POLICY DEVELOPMENT AND MANAGEMENT

1. PURPOSE

The purpose of this Memorandum is to ensure that the process of policy development for College-wide policies (hereafter “College Policies”), as well as the form and dissemination of policies, meets College standards for consistency, compliance with laws and regulations, accessibility and understandability. Specifically, this Memorandum defines the ultimate steps by which policies are promulgated at The Citadel. College Policies should be kept current, and made available to all relevant operating units in a timely manner.

2. REFERENCE

United States Sentencing Commission Sentencing Guidelines Manual, Chapter 8, Effective Compliance and Ethics Program

3. DEFINITIONS

A. College Policy: A policy that has broad application or impact throughout the College, generally applying across schools, divisions, or administrative units, and that helps ensure compliance with applicable laws, regulations and standards, promotion of operational efficiencies, enhancement of the College’s mission, or reduction of institutional risks. College Policies are approved pursuant to the process described below, and are published as Memoranda.

B. Departmental Policies: Policies that do not have the broad scope or significant impact of College Policies, but instead apply to only a single division or department. Departmental policies may provide more specific or restrictive guidelines than College Policies, but may not contradict College Policies. A departmental policy is approved pursuant to the procedures adopted by the respective department and published to the department by internal memorandum. Schools or operating units shall provide copies of such Departmental Policies to the Policy Coordinator, who will assure their consistency with College Policies.

C. Policy Coordinator: The Chief Compliance Officer shall act as the Policy Coordinator. The Policy Coordinator may select and recruit ad hoc Policy Committee members whose departments or offices are likely to be impacted by a new or revised policy.
D. Procedures: Schools or operating units may adopt implementing procedures that assist them to fulfill College Policies. A departmental policy is approved pursuant to the procedures adopted by the respective department and published to the department by internal memorandum. Such procedures should refer to the official policy document they seek to implement. Schools or operating units shall provide copies of such implementing procedures to the Policy Coordinator, who will assure their consistency with College Policies.

E. Responsible Administrator: the Vice President, Dean or Director of the Responsible Department (as defined below).

F. Responsible Department: The department, division or office responsible for the maintenance and review of a College Policy.

G. Responsible Official: The Vice President, Dean, Director, or other staff member of the Responsible Department who is assigned responsibility for publishing, monitoring, and amending a College Policy.

H. Signatory: The signatory will be the Chairman of the Board of Visitors for Board of Visitor (BOV) policies, the Vice President of the responsible department or requisite department head (e.g. Executive Assistant to the President for the Office of the President).

4. POLICY

A. Responsibility for Creating College Policies

College Policies may be initiated by individual Schools, business units, the Faculty Council, members of the Policy Committee, or other bodies or individuals, as appropriate.

B. Formulating and Approving a College Policy

The following are the required steps any faculty or staff member (hereinafter “the employee”) must follow to create or revise College Policies.

1. Identification and Proposal: An employee identifies the need for a new College Policy or a substantial revision to an existing College Policy, completes the Policy Proposal Form (Annex A) and submits it to his or her supervisor.

2. Initial Review: After reviewing the completed Policy Proposal Form, the supervisor approves or denies the proposal. In making this decision, the supervisor should consult with his or her Dean, Director, or Vice President, as applicable. If there is any question regarding whether the proposed policy rises to the level of a College Policy, the supervisor may elect to contact the Policy Coordinator for a determination on the matter, who may refer the
question to the Vice Presidents or the specific Vice President responsible for the policy.

3. Drafting: If the Policy Proposal is approved, the employee drafts the new or revised policy using the Policy Template (Annex B). Where possible, use positions (e.g. Chief Compliance Officer) and not specifically named individuals for contact information. Consider creating an office e-mail account (e.g. compliance@citadel.edu) rather than using Citadel accounts of specific person. This will reduce the need for policy changes when personnel change/leave jobs. For any questions, contact the Office of Institutional Compliance (OIC): 843-953-2667 or compliance@citadel.edu. The employee submits the draft along with a Policy Submission Cover Sheet (Annex C) and the Policy Proposal Form to the Policy Coordinator. Annex D is a copy of the policy structure.

4. (Optional) Policy Committee Review: If necessary, the Policy Coordinator convenes a Policy Review Committee, composed of representatives from departments significantly affected by the proposed policy. After reviewing these documents and discussing the proposed policy with their respective constituency groups, Policy Committee members provide written feedback to the Coordinator. The Coordinator will make changes to the proposed policy, in consultation with the employee, as necessary.

5. Vice President Review: The Policy Coordinator distributes the proposed college policy and accompanying documents to the Vice Presidents and General Counsel. The Vice Presidents and General Counsel provide comments, and recommend designation of a Responsible Department and Responsible Administrator. In most cases, the employee’s department, division or office will be designated as the Responsible Department, and the applicable Dean, Director or Vice President will be designated as the Responsible Administrator. After receiving these comments and recommendations, the Policy Coordinator makes any or all requested changes, assigns a proposed Memorandum number, and submits the revised policy to the Office of the President or the Board of Visitors for approval, as appropriate. Memoranda are categorized and numbered according to the College Department responsible for their administration.

6. Implementation: Once the policy is approved, the Policy Coordinator will designate a Responsible Department and Responsible Administrator. Any additional education and training will be provided or coordinated by the Responsible Department.

C. Issuance of Policies

1. The Policy Coordinator is responsible for creating and maintaining a central College Policy repository and a College Policy website page with links to all College Policies. The Policy Coordinator will publish the policy on the College
Policy website, and provide copies to all Deans, department heads, and supervisors. The Responsible Officer is responsible for issuing, publishing and distributing approved policies and procedures on any additional appropriate College website pages, and by other means as deemed appropriate. The Policy Coordinator shall provide assistance with the Responsible Officer’s proper distribution and publication of the policy.

2. The Policy Coordinator will use a standard naming convention for all policies. The name and the hyperlink on the College Policy website will remain the same (static) so that cross-referencing hyperlinks in policies will function. For example, this policy is named:

2-103-policy-development-and-management.pdf

The permanent hyperlink for this policy is:


D. Amendments to College Policies

The Responsible Official for each College Policy is responsible for keeping the policy up to date. Accordingly, the Responsible Officer should ensure appropriate review of the policy periodically, as necessary to assure that the policy reflects obligations imposed by current laws, regulations, and best practices. The Policy Coordinator shall help assure that the Responsible Officer reviews and updates policies as needed. Each policy will include the calendar year in which it was made effective so that it may be reviewed on a timely basis under this policy. Except when the process or authority for making changes to a policy is included in the policy itself, amendments must follow the same process outlined above for initial issuance. Non-substantive changes (such as changes in contact information, updated forms, correction of spelling errors, etc.) may be made without full coordination, provided approval is obtained by both the policy’s Responsible Official and the Office of Institutional Compliance. These changes must be recorded in the Notes section of the policy as an Official Amendment.

E. Departmental Policies and Procedures

A School or administrative unit may issue policies or procedures that relate to matters of interest only to that particular School or administrative unit or that set forth procedures by which the unit will carry out the College Policies. These shall be referred to generally as “Departmental Policies and Procedures.” Departmental policies and procedures are not “College Policies” and therefore are not governed by the procedures set forth in this policy. Departmental policies should be reviewed and approved by the relevant Dean, Unit Head, or appropriate College officer prior to adoption. Departmental policies are published as “Memoranda,” but should otherwise use the standard policy format to encourage uniformity of form and appearance for policies and procedures.
throughout the College. Schools or operating units shall provide copies of unit policies and procedures to the Policy Coordinator, who will assure their consistency with College Policies.

F. Supersession

Unit policies or procedures may not be contrary to College Policies in language, purpose, intent or application. Any unit policy that is contrary to College Policies is void and will not be enforced.

G. Reservation of Rights

Nothing in this policy limits or circumscribes in any way the power and authority of the Board of Visitors or the President to issue, amend, or revoke College Policies on any matter.

5. COMPLIANCE

Any employee that does not comply with this policy may face corrective action. Any College Policies that do not conform to this policy are not official College Policies, except those College Policies that predate this policy. Those policies will remain official College Policies, but must be reviewed in compliance with this policy within two (2) years from the date this policy is enacted.

6. NOTES

A. Dates of Official Enactment and Amendments:

Approved by Executive Assistant to the President on 10 December 2014.

Changed VPEA (VP External Affairs) to VPCM (VP Communications and Marketing) on Annex A, Page 1, Annex C, and Annex D on 3 February 2015; clarified Annex B formats for template.

B. Responsible Department:

Office of Institutional Compliance

C. Responsible Official:

Chief Compliance Officer

D. Cross References:

Citadel Policies
7. **RESCISSION**

Memorandum Number 2-103, dated 10 December 2014, and all previous versions are rescinded.

8. **REVIEW**

Review this policy on an annual basis.

FOR THE PRESIDENT:

//signed, TWS, 4 March 2015//

OFFICIAL
TAYLOR W. SKARDON
Captain, US Navy, Retired
Executive Assistant to the President

Attachments
Annex A, Policy Proposal Form
Annex B, Policy Template
Annex C, Policy Submission Cover Sheet
Annex D, The Citadel’s Policy Structure Template
Policy Proposal Form

As part of the College’s Policy Development Process, a staff or faculty member must complete this form before proceeding to the policy development phase. Once it is complete, the staff or faculty member should submit the form to his or her supervisor, who will review the form and approve or deny the proposal. If the proposal is approved, the staff or faculty member may proceed to the policy development phase.

Name__________________________  Department/Office ____________________

Supervisor ______________________ Date Submitted to Policy Coordinator________

Intended Name of Policy (if new)____________________________________________

Name of Existing Policy (if revision)________________________________________

Policy Classification (circle one):

Board of Visitors (1-xxx)  President (2-xxx)  Provost (3-xxx)
Commandant (4-xxx)  VPF (5-xxx)  VPOps (6-xxx)
VPCM (7-xxx)  Dir Athletics (8-xxx)  VP Institutional Adv (9-xxx)

Please answer the following on a separate sheet of paper:

1. **Briefly** state the purpose of the new policy or revision (what is this policy going to do)?

2. **Briefly** describe the rationale behind the need for this policy or revision (why does this policy need to exist, or why should it be revised)?

3. What are the best practices related to the subject matter of this policy? Specifically, what resources and authorities have you or do you plan on consulting in developing/revising this policy?

4. Are there any existing policies that may be amended to address the needs stated in the proposed policy? If so, please contact the Responsible Department for the existing policy.

5. Is there a deadline for this policy to be implemented?

6. What other campus offices, departments, or groups may be affected by this policy?

7. What financial implications will this policy bring on the College?

8. Who will be responsible for regulating and enforcing the policy?
9. Who will be responsible for maintaining and reviewing this policy? How often?

10. Through what venues will the affected parties be informed of the implementation of the policy, and how will they be trained on its processes?

Please complete the following Policy Risk Assessment Matrix1

<table>
<thead>
<tr>
<th>In the absence of this policy or revision . . .</th>
<th>(Circle One)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Will the College be in violation of or out of compliance with the law?</td>
<td>Low</td>
</tr>
<tr>
<td>What is the likelihood the unwanted behavior or problem will continue?</td>
<td>Low</td>
</tr>
<tr>
<td>What is the severity of financial consequences?</td>
<td>Low</td>
</tr>
<tr>
<td>What is the severity of reputational consequences?</td>
<td>Low</td>
</tr>
<tr>
<td>What is the severity of health and safety consequences?</td>
<td>Low</td>
</tr>
<tr>
<td>What is the severity of management and operational consequences?</td>
<td>Low</td>
</tr>
<tr>
<td>What is the effect of this policy or revision on the College’s mission to educate principled leaders?</td>
<td>Low</td>
</tr>
</tbody>
</table>

If you answered medium or high to any of the questions above, please briefly describe on attached sheet.

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**FOR SUPERVISOR’S USE ONLY**

I have reviewed this Proposal to determine whether the faculty or staff member should be authorized to initiate the Policy Development Process, develop/revise this policy and submit a draft to the Policy Coordinator. I have determined that the proposal is (circle one):

- APPROVED
- DENIED
- NEEDS REVISION

Signature of Supervisor______________________________

Date ___________________________ Extension____________________________

Signature of Provost/VP______________________________

Date ___________________________ Extension____________________________

Please list any revisions needed on a separate attachment:
THE CITADEL
The Military College of South Carolina
171 Moultrie Street
Charleston, SC 29409

MEMORANDUM
NUMBER (X)-(Y)

(Number of Proposed Policy)

1. PURPOSE

(The Purpose identifies the overarching "rules" or reasons driving the campus procedures (or processes). In other words, the Purpose answers why The Citadel does something. In this section, state the motivation or reason behind the enactment of the policy. This is generally one to two sentences.)

2. REFERENCE

(Identify any relevant laws or regulations that mandate or affect the policy.)

3. DEFINITIONS

(Define any terms used within the policy that are unfamiliar, technical, or have a specialized meaning. Terms should be listed in alphabetical order.)

4. POLICY

A. Policy Body. Section 4 is the main part of the policy. Use attachments to provide detailed procedures or supporting forms to the policy.

B. Font. All typing should be twelve (12) pitch, Arial Font, using full justification. All margins should be one (1) inch.

C. Heading and Title. Include the heading as shown on this template. Underline and capitalize the proposed title of the policy.

D. Required Sections. Include the eight numbered sections of this template (PURPOSE, REFERENCE, DEFINITIONS, POLICY, COMPLIANCE, NOTES, RESCISSION, and REVIEW). Capitalize and bold the number and name of each section, and provide the information in each section as described in the respective sections in this template. If a section is not applicable, type “N/A” after section title. Subdivide each section as follows:

1. Sub-Section Subdivision 1 (if required)
   a. Sub-Section Subdivision 2 (if required)
1) Sub-Section Subdivision 3 (if required)
   
a) Sub-Section Subdivision 4 (if required)

E. Identify attachments as “Memo X-XXX, Annex A,” “Memo X-XXX, Annex B,” etc., at the bottom of the policy, in the form indicated below. Include a subject or title for each annex. Attach annexes to the policy in the order they are referenced in the policy.

F. Include page numbers on documents with more than two (2) pages (e.g. Memo 2-103, Page 2). Insert the page number, in a footer, flush right at the bottom of the page. Annex page numbers should appear as “Memo X-XXX, Annex A, Page 1,” “Memo X-XXX, Annex A, Page 2,” etc., or “Memo X-XXX, Annex A” for one page.

G. Where possible, use positions (e.g. Chief Compliance Officer) and not specifically named individuals for contact information. Consider creating an office e-mail account (e.g. compliance@citadel.edu) versus using Citadel accounts of specific person. This will preclude policy changes when personnel change/leave jobs. For any questions, contact the Office of Institutional Compliance (OIC): 843-953-2667 or compliance@citadel.edu.

5. COMPLIANCE

(States the consequences if the policy is not followed)

6. NOTES

A. Dates of Official Enactment and Amendments:

   Approved by “Responsible Official” on (Day) (Month) (Year).

   For non-substantive changes, identify all dates of revision, if any, with a brief description of the changes.

B. Responsible Department:

   (Indicate the Responsible Department)

C. Responsible Official:

   (Identify the Responsible Official)

D. Cross References:

   (Identify any related Memoranda)

7. RESCISSION
(Identify any previous version of the Memorandum by number and date, followed by “…is rescinded.”)

8. REVIEW

(State schedule for review: annual or biennial)

FOR THE PRESIDENT:

<table>
<thead>
<tr>
<th>OFFICIAL</th>
<th>RESPONSIBLE OFFICIAL NAME</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Responsible Official Rank</td>
</tr>
<tr>
<td></td>
<td>Position</td>
</tr>
</tbody>
</table>

Attachment
Annex A, (Name of First Attachment)
Annex B, (Name of Second Attachment)
Annex C, (Name of Third Attachment)
POLICY SUBMISSION COVER SHEET

Instructions

As part of The Citadel’s Policy Development Process, a faculty or staff member should submit this form to the Policy Coordinator, along with a draft policy and Policy Proposal Form. The Policy Coordinator, and the Policy Committee, if necessary, should also use the form to review the draft policy.

To Be Completed by Faculty or Staff Member

Name ______________________________ Department / Office __________________________

Supervisor __________________________ Date Submitted to Policy Coordinator____

Intended Name of Policy (if new) ______________________________________________

Name of Existing Policy (if revision) ____________________________________________

Policy Classification (circle one)

Board of Visitors (1-xxx) President (2-xxx) Provost (3-xxx)
Commandant (4-xxx) VPF (5-xxx) VPOps (6-xxx)
VPCM (7-xxx) Dir Athletics (8-xxx) VP Institutional Adv (9-xxx)

To Be Completed by Members of the Policy Committee

Policy Committee Member __________________________ Title ___________________

Department / Office ______________________________

Please check all that apply:

I have reviewed the Policy Proposal Form and its attachments. ______

I have reviewed the Draft Policy. ______

The Policy should be approved as is. ______

Before being approved, the following revisions should be made and/or issues should be considered:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

The Policy should not be approved for the following reason(s): ______

________________________________________________________________________

________________________________________________________________________

Signature of Policy Committee Member ________________________________________

Date __________________________ Extension ___________________
The Citadel’s Policy Structure

1 – BOARD OF VISITORS
1-0XX General

2 – PRESIDENT
2-0XX General
2-1XX Chief Compliance Officer
2-2XX General Counsel
2-3XX Internal Audit

Ombudspersons

Executive Assistant
to the President

3 – PROVOST
3-0XX General
3-1XX Academic Affairs
3-2XX Planning, Assess., Eval.
3-3XX Graduate College
3-4XX Library
3-5XX Krause Center
3-6XX Faculty
3-7XX Admissions
3-8XX Financial Aid
3-9XX Registrar

4 – COMMANDANT
4-0XX General
4-1XX Guard Orders
4-2XX Operations and Training
4-3XX Logistics
4-4XX Cadet Discipline
4-5XX Leadership Programs
4-6XX Cadet Life (C3, CARE, Infirmary, Cadet Activities
4-7XX Religious Activities

5 – FINANCE
5-0XX General
5-1XX Financial Services
5-2XX Procurement
5-3XX Budget & Analysis

6 – OPERATIONS
6-0XX General
6-1XX Human Resources
6-2XX Facilities & Engineering
6-3XX IT & Telecommunications
6-4XX Public Safety
6-5XX Auxiliary Services
6-6XX Gov’t & Community Aff.
6-7XX Program Management

7 – COMMUNICATIONS & MARKETING
7-0XX General

8 – ATHLETICS
8-0XX General
8-1XX NCAA Compliance
8-2XX Marketing
8-3XX Business & Operations

9 – INSTITUTIONAL ADVANCEMENT
9-0XX General
9-1XX Alumni Affairs

Policy Numbering
First Digit – Office
Second Digit – Department
Last 2 digits – policy #

Example: Memorandum 6-126 6 – Operations
1 – Human Resources
26 – Policy #