Antioch University

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1.103 Policy Development and Approval Process

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Antioch University

Type of Policy ■ *University* □ **Interim**		**Policy Development and Approval Process** **Policy 1.103**	
General Policies		**Effective date: March 1, 2011**	
Policy History:	**Approved by:**	**Resolution #**	**Date**
	Board of Governors	**2.26.11:2**	**February 26, 2011**
Revised:	**Office of General Counsel**	N/A	**February 13, 2017**
	Office of General Counsel	N/A	**February 1, 2021**
Responsible Office	**Responsible Administrator:**	**Contact information**	**Applies to:**
Office of the University Chancellor	**Chancellor**	**937-769-1351**	**All Policy Development Personnel**

I.   Introduction

Antioch University develops and implements policies to advance its mission, manage institutional risk, promote operational efficiency and to achieve compliance with all statutory and regulatory requirements. This policy describes the policy development and approval process to ensure that policies are properly conceived, drafted and reviewed and to enable the University to maintain official system-wide policies in a consistent format in a central policy library. Antioch University requires individuals engaged in developing and maintaining Antioch University policies to follow the requirements herein for drafting, approving, revising, communicating and withdrawing policies.

II.   Reason for Policy

Antioch University policies must be reviewed, maintained, and disseminated to the Antioch University community to promote compliance and accountability and to provide the Antioch University community and the public with a clear explanation of how Antioch University conducts its business and affairs.

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III. Definitions

Antioch University includes any campus, unit, program, association, or entity of Antioch University, including but not limited to: Antioch University Los Angeles, Antioch University Midwest, Antioch University New England, Antioch University Online, Antioch University Santa Barbara, Antioch University Seattle, and the Graduate School of Leadership & Change.

Antioch University Policy is an official directive that:

1. Provides for rights or expectations and/or imposes obligations or responsibilities for members of the Antioch University community and provides procedures for fulfillment of such;

2. Has broad application throughout the Antioch University system;

3. Enhances the Antioch University mission, reduces institutional risk, promotes operational efficiency and/or achieves compliance with any applicable laws and regulations affecting employers in general or institutions of higher education specifically; and

4. Has been reviewed and approved in accordance with this procedure.

An **Interim Policy** is a provisional policy issued when an Antioch University policy is needed within a time period too short to complete the process described herein. Such policy is ordinarily in effect for at least six months with possible extensions of three-month increments, up to a maximum of twelve months.

The Office of General Counsel (OGC) is the Antioch University office charged with stewardship of the policy development and revision process and of the official policy template. The OGC guides policies through the development and revision processes, and maintains a central repository and archive of Antioch University policies.

The Policy Development Commission (PDC) is an ad hoc commission or task group appointed by the Chancellor to develop a class or broad range of policies related to a particular group or subject matter.

A **Procedure** includes those actions, mechanisms and processes for the implementation of policies. Procedures may be tailored to the unique administrative requirements of a campus or unit. Procedures shall not conflict with policy.

A **Policy Proposal** is a brief document that proposes a new policy or major revisions to an existing policy. The document describes the background, justification, and the likely impact of the new or revised policy. It is ordinarily submitted on the Policy Proposal Template by the Responsible Executive to the ULC.

Promulgation is the official declaration that a policy is in effect.

Reason for Policy is a statement that articulates the reason why the subject matter is appropriate as a University policy. It also identifies the Antioch University mission, institutional risk, operational need or value, and/or any legal or regulatory requirements the policy addresses.

Responsible Executive is at least one executive-level employee who agrees to sponsor a policy's development or revision and be initially accountable for the content of its principles and procedures. New policies will ordinarily be developed by a standing University Resource Group (URG) tasked in the University Committees and Resource Groups Policy 3.227 with development of policies within its administrative area, or an ad hoc PDC appointed by the Chancellor to develop a policy or policies related to a particular subject. In such cases, the Responsible Executive is ordinarily the chair of the URG or PDC.

Responsible Office(s) is the office(s) designated by the policy to administer and implement a policy, communicate with and train the Antioch University community in its requirements, and initiate any necessary amendments for approval.

Stakeholders include an individual, group, or organization identified in the policy proposal who may be affected by the policy and/or whose University role or professional expertise relates to the subject of the policy, and who may be consulted for comment on its development and/or revision.

The Statement of Policy is the statement that summarizes the policy's core provisions or requirements.

The University Academic Council (UAC) is the standing administrative committee that reviews and approves all new academic and student policies for the University, to ensure that the University's academic programs are of the highest quality and that there is appropriate academic voice in the academic decision-making of the University.

The University Leadership Council (ULC) is the Chancellor's primary advisory group on all policy matters bearing on the University's management and strategic development. As the University's coordinating body charged with implementing the institution's academic, financial, personnel, and management policies, priorities, and plans, the ULC also ensures effective communication, cooperation, and collaboration among the campuses and University administration.

University Resource Groups (URGs) are those administrative groups defined in the University Committees and Resource Groups Policy 3.227 which have responsibility to develop policy within their administrative areas.

IV.   Chancellor Responsibilities

Development, revision and approval of University policies is primarily an administrative function under the direction and control of the Chancellor. New policies shall be developed and promulgated by the administrative staff in accordance with this policy. Input from key stakeholders shall be sought and considered as the Chancellor shall deem reasonable and appropriate. Policies resulting in significant cost or substantial potential liability or risk to the University shall be submitted to the Board of Governor's Audit Committee for review and recommendation and shall be subject to Board approval. For these purposes, significant cost shall mean any cost which exceeds the Chancellor's signatory authority limit under Expenditure and Contract Authority Policy 2.403.

V.   Procedure for Establishing a New Policy

    A.   Determining the Need for a New Policy

Any individual or unit may identify the need for a new policy that meets the following three policy criteria:

    1. Provides for rights and/or imposes responsibilities for members of the Antioch University community and provides procedures for fulfillment of such;

    2. Has broad application throughout the Antioch University system; and

    3. Enhances the Antioch University mission, reduces institutional risk, promotes operational efficiency and/or achieves compliance with any applicable laws and regulations affecting employers in general or institutions of higher education specifically.

After identifying the need for a new policy, the individual or unit shall communicate to the Chancellor its recommendations for a new policy.

    B.   Policy Development

The Chancellor shall assign at least one Responsible Executive to lead the development of a new policy and be accountable for the content of its principles and procedures. Ordinarily, the Chancellor will appoint a standing University Resource Group (URG), an ad hoc Policy Development Commission (PDC) or an individual with expertise to develop and propose a policy or policies related to a certain subject matter.

In cases where the Chancellor appoints a URG or PDC, the chair of such group should be the Responsible Executive. In cases where an individual with expertise has been appointed, the Responsible Executive shall be the Office of General Counsel (OGC). The Responsible Executive(s) shall consult with the Responsible Office(s) and with the Office of General Counsel where appropriate in developing any new policy. Ordinarily, the Responsible Executive will provide a draft of the policy to the OGC which is responsible to ensure that the policy complies with the law, minimizes potential liability, and is consistent with Antioch University policy and practice. For those policies which are specifically required to ensure compliance with laws or regulations, the Office of General Counsel shall prepare the initial draft of the policy.

    C.   Input and Feedback from Stakeholders

The Chancellor and Responsible Executive shall identify stakeholders to be consulted during the policy drafting process. Policy development is an inherently interactive process and there may be multiple feedback loops in the course of drafting and revising a policy. Each Responsible Executive shall determine the methods and means by which such feedback from stakeholders will be obtained. For purposes of most academic and student

policies, the University Academic Council will be the primary stakeholder. Ordinarily, after receiving an approved initial draft of the policy from the Office of University Counsel, the Responsible Executive will share the document with stakeholders for comment. This feedback must be considered by the Responsible Executive who, along with the URG or PDC, will determine whether and how these responses will be incorporated. Such feedback may include comment from representatives of the faculty, staff, and student body as appropriate.

D. ULC Review

The Responsible Executive will incorporate appropriate feedback from stakeholders and submit to the OGC for review. The OGC shall distribute the new draft policy to members of the ULC in advance of the ULC meeting. The ULC may approve, reject or modify the new policy for review by the Chancellor. The OGC and the Responsible Office will thereafter make changes and revisions to the new policy as directed by the ULC.

E. Chancellor Approval

Once the ULC and OGC have reviewed and approved the new policy, the OGC shall submit the policy to the Chancellor for final approval and signature. The OGC will note on the document the date the policy will be in effect as the "Effective Date."

F. Board of Governors Approval

All University policies, whether new or revised, become effective upon the approval of the Chancellor and need not be approved by the Board of Governors except in the following four circumstances:

1. The policy is required by law to be approved by the fiduciary board of the corporation;

2. The policy is required by generally accepted accounting principles (GAAP) or best practices to be approved by the fiduciary board of the corporation;

3. The policy is one which requires the *imprimatur* of the Board of Governors to most effectively ensure compliance; or

4. The policy creates significant and material legal liabilities and/or financial obligations to the corporation.

VI. Procedures for Revising an Existing Policy

There are two types of revisions to existing policy – non-substantive revisions and substantive revisions – each with its own review process as described herein.

A. Non-substantive Revisions to an Existing Policy

On an as-needed basis, the Responsible Office will request that the OGC make non-substantive revisions and updates (such as making corrections and adding new contact information) to an existing policy. The OGC will note the date of such changes in the "Policy History and Updates" section of the policy. No further review is needed for promulgating non-substantive revisions to existing policy.

B. Substantive Revisions to an Existing Policy

1. **Regular Review.** Any individual or unit may propose substantive revisions to an existing policy. Review of each policy should be conducted regularly by the Responsible Executive. The extent of any changes resulting from this regular review will determine whether the review process proceeds as a non-substantive or substantive revision review.

2. **Substantive Revisions to an Academic Policy.** Substantive revisions to an existing academic policy must be submitted to the OGC for review. The OGC must review and submit all revisions to the University Academic Council for review, approval, or suggested modification. The UAC will review the proposed revisions and provide feedback to the OGC and the Chancellor prior to promulgation.

3. **Substantive Revision to All Other Policies.** Substantive revisions to any existing policy which is not academic in nature must be submitted to the OGC for review. The OGC must review and submit all revision to the ULC for review and approval or suggested modification. The ULC will review the proposed revisions and provide feedback to the OGC and Chancellor prior to promulgation.

4. **Office of University Counsel Process.** Ordinarily the OGC will submit substantive revision to a particular policy in a marked-revision format showing proposed changes, unless these changes are so substantial as to make this impractical. In this event, the existing policy provisions and the amended document with the proposed revisions will be provided to the ULC at the time of review. When the promulgating the revised policy, the OGC will note the date of all revisions in the Policy History and Updates section of the policy document.

VII. Communication and Training

As soon as reasonably practical, the Chancellor, or the Chancellor's designee, will issue an announcement of a new or substantially revised policy via one or more of the following means of communication, as the Chancellor deems appropriate: the Antioch University website, University email, or other equally effective means. The Responsible Office will develop a plan for additional communication as needed. The Responsible Office will carry out any additional communication and/or training as needed and will assist the Responsible Executive to establish any support systems necessary to achieve ongoing compliance. For any such training, the Responsible Office should maintain a copy of the training materials presented, the date of training, location and duration of the

training and a roster of the persons in attendance.

VIII. Procedures to Establish a New Interim Policy

When a new policy is needed within a time period that does not allow for complete drafting and review as outlined in this policy, the Responsible Executive may submit a draft interim policy and request approval from the Chancellor to allow promulgation of that policy on an interim basis. The Chancellor must give explicit written permission to issue a new policy as an interim policy. Interim Policies are ordinarily effective for six months. Extensions beyond this period must be approved by the Chancellor. This date may be extended in three-month increments, up to a maximum of twelve months. To derive the benefits of the full review cycle, the interim policy must ordinarily complete the process outlined in this policy within one year of the issuance of the Interim Policy.

IX. Procedures to Withdraw an Existing Policy

From time to time, a Responsible Executive may deem it appropriate to withdraw or decommission an existing policy or consolidate it with another policy and will inform the OGC of this intent. Upon the approval of the Chancellor, the OGC will withdraw such policy. The Responsible Executive will deliver any appropriate communication to the University community.

X. Adoption of Procedures

The Responsible Executive shall be responsible for developing and communicating any necessary procedures for implementing a policy.   Such procedures may clarify a policy but may not be in conflict with the policy.   Copies of all implementing procedures shall be provided to the OGC for posting to the official policy library.

XI. Effect on Current Policies

Policies that predate this policy remain official Antioch University policies until withdrawn or revised.

XII.   APPENDICES

1. Policy Development Template
2. Chart for Establishing Policies

Policy Cross Reference

University Committees and Resource Groups	Policy # 3.227
Expenditure and Contract Authority	Policy # 2.403

ANTIOCH UNIVERSITY

Type of Policy ■ *University* □ **Interim**		**Policy Development Template [policy name]** **Policy number**	
[policy category]		**Effective date:**	
Policy History:	**Approved by:**	**Resolution #**	**Date**
Revised:			
Responsible Office	**Responsible Administrator:**	**Contact information**	**Applies to:**

I.   Introduction

II.   Reason for Policy

III.   Definitions

IV.   Policy Details

V.   Administrative Procedures

VI.   Related Documents and Forms

VII.   Appendices

How to Establish Antioch Policy

New Policy
- Responsible Executive drafts
- OUC review
- Stakeholder review
- ULC review
- Chancellor review & decision
- Possible BoG approval
- OUC posts

Existing Policy

Non-substantive revisions
- Responsible Executive requests
- OUC revises
- Chancellor review & decision
- OUC posts

Substantive revision
- Revision proposed
- OUC review
  - Academic → UAC review
  - Other → ULC review
- Chancellor review & decision
- Possible BoG approval
- OUC posts

Interim Policy
- Responsible Executive drafts
- Chancellor review & decision
- OUC posts

Denotes optional