responsible for archiving deaccessioned policies and deleting them from the University Policy website.

Related Information

University Policy Website

Standard Policy Template

Policy Development Process Flowchart

Guidelines for Administrative Updates

Contacts

Please communicate all policy questions and updates to policy@northwestern.edu.

History

This Policy supersedes the University Policy Development Guidelines dated May 23, 2017, and the University Policy Development and Publication policy dated August 6, 2009.

Policy URL:

http://policies.northwestern.edu/docs/university-policy-development.pdf