CLARK ATLANTA UNIVERSITY

Policy 2.0: University Policy Development Policy

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<tr><td colspan="3">CLARK ATLANTA UNIVERSITY</td></tr>
<tr><td>POLICY and Procedure</td><td colspan="2">Subject:

University Policy Development Policy</td></tr>
<tr><td>Department:

Compliance Office
Division of General Counsel</td><td>Review Date:

04/21/2022
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Policy Development and Compliance</td></tr>
<tr><td>Distribution:

This policy applies to all employees, faculty, and staff, all divisions, departments, and units of Clark Atlanta University.</td><td>Required Approval:

President of Clark Atlanta University</td><td>No. of Pages:

9</td></tr>
<tr><td colspan="3">Signature of Approver Effective Date

Signed by Dr. George T. French Jr., President 12/12/2023</td></tr>
</table>

Table of Contents

Page

1.0 Authority to Establish University Policy 3
2.0 Policy Statement 3
3.0 PROCEDURE NARRATIVE 3
3.1 Compliance Purpose 3
3.2 CAU University Policy Definition 3
3.3 Policy Development and Maintenance 4
3.3.1 Drafting University Policies and Related Procedures 4
3.3.2 Compliance Committee Approval 4
4.0 POLICY FORMAT 6
4.1 Numbering Index for University Policies 7
5.0 ENTITIES AFFECTED BY THIS POLICY 7
6.0 DEFINITIONS 7

1.0 Authority to Establish University Policy

The **ultimate authority** to formulate Clark Atlanta University "University" policy rests with the Board of Trustees. The Board of Trustees and the President have retained their authority to mandate a new policy and to require change in an existing policy. A list of new and revised policies is given to the Board of Trustees at each meeting. In addition, they have the authority to change the current policy review and approval process.

The Board of Trustees has **delegated** this authority to the President of the University (the President), who, in turn, has delegated his authority to formulate policy to the Compliance Committee. The President reviews all proposed University policies after they have been approved by the Compliance Committee but prior to the policy being communicated to the University community. Should the President reject a policy, the policy is sent back to the Compliance Committee for further review and revisions. The revised policy is sent to the President for his final approval and signature. No policy is approved without the President's signature.

2.0 Policy Statement

Clark Atlanta University ("University") ("CAU") formally approves, issues, and maintains, in a consistent format, official University policies. Individuals engaged in developing and maintaining University policies must follow the requirements outlined in this document.

All University policies are:

- Approved by the Compliance Committee and the President
- Kept current by Policy Owners
- Made accessible and communicated in a timely manner to all members of the University community

University policies mitigate institutional risk. They connect the University's mission to individual conduct, clarify institutional expectations, and support compliance with federal, state, and local regulations.

3.0 PROCEDURE NARRATIVE

3.1 Compliance Purpose

The University establishes policies and procedures that bring the institution into compliance with all relevant federal, state, and local statutes and regulations, as well as sound business practices. University constituencies are consulted in the formation and establishment of mandated policies and procedures, but they do not have the right to reverse any policy or procedure.

3.2 CAU University Policy Definition

Clark Atlanta University has University policies defined by the following criteria:

- They have broad applications throughout the University.
- They help ensure compliance with applicable laws and regulations, promote operational efficiencies, enhance the University's mission, and/or reduce institutional risks.

- They mandate actions or constraints and contain specific procedures for compliance and articulate desired outcomes.
- They do not conflict with any existing University policy.
- The subject matter always requires approval by the Compliance Committee and the President.

3.3 Policy Development and Maintenance

The following steps must be followed when developing a new or revised university policy.

Step 1: Clark Atlanta University's policy development process will be initiated by the compliance office.

Step 2: The process to develop, format and structure, review, benchmark, and research a policy for legal and regulatory compliance updates will be directed by the compliance office.

Step 3. Each policy owner will work closely with the compliance office. After assessing the need for a new or revised existing policy, the compliance office will contact the policy owner promptly to begin the policy development process before review and approval by the Compliance Committee.

3.3.1 Drafting University Policies and Related Procedures

The policy owner may designate one or more subject matter experts or an internal ad hoc group to assist in reviewing a new or revised university policy or related procedure.

Once the compliance office completes the draft, the compliance office forwards the policy to the policy owner to review. After the policy owner has conducted a thorough review, it resubmits the policy draft to the compliance office. The compliance office and legal complete their review, and send the policy draft to the Executive Cabinet, General Counsel, and Compliance Committee for a 14-day comment period prior to the Compliance Committee meeting.

Related Departmental policies and procedures approved by the Compliance Committee include but are not limited to the Institutional Review Board (IRB) Procedures, Title III Handbook, Public Safety Handbook, and Principal Investigator (PI) Handbook for Research and Sponsored Programs.

3.3.2 Compliance Committee Approval

After the Executive Cabinet, General Counsel, and Compliance Committee review the policy draft, the Compliance Office will review the policy draft with the Compliance Committee at its next meeting, which will include a presentation by the policy owner or designee. Once there is majority approval of the policy by the committee members, the policy is forwarded to the President for final review and signature.

If the Compliance Committee determines that substantial revisions are necessary prior to approval, they may ask the policy owner to complete the revisions and resubmit them within 14 days for the policy draft to be reviewed at the next Compliance Committee meeting.

3.3.3 Presidential Approval

After approval by the Compliance Committee, the President reviews and approves all proposed and revised University policies and associated procedures. The President may or may not have comments and may approve and sign the policy. If there are comments, they are addressed to the compliance office. Once clarification is provided, the President signs the policy.

3.3.4 Website

All University policies and associated procedures are published on the CAU Website unless prohibited by the President. In addition, the compliance office maintains copies of all University policies and procedures.

3.3.5 Communication

In addition to publishing the new or revised University policy on the CAU Website, the compliance office issues a university-wide communication to affected parties announcing the new policy. The announcement includes a brief explanation of the policy.

3.3.6 Revision

Minor changes or updates to a University policy may be made by the Compliance Office. The policy owner may recommend and/or inform the Compliance Office of recent minor changes and updates that would affect the policy.

3.3.7 Maintenance

Copies of all policies and associated procedures are kept in the Compliance Office as well as the office of the policy owner.

3.3.8 Policy Review Cycle

The compliance office must conduct a detailed review of every University policy at least every 5 years. The review date history is noted on the cover page of the policy.

3.3.9 Retirement or Repeal of Policies

In the event a policy should be retired or repealed, the Vice President and Chief Compliance Officer and General Counsel must approve such action upon recommendation of the Compliance Office.

Retired Policies: The Compliance Office will carefully review and examine policies regularly to ensure their currency, applicability to the university's current mission, and consistency with other University policies before recommending their retirement.

Repealed Policies: In the event revoking or annulling a previous University policy is necessary, the compliance office may recommend the repeal of that University policy.

Index Number: The policy index number cannot be used again once it is retired or repealed.

3.3.10 Interim Policy or Interim Policy Updates

An interim policy or policy update is developed on rare occasions when a University policy is needed within a time frame that is too short to allow for the complete policy development process to be followed.

Interim policies must, at a minimum, contain the title page, policy statement, and a brief procedure narrative. The policy owner must get approval from the Compliance Committee to develop an interim University policy.

The complete interim University policy or policy update is presented to the Compliance Committee for approval. Interim policies are in place for no more than 12 months, at that time, the interim policy is replaced by a permanent policy approved by the Compliance Committee. The Compliance Committee may renew the interim policy if necessary.

3.3.11 Training

The University offers University-wide Annual Mandatory Compliance Training.

4.0 POLICY FORMAT

To ensure consistency, a standard format for policies has been created. The standard format facilitates the adoption of clear, concise policies and procedures at all levels of the University. Policies do not need to have identical formats, but all must, at a minimum, contain the following:

Cover Page: The cover page contains the CAU seal, the title of the policy, the name of the department issuing the policy, the title of the policy owner, the effective date, and the date the policy was approved by the Compliance Committee. All dates must be visible on the document when published on the CAU website. A sample of the Cover Page can be provided upon request. The Compliance Office assigns each University poly an index number. Arial font no smaller than 11 font size should be used.

Policy Statement: The policy statement appears on the first page of a policy document and summarizes the policy's purpose. If the policy is being developed as a result of a legal or regulatory requirement or to minimize the institutional risk stated here. The policy statement should be no more than 2 or 3 paragraphs.

Procedure Narrative: This section documents the actual details of the policy, including its core provisions and requirements.

Entities Affected by this Policy: Departments or University entities that must adhere to and/or are affected by the policy are listed in this section.

Definitions: A list of key terms used in the policy and their definitions are included in each policy. Definitions are included at the end of the document.

Other information should be included as appropriate. Examples of acceptable activities and activities that violate the policy may be particularly helpful in facilitating the understanding of the policy. Enforcement processes and penalties should be included if appropriate. Where the policy and associate procedures are complex, the policy owner should consider including diagrams and charts.

4.1 Numbering Index for University Policies

Revised University Policy Numbering System Index

The following number scheme is a recommendation for the CAU Policies.

Office of the President	1.0
Compliance Office	2.0
Title III	3.0
Public Safety	4.0
Office of Planning, Assessment, and Research	5.0
Student Affairs	6.0
Finance and Business Services	7.0
Student Affairs/Enrollment Management	8.0
Human Resources	9.0
Financial Aid	10.0
Research and Sponsored Programs	11.0
Institutional Advancement	12.0
Facilities	13.0
Information Technology	14.0
Athletics	15.0
Office of General Counsel	16.0

Every policy issued by the Office of the President will start with a 1, the Compliance Office 2, etc. The second number is the actual number of the policy. For example, this policy is issued by the Compliance Office and is the first policy issued. Therefore, it is number 2.1.

5.0 ENTITIES AFFECTED BY THIS POLICY

This policy applies to all employees, all divisions, departments, and units of Clark Atlanta University.

6.0 DEFINITIONS

University Policy or University Policies: the written university position or set expectation on a particular subject. University policies may include related procedures and guidance documents based on the nature and complexity of the issue.

Compliance Committee. A standing University committee appointed by the President whose role is to advise the CAU community on policy development and implementation; to

review and approve New Policy Proposals; to designate the Responsible Office for approved proposals; to support the policy development process.

The Committee includes representatives from the following offices: Provost, School Deans, Faculty, General Counsel, Research, Student Affairs, 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 developing policies that are academic or otherwise directly affect the faculty. The Committee conducts its work in consultation with other offices, as appropriate.

Policy Document(s): one or more university policies, related procedures, and guidance documents.

Related Procedure(s): the specific written actions, processes, and practices required by the University to implement, enforce, administer, and ensure compliance with a particular university policy. Related procedures may exist independent of or be embedded within a university policy, but all independently related procedures must include a direct reference to a University Policy.