

POLICY MANAGEMENT OVERSIGHT COMMITTEE

Historical Context

Middle States Visit

Assessment Plan No. 2

With the goal of leveraging our present assessment activity, we created the following assessment plan that will provide further evidence of the periodic assessment of all institutional policies and procedures and describe the manner in which they are assessed.

MSCHE	
Standard:	Standard II: Ethics and Integrity
Proponents:	Chief of Staff

Recommendations:	
MS21-04	"The College should provide further evidence of the periodic assessment of all institutional policies and procedures and the manner in which they are assessed."
1. Associated best practices	
2015 Ethics and Compliance Policy Management Benchmark Report (Foosse, 2015)	
<p>1) A schedule for reviewing and updating policies should be agreed to and established by policy stakeholders, then followed and audited. To determine the right schedule for policy review, consider the organization's risk factors and create a cohesive plan. Policies related to higher risk areas will need more frequent review than low risk areas.</p> <p>2), An annual review plan is a good practice. The number of polices you need must be determined by your organization's risk assessment.</p> <p>3) A policy review committee is a best practice for policy management. Organizations should form a Policy Oversight Committee comprised of senior leaders and other key policy stakeholders across departments. The Committee is responsible for developing and implementing policies, procedures, and controls throughout an organization.</p> <p>4) A policy that is created but not effectively monitored or utilized, could be even more detrimental than no policy. Without policies, each employee is left to their own devices and an organization can never say that an employee "violated policy." Also, the Federal Sentencing Guidelines for Organizations and other compliance guidance always require that an organization have policies and standards and that it effectively communicates these policies or standards.</p> <p>5) Third party risk management impacts policy management. Third parties must also adhere to and attest to an organization's policies, as the legal risk of misconduct from third party vendors and employees is comparable. The ability to show that third parties have read and attested to policies is a critical legal defense.</p> <p>6) Policies are necessary when they define organizational values or mandates, address regulatory obligations, or manage potential risk or liability. Too many policies burden the organization—too few expose it to unnecessary risk. Policies need to be based on a risk assessment.</p>	

7) **On-boarding** is the best time to train employees on policies. Employees should be periodically re-trained on policies to ensure they remain top of mind. The frequency of re-training should be determined by a risk assessment by the Policy Oversight Committee.

8) **Policy Review.** Establishing a process for sound policy management is important. The decision to automate the process using policy management software would provide significant energy and focus for establishing workflows and processes necessary for a best-practice program.

9) **Best practices for policy exceptions, logging policy violations.** As a best practice, policy exceptions and violations should be logged and tracked in an incident management system and followed up on, whether through a formal investigation or by other means. All actions related to the policy exception or violation should be documented. Of course, exceptions can be tracked in several ways, but the more automated the process is, the easier it will be to ensure that each exception has been properly reviewed. Failing to follow up on a reported exception creates real risk for the organization.

10) **Differentiate between E&C policies and operational policies (HR, finance, security, IT systems access, etc.)** In terms of policy management, an organization needs to define for itself which kinds of documents require a specific workflow and approval process. This is often contained in a "policy on policies." Any document that is identified as a policy should be reviewed and vetted by all critical stakeholders. Procedures, SOPs and guidelines should be clearly identified, but may be subject to differing levels of review and approval.

2. Technology requirements

Policy management system software

3. Preliminary budget

To be determined based on selection of policy management software

4. Deliverables

- Create Policy Management Oversight Committee
- Create Policy Review Sub committee
- Create database of policy management best practices
- Establish policy revision standards and process to introduce new policies.
- Development incident management process to log and track policy exceptions and violations
- Establish policy review timeline
- Purchase policy management software

5. Tactical approach

- Guided by the Chief of Staff, the Cabinet will create and manage a Policy Management Oversight Committee, the committee will be trained on risk assessment
- The Policy Management Oversight Committee will appoint a Policy Review Subcommittee
- Guided by the Chief of Staff, the Policy Review Subcommittee will develop a database of policy management best practices
- The Policy Review Subcommittee will establish policy revision standards and a process to introduce new policies
- The Policy Review Subcommittee will develop an incident management process to log and track policy exceptions and violations
- The Policy Management Oversight Committee will develop the policy review timeline
- The Policy Management Oversight Committee will assess policy management software and recommend a software package for purchase and implementation at OW
- Chief of Staff in collaboration with VP's will develop campus wide training on policy management

6. Collaborations

Academic Affairs, Student Affairs, Business and Finance, Communications, Human Resources, and Enrollment Management review of all policies and procedures at the programmatic, departmental, division, and institutional level

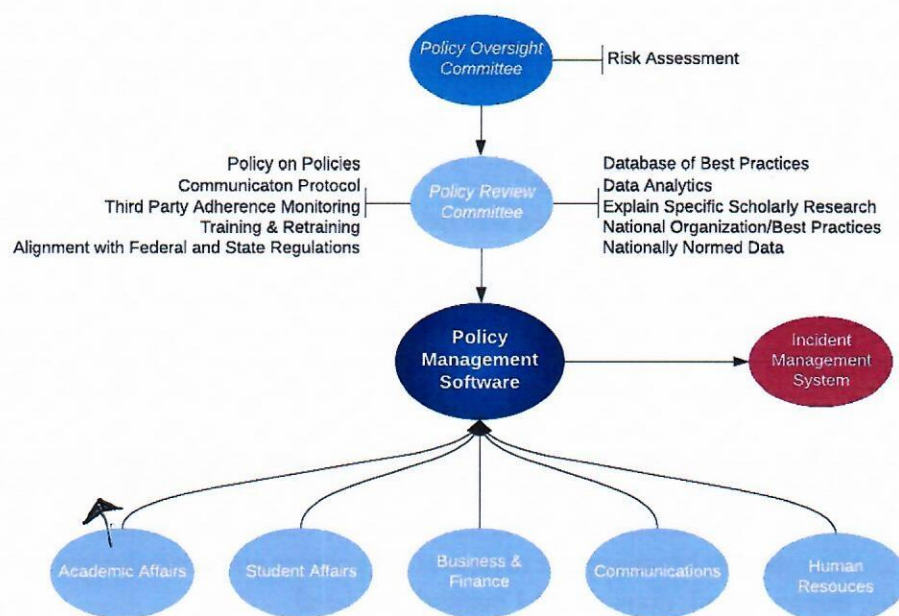
7. Timeline

- June 2021 Establish Policy Oversight Committee
- October 2021 Establish Policy Review Subcommittee
- December 2021 Create database of best practices for policy management
- TBD Purchase policy management software

8. Support documentation

1. Foose, A. (2015). *2015 Ethics and Compliance Policy Management Benchmark Report*. Navex Global. https://www.navexglobal.com/en-us/file-download-canonical?file=/NAVEXGlobal_2015_Policy_Management_Benchmark_Report_Web.pdf&file-name=NAVEXGlobal_2015_Policy_Management_Benchmark_Report_Web.pdf
2. NAVEX Global. (2017). *Definitive Guide to Policy and Procedure Management*.
3. <https://www.navexglobal.com/en-us/resources/definitive-guides/definitive-guide-policy-and-procedure-management?RCAssetNumber=152>
4. NAVEX Global. (2020). *Definitive guide to Ethics and Compliance Programs*. <https://www.navexglobal.com/en-us/resources/definitive-guides/definitive-guide-ethics-and-compliance-programs?RCAssetNumber=8047>
5. NAVEX Global. (2016). *Definitive Guide to Incident Management*. <https://www.navexglobal.com/en-us/resources/definitive-guides/definitive-guide-incident-management?RCAssetNumber=1825>

Figure 3. Centralized Policy Management System



MEMBERSHIP

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