ST. LOUIS COLLEGE *of* PHARMACY

INSTITUTIONAL POLICY FRAMEWORK

(approved by the President on November 6, 2015)

INTRODUCTION

This Institutional Policy Framework (Framework) is founded upon the principle that sound Institutional Policy development and implementation is a collaborative process that actively seeks input from affected Stakeholders. The Policy Oversight Committee (POC) is a standing committee of College personnel appointed by the President because of their expertise in policy administration. It is tasked with working with institutional Policy Sponsors to review and make recommendations for developing institutional policies related to general administrative and business operations of the College and to manage the policy development process from the initial proposal until the policy document is ready for final review by the President's staff and, ultimately, final approval by the President. This responsibility includes ensuring: 1) consultation occurs with Policy Stakeholders and internal review groups; 2) adherence to Framework guidelines and standards; 3) proper socialization of policies; 4) congruency with existing Institutional Policies; and 5) publication, access, and retention of Institutional Policies. The POC does not approve policy document content. The Faculty Manual, Student Code, Student Handbook, and Academic Catalog are not subject to this Framework. However, the POC works with stakeholders in a timely manner to ensure that institutional policies contained in each of these publications are accurately and consistently written.

The Framework does not apply to departmental policies or policies that must be implemented as an interim measure due to an emergency or compliance with legal requirements. Interim policies will remain in effect until such time as a formal policy can be adopted through the process contained in this Framework. Faculty policies must be developed in accordance with the shared governance process outlined in the Faculty Manual. Departmental Policies must be reviewed by the General Counsel to ensure that they are not Institutional Policies subject to this Framework. Any Departmental Policy involving financial or budgetary matters must first be approved by the Chief Financial Officer before it is reviewed by the General Counsel. Institutional Policy requirements must be followed in the event of a conflict with a Departmental Policy unless otherwise approved in writing by the President.

GUIDING PRINCIPLES

1. The policy development process is well-defined, understandable, transparent, and easy to navigate.
2. The process sets and follows a timeline for each policy.
3. Stakeholder input and feedback are broadly sought, valued, and used.
4. Policy ownership/sponsorship resides with a responsible office/administrator.
5. Policy Sponsors are responsible to review policies in accordance to the frequency defined in each policy's Timeline and Overview section. Review will determine the need to maintain, update, or decommission the policy.

DEFINITIONS

Departmental Policy:
A statement of intent or principle which regulates, directs, and controls a particular kind of transaction or risk that needs to be managed within or by a department. A Departmental Policy generally establishes the department's position on a specific subject and sets forth minimum requirements, expectations, standards, and procedures that relate to a departmental goal or matter of intra-departmental importance.

Institutional Policy:
A statement of intent or principle which regulates, directs, and controls College programs and operations. An Institutional Policy generally establishes the College's position on a specific subject and sets forth minimum requirements, expectations, standards, and procedures that relate to overall institutional goals or matters of importance.

Major Revision:
A material change to a policy document that affects the rules, principles, or other critical requirements relating to expectations, standards, and procedures.

Policy Oversight Committee (POC):
The standing committee of College personnel appointed by the President to review drafts of new policy documents and major revisions to existing policy documents for compliance with this Framework.

Policy Sponsor:
The President's Staff Member and/or Executive Officer who is responsible for the endorsement, creation, implementation, and promulgation of an Institutional Policy that falls under their jurisdiction.

Policy Stakeholder:
Individual(s) or group(s) identified through the policy development process whom may be impacted by a policy.

<u>Responsible Office</u>:

The employee, unit, committee, or area designated by the Policy Sponsor to develop and administer a policy document through all stages of the document life cycle (from initiation through to review).

CRITERIA TO DETERMINE IF A POLICY MAY BE NEEDED

Issues can emerge as a result of federal, state, or local legislation; incidents or trends that emerge within or outside of the College; a shift in College values or priorities; or a host of other sources. Issues arising to the level that need to be addressed through the College's institutional policy process share a number of characteristics that include but are not limited to:

1. Endure across time and administrations; change infrequently and set the course for the foreseeable future.
2. Manifest and operationalize the College's mission, vision, values, and strategic plan.
3. Apply broadly across the College.
4. Ensure compliance with applicable laws and regulations.
5. Promote operational efficiency and reduce bureaucracy.
6. Manage institutional risk.

POLICY OVERSIGHT COMMITTEE

Overview

The Policy Oversight Committee (POC) is a standing committee of College personnel appointed by the President because of their expertise in policy administration. It is tasked with working with institutional Policy Sponsors to review and make recommendations for developing institutional policies related to general administrative and business operations of the College and to manage the policy development process from the initial proposal until the policy document is ready for final review by the President's staff and, ultimately, final approval by the President. This responsibility includes ensuring: 1) consultation occurs with Policy Stakeholders and internal review groups; 2) adherence to Framework guidelines and standards; 3) proper socialization of policies; 4) congruency with existing Institutional Policies; and 5) publication, access, and retention of Institutional Policies. The POC does not approve policy document content.

Membership, Meetings & Decision-Making

POC members will be appointed by the President. The list of member names will be published on the College's online policy library (available at: http://policies.stlcop.edu). The POC will meet at least monthly, or at an interval determined by the Committee at the start of each term. The POC will strive to review policy proposals and policies within a reasonable timeframe, normally within 30 days for policy proposals and within 60 days for policies.

A Policy Sponsor, personnel from a Responsible Office and other Policy Stakeholders involved in the policy development process may be invited to POC meetings to address questions and provide insight into policies or policy proposals under review.

To reach decisions on committee matters, POC members will seek consensus when possible. In the event consensus cannot be achieved, the issues will be identified and passed on to the Policy Sponsor and/or Responsible Office to be further discussed by the President's Staff.

The POC ensures College adherence to this policy framework and works collaboratively with the Information Technology (IT) department to maintain an online policy library/repository of policy-related documents and forms.

POLICY PROCESS

Proposing a New Policy or a Revision to a Current Policy

Any College stakeholder (i.e., faculty, staff, administrators, students) can propose that a new institutional policy be developed, revisions be made to current policies, or an existing policy be decommissioned by using the *Policy Proposal Form*. The POC determines if an issue needs to be addressed by a policy.

Developing a New Policy or Revising a Current Policy

Once a policy proposal has been endorsed by the POC, the Responsible Office drafts the policy document using the *Policy Template* form, solicits feedback from stakeholder groups as appropriate, seeks approval from departments or units (e.g., faculty) as appropriate, and then submits the draft policy to the POC for review. The POC may endorse the policy immediately, recommend substantial revisions, or take additional time to review the policy. Policies endorsed by the POC are then forwarded to the President's Staff for final review and approval by the President. The President will determine whether Board of Trustees approval is necessary.

Implementing a New or Revised Policy

Once a policy has been approved by the President and/or the Board of Trustees, the Responsible Office communicates policies to the College community, provides training and information about requirements related to the policy, and works with the POC and IT department to archive policies and associated documents in the College's online policy library. Policy Sponsors also collect feedback on policies and ensure that policies are reviewed and updated in accordance to their approved review frequency.

Establishing an Interim Policy

When a policy is needed in a timeframe that does not allow for the entire Policy Framework process, it can be implemented as an interim policy. Interim policies are needed, but are not limited to, cases of life, safety, or regulatory compliance. In such cases, the interim policy will be developed, vetted as needed by President's Staff members, and approved by the Policy Sponsor and the President with the POC notified and provided a copy of the interim policy. Interim policies approved by the Policy Sponsor and President must complete the regular policy process as described in the "Proposing a New Policy or a

Revision to a Current Policy" section above within 30 days of establishing the interim policy. The POC will review and act upon the proposal at its next regularly scheduled meeting and work with the Policy Sponsor to establish a reasonable plan and timeframe to transition the interim policy to a regular policy as described in the "Developing a New Policy or Revising a Current Policy" section above.

Decommissioning a Policy

Policy Sponsors may propose that a policy be decommissioned when it is no longer needed (Retire) or is more effectively combined with another policy (Merge). If a policy is proposed to be merged, the adjoining policy name must be specified on the *Policy Proposal Form*. Steps in this process include: 1) consultation with Policy Stakeholders, 2) proposal submission and endorsement by the POC, and 3) approval by the President. Once the President authorizes the policy's decommissioning, it is removed from the College's online policy library as an active policy. The Policy Sponsor communicates the change in status to the College community.

Archiving a Policy

All new policies will be posted to the online policy library. When a policy is revised, the Policy Sponsor sends the revised policy and its associated documents to the POC and IT department for posting to the online policy library. Previous versions of a policy will be archived.

POLICY DEVLOPMENT, APPROVAL & IMPLEMENTATION PROCESS

An issue to be addressed by a new policy or revision of an existing policy is identified by any College stakeholder and is proposed to the appropriate Policy Sponsor or to the POC who will assist with determining the appropriate Sponsor

Policy Sponsor denies the policy request

Policy Sponsor approves the policy request

Policy Sponsor designates a Responsible Office to complete a *Policy Proposal Form* for submission to the POC

POC reviews and provides feedback on the *Proposal* normally within 30 days of receipt

Responsible Office develops the policy using the *Policy Template* form, consulting with stakeholders and internal review groups as needed; submits completed *Template* to POC

POC reviews and *Policy Template* normally within 60 days of receipt

POC Endorses *Policy Template*

POC sends *Policy Template* back to Policy Sponsor for revision

POC sends *Policy Template* to President's Staff for review

President approves the *Policy* and sends *Policy* to BOT for approval if needed

Policy Sponsor/Responsible Office implements the policy

- Communicates policy to stakeholders and provides any related training if needed
- Works with the POC to post policy to the online policy library
- Monitors compliance, measures effectiveness, and solicits feedback on the policy as needed
- Ensures the policy is reviewed and updated

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Proposal to Develop a New Policy or Substantially Revise or Decommission an Existing College Policy

1. **General Information:**

Responsible Office/ Department:	
Policy Sponsor:	
Type of Proposal:	☐ New ☐ Revision ☐ Decommission (specify): ☐ Retire ☐ Merge
Proposed Policy Name	
Proposed Policy Manual Section	
Policy Applies to:	
Interim Policy Established?	☐ No ☐ Yes If yes, why?
Note – policies approved as interim must complete the College's regular policy process as described in the "Establishing an Interim Policy" section.	
Target Date to Implement Policy:	
Note –Implementation protocol is to use the first day of the month in which the policy will become effective.	
Date Policy Proposal Form Submitted:	

2. **Summary/Overview of what the Policy will Contain**:

3. **Reason for Policy and Desired Result:** What are we trying to accomplish? What are we trying to fix? Why are we recommending a new, revised, or decommissioned policy?

4. **Anticipated Impact of the Policy** on the College (who, what, when, cost, etc.)?

5. **Writing Group Members** (add rows as needed):

Name	Position	Department	Phone	E-mail

6. **Timeline** for policy development and implementation.

7. **Policy Stakeholders** (those impacted, those who will administer or implement, etc.) that will provide input during the process; how feedback will be solicited.

   a) Stakeholders to be Consulted:
   b) Stakeholders to be Informed:
   c) Stakeholders who will Approve:

8. **Policy Result:** Will the policy affect or is it affected by any of the following?
   Current College policies (please list)

   Federal, state, local legislation, regulations (please list)

9. **Communication:** How do you anticipate communicating this policy? Any training needed for policy stakeholders?

POC's POLICY PROPOSAL REVIEW CHECKLIST

_____

Date:

Committee Members Present:

Policy Name & Number:

Review of a Policy Proposal
To be approved, a policy proposal must meet all of the following:

☐ The proposal form is complete.

☐ The appropriate responsible office/department is identified.

☐ All stakeholders to which the policy applies are identified.

☐ Impact of the policy is well-reasoned.

☐ Timeline for developing the policy is reasonable.

☐ Policy stakeholders from whom input/feedback will be sought are identified and are appropriate.

☐ Effect of the proposed policy on other college policy and/or federal, state or local regulations is adequately considered and articulated in the proposal.

☐ Mechanisms for how the policy will be communicated to stakeholders and training provided (if needed) has been adequately described.

Feedback to Policy Sponsor: (to be recorded on the _Policy Proposal Form_ and sent to Policy Sponsor)

POLICY TEMPLATE

Responsible Office

Policy Name *(note if interim policy)*

Policy Timeline

Initial Effective Date:
Frequency of Review:
Date(s) Revised:

Policy Overview

Provide a brief, general descriptive paragraph to overview the policy.

Applies to: (examples—Faculty, Staff, Students, etc)

Table of Contents: (optional; suggested for policies > 8-10 pages)

Definitions: (optional; suggested for terms that have specialized meaning in the policy)

Term	Definition

Policy Details

    I.   Example level 1
          a. Example level 2
               i. Example level 3

Procedures

    I.   Example level 1
          a. Example level 2
               i. Example level 3

Responsibilities

Position/Office/Department	Responsibility

Resources (required for any resource referred to in the policy)

Policy Contacts

Name	Contact Information

POLICY APPROVALS

POC: ☐ **Approved as to Form**   ☐ **Not Approved**
POC Chair Signature:
Date:

Policy Sponsor: ☐ **Approved**   ☐ **Not Approved**
Signature:
Date:

President: ☒ **Approved**   ☐ **Not Approved**
Signature: (see pdf version for signature)
Date: 11-6-15

Board of Trustees: ☐ **Approved**   ☐ **Not Approved**   ☐ **Not Applicable**
Chair Signature:
Date:

POC's POLICY TEMPLATE REVIEW CHECKLIST

Date:

Committee Members Present:

Policy Name & Number:

Review of a Policy Template

To be approved, a policy must meet all of the following:

☐   The policy template form is complete.

☐   All stakeholders to which the policy applies are listed.

☐   The policy timeline is correctly listed.

☐   The provided overview of the policy is succinct but adequately summarizes the policy.

☐   A table of contents is provided if applicable (ie, if the policy is > 8-10 pages in length).

☐   Terms used in the policy are listed and well-defined (optional; check only if terms and definitions are supplied by the Policy Sponsor).

☐   Policy details are complete, explicit and well-organized.

☐   Procedural details are complete, explicit and well-organized.

☐   Appropriate person(s) are identified and their responsibilities are well-described.

☐   Resources, if referred to in the policy, are listed.

☐   Appropriate person(s) to contact for questions or concerns related to the policy and their contact information is provided.

The POC will maintain a spreadsheet/log of all policy proposals and templates to help track timeline and where proposals and policies are in the development, submission and approval process.