I. PURPOSE
Villanova University formally approves official University policies and procedures through an established process and publishes these policies and procedures in a central policy library. This policy establishes guidelines for the development, revision, approval and publication of University policies and procedures while also ensuring that they are current and available. Villanova University employees are expected to become familiar with the University’s policies and procedures that govern their particular division or department and that are applicable to their University roles and responsibilities.

An open and inclusive governance structure is essential for building a vibrant community, guided by best practices and a collegial spirit of Unitas. Villanova University reflects this inclusive governance structure through a process, set forth in this policy.

Depending on the scope and nature of the policy, there may be officially recognized University committees and/or work groups (collectively “Committees” as defined below) that serve in an advisory role during the draft development and revision of such policy. This policy recognizes the important role and work that these committees perform in connection with their areas of knowledge and expertise. Nothing contained in this policy in any way limits or abrogates the advisory role of these Committees in the review of the policies that fall within their purview, as further outlined in the Procedure below.

II. SCOPE
This policy applies to all Villanova University employees who are responsible for developing, updating and publishing University policies. Policies that are created or significantly revised subsequent to the adoption of this policy and do not follow the appropriate approval procedure may not be recognized as official University policies.

III. DEFINITIONS
Executive Council: This oversight committee is responsible for overseeing the policy and procedure approval process, and the periodic review of University policies.

President’s Cabinet: The oversight committee that is appointed by the President and is responsible for review/recommendations for approval of University policies that are forwarded to it by the Responsible Officer, the President, or the President’s designee.

Responsible Office: Under the direction of the Responsible Officer, the Responsible Office develops and revises policies and procedures. The Responsible Office is
accountable for the accuracy of the subject matter, and for the timely updating of its policies and procedures.

**Responsible Officer:** The Responsible Officer is the senior level employee responsible for creating, revising, updating and publishing policies in his or her area of oversight. As policy owners, these senior level employees are responsible for management of the policy development and revision process for their area of authority as set forth in this policy.

**Revisions:**

**Minor Revisions:** Minor revisions are those changes that do not alter the scope or application of an existing policy or procedure. Examples of minor revisions include, but are not limited to, title changes for individuals or departments, spelling corrections, address changes or any changes that update or clarify current processes (e.g., updates due to utilization of new technology platforms or applications; deletions of outdated forms; or clarification of steps to complete a process, etc.)

**Significant Revisions:** Significant revisions are those changes that alter the scope or application of an existing policy or procedure.

**University Committee:** A committee that is recognized directly or indirectly by the President, the members of the President’s Cabinet, or any of the duly recognized University faculty governance bodies. Such a committee has a longstanding existence, and carries out goals and objectives which have a broad and significant impact upon the University.

**University Policy:** Written statement of policy with broad application throughout the University and significant impact to the University. University policies and procedures may be developed by an academic or administrative department in order to express basic values of the University, ensure coordinated compliance with applicable laws and regulations, promote operational efficiencies, enhance the University’s mission, mitigate and manage institutional risk.

**University Procedure:** Procedures contain a series of consecutive action steps related to a policy and provides guidance as to how users will follow a particular policy. University procedures are optional except where the procedures are specifically mandated by the applicable laws and regulations.

**IV. POLICY STATEMENT**

Villanova University strives to ensure that University policies and procedures extend the Mission and values of the University, and that they are managed according to a
process that maintains consistency in the development, revision, approval and publication of policies and procedures. Under the direction of the Responsible Officer all University policies and procedures must be developed, revised and approved in accordance with the procedure outlined in this policy. In the event that there is a conflict between a college, school, or departmental policy and a University policy or procedure, the University policy and procedure will prevail.

V. PROCEDURE
A. Development, Review and Approval Process:
Any Villanova faculty or staff member can propose the creation of a new, or revisions to an existing, policy or procedure. All new policies require initial approval from the Responsible Officer who has oversight of such area.

The Responsible Officer will identify and consult with the appropriate University Committees or area stakeholders impacted by the policy during the draft development and review or significant revision review process. However, there may be times when a regulatory mandate, legal or contractual requirement or other exigent circumstance requires immediate University action without an opportunity for additional input or consultation.

The Responsible Officer must have the policy reviewed by all Vice Presidents of areas that are impacted by the policy prior to submitting the policy for approval.

If the policy contains any legal concerns, it is the expectation that the Responsible Officer will have the policy reviewed by the Office of General Counsel prior to submitting the policy for approval.

The University Compliance Office (UCO) will act as a clearinghouse for the approval of University policies. The UCO upon review of the draft policy will submit the policy to the Office of General Counsel for review, if necessary.

The Responsible Officer will submit the working draft to the President’s Cabinet for review. After reviewing the proposed policy, the Cabinet will submit any revisions and/or recommendations for approval to the President for his review and final approval. Upon the President’s final approval of the policy, the Responsible Officer must ensure that everyone who is impacted by the policy is notified of the new policy and receives training, as appropriate. The University Compliance Officer will ensure that the communication and policy rollout are carried out.

i. Faculty Handbook policies
Per the requirement of the Villanova University Faculty Handbook, revisions to policies that are contained in said handbook require prior consultation with
the Faculty Rights and Responsibilities Committee, unless, mandated by legal or contractual requirements, merely technical in nature, or driven by emergencies.

ii. VU Board of Trustees review and approval
The President, at times, may submit to the Villanova University Board of Trustees a policy for review/final approval.

B. Updates/Revisions
The Responsible Officer will submit the proposed updates/revisions for review and approval as needed to keep policies current with regulatory changes or changes in operations. Policies shall be reviewed as frequently as required by law and as may be specified in the policy review revision cycle. Significant revisions to policies will follow the same review and approval process as new policies. Minor revisions (as defined) only require approval from the Responsible Officer of such area and will not require further review/approval. The UCO will work with the Responsible Officer to ensure that appropriate review cycles are established for all University policies.

VI. RELATED INFORMATION/FORMS
University Policy Template with Instructions/Definitions
Attachment A – Policy Approval Process Flowchart
Faculty Handbook

VII. HISTORY
Approved December 14, 2016
Revision Date(s): 01/12/2017; 05/09/2018

VIII. RESPONSIBLE UNIVERSITY DIVISION/DEPARTMENT
University Compliance Officer
University Compliance Office
800 Lancaster Avenue
204 Tolentine Hall
Villanova, PA 19085

IX. RESPONSIBLE ADMINISTRATIVE OVERSIGHT
University Compliance Officer
University Compliance Office
800 Lancaster Avenue
205 Tolentine Hall
Villanova, PA 19085
Attachment A: Policy Approval Process Flowchart

<table>
<thead>
<tr>
<th>ROLE</th>
<th>RESPONSIBILITY</th>
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<tbody>
<tr>
<td>Responsible Officer (RO)</td>
<td>The Responsible Officer will identify and consult with the appropriate University Committees or area stakeholders impacted by the policy during the draft development and review or significant revision review process (exceptions noted in policy). After review by all VP’s whose areas are impacted by the policy the RO will submit a draft of the proposed policy to the University Compliance Office, which acts as a clearinghouse for initial review. If the policy is contained in the Faculty Handbook, the RO must consult the Faculty Rights and Responsibilities Committee prior to submission for final review/approval.</td>
</tr>
<tr>
<td>University Compliance Office (UCO)</td>
<td>Reviews draft policy and provides feedback and/or clearance to the RO who will continue the approval process. In the event that there are any outstanding legal issues, UCO will submit the draft policy to the OGC for review of such issues.</td>
</tr>
<tr>
<td>President’s Cabinet</td>
<td>Upon receiving clearance from the UCO and from the OGC if requested, the RO submits the draft policy to the President’s Cabinet for its review and recommendation for approval. The President’s Cabinet reviews the draft policy, provides feedback, and submits draft to President for final approval.</td>
</tr>
<tr>
<td>President</td>
<td>Reviews draft policy and provides approval. If the President deems the policy requires additional work or input, the President submits the policy to the Executive Council, the President’s Cabinet, or the appropriate University representative. OR The President may submit a policy to VU Board of Trustees for review/final approval.</td>
</tr>
<tr>
<td>Role</td>
<td>Responsibilities</td>
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<tr>
<td>Responsible Officer (RO)</td>
<td>After receiving final approval from the President, the policy is made effective according to the RO’s rollout plan. The RO must ensure that the new policy is communicated, and training is provided to everyone impacted by the policy as necessary. The RO must post the new policy so that it is available to everyone who is expected to follow the policy. University policies and procedures will be housed in the University Policies and Procedures library once it is operational.</td>
</tr>
<tr>
<td>University Compliance Officer</td>
<td>The University Compliance Officer works with the RO to ensure that the policy is communicated to the University community and education on the policy is provided, as may be necessary.</td>
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