

THE CITADEL
The Military College of South Carolina
171 Moultrie Street
Charleston, SC 29409

MEMORANDUM
NUMBER 5-503

6 July 2016

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. Citadel Routing Sheet (CRS): Document routing sheet used to coordinate packages across the campus staff.
- B. 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.
- C. 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.

- D. 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 on an as needed basis.
- E. 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.
- F. Responsible Administrator: The Vice President, Dean or Director of the Responsible Department (as defined below).
- G. Responsible Department: The department, division or office responsible for the maintenance and review of a College Policy.
- H. Responsible Official: The faculty or staff member of the Responsible Department who is assigned responsibility for publishing, monitoring, and amending a College Policy.
- I. Signatory: The signatory will be the Chairman of the Board of Visitors for Board of Visitor (BOV) policies, the Vice President/equivalent 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 staff, faculty, Schools, business units, the Faculty Council, or members of the Policy Committee, as appropriate.

B. Formulating and Approving a College Policy

1. Identification and Proposal: A Responsible Official identifies the need for a new College Policy or a substantial revision to an existing College Policy. The following items should be addressed in the Citadel Routing Sheet (CRS) during the coordination process:
 - a. Briefly state the purpose of the new policy or revision (what is this policy going to do)?
 - b. 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)?
 - c. 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?
 - d. 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.
 - e. Is there a deadline for this policy to be implemented?
 - f. What other campus offices, departments, or groups may be affected by this policy?
 - g. What financial implications will this policy bring on the College?
 - h. Who will be responsible for regulating and enforcing the policy?
 - i. Who will be responsible for maintaining and reviewing this policy? How often?
 - j. Through what venues will the affected parties be informed of the implementation of the policy, and how will they be trained on its processes?
 - k. Will the College be in violation of or out of compliance with the law?
 - l. What is the severity of financial, reputational, health & safety, and management and operational consequences (Low, Medium, or High)?
2. Initial Review: The supervisor approves or denies the proposal. In making this decision, the supervisor should consult with his or her Dean, Director, or Vice President/equivalent, 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 Responsible Official drafts the new or revised policy using the Policy Template ([Annex A](#)). 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 a 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. [Annex B](#) is a copy of the policy numbering 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 Policy Coordinator. The Responsible Official will make changes to the proposed policy, in consultation with the Policy Coordinator, as necessary.
5. Cross-Campus Initial Coordination: The Responsible Official will coordinate the proposed/revised college policy and accompanying documents to any required departments or personnel and the Policy Coordinator during the cross-campus initial coordination process. The Citadel Routing Sheet (CRS) is used for this purpose. For proposed policies, the Policy Coordinator assigns a Memorandum number to the policy. Memoranda are categorized and numbered according to the College Department responsible for their administration ([Annex B](#)).
6. Vice President Review: Once cross-campus initial coordination is complete, the Responsible Official sends the package to the Vice Presidents and General Counsel. The Vice Presidents and General Counsel provide comments and changes back to the Responsible Official. After receiving these comments and recommendations, the Responsible Official makes the appropriate changes and submits the proposed/revised policy to the Signatory for approval.
7. President: The Vice President/equivalent Signatory is signing the policy on behalf of the President. The Vice President/equivalent decides, in concert with the Policy Coordinator, whether or not the President must review the policy before signing. For minor revisions, the President will be provided an information copy of the policy by the Policy Coordinator.

8. Implementation: Once the policy is approved, the Policy Coordinator will finalize the policy and post it to the college website. 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 using e-mail distribution lists and DogNews.
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: 5-503-policy-development-and-management.pdf

The permanent hyperlink for this policy is:

<http://www.citadel.edu/root/images/Policies/5-503-policy-development-and-management.pdf>

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 Vice President or equivalent and the Policy Coordinator. An overview of non-substantive 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 the Vice President for Finance and Business on 6 July 2016.

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 4 March 2015, and all previous versions are rescinded.

8. REVIEW

Review this policy on an annual basis.

FOR THE PRESIDENT:

OFFICIAL

//Signed, JLG, 6 July 2016//

JOSEPH L. GARCIA

Colonel, UMSC

Vice President for Finance and Business

Attachments

[Annex A](#), Policy Template

[Annex B](#), The Citadel's Policy Structure

Annex A

THE CITADEL
The Military College of South Carolina
171 Moultrie Street
Charleston, SC 29409

MEMORANDUM
NUMBER (X)-(Y)

(Day) (Month) (Year)

(NAME 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:

OFFICIAL

SIGNATORY OFFICIAL NAME
Signatory Official Rank
Position

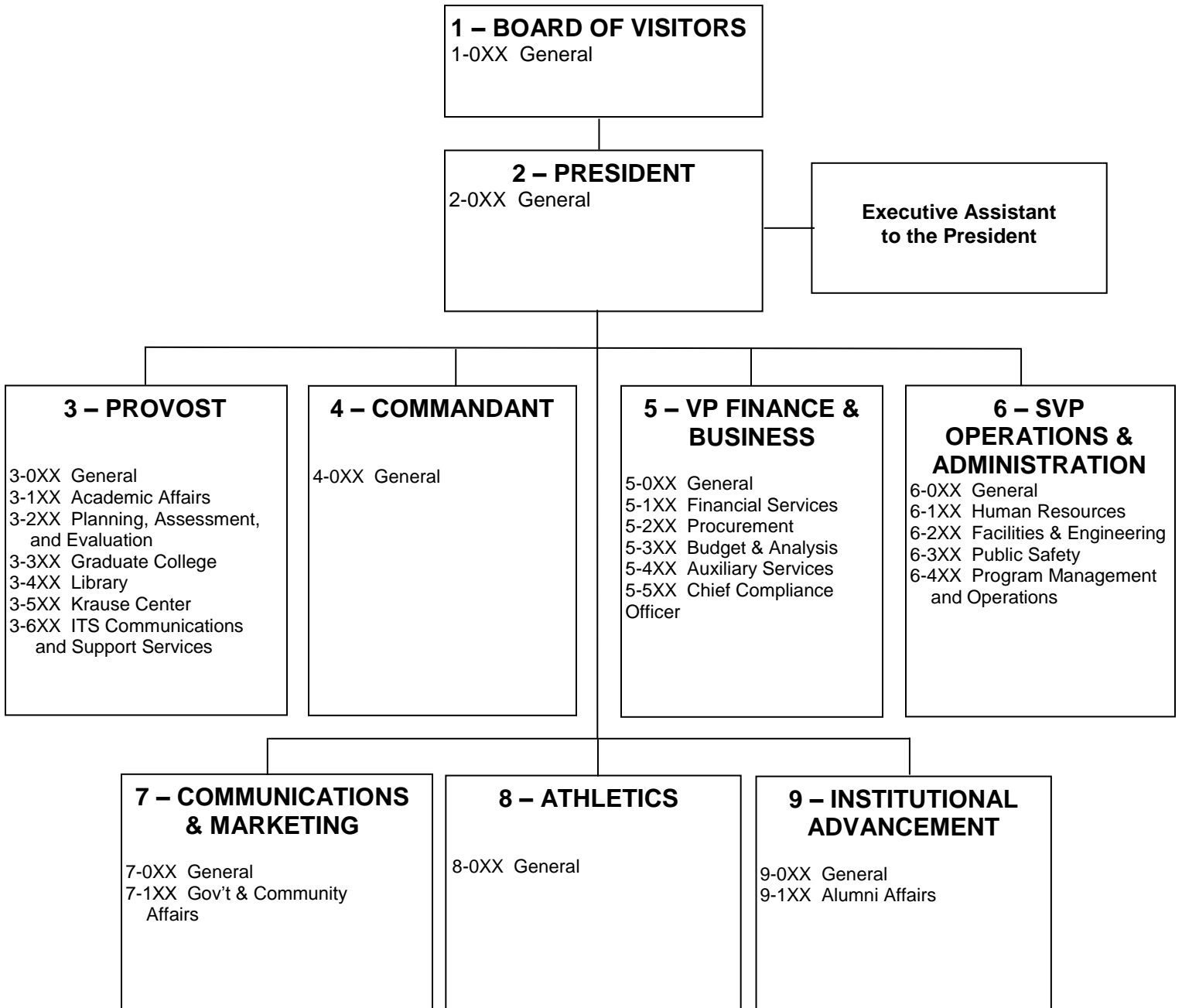
Attachment

Annex A, (Name of First Attachment)

Annex B, (Name of Second Attachment)

Annex C, (Name of Third Attachment)

Annex B
THE CITADEL'S POLICY STRUCTURE



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

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