

Centralizing University Policy Approval and Management

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University

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Background: Project to Centralize Policy Approval and Management

Introduction of a new policy management system

Review and improvement of process for adopting university-wide policies

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New Policy Management System

Prior “system” was just a website with policies posted on it

University adopted a new policy management system used by the Healthcare system

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Existing Policy Approval and Management Process

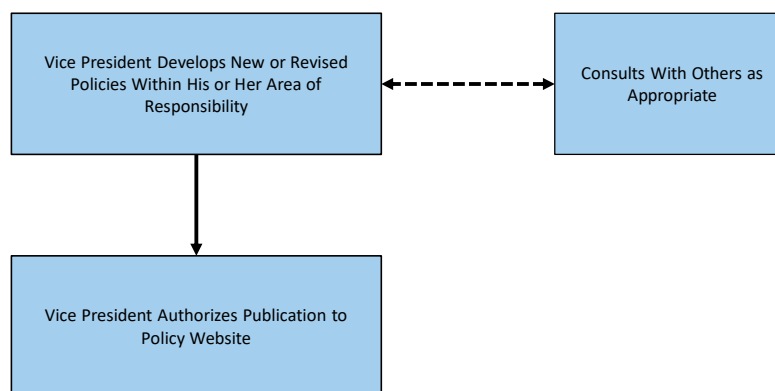
Decentralized

Vice Presidents have authority to issue policies within their respective domains

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Existing Decentralized Process



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Goals for New Approach

1. Mechanism for ensuring consistency between policies falling under Vice Presidents
2. Formalization of process for soliciting stakeholder input on policies in development or undergoing major revisions
3. Consistent review cycle for existing policies

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Initial Steps for Developing New Approach

Surveyed other institutions about approach to policy management

- Centralized vs. decentralized
- Utilization of centralized committee
- Process for stakeholder review

Established a working group

- Vice Presidents with university-wide policy making authority
- Faculty Council
- Office of Business Practice Improvement
- Office of Compliance

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Survey of Other Institutions

Distributed survey other institutions via listserv

Mixed Results:

- Some used a centralized approach, and some used a decentralized approach
- Some had a central policy review committee, and some didn't
- Various methods for soliciting feedback on policy drafts

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Working Group

Examined policy management approaches utilized by other institutions

- Many institutions, but looked specifically at/benchmarked:
 - Northwestern University
 - University of California
 - Boston University
 - Rice University
 - Duke University

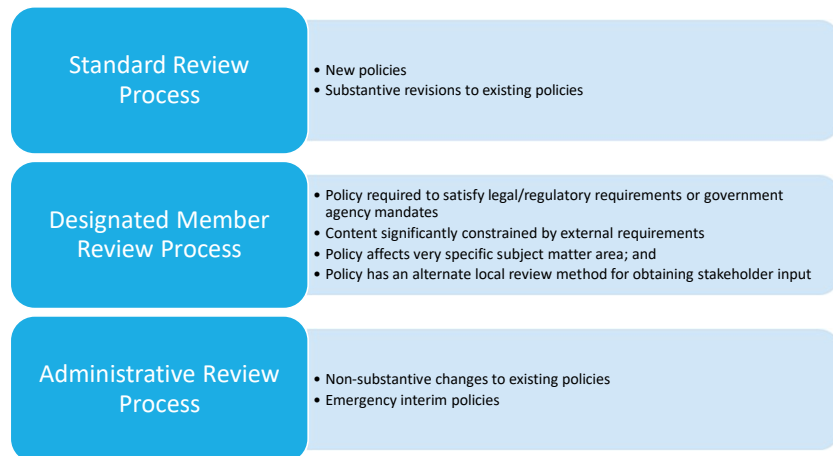
Developed a centralized approach based on elements from these models

- Refined over time after feedback from leadership

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Settled on New Process Involving Three Review Tracks



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Scope of New Process

University-wide policies (i.e., applicable throughout the University)

Does not include school, division, department, or other local policies

Specific exemptions:

- The Faculty Handbook
- Institutional Review Board (IRB) policies
- Institutional Animal Care and Use Committee (IACUC) policies
- Healthcare Policies
- Unit-level standard operating procedures

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Track 1: Standard Review

Important elements of the new approach

- Committee Review
- Mechanism for the solicitation of feedback from faculty, staff, and students

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Committee Review – Purpose

To ensure policies are developed in accordance with certain criteria:

- Policy is necessary
- Policy consistent with other university-wide policies
- Policy developed/vetted by persons with relevant expertise
- Policy received sufficient stakeholder review

Review does not focus on subject matter of policy – policy proponent and stakeholder/legal review process provide subject matter expertise.

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Committee Representation

Vice Presidents

Plus representatives from the following units:

- Faculty Council
- Employee Council
- Student Government Association
- Office of Compliance
- Office of the General Counsel
- Internal Audit Division

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Feedback from University Community

Draft policies will be posted on a password-protected page on the Policies website

Faculty, staff, and students can log in and submit feedback on draft policies

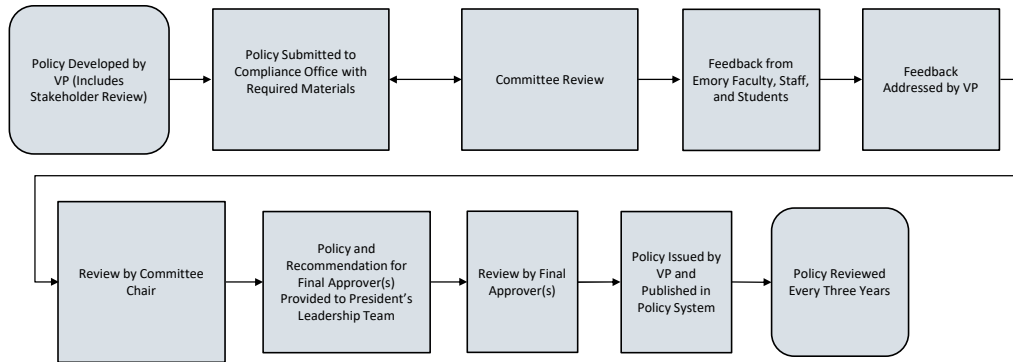
Feedback will be considered by the individual who proposed the policy

- Good faith effort to consider feedback and incorporate where appropriate
- No obligation to incorporate all feedback

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Track 1: Standard Review (Primarily Based on Northwestern and UC Models)



(Policy review process incorporates elements from benchmarked institutions - see slide 10)

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Track 2: Designated Member Review

Important elements of the new approach

- Review by one or more committee members (not full committee)
- No feedback from University community

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Track 2: Designated Member Review

Important elements of the new approach (continued)

- Process is only available in limited circumstances

1. Policy must be adopted to fulfill legal, regulatory, and/or governmental agency requirements;
2. Content significantly constrained by legal, regulatory requirements, and/or governmental agency requirements;
3. Policy affects specific subject matter area (e.g., grants administration); and
4. Policy has an alternate method of review for obtaining input from affected stakeholders.

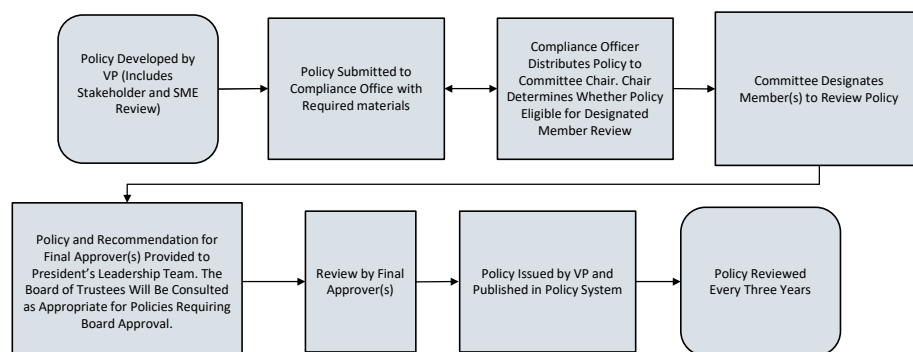
- Review criteria limited

1. Policy is consistent with other University-wide policies
2. Appropriate stakeholder and legal/regulatory/subject matter expertise review has been obtained

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Track 2: Designated Member Review



(Policy review process incorporates elements from benchmarked institutions - see slide 10)

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Track 3: Administrative Review

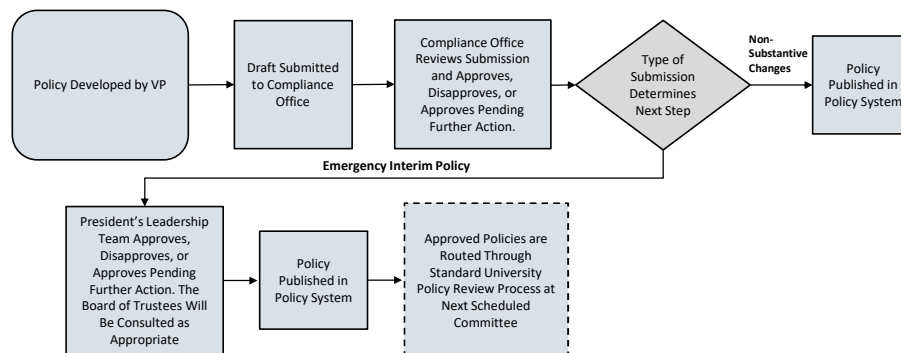
Important elements of the new approach

- Only available for non-substantive changes to existing policies and emergency interim policies
- No feedback from university community
- Emergency policies routed back through standard review process after approval

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Track 3: Administrative Review



(Policy review process incorporates elements from benchmarked institutions - see slide 10)

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Expected Benefits of Centralized Approach

Ensures transparency in the creation, review, and approval of University-wide policies

Includes faculty, staff, and students in the review process through committee membership and via the comment period

Standardizes policy review criteria

Ensures policies are reviewed regularly

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Challenges with Overhauling Policy Approval Process

Challenge 1: Obtaining final approval of the processes

- Reviewed by multiple groups/multiple times
- Organizing, reconciling, and incorporating feedback
- Timeline: Development to refinement to final approval of approach took more than a year and a half

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Challenges with Overhauling Policy Approval Process

Challenge 2: Obtaining buy-in from those with policy making authority

- Challenges inherent with change
 - Diminished policymaking autonomy
- Impact on existing siloed processes

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Challenges with Overhauling Policy Approval Process

Challenge 3: Aligning new review tracks with policy management software

- Integration with software's built-in workflow structure
- Documentation of review steps and approvals

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Where Are We Now?

The new policy approval process was given final approval by Emory leadership at the end of 2019

Policy Review Committee members have been identified

The plan to implement the processes in late Spring 2020 has been delayed due to the COVID-19 pandemic

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Where Are We Headed?

The new plan is to launch the new policy approval processes this fall

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Uncertainties and Anticipated Challenges

Logistics of Policy Review Committee Meetings

- Must decide the frequency and format of the meetings
 - Synchronous vs. Asynchronous
 - In-person vs. virtual

Workload for Office of Compliance

- Administering policy process will be only one of our many responsibilities

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Questions?

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