



**THE GEORGE
WASHINGTON
UNIVERSITY**
WASHINGTON, DC

Responsible University Official:
Compliance Officer
Responsible Office: Compliance Office
Last Revised Date: March 10, 2017

UNIVERSITY POLICY DEVELOPMENT AND PUBLICATION

Policy Statement

All university policies must be developed, approved and published in accordance with the standards outlined in this policy. Policies not following this standard will not be considered official university policies and will not be published on the university’s central [policy web page](#).

Reason for Policy

University policies must be kept current, and made available to all relevant operating units in a timely manner. This policy is required for the effective communication of university policies and for the ease of use and identification of approved university policies.

Who is Governed by this Policy

Faculty, staff and students

Table of Contents

Policy Statement	1
Reason for Policy	1
Who is Governed by this Policy	1
Table of Contents	1
Policy	2
Definitions	4

Contacts..... 5
Document History 5
Who Approved This Policy..... 5

Policy

General University Policy Standards

All policies that meet the definition of a university policy must be included on the official [policy web site](#) and are governed by this policy. Please see the definitions below for guidance on the distinction between a policy and a procedure.

Many other important school or departmental policies and procedures do not meet the definition of a university policy. Although not governed by this document, these departmental/local policies must be clearly written and well communicated.

Every university policy must fall within the jurisdiction of a responsible university official. The responsible official will designate a responsible office within their department. Both the responsible university official and the responsible office will be listed at the top of the first page of the policy document. The responsible office will generally be the office that develops and administers the policy and procedures, and will be accountable for the accurate formulation, issuance, and timely updating of the document.

Policies must be drafted so that they are clear and concise. Policies must contain enough information to provide sufficient guidance on the subject without being excessive in length.

Policy Naming Convention

The policy name must be no more than ten words. The choice of a descriptive name is critical since people will search for policies using keyword searches.

Policy Approval

The originator of the policy will forward the policy to the Compliance Office. The Compliance Office will review the policy for format and content. If material changes have been made to the content of the policy, then further review is required, thus the Compliance Office will forward the policy to the Policy Advisory Committee (“the Committee”) for review. The Committee will review the policy and either suggest changes or approve the policy for publication. The Committee will indicate its recommendation(s) by comments in the monthly Committee meetings. If changes are recommended, the policy will be returned to the owner for consideration of the

changes. Once the policy is approved by the Committee, it will then be forwarded to the appropriate Vice President(s) for final approval.

If a policy involves compliance with regulatory issues, both the Office of the Senior Vice President and General Counsel and the Compliance Office must review the policy prior to publication on the web site.

Standard Policy Template

To provide consistency, a standard policy template has been created. Use of the standard policy template facilitates the adoption of clear, concise policies and procedures at all levels of the organization. All university policies must be in the standard university policy template. If a section does not contain any information or is not applicable, remove the section heading from the body of the policy and from the table of contents. Please contact the Compliance Office (202-994-3386 or comply@gwu.edu) to obtain a copy of the university policy template.

Interim Policies

Policies may be put into place on an interim basis in situations when final approval in a timely manner is not possible.

Issuing a Policy

The Policy Advisory Committee will assist in the coordination of announcements and distribution of newly released policies so that the university community is made aware of changes when they occur. Newly-released policies may be communicated to the community at large via targeted email, portal messages, and/or other means as appropriate.

Origination Date

Every policy must have an origination date so that it is clear when and for how long the policy has been in effect. An attempt to include the policy origination date should be made; however, if this cannot be determined or is unavailable, this section should indicate "not available."

Policy Applicability/Who Needs to Know the Policy

A brief statement must be provided indicating who must observe the policy, who may be affected by the policy, and/or who must understand the policy in order to perform his/her job. The primary audiences are "faculty," "staff" and/or "students."

Review Period/Policy Amendments

Every policy shall be reviewed periodically as determined by the Policy Advisory Committee, but no less frequently than once every year. The “Last Reviewed Date” and “Last Revised Date” headings must be included and maintained. The policy owner is responsible for updating the policy if there is a change in law or regulation.

The Compliance Office will notify the responsible office when a policy is scheduled for review at the beginning of each fiscal year.

External Regulations

If the policy is created in response to external regulations, those laws or regulations, as well as the responsible agency, must be identified in the policy by reference or by link (address) to the actual regulatory sources.

Definitions

Appendices: Contain laws, regulations and checklists that may pertain to the policy.

Contacts: Names the university office(s) that can answer specific questions regarding the policy or approve exceptions.

Definitions: Lists the terms used in the document alphabetically and defines unfamiliar terms that have a specialized meaning in the policy.

Departmental Policy: A departmental policy is one that does not have broad impact on the university community and is limited in scope and application.

Forms: Lists forms the reader must use to comply with the policy, explains the purpose of each form, and may provide a hyperlink to the applicable form(s).

Policy Statement: Is a concise statement of the university’s position on the subject matter. It may state who should follow the policy, when the policy applies, and list any major conditions or restrictions.

Procedures: Describe the means by which policies are implemented.

Reason for Policy/Purpose: States the legitimate interests of all parties, describes the problem or conflict the policy addresses, and cites any legal or regulatory reasons for the policy.

Responsible Office: Under the direction of the Responsible University Official, the Responsible Office develops and administers a particular policy and its procedures, and will be accountable for the accuracy of its subject matter, its issuance, and timely updating.

Responsible University Official: The Policy Owner, who is charged with responsibility for creating, implementing and updating university policies in his or her area of jurisdiction.

University Policy: A university policy is defined as one with broad application throughout the university, which helps promote coordinated compliance with applicable laws and regulations, promotes operational efficiencies, enhances the university’s mission or reduces institutional risk.

Contacts

Contact	Telephone	Email
Compliance Office	202-994-3386	comply@gwu.edu

Document History

- **Last Reviewed Date:** May 10, 2018
- **Last Revised Date:** March 10, 2017
- **Policy Origination Date:** May 1, 2001

Who Approved This Policy

Louis H. Katz, Executive Vice President and Treasurer

Steve Lerman, Provost and Executive Vice President for Academic Affairs

Beth Nolan, Senior Vice President and General Counsel

This policy, as well as all [university policies](#), are located on the [Compliance Office website](#).