

POLICY APPROVAL PROCEDURES

Forms referenced in these procedures can be found in the Policy Toolkit on NKU's policy website - <https://inside.nku.edu/policy/policy-toolkit.html>.

1) Drafting a New Policy or Making a Major/Minor Revision to a Policy:

- a. All policies regardless of type proceed through the following steps:
 - i. A Policy Request Form is submitted by the Policy Initiator. The Policy Request Form must be signed by all parties required (if the initiator is acting on behalf of a university governing body, such as Staff Congress or Faculty Senate, the President of those respective groups shall act as the Immediate Supervisor/Director signature).
 - ii. The Policy Request Form is circulated for feedback from the President's Cabinet by either the Provost or the University Policy Administrator designated by the President. The details of the policy transaction are confirmed, including but not limited to policy type and review bodies (such as Academic Affairs Council, Professional Concerns Committee, Human Resources, Legal/Compliance, or IT Policy Council).
 - iii. The Drafter/Drafting Team, established by the completed Policy Request Form in consultation with the Responsible Official of the policy, drafts the proposed policy (or policy revision).
 - iv. The Drafter/Drafting Team submits the draft policy to the Policy Coordinator.
 - v. The Policy Coordinator submits the draft policy to the review bodies as indicated on the completed Policy Request Form. If a Legal/Compliance Review is needed, as established by the completed Policy Request Form, the Legal/Compliance Review will occur after all other review bodies have conducted reviews, and before the policy draft proceeds through the type-specific policy process. In addition to a Legal/Compliance review, the Vice President for Legal Affairs and Office of Institutional Compliance & Ethics make a predetermination whether the draft policy will need to be approved by the Board of Regents.
- b. The subsequent processes outlined below are specific to the policy types, as established by virtue of a completed and reviewed Policy Request Form.
 - i. If the requested transaction is either (a) submitted by the Academic Affairs Policy Council (AAPC) as established by its charter and by-laws, or (b) is deemed an AAPC policy type per the completed, reviewed, and approved Policy Request Form, after the conclusion of the steps outlined in 1.a.i-v above, the policy draft shall follow the process below:
 1. The Policy Coordinator (designated by the University Policy Administrator) will forward the draft policy to the Provost (or Provost designee) who will coordinate the review by the Academic Affairs Council (AAC).
 2. Upon completion of the review by the AAC, the Provost (or Provost designee) will forward the revised draft to the Vice Provost for Undergraduate Academic Affairs (VPUAA) and copy the Policy Coordinator.
 3. The Vice Provost for Undergraduate Academic Affairs (VPUAA) or designee will coordinate the first reading of the policy draft by the AAPC.
 4. The VPUAA will determine whether the draft policy is subject to University Curriculum Committee (UCC) review.

- a. If the policy is subject to UCC review, the VPUAA will coordinate the draft approval by the UCC. If the draft is approved, the draft becomes university policy and the process has concluded.
 - b. If the policy is not subject to UCC review, the VPUAA will submit the revised draft to the Policy Coordinator.
5. The Policy Coordinator will post the draft to the university policy website and send an announcement to the policy distribution list announcing that the draft is open for public comment. The draft will be subject to public comment for a period of at least 14 days.
6. During the comment period, the Policy Coordinator will forward comments received regarding the draft policy to the Drafting Team and Responsible Official. The Drafting Team and Responsible Official are not required to respond to all comments nor are they required to adjust the draft based on comments received. However, Responsible Officials are expected to adhere to a high standard of communication while balancing the operational feasibility of suggested revisions, and by virtue of their positions, are expected to ensure incorporated revisions align with the university's strategic priorities and comply with all federal, state, and local regulations and laws.
7. Upon completion of the comment period, the Policy Coordinator will send a final communication to the Drafting Team and Responsible Official comprehensive of all comments received during the period.
8. The Drafting Team and Responsible Official then incorporate revisions as necessary (see item 6 above) and forward the revised draft to the VPUAA, copying the Policy Coordinator.
9. The VPUAA coordinates the second reading of the policy draft by the AAPC.
10. The Drafting Team and Responsible Official then incorporate revisions as necessary (see item 6 above) and forward the revised draft to the Provost, copying the Policy Coordinator.
11. The Provost conducts the final review and forwards the revised draft to the President's Cabinet, copying the Policy Coordinator.
12. The Provost (or Provost designee) may make changes to the draft based on feedback received from members of the President's Cabinet.
13. The Provost forwards the draft to the President for final approval, copying the Policy Coordinator.
14. If the President:
 - a. Approves the draft as is, the draft becomes university policy and an effective date is established.
 - b. Provisionally approves the draft, the draft is revised as necessary and resubmitted to the President for approval.
 - c. Rejects the draft, the draft is not adopted as a university policy.
 - d. Determines approval of the draft by the Board of Regents is necessary (see Section VI (Board of Regents Approval) of the policy, "Policy Creation, Revision, Retirement, and Communication"):
 - i. As is, the Office of the President will coordinate Board of Regents approval.

- ii. With revisions, the Drafting Team/Responsible Official will make the necessary adjustments and submit to the Office of the President, which will coordinate Board of Regents approval.
- ii. If the requested transaction is either (a) submitted by the Faculty Senate or a subcommittee of the Faculty Senate as established by the charter and by-laws of the Faculty Senate, or (b) deemed an Academic policy type per the completed, reviewed, and approved Policy Request Form, after the conclusion of the steps outlined in 1.a.i-v above, the policy draft shall follow the process below:
 1. The Policy Coordinator will forward the draft policy to the Provost (or Provost designee) who will coordinate the review by the Academic Affairs Council (AAC).
 2. Upon completion of the review by the AAC, if the draft request was submitted on behalf of the Graduate Council or the completed Policy Request Form indicates the draft is a Graduate Council policy, the draft will proceed through the steps outlined in item 8-10 below. Graduate Council Policies do not proceed through review by the PCC. If the draft request was submitted by the Faculty Senate, or a subcommittee of the Faculty Senate, the Provost (or Provost designee) will coordinate approval by the Professional Concerns Committee (PCC).
 3. Upon approval by the PCC, the Provost will coordinate approval by the Faculty Senate.
 4. Upon approval by the Faculty Senate, the Provost will forward the revised draft to the President's Cabinet for final review and copy the Policy Coordinator.
 5. The Provost and/or University Policy Administrator may work with the Drafting Team/Responsible Official to incorporate any changes as necessary as a result of the final President's Cabinet review.
 6. The Provost forwards the draft to the President for final approval and copies the Policy Coordinator.
 7. If the President:
 - a. Approves the draft as is, the draft becomes university policy and an effective date is established.
 - b. Provisionally approves the draft, the draft is revised as necessary and resubmitted to the President for approval.
 - c. Rejects the draft, the draft is not adopted as a university policy.
 - d. In consultation with the VP of Legal Affairs, determines approval of the draft by the Board of Regents is necessary (see Section VI (Board of Regents Approval) of the policy, " Policy Creation, Revision, Retirement, and Communication"):
 - i. As is, the Office of the President will coordinate Board of Regents approval.
 - ii. With revisions, the Drafting Team/Responsible Official will make the necessary adjustments and submit to the Office of the President, which will coordinate Board of Regents approval.
 8. The Provost forwards the revised draft to the Vice Provost for Graduate Education, Research, and Outreach (VP-GERO) and copies the Policy Coordinator.

9. The VP-GERO coordinates approval by the Graduate Council, if necessary.
10. Upon approval by the Graduate Council, the VP-GERO will forward the revised draft to the Provost, copying the Policy Coordinator.
11. The Provost will coordinate approval by the Faculty Senate.
12. Upon approval by the Faculty Senate, the Provost will forward the revised draft to the President's Cabinet for final review and copy the Policy Coordinator.
13. The Provost or University Policy Administrator may work with the Drafting Team/Responsible Official to incorporate any changes as necessary as a result of the final President's Cabinet review.
14. The Provost forwards the draft to the President for final approval, copying the Policy Coordinator.
15. If the President:
 - a. Approves the draft as is, the draft becomes university policy and an effective date is established.
 - b. Provisionally approves the draft, the draft is revised as necessary and resubmitted to the President for approval.
 - c. Rejects the draft, the draft is not adopted as a university policy.
 - d. In consultation with the Vice President of Legal Affairs, determines approval of the draft by the Board of Regents is necessary (see Section VI (Board of Regents Approval) of the policy, "Creation, Revision, Retirement, and Communication of Policies"):
 - i. As is, the Office of the President will coordinate Board of Regents approval.
 - ii. With revisions, the Drafting Team/Responsible Official will make the necessary adjustments and submit to the Office of the President, which will coordinate Board of Regents approval.
- iii. If the requested transaction is deemed a Hybrid policy type per the completed, reviewed, and approved Policy Request Form, after conclusion of the steps outlined in 1.a.i-v above, the policy draft shall follow the process below:
 1. The Policy Coordinator will forward the draft policy to the Provost (or Provost designee), who will coordinate the review by the Academic Affairs Council (AAC).
 2. Upon completion of the review by AAC, the Provost will forward the revised draft to the University Policy Administrator, copying the Policy Coordinator.
 3. The University Policy Administrator will coordinate the first review of the draft by the President's Cabinet.
 4. The Drafting Team/Responsible Official will incorporate feedback from the President's Cabinet as necessary and forward the revised draft to the Policy Coordinator, the Provost, and the Senior Director of Human Resources.
 - a. The Policy Coordinator will post the draft to the university policy website and send an announcement to the policy distribution list announcing that the draft is open for public comment. The draft will be subject to public comment for a period of at least 45 days.

- i. During the comment period, the Policy Coordinator will forward comments received regarding the draft policy to the Drafting Team/Responsible Official.
 - b. The Provost will coordinate a review by the Professional Concerns Committee and relay feedback regarding the draft to the Drafting Team/Responsible Official.
 - c. The Senior Director of Human Resources will coordinate a review by Staff Congress and relay feedback regarding the draft to the Drafting Team/Responsible Official.
5. Upon completion of the 45-day comment period, the Drafting Team/Responsible Official may revise the policy as appropriate. The Drafting Team/Responsible Official are not required to respond to all comments nor are they required to adjust the draft based on comments received. However, Responsible Officials are expected to adhere to a high standard of communication while balancing the operational feasibility of suggested revisions, and by virtue of their position, are expected to ensure incorporated revisions align with the university's strategic priorities and comply with all federal, state, and local regulations and laws.
6. The Drafting Team/Responsible Official forward the revised draft to the University Policy Administrator and the Provost, copying the Policy Coordinator.
7. Either the University Policy Administrator or the Provost will circulate the final draft to the President's Cabinet for feedback and approval to forward to the President.
8. Upon completion of the final President's Cabinet review, the University Policy Administrator or Provost or designee forwards the draft to the President for final approval, copying the Policy Coordinator.
9. If the President:
 - a. Approves the draft as is, the draft becomes university policy and an effective date is established.
 - b. Provisionally approves the draft, the draft is revised as necessary and resubmitted to the President for approval.
 - c. Rejects the draft, the draft is not adopted as a university policy.
 - d. In consultation with the Vice President of Legal Affairs, determines approval of the draft by the Board of Regents is necessary (see Section VI (Board of Regents Approval) of the policy, "Policy Creation, Revision, Retirement, and Communication"):
 - i. As is, the Office of the President will coordinate Board of Regents approval.
 - ii. With revisions, the Drafting Team/Responsible Official will make the necessary adjustments and submit to the Office of the President, which will coordinate Board of Regents approval.
- iv. If the requested transaction is either (a) submitted by the Staff Congress or subcommittee of the Staff Congress as established by the charter and by-laws of the Staff Congress or (b) is deemed an Administrative policy type per the completed, reviewed, and approved Policy Request Form, after the conclusion of the steps outlined in 1.a.i-v above, the policy draft shall follow the process below:

1. The Policy Coordinator will forward the draft policy to the University Policy Administrator, who will coordinate the first review by the President's Cabinet.
2. Upon review by the President's Cabinet, the Drafting Team/Responsible Official may incorporate changes as necessary.
3. The Drafting Team/Responsible Official forwards the revised draft to the policy coordinator.
4. The Policy Coordinator will post the draft to the university policy website and send an announcement to the policy distribution list announcing that the draft is open for public comment. The draft will be subject to public comment for a period of at least 14 days.
5. Upon completion of the 14-day comment period, the Drafting Team/Responsible Official may revise the policy as appropriate. The Drafting Team/Responsible Official are not required to respond to all comments nor are they required to adjust the draft based on comments received. However, Responsible Officials are expected to adhere to a high standard of communication while balancing the operational feasibility of suggested revisions, and by virtue of their position, are expected to ensure incorporated revisions align with the university's strategic priorities and comply with all federal, state, and local regulations and laws.
6. The Drafting Team/Responsible Official forwards the revised draft to the University Policy Administrator and copies the Policy Coordinator.
7. The University Policy Administrator coordinates the final President's Cabinet review.
8. Upon approval by the President's Cabinet, the Drafting Team/Responsible Official forwards the revised draft to the President for approval, copying the Policy Coordinator.
9. If the President:
 - a. Approves the draft as is, the draft becomes university policy and an effective date is established.
 - b. Provisionally approves the draft, the draft is revised as necessary and resubmitted to the President for approval.
 - c. Rejects the draft, the draft is not adopted as a university policy.
 - d. In consultation with the Vice President of Legal Affairs, determines approval of the draft by the Board of Regents is necessary (see Section VI (Board of Regents Approval) of the policy, "Policy Creation, Revision, Retirement, and Communication"):
 - i. As is, the Office of the President will coordinate Board of Regents approval.
 - ii. With revisions, the Drafting Team/Responsible Official will make the necessary adjustments and submit to the Office of the President, which will coordinate Board of Regents approval.

2. Drafting an Editorial Revision to a Policy:

- a. A Policy Request Form (PRF) is submitted by the Policy Initiator. Policy request forms must be signed by all parties required (if the initiator is acting on behalf of a university governing body, such as Staff Congress or Faculty Senate, the President of those respective groups shall act as the Immediate Supervisor/Director signature).

- b. The Policy Initiator forwards to the Policy Coordinator.
- c. The Policy Coordinator circulates the PRF to the Provost and the University Policy Administrator.
- d. Once the University Policy Administrator and/or the Provost sign the PRF certifying the nature of the revision is editorial, the Policy Coordinator forwards the completed PRF and a policy template to the Policy Initiator, Immediate Supervisor/Department Head, and appropriate Responsible Official.
- e. The Policy Initiator/Supervisor/Responsible Official are responsible for completing the requested changes using the latest policy template.
- f. The Policy Initiator/Department Head/Responsible Official submit the revised policy to the Policy Coordinator.
- g. The Policy Coordinator posts the revised policy to the policy website, where it becomes official university policy.

3. Conducting On/Off-Cycle Review of a Policy:

- a. If a policy is scheduled for review as determined by a completed Policy Request Form AND the policy meets the following criteria, the Policy Initiator (which is the head of the Responsible Office), will complete the details sections and "Review" sections of the PRF and submit to the Policy Coordinator:
 - i. the current policy, as written, is sufficient to maintain efficiencies and order at the university in the domains for which the policy was intended,
 - ii. legal, operational, financial, social, or business circumstances have not changed to warrant revisions to this policy,
 - iii. changes in legal, operational, financial, social, or business circumstances which would warrant a revision to this policy are not expected within the scope of the next review cycle of this policy,
 - iv. I have consulted with all appropriate university officials, campus experts, and stakeholders to obtain the information in the preceding bullet points.

4. Retiring a Policy:

- a. Retirement of a policy may only be initiated by the Responsible Owner. The Responsible Owner completes a PRF details and retirement sections and submits the PRF to the Policy Coordinator.
- b. The Policy Coordinator will circulate the PRF to the Provost and the University Policy Administrator.
- c. The University Policy Administrator and the Provost will sign the Policy Request Form and forward to the President for signature.
- d. Once the President signs the Retirement section of a Policy Request Form, the policy is considered retired.
- e. Announcements of retired policies will be made through a central distribution list.