

# Policy on Policies

**Policy Number:** GA-3030

**Effective Date:** March 2005

**Review Date:** August 2025

**Approved By:** President and Executive Cabinet

## 1. Purpose

This Policy establishes a transparent, consistent, and standardized approach for all policies to be collaboratively created, revised, discontinued, reviewed, approved, implemented, and maintained. It serves to promote awareness, compliance, risk mitigation, and accountability across the College.

## 2. Scope

This Policy on Policies applies to all members of the College community, including faculty, staff, students, and guests on college premises. It also applies to all Policies created, revised, or discontinued after the Effective Date of these Policy. This excludes Board policies, which are independently governed by the Board of Trustees.

This Policy on Policies does not apply to Internal Guidance as defined below. To the extent possible, departmental or program specific rules should not be referred to as a policy to distinguish such rules from Policies that are approved by the Board or the Executive Cabinet or President and applied College-wide. Additionally, Policies that only impact one division and that do not have cross-divisional impact will follow a more narrowly tailored review and approval process than those that have more widespread impact.

## 3. Definitions

1. Constituency Groups (CGS) refer to formally recognized groups that are composed of and representing faculty, staff and/or students (i.e. Faculty Senate, Staff Senate, and Student Government Association).
2. Drafter is the General Counsel (“GC”) or designee assigned to the Drafting Committee by the Executive Cabinet to assist the Policy Administrator and/or Policy Owner in drafting and reviewing a particular Policy, as described below.
3. Drafting Guidelines are guidance on how to draft or revise Policies.
4. Effective Date is the date upon which a Policy will be published, implemented, and take effect.
5. GC is the Vice President of Policy and General Counsel. The GC, or designee, is responsible for overseeing the development, revision, review, approval, discontinuation, maintenance, implementation, communication, and accessibility of the College-Wide Policy Manual Policies.
6. Policies are rules to follow, as well as behavioral and performance expectations. Procedures mean directions or process to be followed to implement or effectuate the intent of a policy or other applicable



laws, regulations, or college rules. Periodically, a policy will include procedures or guidelines embedded within it and, in such circumstances, the combined document must follow the expectations of this Policy on Policies.

7. Guidelines are a set of general rules, procedures, principles, recommendations, or instructions that apply to the College community.

8. Policy Statement describes what the policy is (purpose and general requirements).

9. Internal Guidance includes standard operating procedures (SOP), protocols, forms, templates, rules, job aids, or training materials for internal use and do not apply College-wide.

10. Implementation Plan is a roadmap for achieving all actions, including training and communications, necessary to effectively implement the Policy.

11. Non-substantive means revisions to a Policy and/or Procedures that modify position titles; change department, division or other entity names; update contact information; correct typographical, grammatical, or citation errors; fix broken hyperlinks; reformat, reorganize, or provide clarifications without changing the substance or meaning; or change references to laws, regulations, or other policies or materials that have changed or become obsolete. Requests for Non-substantive revisions can be forwarded to the GC for approval. The GC shall approve and implement the changes, or provide a rationale for not approving or implementing changes. Any denial is subject to the review of EC.

12. Policy Action is developing, revising, or discontinuing a Policy. A Policy Action Request Form is used to seek a Policy Action. The [Policy Action Request Form is located here](#).

13. Policy Administrator is the employee designated by the division Vice President and/or President to be responsible for assisting with the drafting, as well as the administering, implementing, and interpreting a specific policy on a day-to-day basis. A Policy Owner can also elect to serve as the Policy Administrator or name another employee to serve in that role. When there is a conflict with a policy interpretation, the GC is charged with providing the official College interpretation of the policy.

14. Policy Owner is the member of the Executive Cabinet who has the overall or ultimate responsibility for creating or revising and implementing a Policy. A Policy Owner can also serve as the Policy Administrator if another employee is not designated.

15. College Wide Policy is any policy that is reflected in the online NEOED policy portal.

16. Subject Matter Expert is an internal or external resource who can provide knowledge on the specific subject, business area, business process, or technical issues as may arise within the scope of the Policy or Procedures under consideration.

17. The college is required to follow various policies. Federal, state and local government policies, laws and regulations take priority over college policies. Board policies take priority over college policies. Administrative Manual policies take priority over any other college policy (i.e. departmental policies), guidelines, handbooks or internal guidance.



## 4. Policy Statement

The mission and values of the College of Southern Maryland are expressed through its Board and various college policies (i.e. administrative, employee, faculty and student policies), which are approved by the President's Executive Cabinet or the Board of Trustees.

Policies promote compliance with laws, regulations, and accreditation standards; clarify the expected behavior of faculty, staff, students, prospective students, contractors, volunteers, and other third parties; afford due process when applicable; establish roles and responsibilities within the College; protect the integrity of the College's operations and reputation; and shape College decision-making and risk mitigation strategies. Policies are integral to creating a culture of compliance, providing quality service to students, and safeguarding fair and equitable treatment of members of the College community. A policy may include governing principles or may mandate or restrict action.

## 5. Procedures

### A. Request

1. Any individual member or constituency group of the college community who believes that a current Policy should be modified, or a new Policy should be created, must submit a Policy Action Request electronically and must include the reasons for the requested Policy Action and a summary of the new Policy/Procedure to be created or the proposed changes.
2. The existing Policy Owner and/or GC or designee may also identify a need for a Policy Action.
3. The requestor can submit a draft, sample policies or procedures, or a description, outline, or list of proposed provisions in the Policy Action Request. If the Request is missing information or needs clarification, the GC or designee, may consult with the individual or group that submitted the Request and revise it as needed.
4. The Policy Owner and/or Policy Administrator, in consultation with the GC, will consider related existing policies to determine if rather than creating a new stand-alone policy, the new content could be combined in an existing policy.
5. The GC, in consultation with the President and/or EC, will review the Policy Action Request and determine whether to approve the Policy Action for drafting.
6. The Policy Administrator, Policy Owner, and GC or designee will serve as the Drafting Committee.

### B. Drafting

1. The College recognizes that standardizing all Policies pursuant to the requirements of this Policy will occur and that, as Policies are revised, the College will re-format them to follow the [Policy Template](#).
2. The Policy Owner and/or Administrator, with assistance of the GC or designee, will create or revise the Policy using the Template(s).



3. During the drafting period, the Policy Administrator or Policy Owner will complete an [Implementation Plan](#) to determine how to comply with applicable laws, regulations, and accreditation standards; whether other Policies may be affected; whether changes will need to be made to business processes, technology, catalog provisions, College websites, marketing materials, employee training materials, forms, guidelines, Internal Guidance, or any other materials that may be affected; how the Policy should be communicated to the College community or specific groups within it; and a proposed Effective Date for when the Policy will be published on the College's website and take effect.

4. During the drafting process, the Policy Owner, Policy Administrator, and GC may consult with subject matter experts, including Constituency Group leaders, on the Policy and/or the Implementation Plan, prior to finalizing the draft for review.

5. The Policy Owner will submit the draft of the Policy and/or Implementation Plan to the GC or designee for review. The GC or designee will provide feedback to the Policy Owner who will work with the Policy Administrator to incorporate any changes.

6. After any changes are made, the Policy Owner will approve the Policy for review by the college community.

### **C. Review and Approval**

1. Except for non-substantive policy changes, the draft of the policy will be shared with CWC for review at their next available meeting. This review should take place within 30 days of receipt of the email request for review. An extension of time of up to 15 additional days may be granted by the GC for good cause shown. At the CWC meeting, the Policy will be discussed and, if appropriate, an additional level of review may be delegated to one or more of the Constituency Groups for further review. This level of review shall be completed within 30 days. However, an extension of time of up to 15 additional days may be granted by the GC for good cause shown. No additional review time will be granted, and the Constituency Group(s) will timely submit its recommendation to CWC. Failure to submit a timely recommendation may result in the CWC recommending either abandoning or moving the Policy forward for further review.

2. The CWC will make its Policy recommendation to the GC within 15 days review who will, in turn, present the recommendation to EC. If the CWC does not accept certain recommendations from the Constituency Groups, upon request it may provide them with feedback. If the CWC fails to render a recommendation to EC, the GC is empowered to present the latest iteration of the Policy to EC for further review and consideration. EC will determine which recommendations, if any, from CWC and/or GC will be accepted and, if the EC desires for the Policy to proceed forward, will charge the GC with posting the Policy for College-community review and suggestions for a 30-day period. If the EC does not accept certain recommendations from the CWC, upon request it may provide them with feedback. EC will then either request that the GC and Policy Owner implement changes based upon feedback received from the CWC and/or College community, or alternatively it will recommend to the President that the Policy should be implemented or abandoned. If EC fails to render a recommendation, the President shall decide the next steps with the Policy. The President, in their sole discretion, may decide to seek Board input prior to rendering a decision on implementation or abandonment.

3. If it is determined by the President, in consultation with the GC and/or the Board, that the



Policy Action would also affect a related Board Policy, the President may wait to complete its review and approval until any relevant changes to the Board Policy are approved by the Board to ensure consistency is maintained.

4. After the President approves the Policy, the GC or designee will post the approved Policy, with an effective, revision, next revision and/or rescission date(s), to the policy management software platform, and share an appropriate Policy update to the College community via an all-campus Email as soon as practicable.;

The GC will also:

- a. Archive any prior versions of the Policy;
- b. Maintain the Approval documentation; and
- c. Ensure that the next review cycle is calendared, which shall be no more than four (4) years from the Effective Date.

5. Upon receipt, the Policy Owner and/or Administrator will begin implementation and communication in accordance with the Implementation Plan.

#### **D. Expedited Policy Review**

1. At times, it may be necessary to expedite the Policy review process. This can occur for reasons such as the need to be compliant with a new law or regulation, or in instances where there has been significant delay in the above-referenced process creating a backlog of policies and procedures for review and approval. In such instances, the following review process will be followed:

- a. The Policy will be reviewed by EC. Upon review and tentative approval;
- b. The document(s) will be simultaneously shared with the Constituency Groups and posted online for the campus community to review and comment for a 15-day period. A Constituency Group may request an extension of time of up to 15 additional days. This request may be granted by the GC for good cause shown – contingent in large part on the urgency of the need to implement the Policy;
- c. Following this review and comment period, within 15 days the GC will present a comprehensive summary of the recommendations received to EC. EC will then either request that the GC and Policy Owner implement changes based upon feedback received from the Constituency Groups and/or College community, or alternatively it will recommend to the President that the Policy should be implemented or abandoned. If changes are recommended, the GC and Policy Owner shall bring the updated Policy and/or Procedure to the next available EC meeting for EC review and recommendation to the President for implementation or abandonment. If EC fails to render a recommendation, the President shall decide the next steps with the Policy. The President, in their sole discretion, may decide to seek Board input prior to rendering a decision on implementation or abandonment.

2. Policies that only impact one division will also follow an expedited review process, as follows:

- a. The Policy will be approved by the Divisional Vice President;
- b. Next, it will be reviewed by EC. Upon review and tentative approval;



- c. The document(s) will be shared with any impacted Constituency Group(s) to review and comment for a 30-day period (for example, a faculty policy would be shared with Faculty Senate, a staff/administrative policy would be shared with Staff Senate, and a student policy would be shared with SGA);
- d. Following this review and comment period, within 15 days the GC will present a comprehensive summary of the recommendations received to EC. EC will then either request that the GC and Policy Owner implement changes based upon feedback received from the Constituency Group(s), or alternatively it will recommend to the President that the Policy should be implemented or abandoned. If changes are recommended, the GC and Policy Owner shall bring the updated Policy and/or Procedure to the next available EC meeting for EC review and recommendation to the President for implementation or abandonment. If EC fails to render a recommendation, the President shall decide the next steps with the Policy. The President, in their sole discretion, may decide to seek Board input prior to rendering a decision on implementation or abandonment.

#### **E. Ongoing Policy Review**

1. Policies will be regularly reviewed by the Policy Owners, Policy Administrators, and the GC or designee no less than every four (4) years to determine whether:

- a. Each Policy is still needed;
- b. Revisions are needed based on changes in the law or regulations, to conform to practice or other reasons; and/or
- c. There are gaps that indicate a new or revised Policy should be developed.

2. The GC or designee will submit a request for Policy Action for any Policy that has not been reviewed in four (4) years.

#### **F. Conflicts with Policies**

1. To the extent that a Faculty, Student, Administrative, Employee or other College-Wide policy conflicts with a Board policy or procedure, the Board policy will prevail.
2. To the extent that any Handbooks, Internal Guidance or Guidelines conflict with a College-Wide Policy, the College-Wide Policy will prevail.
3. To the extent that a Procedure or Guideline conflicts with a Policy, the Policy will prevail.

## **6. Roles and Responsibilities**

The President and Vice Presidents (“Executive Cabinet” or “EC”) are delegated ultimate authority for reviewing and approving administrative and employee policies as well as faculty and student policies that implicate staff, administration, and/or the Board of Trustees (policies implicating the Board also require Board approval). All new and significantly revised administrative policies, employee policies, student policies, and faculty policies that specifically concern the terms and conditions of employment (i.e. hiring, promotion, tenure, and disciplinary procedures) must be approved by the Executive Cabinet before going into effect. The Executive Cabinet must also approve administrative, employee, student, and



faculty policies proposed for discontinuance or retirement.

Policy Owners and Policy Administrators must periodically (at a minimum once every four years) review and monitor their policies and procedures for accuracy, efficiency, and effectiveness.

Policy Owners must ensure that monitoring compliance with their policies occurs.

## **7. Enforcement and Compliance**

The Executive Director of Compliance and Risk Management will oversee policy administration and development procedures.

## **8. Related Policies and References**

None

## **9. Review and Revision Process**

This policy will be reviewed and revised as needed, and at a minimum once every four years.