



Policy on Policies

POL 01.20.01

Effective Date: November 11, 2019

1.0 Policy Purpose

For the effective and orderly administration of Brown University, this Policy on Policies is established to govern the adoption, revision and publication of Brown University Policies.

2.0 To Whom the Policy Applies

This policy applies to any member of the Brown University community who develops, reviews, approves, publishes, manages, or otherwise engages in the promulgation and dissemination of University policies.

3.0 Policy Statement

A Brown University Policy is a document that states the rights and responsibilities of members of the Brown community. A University Policy must meet all of the following criteria:

- It has broad application throughout the University; or is required by regulation or documented industry standards;
- It helps achieve compliance with applicable laws and regulations, promotes operational efficiencies, enhances the University's mission, or reduces institutional risks;
- It mandates actions; and
- The subject matter requires Corporation, President or delegated Cabinet member review and approval for policy issuance and major revisions.

If a document does not fit the above criteria it is an operating unit, department or school Standard Operating Procedure (SOP).

To ensure consistency, policies must be written in standard outline form consistent with the University's Policy Template and instructions. Policies are effective when adopted by the Corporation, or when adopted by the President (or the delegated Cabinet member with policy approval authority) upon written approval. Policies will be posted to the dedicated official University Policy web site. Operating units, departments, and schools should provide links to the official University web site dedicated to policies to assure the official and most current version is referenced and relied upon.

3.1 Authority

3.1.1 The Corporation of Brown University

The Corporation of Brown University or one of its committees acting under authority delegated by the Corporation may establish policies in accordance with The Charter of Brown University, and pursuant to its authority delegated by law.

3.1.2 The President

The President may establish a policy:

- Under the sole authority of the President;
- To implement a directive of the Corporation; or
- To address matters of compliance with fiscal, academic, research, human resources or other requirements imposed by federal, state or local laws, matters not specifically reserved to the Corporation, and matters within the President's general responsibilities to manage the University.

The President may delegate authority to a Cabinet member to establish and administer policy in their area of administrative and academic authority, in a manner consistent with this Policy on Policies.

3.2 Adopting and Revising Policies

3.2.1 Revisions to existing University policies that are not considered material do not need to follow Section 3.2.3 below, provided that the revisions are reformatting, editorial or technical changes that do not materially affect the substance of the policy (e.g., updating titles; assigning numbers; correcting grammar; punctuation and typographical errors; editing for stylistic consistency; or changing monetary rates that are the result of federal or state laws). The University Policy Template and instructions must still be followed, and the proposed revisions require review by University Compliance.

3.2.2 Nondiscretionary revisions to policies based on federal or state laws and regulations or Corporation policies may be made by the Policy Owner after consultation with the President (or the delegated Cabinet member with policy approval authority), the Office of General Counsel and University Compliance without following Section 3.2.3 below. The University Policy Template and instructions must be followed.

3.2.3 New policies or material revisions to existing policies, must be sponsored by a Cabinet member. Any senior officer of a Responsible Office (or any University standing, advisory or ad hoc committee or task force) may present policy proposals to the pertinent Cabinet member for sponsorship. If the Cabinet member concurs with the proposed new or revised policy, the Cabinet Member becomes its Sponsor.

The Sponsor is also the Policy Owner, and will ensure relevant campus constituents are provided opportunity for feedback prior to seeking policy establishment. Appropriate University governance processes, including any necessary approvals, will be followed prior to establishment of a new or revision to an existing policy.

3.2.3.1 Corporation Authorized Policies

- After a policy has been coordinated with relevant campus constituents the Responsible Office forwards the policy to University Compliance for the compliance and legal review.
- After the Office of General Counsel's review, University Compliance coordinates with the Senior Associate Secretary of the Corporation to determine if the policy is within the Corporation's authority.
- Upon confirmation that the policy is within the Corporation's authority, University Compliance forwards the policy to the President for action. The President will recommend approval or reject the policy.
- If the President recommends approval, the President's Office coordinates with the Senior Associate Secretary to place the policy on the agenda for the next Corporation meeting.
- The Corporation will take appropriate action on a proposed or revised policy. Upon approval by the Corporation, University Compliance will assign a number to the final policy and authorize its publication on the official University policy web site.

3.2.3.2 President Authorized Policies

- After a policy has been coordinated with relevant campus constituents the Responsible Office forwards the policy to University Compliance for the compliance and legal review.
- After the Office of General Counsel's review, University Compliance forwards the draft policy to the President for action. The President approves or rejects the policy.
- Upon approval by the President, University Compliance will assign a number to the final policy and authorize its publication on the official University policy web site.

Note: If the President delegates policy approval authority, the Delegate accomplishes all President Authorized Policy actions on behalf of the President.

4.0 Definitions

For the purpose of this policy, the terms below have the following definitions:

- 4.1 **Cabinet Member:** A member of the President's Cabinet which is a standing committee of Brown senior leaders.
- 4.2 **Delegate:** A Cabinet member with delegated policy approval authority from the University President.
- 4.3 **Policy Owner:** The Cabinet member responsible for the policy content, administration, dissemination, communication and training, compliance monitoring and enforcement, and timely review and revision of the policy for which they have been designated.
- 4.4 **Responsible Office:** Office managing the coordination, development, monitoring, maintenance and enforcement of the policy and answers any inquiries that may arise regarding the policy. Carries out policy related tasks, training and communication plans for the policy. Any department, office, University standing, advisory or ad hoc committee or task force may act as Responsible Office.
- 4.5 **Sponsor:** Cabinet member (who owns the policy) responsible for ensuring a proposed policy is coordinated with key campus constituents and recommending the policy be adopted via the appropriate approval process (e.g., the Cabinet member who sponsored the policy).
- 4.6 **Standard Operating Procedure (SOP):** Provides instructions on how to complete a specific task. It is developed by and generally has effect within an operating unit, department or school. SOPs may be developed and published on operating unit, department or school web sites without following the processes set forth in this policy.

5.0 Responsibilities

All individuals to whom this policy applies are responsible for becoming familiar with and following this policy. University supervisors are responsible for promoting the understanding of this policy and for taking appropriate steps to help ensure compliance with it.

President: Approve finalized, full policy documents for promulgation and delegate policy approval authority to Cabinet members, when appropriate.

Cabinet Member: Apply institutional perspective to the review and endorsement of full policy documents for both new and materially revised policies. Provide sponsorship for proposed policies and material revisions to existing policy, for approval by the President.

Policy Owner: Ensure dissemination, communication and training, compliance monitoring and enforcement, and timely review and revision of the policy for which they have been designated.

Responsible Office: Manage the coordination, development, monitoring, maintenance and enforcement of the policy and answers any inquiries that may arise regarding the policy. Carries out policy related tasks, training and communication plans for the policy.

University Compliance: Perform compliance review on proposed new policy and material revisions to existing policy. Maintain a repository of all University policies, including control of official versions. Assist Policy Owners with communication, training, and compliance monitoring, as appropriate. Authorize policies for electronic publication on the official University web site. Provide a periodic update to the Cabinet on all new policies and substantial changes to existing policies.

Office of General Counsel: Perform legal review on proposed new policy and material revisions to existing policy.

Chief Digital Officer and Chief Information Officer or designee: Maintain the official University policy web site.

6.0 Consequences for Violating this Policy

Failure to comply with this and related policies is subject to disciplinary action, up to and including suspension without pay, or termination of employment or association with the University, in accordance with applicable (e.g., staff, faculty, student) disciplinary procedures.

7.0 Related Information

Brown University is a community in which employees are encouraged to share workplace concerns with University leadership. Additionally, Brown's Ethics and Compliance Reporting System allows anonymous and confidential reporting on matters of concern online or by phone (877-318-9184).

The following information compliments and supplements this document. The information is intended to help explain this policy and is not an all-inclusive list of policies, procedures, laws and requirements.

7.1 Related Policies: N/A

7.2 Related Procedures: N/A

7.3 Related Forms: N/A

7.4 Frequently Asked Questions (FAQs): N/A

7.5 Other Related Information:

- Policy Template, Brown University
- SOP Template, Brown University
- Policy Coordination and Approval SOP

8.0 Policy Owner and Contact(s)

8.1 Policy Owner: Executive Vice President for Planning and Policy

8.2 Policy Approved by: President

8.3 Contact Information: Chief Compliance Officer, Donna Foresti

- Email: donna_foresti@brown.edu
- Telephone: 401-863-2392

9.0 Policy History

9.1 Policy Effective Date: November 11, 2019

9.2 Policy Last Reviewed: November 11, 2019

9.3 Policy Update/Review Summary: Expanded policy criteria in section 3.0. Removed the requirement for Cabinet review of all policies and clarified delegation of policy approval authority. Prior approved version had a Policy Effective Date of August 16, 2019.