

Item: AC: A-1

AUDIT & COMPLIANCE COMMITTEE

Tuesday, November 18, 2025

SUBJECT: REQUEST FOR APPROVAL OF AMENDMENTS TO POLICY 1.1, GUIDELINES FOR POLICY DEVELOPMENT

PROPOSED COMMITTEE ACTION

Recommend approval of amendments to Policy 1.1, Guidelines for Policy Development

BACKGROUND INFORMATION

The University seeks to amend Policy 1.1, Guidelines for Policy Development. The proposed changes the nomenclature to reflect current position titles, streamlines the policy review process, includes a requirement to periodically review policies, and updates the templates.

IMPLEMENTATION PLAN/DATE

The proposed amended policy will be implemented and effective upon adoption by the Board of Trustees.

FISCAL IMPLICATIONS

There are no fiscal implications to this proposed board action.

Supporting Documentation: Proposed Amendments to Policy 1.1, Guidelines for Policy

Development

Presented By: Neil D'Arco

Chief Compliance and Ethics Officer

Phone: 561-297-3094; Email: ndarco@fau.edu



SUBJECT:	Effective Date:	Policy Number:	
GUIDELINES FOR UNIVERSITY POLICY DEVELOPMENT	<mark>3-18-09</mark>	1.1	
	Supersedes:	Page	Of
	Policy 1.1 (adopted revised 3-19-08)	1	7 <u>6</u>
	Responsible Author	sible Authority:	
	General CounselChief Compliance and Ethics Officer		nce and

I. INTRODUCTION:

The Florida Atlantic University ("University") Policies and Procedures Manual includes university-wide policies and procedures.

Florida Atlantic-University ("University") policies and procedures should be organized and drafted using a standard format as outlined by this policy. The University Policies and Procedures Review Committee_-(UPPRC) constitutes the principal body for reviewing and managing University policies and procedures. Policy-initiating authorities may suggest-propose policies and procedures to the University Policies and Procedures Review CommitteeUPPRC. All policies and procedures require review by the University Policies and Procedures Review CommitteeUPPRC and _, the Executive Committee or Senior StaffLeadership Team (ELT). Unless otherwise stated, the President must approve all policies and procedures _, and final approval by the President prior to implementation and/or inclusion in the manual. Approval of and amendments to this "Guidelines for University Policy Development" policy and any University policies pertaining to the naming of institutional facilities, buildings, colleges, schools or other institutional elements shall also require approval by the Florida Atlantic-University Board of Trustees (BOT). Final authority and approval over University policies and procedures rests with the President.

II. APPLICABILITY/ACCOUNTABILITY:

This policyese guidelines on University policies and procedures are applicable to all members of the University community. The University Policies and Procedures Manual includes only those policies and procedures that are generally applicable to more than one college or unit of the University or matters of such importance that the President

deems appropriate for a university-wide policy. Matters pertaining only to the internal procedures of a given college or unit are not within the scope of the manual or this policy and must be obtained from the specific college or unit. However, in the event of an inconsistency between a provision in a college or unit policy and a provision in a University policy or regulation, the University policy or regulation shall prevail.

III. POLICY STATEMENT:

The Florida Atlantic University is governed by federal state and state federal statutes and regulations, Florida Board of Governors and rules and policies of the Florida Atlantic University Board of OTrustees and Florida Board of Governors regulations and policies, and other applicable laws, regulations, laws and collective bargaining agreements. However, there are many occasions where such authorities do not provide specific guidance or do not offer procedures or implementation directives necessary for efficient University operations. Where this occurs, the University must adopt policies and procedures to dictate and guide the operations of the University.

This policy establishes procedures guidelines for the creation, issuance, review, and publication of policies at Florida Atlanticthe University; ensures consistency in policy creation and implementation; and centralizes policies for ease of reference, application, and enforcement.—To the extent that there is a conflict between any University policy and procedure and a state and federal statute, regulation, rule or policy of the Florida Atlantic University Board of Trustees or Florida Board of Governors or other applicable law or collective bargaining agreement, the state and federal statute, regulation, rule or policy of the Florida Atlantic University Board of Trustees or Florida Board of Governors or other applicable law or collective bargaining agreement will prevail.

The Florida Atlantic University Policies and Procedures Manual is the official repository of University policies and procedures. It may be reviewed in the Office of the President Chief Compliance and Ethics Officer (CCO) or on the University's websiteenline. Having an official policies and procedures manual for the University ensures that University-level policies and procedures will be consistent and subject to appropriate review before implementation.

The President, Executive Committee or Senior StaffELT, CCO, and University Policies and Procedures Review Committee UPPRC are the University's policy-initiating authorities.

The University Policies and Procedures Review Committee UPPRC and the Executive Committee or Senior StaffELT must give preliminary review to all University policies and procedures. The President must give final approval to all University policies and procedures. The Florida Atlantic University Board of Trustees must also give final approval to this "Guidelines for University Policy Development" policy and any University policies pertaining to the naming of institutional facilities, buildings, colleges, schools or other institutional elements, and all amendments thereto. University policies and procedures should be formulated and drafted according to a template to ensure consistency and organized to ensure ease of reference. Specific implementation directives are provided in Section V below.

IV. DEFINITIONS:

Executive Committee or Senior StaffLeadership Team. Chaired by the University President, the ELT consists of Universitysenior administrators who are individually and collectively responsible to guide a shared vision and lead institutional operations for the advancement of the University.

Policy. A statement of management philosophy or practice established to provide direction and assistance to the University community in the conduct of University business or activities. University policies apply to all units, departments, or divisions of the University with respect to their operations at the University. Policies must not conflict with statutes, regulations, or other laws applicable to the University.

Procedure. A statement that prescribes categories of action applicable to all units, departments, or divisions with respect to their operations at the University, to be taken to conform to established policies, allowing for the orderly and consistent implementation of policies.

Responsible Authority: The Vice President with primary responsibility for the subject matter of a given policy or procedure and its administration and interpretation. The responsible authority assesses effectiveness of the policy or procedure and monitors the regulatory landscape for any changes in law or regulation which would require a change in policy.

University Policies and Procedures Review Committee. The committee designated and appointed by the President to act as the central body for reviewing and managing University-wide policies. The committee will be chaired by the CCO. The is-committee will include the General Counsel, the Vice Presidents or their designees, a representative of the faculty, a representative of the student bodyrepresentatives from the following units: Academic Affairs, Administrative Affairs, Athletics, College of Medicine, Environmental, Health, & Safety/ Risk Management, Faculty, Financial Affairs, Government Relations, Human Resources, Information Technology, Institutional Advancement, Office of General Counsel, Public Affairs, Research, Student Affairs, and Student Government. Additionally, the President may appoint any other person and such other persons as the President deems appropriate. The CCO has the authority to waive participation of any member for a particular UPPRC meeting. The President shall appoint the chair of this committee.

V. PROCEDURES:

A. Initiation of New Policies and Procedures

Initiation of new policies and procedures occurs when the need for a new policy and procedure is identified by the President, the Executive Committee or Senior StaffELT, the General, CCO, or a representative of the University Policies and Procedures Review Committee UPPRC.

(1) Working with a representative on the University Policies and Procedures Review Committee UPPRC, the appropriate Vice President, or their designees, oversees the creation of a draft of the policy and procedure, or revision thereof, following the <u>proceduresguidelines</u> described in Subsection C below. If a policy and procedure <u>fallsfall</u> within more than one section of the University Policies and Procedures Manual, any affected unit may assume the responsibility for drafting and reviewing the policy and procedure. The individual who sponsors and oversees the drafting a new or revised policy and procedure is the <u>initiating-responsible</u> authority.

(2) The responsible authority must coordinate with appropriate stakeholders and accountable entities during the drafting phase for new or revised policies.

- (32) WWhen the responsible initiating authority has finished drafting the policy and procedure, that draft should be submitted to the University Policies and Procedures Review Committee UPPRC for review. The policy will be placed on the next available agenda of the University Policies and Procedures Review Committee UPPRC, and the responsible initiating authority or designee will be invited to present the policy to the committee. The responsible initiating authority should be prepared to answer questions regarding the policy. While every effort will be made to have the UPPRC review a draft policy and procedure, or revision thereof, circumstances may require bypassing the UPPRC's review directly to the ELT in order to facilitate a timely implementation of a policy.
- (43) After the proposed policy and procedure has been reviewed by the University Policies and Procedures Committee UPPRC, the chair of the University Policies and Procedures Review Committee CCO will send a copy of the proposed policy and procedure to the Executive Committee or Senior StaffELT for review.
- ——(<u>5</u>4) Once the proposed policy and procedure is reviewed <u>by the ELT and approved</u> by the <u>Executive Committee or Senior Staff</u>, the <u>chair of the University Policies and Procedures Review Committee will forward the final draft to the President for final review and approval-P</u>
 - (5) Once the President has approved a final draft, and the Florida Atlantic University Board of Trustees, if applicable, the CCO will chair of the University Policies and Procedures Review Committee will ensure that the incorporate the new policy and procedure is incorporated into the Policies and Procedures Manual.
- B. Review, and/or Revision, and Retirement of Existing Policies and Procedures

Each responsible authority must complete a baseline review of all current University policies and procedures by December 1, 2026. Once the baseline review is complete, Every policy and procedure, every policy and procedure once implemented, should must be reviewed every three years on a periodic basis to ensure that the policy and procedure remains current and necessary.

The procedures to initiate and review revisions to existing policies and procedures, and to eliminate retire policies, are as follows:

- (1) The need for revisions to an existing policy and procedure, or to eliminate a policy and procedure, may be identified by the President, the Executive Committee or Senior StaffELT, the General Counsel, CCO, a representative of the University Policies and Procedures Review Committee UPPRC, or by the authority responsible for the policy and procedure.
- (2) If the need for <u>a revision revision</u> is identified, the responsible authority must review the existing policy and procedure <u>carefully</u> to determine whether it continues to reflect current practice and responds to a need in the University community. If the responsible authority <u>feels identifies</u> that changes to the policy and procedure are <u>in order required</u>, then <u>he or shethe responsible authority</u> will prepare a draft of a revised policy and procedure in a format that highlights the proposed changes. If the responsible authority <u>feels identifies</u> that the policy and procedure is no longer needed and should be <u>eliminated retired</u>, then <u>he or shethe responsible authority</u> will prepare a written statement to that effect for submission to the <u>University Policies and Procedures Review Committee UPPRC</u>. <u>The Policy Action Form will accompany any review of proposed or current University policy</u>.
- (3) If no changes to a policy or procedure are identified by the responsible authority as part of the regular review process, the responsible authority will report their determination to the UPPRC. The CCO will ensure that standard reviews of all University policies and procedures are complete.

C. Drafting of Policies and Procedures

A standardized format will be used for University policies and procedures and will include certain minimum information. To guide in that effort, the UPPRC has created a policy template to be used in drafting policies and procedures. Policies and procedures should be submitted on the policy template and should contain the policy number, policy name, the responsible authority, the dates of initial adoption and revisions, applicability, a policy statement, definitions, responsibilities, and procedures. Implementing stakeholders should ensure that the policies successfully implement applicable laws and regulations. Policies and procedures may also contain general policy or background information, contacts, and related information, documents or forms, as necessary for a full explanation of the policy and its application and procedures.

A standardized format will be used for University policies and procedures and will include certain minimum information. To guide in that effort, the University Policies and Procedures Review Committee has created a policy template to be used in drafting policies and procedures.

Policies and procedures should be submitted on the policy template listed under FORMS and should contain the following information:

The policy number (issued upon approval)

The policy name

The initiating authority

Date(s) of initial adoption and any revisions; effective date, if different

The responsible authority for that policy

Applicability or Accountability

Policy Statement
Definitions of relevant terms
Procedures, if any are needed, to implement the policy
Forms, if any are required or suggested, to carry out the procedure

Policies and procedures may also contain the following information as necessary for a full explanation of the policy and its application and procedures:

General policy or preamble summarizing policy
Related information or documents
Background information
Contacts (may be included as part of the procedures)

D. Dissemination of Information about New or Revised Policies and Procedures

Information about new, revised, or eliminated policies and procedures may be announced by e-mail or released in a memorandum by the Chair of the Policies and Procedures Review Committee or his or her designee. promulgated in accordance with the University's Public Affairs guidance.

E. Maintenance of the Policies and Procedures Manual

The Chair of the Policies and Procedures Review Committee will be responsible for maintaining the master list of policies and procedures within the Policies and Procedures Manual. A copy of each approved policy and procedure will be kept on file. The policies and procedures will be maintained on the University <a href="https://www.www.eb-site-and-users-may-print-a

VI. FORMS:

(1) Policy Template(2) Policy Action Form

VII. RELATED INFORMATION:

Colleges, centers, and institutes may have policies and procedures specific to their operations, but those will not be included in the University's Policies and Procedures Manual. Any such policies and procedures must not conflict with and are subordinate to statutes, federal and state regulations, regulations of the Board of Governors or the Florida Atlantic University Board of Trustees or the Board of Governors, and University policies and procedures, and any approved University collective bargaining agreements. To the extent that there is a conflict between a college, center, or institute policy and a University policy and procedure, University regulation, other regulation or statute, or any approved University collective bargaining agreement, the provision of the University policy and procedure, University regulation, other regulation or statute, or any approved University collective bargaining agreement will prevail. Colleges should must use the template outlined above for their policies and organize their policies in a manual for ease of reference.

VIII. INITIATING AUTHORITY: General CounselCCO

POLICY APPROVAL (For use by the Office of the President)	
Policy Number:1.1	
Initiating Authority	
Signature:	Date:
Name: David L. Kian <u>Neil D'Arco</u>	
Policies and Procedures	
Review Committee Chair	
Signature:	Date:
Name: Elizabeth F. Rubin Neil D'Arco	
President	
Signature:	Date:
Name: Frank T. BroganAdam Hasner	
Board of Trustees Chair	
Signature:	_ Date:
Name: Nancy BlosserPiero Bussani	

Executed signature pages are available in the Office of the Compliance and Ethics General Counsel

Instructions for Drafting University Policies:

Use the form below to draft or revise a University policy. Please use Arial in 11 pt font size. You are not limited to the spacing that appears on the form. Draft policies ready for review by the University Policies and Procedures Review Committee should be sent via e-mail as a Word document attachment to the Office of the General Counsel at GeneralCounsel@fau.edu. There should be clear indication in the transmittal that the draft policy has been reviewed and approved by its initiating authority.

POLICY TEMPLATE

SUBJECT:	Effective Date:	Policy Number:
	Supersedes:	Page Of
	Responsibl	e Authority:

(REQUIRED)

DATE(S) OF INITIAL ADOPTION AND EFFECTIVE DATE:*

APPLICABILITY/ACCOUNTABILITY:

POLICY STATEMENT:

DEFINITIONS:

PROCEDURES:**

INITIATING AUTHORITY:

(OPTIONAL)

GENERAL POLICY OR PREAMBLE; BACKGROUND INFORMATION; RELATED INFORMATION; RELATED DOCUMENTS; CONTACTS; FORMS:

*THIS REQUIREMENT APPLIES ONLY TO EXISTING POLICIES BEING REVIEWED OR REVISED

**IF ANY ARE NEEDED TO IMPLEMENT THE POLICY

		POLICY APPROVAL (For use by the Office of the President) Policy Number:		
Signature:	Name:	Initiating Authority	Date:	
Signature:	Nama	Policies and Procedures Review Committee Chair	Date:	
Signature:	Name:	President	Date:	
	Name.			



Policy Action Form

1	Responsible Division:	
	Division.	
2	Policy Owner	
	(content driver):	
3	Policy Action	
	(summary):	
	D 1: D : (1 .	
4	Policy Driver (what	
	is driving the need	
	for the policy action	
	(e.g., new	
	legislation, internal	
	controls etc.)):	
_	A 1' 1'1', (1	
5	Applicability (who	
	is impacted by the	
	policy action):	
6	Primary	
	Stakeholders	
	(involved in the	
	policy action):	
	T 1	
7	Implementation	
	Plan (include	
	training and	
	communications, as	
0	applicable):	
8	Legal Review:	
1	I	





SUBJECT: NAME OF POLICY	Effective Date:	Policy Number:	
	Supersedes:	Page	Of
	Responsible Authority: Vice President,		
APPLICABILITY:			
POLICY STATEMENT:			
DEFINITIONS:			
RESPONSIBILITIES:			
PROCEDURES:			
RESPONSIBLE AUTHORITY: Vice Preside	ent,		
	ICY APPROVAL ne Office of the President)		
Responsible Authority Signature: Name:	Da	te:	
Policies & Procedures Committee Chair Signature: Name:	Da	te:	
President Signature: Name:	Da	te:	

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SUBJECT:	Effective Date:	Policy Number:	
UNIVERSITY POLICY DEVELOPMENT	11/18/25	1.1	
	Supersedes:	Page	Of
	3/19/08	1	5
	Responsible Authority: Chief Compliance and Ethics Officer		
			ficer

I. INTRODUCTION:

The Florida Atlantic University ("University") Policies and Procedures Manual includes university-wide policies and procedures.

University policies and procedures should be organized and drafted using a standard format as outlined by this policy. The University Policies and Procedures Review Committee (UPPRC) constitutes the principal body for reviewing and managing University policies and procedures. Policy-initiating authorities may propose policies and procedures to the UPPRC. All policies and procedures require review by the UPPRC and the Executive Leadership Team (ELT). Unless otherwise stated, the President must approve all policies and procedures prior to implementation and inclusion in the manual. Approval of and amendments to this "University Policy Development" policy shall require approval by the University Board of Trustees (BOT).

II. APPLICABILITY:

This policy on University policies is applicable to all members of the University community. The University Policies and Procedures Manual includes those policies and procedures that are generally applicable to more than one college or unit of the University or matters of such importance that the President deems appropriate for a university-wide policy. Matters pertaining only to the internal procedures of a given college or unit are not within the scope of the manual or this policy and must be obtained from the specific college or unit. However, in the event of an inconsistency between a provision in a college or unit policy and a provision in a University policy or regulation, the University policy or regulation shall prevail.

III. POLICY STATEMENT:

The University is governed by federal and state statutes and regulations, Florida Board of Governors and University BOT and Florida regulations and policies, and other applicable laws, regulations, and collective bargaining agreements. However, there are many occasions where such authorities do not provide specific guidance or do not offer procedures or implementation directives necessary for efficient University operations. Where this occurs, the University must adopt policies and procedures to dictate and guide the operations of the University.

This policy establishes procedures for the creation, issuance, review, and publication of policies at the University; ensures consistency in policy creation and implementation; and centralizes policies for ease of reference, application, and enforcement. To the extent that there is a conflict between any University policy and procedure and a state and federal statute, regulation, rule or policy of the Florida Atlantic University BOT or Florida Board of Governors or other applicable law or collective bargaining agreement, the state and federal statute, regulation, rule or policy of the Florida Atlantic University BOT or Florida Board of Governors or other applicable law or collective bargaining agreement will prevail. The University Policies and Procedures Manual is the official repository of University policies and procedures. It may be reviewed in the Office of the Chief Compliance and Ethics Officer (CCO) or on the University's website. Having an official policies and procedures manual for the University ensures that University-level policies and procedures will be consistent and subject to appropriate review before implementation.

The President, ELT, CCO, and UPPRC are the University's policy-initiating authorities.

The UPPRC and the ELT must give preliminary review to all University policies and procedures. The President must give final approval to all University policies and procedures. University policies and procedures should be formulated and drafted according to a template to ensure consistency and organized to ensure ease of reference. Specific implementation directives are provided in Section V below.

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Executive Leadership Team. Chaired by the University President, the ELT consists of senior administrators who are individually and collectively responsible to guide a shared vision and lead institutional operations for the advancement of the University.

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Procedure. A statement that prescribes categories of action applicable to all units, departments, or divisions with respect to their operations at the University, to be taken to conform to established policies, allowing for the orderly and consistent implementation of policies.

Responsible Authority: The Vice President with primary responsibility for the subject matter of a given policy or procedure and its administration and interpretation. The responsible authority assesses effectiveness of the policy or procedure and monitors the regulatory landscape for any changes in law or regulation which would require a change in policy.

University Policies and Procedures Review Committee. The committee designated and appointed by the President to act as the central body for reviewing and managing University-wide policies. The committee will be chaired by the CCO. The committee will include representatives from the following units: Academic Affairs, Administrative Affairs, Athletics, College of Medicine, Environmental, Health, & Safety/ Risk Management, Faculty, Financial Affairs, Government Relations, Human Resources, Information Technology, Institutional Advancement, Office of General Counsel, Public Affairs, Research, Student Affairs, and Student

Government. Additionally, the President may appoint any other person the President deems appropriate. The CCO has the authority to waive participation of any member for a particular UPPRC meeting.

V. PROCEDURES:

A. Initiation of New Policies and Procedures

Initiation of new policies and procedures occurs when the need for a new policy and procedure is identified by the President, the ELT, CCO, or a representative of the UPPRC.

- (1) Working with a representative on the UPPRC, the appropriate Vice President, or CCO, or their designees, oversees the creation of a draft of the policy and procedure, or revision thereof, following the procedures described in Subsection C below. If a policy and procedure fall within more than one section of the University Policies and Procedures Manual, any affected unit may assume the responsibility for drafting and reviewing the policy and procedure. The individual who sponsors and oversees the drafting of a new or revised policy and procedure is the responsible authority.
- (2) The responsible authority must coordinate with appropriate stakeholders and accountable entities during the drafting phase for new or revised policies.
- (3) When the responsible authority has finished drafting the policy and procedure, that draft should be submitted to the UPPRC for review. The policy will be placed on the next available agenda of the UPPRC, and the responsible authority or designee will be invited to present the policy to the committee. The responsible authority should be prepared to answer questions regarding the policy. While every effort will be made to have the UPPRC review a draft policy and procedure, or revision thereof, circumstances may require bypassing the UPPRC's review directly to the ELT in order to facilitate a timely implementation of a policy.
- (4) After the proposed policy and procedure has been reviewed by the UPPRC, the CCO will send a copy of the proposed policy and procedure to the ELT for review.
- (5) Once the proposed policy and procedure is reviewed by the ELT and approved by the President, and the University BOT, if applicable, the CCO will incorporate the new policy and procedure into the Policies and Procedures Manual.

B. Review, Revision, and Retirement of Existing Policies and Procedures

Each responsible authority must complete a baseline review of all current University policies and procedures by December 1, 2026. Once the baseline review is complete, every policy and procedure must be reviewed every three years to ensure that the policy and procedure remain current and necessary.

The procedures to initiate and review revisions to existing policies and procedures, and to retire policies, are as follows:

- (1) The need for revisions to an existing policy and procedure, or to eliminate a policy and procedure, may be identified by the President, the ELT, CCO, a representative of the UPPRC, or by the authority responsible for the policy and procedure.
- (2) If the need for revision is identified, the responsible authority must review the existing policy and procedure to determine whether it continues to reflect current practice and responds to a need in the University community. If the responsible authority identifies that changes to the policy and procedure are required, then the responsible authority will prepare a draft of a revised policy and procedure in a format that highlights the proposed changes. If the responsible authority identifies that the policy and procedure is no longer needed and should be retired, then the responsible authority will prepare a written statement to that effect for submission to the UPPRC. The Policy Action Form will accompany any review of proposed or current University policy.
- (3) If no changes to a policy or procedure are identified by the responsible authority as part of the regular review process, the responsible authority will report their determination to the UPPRC. The CCO will ensure that standard reviews of all University policies and procedures are complete.

C. Drafting of Policies and Procedures

A standardized format will be used for University policies and procedures and will include certain minimum information. To guide in that effort, the UPPRC has created a policy template to be used in drafting policies and procedures. Policies and procedures should be submitted on the policy template and should contain the policy number, policy name, the responsible authority, the dates of initial adoption and revisions, applicability, a policy statement, definitions, responsibilities, and procedures. Implementing stakeholders should ensure that the policies successfully implement applicable laws and regulations. Policies and procedures may also contain general policy or background information, contacts, and related information, documents or forms, as necessary for a full explanation of the policy and its application and procedures.

D. Dissemination of Information about New or Revised Policies and Procedures

Information about new, revised, or eliminated policies and procedures may be promulgated in accordance with the University's Public Affairs guidance.

E. Maintenance of the Policies and Procedures Manual

The Chair of the Policies and Procedures Review Committee will be responsible for maintaining the master list of policies and procedures within the Policies and Procedures Manual. A copy of each approved policy and procedure will be kept on file. The policies and procedures will be maintained on the University website. Policies and procedures will be numbered and organized by topic.

VI. FORMS:

- (1) Policy Template
- (2) Policy Action Form

VII. RELATED INFORMATION:

Colleges, centers, and institutes may have policies and procedures specific to their operations, but those will not be included in the University's Policies and Procedures Manual. Any such policies and procedures must not conflict with and are subordinate to statutes, federal and state regulations, regulations of the Board of Governors or the University BOT, and University policies and procedures, and any approved University collective bargaining agreements. Colleges must use the template outlined above for their policies and organize their policies in a manual for ease of reference.

VIII. INITIATING AUTHORITY: CCO

Dollov Number: 1.1	POLICY APPROVAL (For use by the Office of the President)	
Policy Number: 1.1		
Initiating Authority Signature: Name: Neil D'Arco		Date:
Policies and Procedures		
Review Committee Chair		
Signature:		Date:
Name: Neil D'Arco		
President		
Signature:		Date:
Name: Adam Hasner		
Board of Trustees Chair		
Signature:		Date:
Name: Piero Bussani		

Executed signature pages are available in the Office of Compliance and Ethics