



**Northwestern  
University**

**Approving University Official(s):** Executive Vice President;  
Provost

**Responsible Office:** Compliance, Audit & Advisory Services

**Effective date:** February 2, 2017

**Next review date:** February 2, 2018

## **UNIVERSITY POLICY DEVELOPMENT GUIDELINES**

### **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 these Guidelines. The development of school, department, or unit policies is not covered by these Guidelines, but such policies may not conflict with University Policies.

### **Purpose**

The purpose of these Guidelines 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. These Guidelines are designed to promote expeditious policy development, approval, and management while allowing for robust debate and discussion of draft policies.

### **Audience**

These Guidelines apply 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 determined by the Policy Review Committee. Approving University Officials may include the President, the Provost, the Executive Vice President, or their designates.

*Associate Director of Policy Management:* an administrator in Northwestern's Compliance, Audit & Advisory Services office whose responsibilities include chairing the Policy Review Committee, working with the Committee to review and edit draft policies, addressing questions from the University community regarding policy development and implementation, and otherwise managing the development and review of University Policies.

*Manager of Policy Publication:* an administrator in Northwestern's Compliance, Audit & Advisory Services office whose responsibilities include archiving deaccessioned policies, maintaining the University Policy website, and implementing routine updates to existing policies.

*New Policy Proposal:* a document that explains the reasons for, summarizes the content of, and indicates the stakeholders who will be consulted during the development of any proposed new or revised University Policy. New Policy Proposals are approved by the Policy Review Committee.

*Policy Review Committee:* a standing University committee whose role is to advise the Northwestern community on policy development and implementation; to review and approve New Policy Proposals; to designate the Responsible Office for approved proposals; to support (and expedite, where necessary) the policy development process; and to determine the Approving University Official(s) whose approvals are required to adopt or revise University Policies. The Committee is chaired by the Associate Vice President and Chief Compliance Officer as well as the Associate Director of Policy Management, and includes representatives from the following offices: Provost, General Counsel, Facilities, Research, Human Resources, Student Affairs, Information Technology, Budget & Planning, and Financial Operations. The President, Provost, or Executive Vice President may designate one or more stakeholders to participate in the Committee's work, including faculty representatives to participate in the development of policies that are academic 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 (i) prepares the New Policy Proposal for a policy and/or (ii) 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 need not follow the development and approval requirements outlined in these Guidelines, but should be developed in consultation with the Associate Director of Policy Management and 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.

*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 by these Guidelines. 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 Associate Director of Policy Management or 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 these Guidelines.

## 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 by preparing a New Policy Proposal, using the [proposal template](#).

New Policy Proposals should (i) briefly explain the reasons for the proposed policy (indicating how it works with, conflicts with, or negates existing policy); (ii) summarize the content of the policy proposal; (iii) indicate the stakeholders from the Northwestern community who will be consulted when developing the policy; and (iv) to the extent feasible, identify any cost or resource requirements of the proposed policy.

New Policy Proposals are approved by the Policy Review Committee, which will conduct an assessment of the need for the proposed policy, in consultation with senior administrators. The Policy Review Committee also designates or approves the Responsible Office and the Approving University Official(s) for each approved proposal.

Once the proposal has been approved, the Responsible Office drafts the proposed policy using the [standard policy template](#). Unless otherwise indicated, all sections in the template should be included; if a section in the template is not applicable, this may be indicated under the section heading.

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. The Associate Director of Policy Management and 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 reassign the Responsible Office or take other necessary measures to ensure that a proposed policy is expeditiously developed and approved.

### *Reviews and approvals*

Proposed policies are subject to review and approval by the designated Approving University Official(s). Prior to such review and approval, the Associate Director of Policy Management reviews and edits draft policies, with input from the Policy Review Committee.

Approved draft policies (as well as major revisions to existing policies) are to be posted to a password-protected page on the University Policy website for 45 days of review and comment from the Northwestern community. The Responsible Office, in consultation with the Associate Director of Policy Management and, if necessary, the Approving University Official, will take comments under advisement and implement any necessary changes to the draft policy based on the comments received.

### *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, in consultation with the Associate Director of Policy Management, should 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 [University Policy website](#). 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 (i) the link to the policy on the University Policy website is current; and (ii) any amendments to the policy are promptly shared with the Associate Director of Policy Management. All University Policies should be formatted in a PDF document that conforms to the [standard policy template](#).

### *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. These dates are an important management tool, as they are used to notify the Responsible Office when it is time to review the policy. Policies remain in effect even if the review date has passed.

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. The Associate Director of Policy Management will notify the Responsible Office 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.

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 should be promptly provided to the Associate Director of Policy Management). Routine revisions that do not change the substance of a policy (such as changing hyperlinks, cross-references, position titles, or contact information in a policy) can be implemented by the Manager of Policy Publication, in consultation with the Responsible Office, without formal review.

### *Deaccessioning and archiving*

The Responsible Office may 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 should 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 Manager of Policy Publication is responsible for archiving deaccessioned policies and deleting them from the University Policy website.

## Related Information

[University Policy Website](#)

[Standard Policy Template](#)

[New Policy Proposal Template](#)

## Contacts

The following individuals or office can address questions regarding these Guidelines:

<i>Office/Officer</i>	<i>Phone</i>	<i>Email</i>
Manager of Policy Publication	847-467-6223	<a href="mailto:policy@northwestern.edu">policy@northwestern.edu</a>
Associate Director of Policy Management	847-467-6172	<a href="mailto:prc@northwestern.edu">prc@northwestern.edu</a>
Policy Review Committee	847-467-6172	<a href="mailto:prc@northwestern.edu">prc@northwestern.edu</a>

## History

These Guidelines supersede the University Policy Development and Publication policy dated August 6, 2009.

**Policy URL:** <http://policies.northwestern.edu/docs/policy-development-guidelines-final.pdf>