



Chancellor's Working Group on Policy and Procedures Report and Recommendations

February 2016



THE UNIVERSITY
of NORTH CAROLINA
at CHAPEL HILL

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Executive Summary

In May 2015, the Policy and Procedures Working Group (hereinafter the Working Group) was created and charged by Chancellor Carol L. Folt to design and oversee an institution-wide review of policies and procedures, develop recommendations for policy and procedures improvements, and create a mechanism for periodic policy reevaluation. Through extensive research and numerous discussions, the Working Group identified five phases for our effort:

Phase I: Develop Scope and Select Consultant

Phase II: Review UNC-Chapel Hill Policies

Phase III: Develop Policy Ecosystem Recommendations

Phase IV: Test Recommendations with Focus Areas

Phase V: Develop Implementation Recommendations

At the completion of Phase V, the Working Group had developed a recommendation for a policy ecosystem built on the following five principles.

1. A coordinating function (office) would play a guiding and supporting role in making policies more consistent, available, and effective.
2. A central repository for University policies would enhance transparency, communication, and accountability.
3. A successful policy ecosystem will involve significant engagement across the University, and a role such as a policy liaison within each unit will be critical for developing the most effective policies and communicating policy changes and additions throughout the institution.
4. The policy management function of a coordinating office cannot act or be seen as a compliance function. Rather, it must be a service-oriented role whose primary mission is to improve the efficiency and effectiveness of policies at the University.
5. An updated, standard policy process could improve the efficiency of policy management at the University and increase the quality of policy development and implementation, enabling the University to function at its highest potential.

Based on these principles, the Working Group has developed several specific recommendations, including a joint recommendation with the Ethics and Integrity Working Group (also presented in its 2015 report). Specific recommendations include:

1. Create a position of Chief Integrity and Policy Officer.
2. Establish a new Office of Integrity and Policy to provide awareness and promotion, monitoring and reporting, and coordinated policy management and guidance.
3. Redefine “university policy” to be more inclusive and to more accurately reflect the scope of relevant policies.
4. Update the policy approval process and the University’s existing policy on Policy Development, Approval, and Publication.
5. Build a central repository for storing and communicating policies across the University.
6. Update the policy template and move all policies into the repository using the updated template.

These principles and recommendations are discussed in depth in Section IV of this report.

The policy ecosystem recommendations were refined and affirmed through an analysis of pilot focus areas and numerous feedback sessions with stakeholders across campus. The focus area analysis also found that the University does not have significant gaps in policy implementation in the areas examined. Our recommendations are thus not intended to solve problems with compliance or implementation but rather to increase the transparency and quality of policy development, enabling the University to most effectively and efficiently use policies to guide and support the work of faculty, staff, and students.

Changing the policy ecosystem at a large and complex institution is a major task that will take years to fully complete. Our recommendation proposes a financial and resource investment from the University and from individual units within the University. During feedback sessions, individual units reported that their investment through policy liaisons could provide significant benefit to their operations. The Working Group recognizes that financial and other considerations may make it appropriate to modify our recommendations and seeks to provide as much information as possible to enable senior leadership to make effective decisions about how best to manage policies into the future. An Implementation Timeline with analysis of key elements is discussed in depth in Section VI of this report.

I. Working Group Charge and Membership

The Policy and Procedures Working Group (hereinafter the Working Group) was charged by the Chancellor to design and oversee an institution-wide review of policies and procedures, develop recommendations for policy and procedures improvements, and create a mechanism for periodic policy reevaluation. Effective policy management must ensure the University is following applicable laws, regulations, and policies.

The Working Group was encouraged to select a higher education consulting firm to assist in the process of taking what they learned from the review and improving upon it. The Working Group was directed to define the firm's scope of work and expected outcomes and to manage the process through its completion.

Working Group membership included representatives from units across campus, with a focus on individuals with experience or responsibility developing, managing, and implementing institutional and unit policies.

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II. Background and Process

The Policies and Procedures Working Group received its charge from the Chancellor at its first meeting on May 13, 2015. The first challenge and need for the Working Group was to develop and refine the scope of effort needed to achieve the group's charge. The Working Group met weekly until a rough plan was developed. While this report shows the final version of this plan, we worked iteratively throughout the process, particularly in the early phases, and refined the approach to reflect what we learned along the way. The overall effort can be broken into five phases:

Phase I: Develop Scope and Select Consultant

Phase II: Review UNC-Chapel Hill Policies

Phase III: Develop Policy Ecosystem* Recommendations

Phase IV: Test Recommendations with Focus Areas

Phase V: Develop Implementation Recommendations

*For the purposes of this discussion, "policy ecosystem" refers to the human resources, tools, and processes related to policy approval, change, and decommissioning.

The following outlines the process followed in each phase in order to develop the Working Group recommendations.

Phase I: Develop Scope and Select Consultant

The Working Group knew that we would need the services of a consultant to complete a significant amount of work. Prior to identifying a consultant, we needed to gain a clearer sense of what was truly achievable in the timeframe given and reach a common understanding of how the work would be divided between the Working Group and the consultant given each group's expertise. This was especially important given the variety of perspectives and experience related to policy on the Working Group. We began by doing independent research on best practices as recommended by policy associations and what the Working Group found being used by other comparable institutions.

While our research succeeded in providing a common understanding of the magnitude of our charge, we needed more information to develop a Request for Proposal (RFP) that would allow a consultant to successfully support our needs. We issued a Request for Information (RFI) on May 29, 2015. Responses were received by June 18, 2015, and were used to refine the RFP so it could be more efficient and effective. The RFP was issued on July 10, 2015, and six responses were received by July 31, 2015. The Working Group reviewed RFP responses to identify three finalists for in-person presentations, which were completed on August 12, 2015. Based on well-defined selection criteria from the Working Group, which included a combination of experience, demonstrated understanding of our needs, feasibility of successful completion,

and value of proposed effort and investment, the Working Group selected Parthenon-EY (hereinafter the Consultant).

The first task in working with the Consultant was to refine the scope in order to ensure their efforts met our needs. Discussions helped refine the scope of work and were also used to inform the second phase of work. The refined scope was approved on September 1, 2015, and guided the remainder of the Consultant's effort. The analysis and recommendations that follow are heavily informed by and pulled from the work of the Consultant but represent the analysis and recommendations of the Working Group.

Phase II: Review UNC-Chapel Hill Policies

The Consultant provided a review of all UNC-Chapel Hill policies as well as a review of policies and policy ecosystems at benchmark institutions. The review of the environment at UNC-Chapel Hill included conversations with over 25 University stakeholders to better understand the implementation of policies and how that was experienced in different parts of the University. In addition, the Consultant found and analyzed all publicly available policies through the <http://policies.unc.edu> website.

Ten benchmark institutions were identified to provide working examples and in some cases, best practices of policy implementation in a complex university environment. Selected institutions were either comparably sized, public research institutions or identified as leaders in policy implementation based on their documented activity in presentations and conferences focused on policy management. In order to ensure candid feedback, the Consultant did not identify specific institution names in their presentations or final report but did identify basic characteristics of each institution. The Consultant reviewed policies at all 10 institutions and talked directly with four institutions to gain a more in-depth understanding. Results were shared with the Working Group to ensure accuracy of the initial UNC-Chapel Hill policy review and discuss implications of the analysis (see Section III for Institutional Analysis).

Phase III: Develop Policy Ecosystem Recommendations

Using the results from Phase II, the Working Group and Consultant worked together over the course of several months to develop draft recommendations of a policy ecosystem, which are the processes, structures, and roles for managing the life cycle of processes from development to implementation and monitoring to updates and even decommissioning. Results from the review of the policy environment at UNC-Chapel Hill and review of benchmark institutions were shared along with initial draft recommendations to a variety of University stakeholders. Based on a list provided by the Office of Faculty Governance, faculty governance leaders, mostly committee chairs, were invited to participate in feedback sessions. Participants included:

- G. Rumay Alexander, Chair of the Community & Diversity Committee
- Anna Beeber, Co-chair of the Faculty Grievance Committee
- Mimi Chapman, Co-chair of the Faculty Hearings Committee

- Jennifer Coble, Chair of the Educational Policy Committee
- Henrik Dohlman, attended on behalf of Leslie Parise, Faculty Executive Committee
- Joseph Ferrell, Secretary of the Faculty
- Nancy Fisher, Chair of the Committee on Fixed-Term Faculty
- Carol Hunter, Chair of the University Committee on Copyright
- Timothy Ives, Chair of the Faculty Welfare Committee
- Peter Mucha, Chair of the Advisory Committee
- Margot Stein, Chair of the Status of Women Committee
- Vin Steponaitis, Chair of the Faculty Committee on University Government
- Anne Whisnant, Deputy Secretary of the Faculty

In addition, we met with the representatives from the Employee Forum as well as groups that expressed interest in offering feedback, including Information Technology Services, Office of the University Registrar, Office of University Counsel, Student Affairs, and Office of Human Resources.

Responses from feedback sessions were considered during additional meetings with the Working Group and Consultant to develop our initial draft. After incorporating lessons learned from Phase IV (page 11), the Working Group contacted faculty governance stakeholders for an additional round of feedback. Participants included:

- G. Rumay Alexander, Chair of the Community & Diversity Committee
- Joseph Ferrell, Secretary of the Faculty
- Nancy Fisher, Chair of the Committee on Fixed-Term Faculty
- Timothy Ives, Chair of the Faculty Welfare Committee
- Peter Mucha, Chair of the Advisory Committee
- Leslie Parise, Member of the Faculty Executive Committee
- Margot Stein, Chair of the Status of Women Committee
- Vin Steponaitis, Chair of the Faculty Committee on University Government
- Joel Tepper, Chair of the Appointments, Promotions, & Tenure Committee

- Anne Whisnant, Deputy Secretary of the Faculty

In addition, we invited unit leaders or delegates to feedback sessions and focus groups if their units did not already have representation on the Working Group and offered additional sessions if Working Group members thought their units would value or want the opportunity. Participants included:

- Rob Bruce, Director, The Friday Center
- Anne Bryan, Assistant Dean of Student Affairs, School of Education
- Jim Beck, Executive Associate Dean, School of Dentistry
- Jen Clark, Assistant Dean for Finance, School of Law
- Susan King, Dean, School of Media and Journalism
- Steve Matson, Dean, The Graduate School
- Kelly Smith, Assistant Dean for Administration for the School of Social Work
- Anita Tesh, Associate Professor and Chair, Division of Adult and Geriatric Health, School of Nursing
- Rick Wernoski, Executive Vice Dean & Chief Operating Officer, Eshelman School of Pharmacy
- Jan Yopp, Dean, Summer School

Gillings School of Global Public Health:

- Kathy Anderson, Associate Dean for Information Technology and Project Planning
- Steve Regan, Assistant Dean for Human Resources
- Barbara Rimer, Dean
- Charletta Sims Evans, Assistant Dean for Student Affairs
- Katie Thornsvar, Assistant Dean for Finance

College of Arts and Sciences:

- Kevin Guskiewicz, Dean
- Jonathan Hartlyn, Sr. Associate Dean for Social Sciences, Global Programs

- Terry Rhodes, Sr. Associate Dean for Fine Arts & Humanities
- Tammy McHale, Sr. Associate Dean, Finance & Operations

The final round of feedback provided refinements to the recommendations, although the bulk of the feedback was endorsement of the need and support for the key principles and having the University invest in a support unit that could facilitate effective policy management across the institution.

All recommendations at this stage were developed without factoring budget constraints or other considerations. The final Policy Ecosystem Recommendations (see Section IV) represent what the Working Group considers the most efficient and effective investment to fully address the charge given to the group.

While our recommendations include many detailed components, we see those as a draft for consideration by whomever becomes responsible for implementing policy leadership and management at the University. We have tried to clearly separate key principles from specific recommendations. Section VI.D identifies options and trade-offs if budget constraints or other considerations necessitate modifying or reducing what is implemented.

Phase IV: Test Recommendations with Focus Areas

The Working Group was concerned about ensuring our theories about policy and policy management could be implemented in real-life settings, which are typically more complicated. In order to see how our policy ecosystem recommendations might match real policy implementation at the University, the Working Group and Consultant explored three policy focus areas, working with relevant campus stakeholders to understand the status, implementation, risks, and opportunities related to the focus areas. The Chancellor's Cabinet identified which areas would be of most immediate interest to the institution.

The Consultant met with campus stakeholders in relevant areas and contacted benchmark institutions to review how specific policy implementation compared. Results related to the focus areas chosen (Policy Governance in the College of Arts and Sciences, Office of the Registrar, Consistency of Undergraduate Academic Policies) are available and are likely of interest to campus leaders. The Working Group refined specific recommendations and developed lessons learned based on exploration of these focus areas (see Section V for Pilot Area Findings and Recommendations).

Phase V: Develop Implementation Recommendations

After developing a full recommendation based on research and feedback and applying lessons learned from the policy focus areas, the Working Group and Consultant worked through options, timelines, and costs for implementation. We first developed options for implementation of the full recommendations. We then discussed and documented trade-offs for partial implementation or modification of the proposed ecosystem should budget constraints or other considerations necessitate an alternative approach (see Section VI for Implementation of Recommendations).

III. Institutional Analysis

In order to make recommendations for what policy management at the University should be, we first needed to understand what policy management currently is at UNC-Chapel Hill and how that compares to peer institutions and best practices. A picture of the current policy ecosystem was developed through interviews with key stakeholders across the institution and review of all publicly available policies. Policy ecosystems were reviewed at benchmark institutions through review of publicly available information and interviewing of campus leaders responsible for policy management.

III.A. Current UNC-Chapel Hill Policy Environment

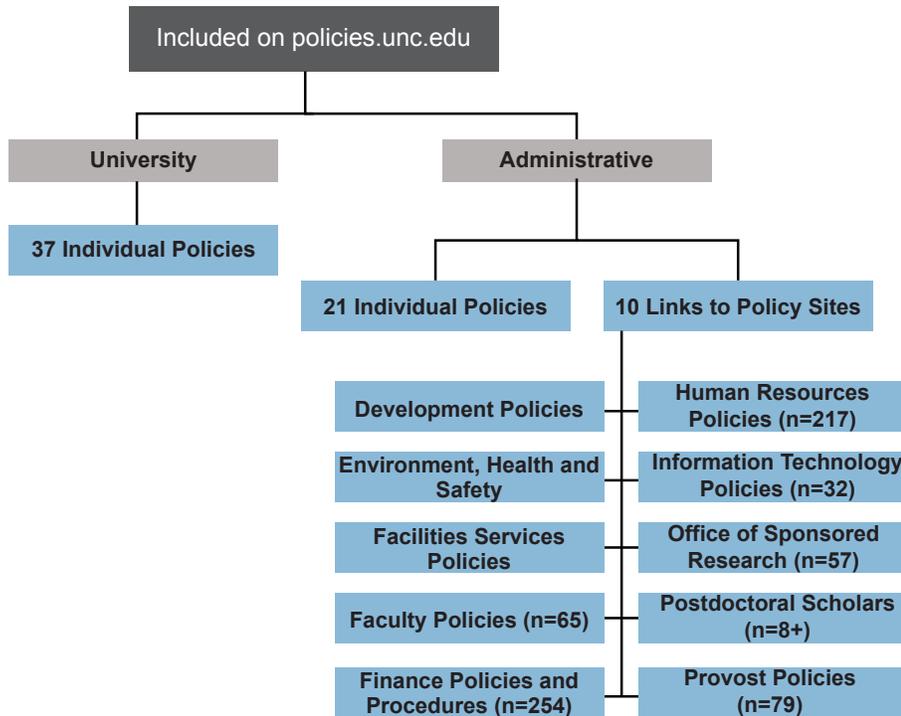
The April 9, 2013, policy on Policy Development, Approval, and Publication provides the definitions, processes, and expectations for policy management across the institution. Policies are categorized as University, Administrative, or Departmental and a template is provided to offer consistency in policy structure and information. All university and administrative policies must follow this policy to be considered official and be posted to the University's policy website: <http://policies.unc.edu>. The current definitions of policy types are:

- A University Policy is a written statement of policy with broad application throughout the University and significant impact to the University if not followed.
- Administrative Policy is a written statement of policy that has general applicability to members of the University community.
- A Departmental Policy is one that applies only to the operation of an individual department or unit within the University.

The difference between university and administrative policies is not clear and appears to be one of magnitude related to institutional values or risk.

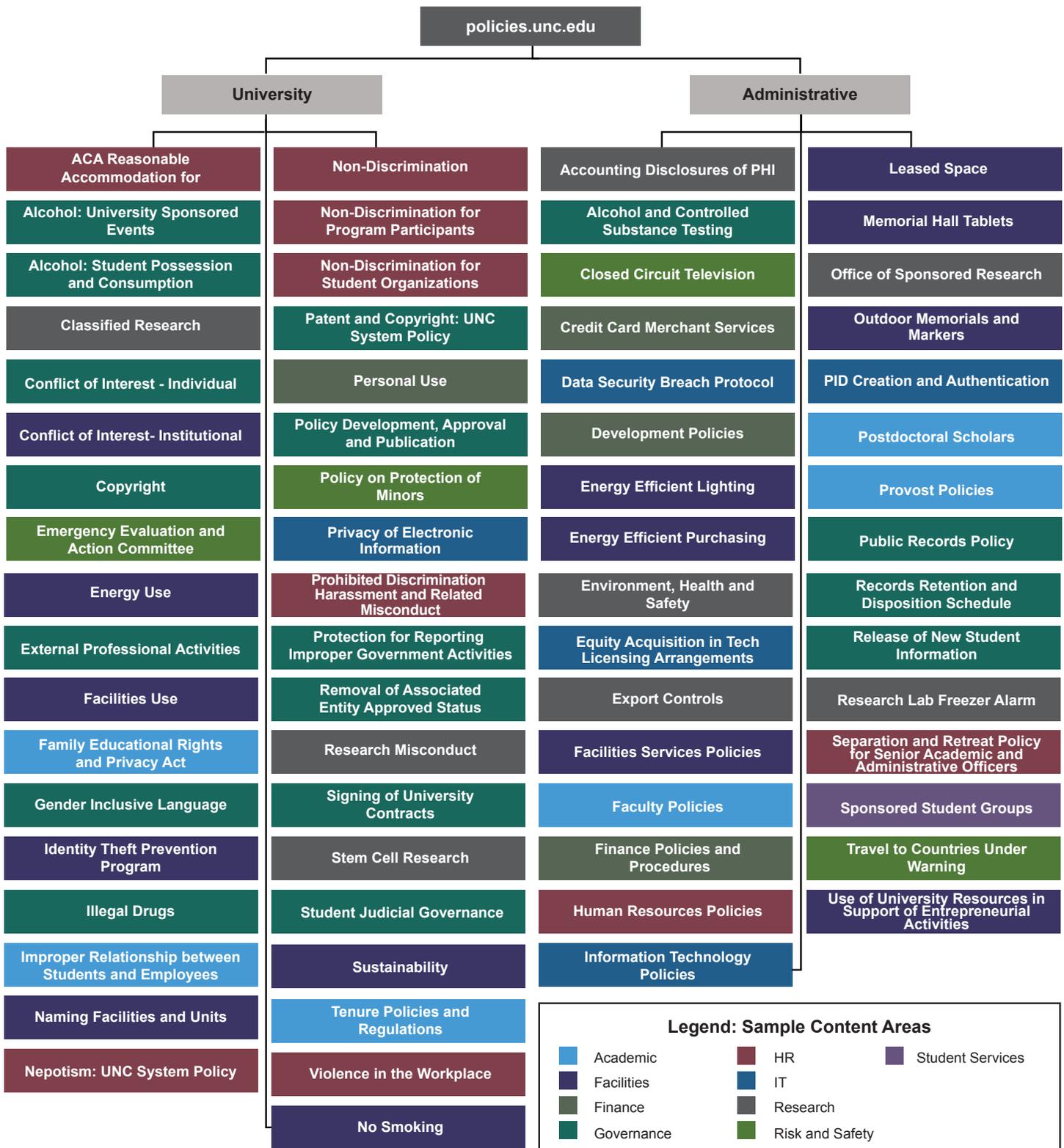
The University's policy website provides direct access to 37 university policies and 21 administrative policies as well as links to 10 policy sites with another 712 policies that are either administrative or departmental. An additional 917 policies are publicly accessible across schools and units but are not connected to the main policies site. While many of these may focus on departmental policies, several have broader application, such as Research, Registrar, and Equal Opportunity and Compliance Office. Of the over 1,600 policies that could be found through university websites, less than half were connected to the main policies site.

Figure 1: Policy Classification at UNC-Chapel Hill



Policies available directly through the main policies site are organized based on only the university/ administrative distinction, but policies in both areas span the same range of varied content areas. No tags or categorization organizes policies, which are listed alphabetically. In addition, administrative policies are mixed with links to administrative policy areas. While there are pockets of strong organizational frameworks and clear policy content within individual departments, the overall system of policies is inconsistent and difficult to navigate.

Figure 2: Policy Content Areas



The Policy Development, Approval, and Publication process identifies a University Policy Committee as being responsible for oversight of university policies, but there are no dedicated resources nor any clear role or function focused on policy guidance, management, process, or communication. Some units have full-time staff dedicated to policy within that unit, and many have roles that include policy management as a formal part-time expectation.

III.B. Policy Environments at Benchmark Institutions

The vast majority of benchmark institutions have a policy that provides clear and public documentation of how policies are managed and communicated at their institutions. At the heart of policy management is a clear definition of university policies at a minimum. No best practice benchmarks distinguish between university and administrative policies, but rather focus on policies affecting the entire institution and those focused on individual units. The components of the policy governing policy management at benchmark institutions are similar to those at UNC-Chapel Hill, but most benchmark institutions have greater detail and depth in definitions, roles, and process.

Benchmark institutions present their policies on a number of dimensions so that they are easily accessible. In addition, this presentation helps determine where a new policy might overlap with another. For example, a single policy could be found by looking at the content area, who it applies to, the issuing unit, keywords, or an alphabetical list. While an efficiently organized policy repository is helpful to site users, a robust search function is also critical. They use web tools to catalog, tag, and communicate policies, and find it important that the tool allow for easy editing in both policy content and organization.

While all benchmark institutions have a central repository for policies, they vary significantly in what policies are included in the repository. One benchmark included only university-wide policies, which has led to confusion about how to access unit policies. Some benchmark institutions include university-wide policies in the repository and link to unit policies. This costs less to maintain and still provides access to all policies but does not allow unit-level policies to be found alongside university policies, making it more difficult for people to determine what policies apply to their individual needs or situation. The most robust benchmark institution includes all university and unit policies, which increases standardization and searchability but also requires more resources to implement and manage.

Most benchmark institutions have a dedicated function or office for policy management across the institution. Responsibilities typically include management of a policy repository, support for policy development and standardization, and policy communication. None of the benchmark institution offices appear to play a role in enforcement of and compliance with policies, and that function happens outside the office. Coordinating policy offices at benchmark institutions are very often supported by liaisons or committees that represent the units across the institutions in a meaningful way. While the split of responsibilities varies across benchmark institutions, most policy offices point to the importance of units owning policies for which they are responsible or generate and see the liaisons as critical to connecting the efforts of a coordinating office with respective units. Benchmark institutions do not have a consistent reporting structure for coordinating offices and appear to have seen success from a variety of locations within the institutions, including Provost, Finance, Operations, and Board.

III.C. Policy Ecosystem Analysis

The current policy on Policy Development, Approval, and Publication has been a critical step in policy management at the University and contains many of the core components found at effective benchmark institutions. Application of the policy, however, is inconsistent and some elements, such as the distinction between university and administrative policies, could be clarified or modified to provide stronger direction to the institution. Perhaps most importantly, the University has not been able to apply attention or resources to facilitating consistent policy implementation and communication. The current policy appears to reflect a mix of current and aspirational practice, but without increased resources, the aspirational components have not been able to be put into practice.

While there are pockets of effective policy, implementation is inconsistent. Only the most recent policies follow the template. Many administrative and departmental policies follow their own templates or no template at all. As evidenced in the conversations with University stakeholders, these inconsistencies in format, location, and implementation create challenges for faculty, staff, and students. A lack of documentation and awareness about policies can lead to inconsistencies in how policies are interpreted: “We have common practices that we don’t have written down. Students come to me and ask to see a policy, and there’s a lot of risk for the University in having policies that aren’t adequately documented anywhere.” Policies that do exist are decentralized and can be difficult for users to access: “There’s no one place to go and get the policies...We are at risk for certain policies because people think they can choose and pick what applies to them and they choose the wrong ones.” Communication of policies is a huge challenge, with people simultaneously feeling they receive too much communication but yet lack critical information: “There’s no consistency and guidance in terms of how we communicate policy. Everyone does it differently. Communications are way too decentralized here, and it is very difficult to communicate in a way that everyone will see.”

As benchmark models were shared with University stakeholders, common themes emerged for what changes or resources stakeholders believe would be most helpful. A single seamless repository for policies would improve policy understanding and University transparency: “I think the University would benefit from having all policies in one place. Easy to access is important.” A coordinating policy office would help manage this large and complex policy ecosystem, helping connect operations across the institution: “We are very decentralized and most people are disconnected from other departments. A central policy office could help with unity of operations and feeling connected.” A primary concern of an office or any coordinating effort is that it would create barriers or otherwise slow down the ability to complete important University work: “No one wants to have a rules-based bureaucratic culture; that is not UNC. It’s important to strike the right balance.”

Comparison with benchmark institutions and feedback from University stakeholders suggest that the University should have a coordinating office or function supporting policy management, which would include facilitating policy approval and revision processes as well as managing a central repository for policies. In addition, the policy governing policy management and the policy template should be updated to reflect best practices. Benchmark institutions provide potential models for all areas of policy definition and implementation and were used to develop detailed recommendations in Section IV.

IV. Policy Ecosystem Recommendations

The following recommendations were developed without consideration for budgetary, resource, or other constraints. Section VI.D. outlines trade-offs for different aspects of the recommendations should alternative solutions or timelines prove necessary given the variety of possible considerations and constraints. Our hope is to provide a picture of what is possible so that leadership can decide what to implement based on University priorities.

Based on review of the current policy ecosystem and comparison with benchmark institutions Section III.B., the Working Group recommends the following policy ecosystem for UNC-Chapel Hill to address current challenges with policy implementation and position the University for optimal effectiveness as institutions continue to face increased pressure to mitigate risk through more aggressive policy and compliance measures. The first part of our recommendation was included in the Ethics and Integrity Working Group report as a joint recommendation: Joint Recommendation of the Ethics and Integrity Working Group and the Policy and Procedures Working Group: Creation of an Office of Integrity and Policy (Section IV.B).

The Working Group recognizes that there may be many ways to implement our recommendations successfully and seeks to give maximum flexibility to the University and any roles working on implementation. With that flexibility in mind, we propose five principles that should guide a policy ecosystem at the University.

Principle One: Coordinating Function (Office)

University stakeholders have described the environment as “radically decentralized” and have pointed to many innovations that have been possible through the autonomy provided to individual units. The cost, however, has been less consistency and guidance. Stakeholders across the University welcomed the idea of a coordinating office that could play a guiding and supporting role in making policies more consistent, available, and effective.

Principle Two: Central Repository

Less than half of policies that are currently publicly available through various University and unit websites can be found by following links from the University’s primary policy website. If faculty, staff, and students are expected to follow the guidance of policies, they must be able to find the policies that apply to their role and situation. A central repository for University policies would enhance transparency, communication, and accountability. Additionally, numerous stakeholders cited examples of spending significant amounts of time trying to find relevant or up-to-date policies, and a central repository would improve individual efficiency for efforts related to or guided by policies, as well as the efficiency of units that provide guidance or support for the use of policies.

Principle Three: University Engagement

Policy management cannot be the responsibility of a single office. Effective policy implementation must happen through the University. A coordinating function or office can help units implement and use policies more effectively, but it cannot do that work for the units. Policies must be owned, managed, and implemented by the unit most closely associated with the respective policies. Accordingly, a successful policy ecosystem will involve significant engagement across the University. A role like a policy liaison within each unit is critical for developing the most effective policies and for communicating policy changes and additions throughout the institution.

Principle Four: Service-Oriented

The primary concern raised about a coordinating support role for policy management was that it could decrease efficiency and risks becoming a compliance function. A central tenant of the Working Group's recommendations is that the policy management function and office cannot act or be seen as a compliance function. Rather, it must be a service-oriented role whose primary mission is to improve the efficiency and effectiveness of policies at the University. Success should be measured by how well it facilitates policy rather than how fully people comply with policies. Compliance and other feedback can help the office assess the effectiveness of policies and encourage policies that appropriately balance risk mitigation with the need to effectively complete the work of the University.

Principle Five: Standard Policy Processes

Current policies are developed, reviewed, and approved in a variety of ways, and it is often not clear how issues or improvements can be suggested or made. The University needs consistent and published means of developing and updating policies that give ownership for the units that own a policy and manage the actions or behaviors surrounding a policy, but also provide guidance and support to that unit to create effective policies that have the endorsement of University leadership. The key to good policy process is matching the level of approval with the risk and concerns of the policy, thus streamlining the policy approval where needed and ensuring other policies have a more thorough review at the correct level. An updated, standard policy process could improve the efficiency of policy management at the University and increase the quality of policy development and implementation, enabling the University to function at its highest potential.

IV.A. Specific Recommendations for Office Consideration

The Working Group developed many ideas and possible processes to provide a more detailed vision of what the office and ecosystem could look like. The details will necessarily change as leadership is put in place and the office begins its work. Throughout the following recommendations, we will try to highlight principles that we believe are critical to the success of an ecosystem and make clear what we include as examples and models that should evolve as the office begins implementation.

IV.B. Joint Recommendation: Creation of an Office of Integrity and Policy

The Working Group recommends a coordinating function or office be formed and made responsible for managing the University's policy ecosystem. The initial recommendation for an Office of Integrity and Policy was included as part of the November 2015 joint recommendation included as part of the Ethics and Integrity Working Group Recommendation to the Chancellor. The Working Group reiterates its support of the joint recommendation and includes the full recommendation as well as additional ideas developed since the recommendation, based largely on feedback from the University community.

Recommendation

The Ethics & Integrity (EI) and Policy & Procedure (PP) Working Groups recommend the creation of a new office at UNC-Chapel Hill to strengthen a culture of ethical behavior and integrity and provide a robust structure for policy management practices that support such behavior. The title of the office should reflect an emphasis on both the promotion of a culture of ethics and integrity and the effective policy management required to support such behavior. The suggested title for this new office is the Office of Integrity and Policy (OIP).

This central office would support the institution by strengthening cultural and procedural best practices related to ethics and policy. It is critically important that the office operates and be accepted as reinforcing the culture of ethics and integrity across the institution through a service orientation balanced with investigative authority. **Units across the University are responsible for implementing and enforcing effective policies, and this office would provide the support to enable them to do so effectively and efficiently.**

The key risk to creating a central office is that it adds layers of bureaucracy without benefit. Even worse, a central office could become focused on being a policy authority, creating additional approval processes and an undue burden on units across campus.

Encouraging a culture of ethics and integrity cannot be done effectively through mandate. This office must use its investigatory authority in the service of improving units rather than policing them, which is why this report intentionally encourages a focus on policy and separates the office from traditional risk management and compliance functions.

Additionally, the success of the office should not be measured by numbers of policies or policy-related incidents. While an impact on one or both of these data sets may be an outcome of the services provided, focusing on such data sets as measures of success would cause the office to become a policy authority to better control the measures to which it is being held accountable, emphasizing policies at the expense of practices. Instead, **success should be measured by documenting work completed, surveying campus leaders and constituencies, and assessing the amount and quality of service provided to units across the institution. An effective office will be service-oriented and focused on reinforcing culture through communication, guidance, and support built on a foundation of consistent, accessible policies.**

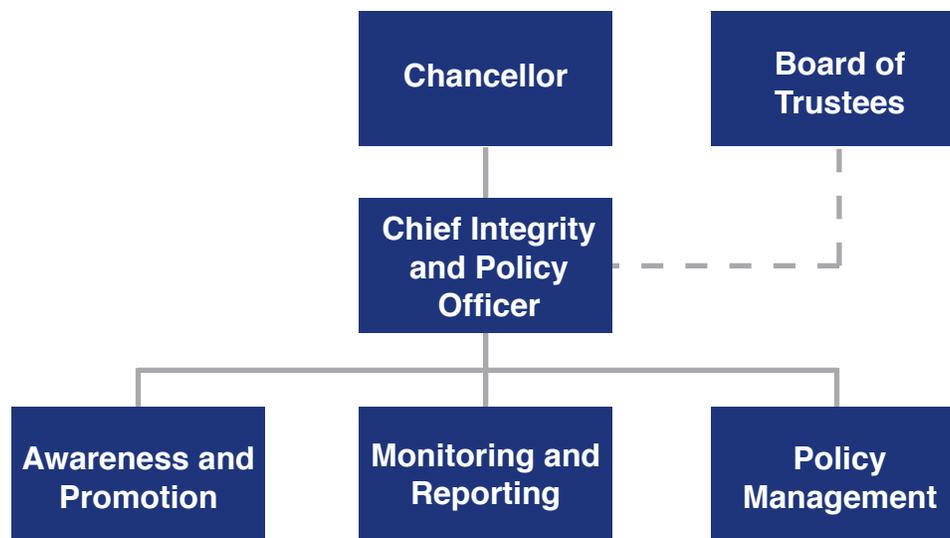
Integrity and Policy Officer

The OIP would be led by a Cabinet-level position, the Chief Integrity and Policy Officer (or roughly equivalent title). The position would report functionally to the University's Board of Trustees and administratively (that is, in its day-to-day operations) to the Chancellor. The roles and responsibilities of the Chief Integrity and Policy Officer include three principal areas of responsibility: awareness and promotion; monitoring and reporting; and policy management.

Office Structure

Led by the Chief Integrity and Policy Officer, the Office of Integrity and Policy would have three functional units, as illustrated in Figure 3.

Figure 3: Office of Integrity and Policy



Awareness and Promotion

The office would foster an awareness of the Statement of Ethics¹, encourage a culture of ethics and integrity, and help the University community be aware of the resources available for everyone to take an active part in upholding University expectations and values. To advance these functions, the office would:

- Initiate opportunities to educate, train, and reinforce a culture of ethics and integrity.
- Work with Ethics Partners identified from each unit to share information, promote new initiatives, and serve as points of contact for investigating issues.
- Recommend updates for orientation training for incoming undergraduate,

¹ Statement contained in Ethics and Integrity Working Group recommendations to the Chancellor.

graduate, and professional students; teaching assistants; staff; faculty; and postdocs to improve consistency and quality.

- Develop materials that promote the values and principles in the Statement of Ethics.
- Develop a comprehensive exit interview/survey program to help identify opportunities to strengthen a campus culture of ethics and integrity.
- Provide periodic review of training materials and the exit interview instrument.
- Develop a plan to communicate to the entire University community the various channels through which individuals may report concerns and potential policy violations.
- Report periodically on office activities and initiatives.

Monitoring and Reporting

The OIP would serve as a resource for University units, identifying policies and procedures that need review or updating, finding gaps or conflicts in policies and procedures, and sharing recommendations to help units resolve identified issues. In addition, it would act as a clearinghouse for reporting concerns and violations, pointing people to the best resources, and ensuring appropriate resolution and communication of issues reported through EthicsPoint². To advance these functions, the office would:

- Ensure that policies are reviewed and updated with a frequency that correlates to the level of potential risk they incur or are associated with for the University.
- Identify proactively or through coordination of efforts with other campus units, such as the Internal Audit Department and the Office of Internal Controls, areas that could benefit from policy and procedures reviews; perform associated reviews; and make recommendations to the appropriate lines of authority for improving policies, monitoring/enforcement, and compliance.
- Provide guidance to units seeking support or help with policy implementation and reporting.
- Report systemic problems or gaps to appropriate lines of authority to facilitate corrective action.
- Facilitate and encourage the use of all channels for reporting concerns and violations:

² EthicsPoint is the commercial service provider for the University's Compliance Line, which is a resource for making a confidential report to help the campus community identify and address ethics and compliance concerns.

- EthicsPoint (anonymous reporting).
 - Campus unit channels (for example, Human Resources, FERPA, Title IX, Honor Code, the Department of Athletics Up and Out
 - Ombuds Office (not an avenue of notice to the University, but individuals in this office can provide guidance on conflict resolution and reporting mechanisms).
- Manage reports submitted via EthicsPoint as follows:
 - Collect reports and communicate with appropriate units.
 - Track status and resolution of reports and communication of resolution where appropriate and permitted by law.

Policy Management

The OIP would develop and maintain the documentation for all policies across the University, making consistent and clear policies available to the entire campus through a central web repository. To advance these functions, the office would:

- Develop a central policy website that serves as a repository for all policies across the University.
- Ensure that policies follow a standard template designed to facilitate communication and implementation.
- Enter all policies and policy changes in the web repository.
- Organize policies with hierarchies and categories that make it easier to search or browse for relevant policies.
- Provide guidance to units developing or revising policies.
- Develop feedback mechanisms that allow people to share the effectiveness of policies and offer suggestions for policy improvement.
- Work with the Monitoring and Reporting unit of the office to identify gaps and conflicts in policies.

Implementation of this Recommendation

The E&I and P&P Working Groups recognize that the administrative and regulatory process

imposed on the University through which the new Office of Integrity and Policy (or any new office) would be established prevents rapid implementation of this recommendation. Both groups further recognize that many details relating to the organization of the office, such as staffing levels, personnel job descriptions, and internal organization, will be informed by the ongoing work of the P&P Working Group and affected by the availability of resources, fiscal constraints, and the need to utilize existing resources and personnel and avoid duplication of functions within the University. Both groups also believe that the Chief Integrity and Policy Officer should be actively involved in establishing the office. Therefore, this report suggests a phased approach to implementing this recommendation by first naming the Chief Integrity and Policy Officer, who would then be charged with the responsibility to develop the administrative plan for establishing the office, taking into consideration the factors identified above. Once the office is fully established, consideration could be given to integrating into its organizational structure other campus functions and positions related to integrity and policy.

Both groups recommend that an announcement regarding the creation of this office be accompanied by a campaign led by Chancellor Folt to reinforce the University's values. This campaign would feature a statement from the Chancellor that communicates the University's commitment to ethics and integrity and helps to develop a shared sense of responsibility and community at UNC-Chapel Hill.

The following additional notes were developed after the joint recommendation was presented and are based on the Working Group's analysis of feedback from the University community. It is important to flesh out some of the more nuanced responsibilities of the policy management function within the Office of Integrity and Policy. In order to succeed as a service-oriented office, it is important that it is fulfilling the specific responsibilities listed above. The OIP has the following goals:

- **Removing Red Tape:** The OIP should question the necessity of all policies. It should encourage units to remove or revise policy where policy impedes faculty, staff, and students from accomplishing the work that they came to UNC-Chapel Hill to do (where possible). Today, many units are tasked with the responsibility of protecting the University from risk and create policy for that goal alone. The OIP will serve as a counterpoint, providing the perspective of the university community needing to get things done. It will help units navigate this tension between risk and efficiency and provide an objective perspective.
- **Solidifying Green Tape³ :** Just as the OIP should help remove/revise policies that are too focused on risk mitigation at the expense of efficiency, it should also help add or strengthen policies that do not take risks seriously enough. The OIP should work with units to judge the potential risks associated with the areas that each unit manages, help to establish processes that reflect an appropriate reaction to that area of risk, and focus on rule effectiveness when recommending additions or changes.
- **Benchmark Best Practices:** UNC-Chapel Hill is not alone in its efforts to navigate the level and extent of policies and processes needed to manage the risks of a modern university. The OIP should provide external perspectives on this issue at large, and on specific policies

3 Green Tape theory from Leisha DeHart-Davis, associate professor of Public Administration and Government, UNC-Chapel Hill. ("Green Tape: A Theory of Effective Organizational Rules." *Journal of Public Administration Research and Theory* 19 2: 361-384. JPART 2010 Virtual Reader inclusion of Leisha DeHart-Davis, 2009.)

where needed. It should bring practices from across the UNC system and from peers around the country where appropriate. This perspective will be a valuable resource in the university's ability to effectively manage policy.

IV.C. Human Capital Infrastructure

The balance of service orientation and investigative authority will be challenging to manage. The purpose of investigation is to be transparent about developing and implementing policy effectively. The OIP has no authority to mandate policy or policy compliance. It can, however, share recommendations within existing authority structures for making policy and policy implementation more effective. For example, if a policy developed by a coordinating support unit, such as finance, IT, or HR, appears onerous in implementation, the OIP can be a point of feedback for understanding the burden placed on individuals or units complying with the policy. This feedback can be shared with units in the hopes of making improvements. Or the OIP may be able to help the coordinating support unit communicate to individuals or units why, despite being burdensome, the policy is necessary for legal, risk management, or other reasons. The function of the OIP in these cases is to increase transparency and communication while seeking the most effective implementation of policy across the University.

The leader of this office is a critical determining factor in whether these goals are realized. She or he must set the tone for this organization's service orientation. The Working Group recommends several characteristics that this leader should (and should not) have:

- The leader should have a service-leadership mindset.
- The leader should not be overly focused on "process".
- The leader should have a proven ability to "get things done" within an academic setting.
- The leader should be a strong facilitator.
- The leader should likely come from within the UNC-Chapel Hill community, understanding the culture and context of the University.
- The leader should likely come from or have significant experience working in a leadership role at a department or school at the University, such as a department chair or associate dean, with a bias toward helping units use policy to facilitate the work of the University rather than focusing on compliance or risk mitigation.

In addition to a coordinating office, resources will be required within individual units to support ongoing policy efforts for the University. While the Working Group believes that the creation of a coordinating office or function is a critical component of the proposed new policy management ecosystem, it also feels the need to reaffirm that policy creation and implementation will remain with the units. The OIP would play a key support/consultative role that will help improve the workflow efficiency of the units with respect to policy, and the units will continue to have primary responsibility for drafting, reviewing, communicating, and implementing policies.

Given that so much of the change will need to be driven from the units, the Working Group currently believes that the units should devote resources to improving policy in the form of Policy Liaisons.

Policy Liaisons: A Policy Liaison would be assigned within each core administrative unit (all units with a Vice Chancellor or Dean), and each school/college. The liaison would have 3 primary responsibilities:

1. Involvement in the drafting of policies put forth by his or her unit (both University policies and unit policies).
2. Communication of new/changed policies affecting his/her unit to the unit more broadly.
3. Serving on the Policy Review Committee, a new committee to be created to ensure effective vetting and review of policies (page 26).

The level of resources required to support these three primary responsibilities are dictated primarily by responsibility #1. Units that are responsible for the creation of a significant number of policies are expected to need dedicated resources, as they will not only be managing their unit's policies but also will be integral to the review of higher risk University policies. This individual will certainly need to partner with other content experts within the unit to draft policies (in addition to the support coming from the coordinating office), but the policy liaison will help drive this process.

Responsibilities #2 and #3 are expected to take less than 10 hours per month. And thus for units that do not have significant policy drafting responsibilities, the policy liaison role will most likely be a partial allocation.

Our current thinking on which units will need greater and fewer levels of resources to fill this role is illustrated in Figure 4 below.

Figure 4: Units Requiring Policy Liaison

Units Requiring Fewer Resources for Policy Liaison		
Schools and Colleges		Administrative Units
College of Arts and Sciences	Law	Athletics
Dentistry	Kenan-Flagler Business School	Communications and Public Affairs
Education	Media and Journalism	General Counsel
Eshelman School of Pharmacy	Medicine	Internal Audit
Friday Center	Nursing	Student Affairs
Gillings School of Global Public Health	Summer School	University Development
Government	Social Work	
Information and Library Science	The Graduate School	
Units Requiring Greater Resources for Policy Liaison		
Administrative Units		
Finance and Administration	Human Resources	Information Technology and CIO
Research		

It will be up to each unit to determine whether their current resources are adequately suited to fulfill this policy liaison role, or if they will need to request additional resources to fill it. The Working Group firmly believes that the establishment of these policy liaisons will streamline processes already in place in many units and provide opportunities for increased efficiency in the policy management process. These gains in efficiency will likely offset some of the additional hours required to support the new infrastructure.

Policy Review Committee (PRC): One of the core responsibilities of the policy liaisons is to serve on a newly formed Policy Review Committee (PRC). In total, this PRC will encompass ~25 individuals (see Figure 4). As noted, the PRC will play a crucial role during the policy development life cycle, to ensure that before new policies/changes to policies are passed, a representative from each core unit has had the opportunity to comment on them. To understand how this process will work and the roles and responsibilities of the PRC in the policy development life cycle, see Section IV.G.

A Note on In-Unit Policy Liaison Resources: In the joint recommendation from the E&I and P&P Working Groups, another set of in-unit resources was depicted (and referred to in the description of the OIP above). Ethics Partners is another role that if embedded in the unit, would help provide the same types of communication channels to the OIP in the area of ethics and integrity that the Policy Liaison would provide in the area of policy. It would not be prudent or efficient to establish two new roles for Partners/Liaisons, and thus our preliminary recommendation is that the same individuals take on the Policy Liaison and Ethics Partner role. But the preliminary bias is that these two roles exist within the same individuals in the majority of units. It will be the responsibility of each unit to identify these liaisons and supply the necessary resources to fill these roles (some units may need to budget for / request additional resources, while others may be able to reallocate responsibilities within their current resource levels).

Executive Policy Approval Committee (EPAC): The final component of the future policy infrastructure vision is an Executive Policy Approval Committee. This does not involve the policy liaisons, but more senior officers of the University. While the vast majority (>90%) of policies need the approval of only a unit head, some policies (<10%) will need to be elevated to the Cabinet level. The EPAC is a subgroup of the Cabinet (or delegates of the Cabinet), representing HR, Finance, Legal, and the Provost's Office. Policies will be sent to the EPAC when the PRC agrees with the policy but believes a more senior group should sign off on the policy, such as complicated and/or potential high-risk policies with significant repercussions if not implemented and followed appropriately. Alternatively, the unit head responsible for sign-off also should have the ability to elevate authority to the EPAC if he or she deems the policy important enough to merit additional senior leadership attention. On very rare occasions (<1% of policies), the EPAC may elevate the policy to the Cabinet for final approval. See Section 3.1 for further description of this process.

While these university-level and unit-level resources represent an investment for the University, having an infrastructure in place to support policy management will bring many benefits to the entire community, enumerated above.

IV.D.Key Policy Definitions

The Working Group proposes the following definitions:

Policy: A policy at UNC-Chapel Hill mandates or prohibits behavior in order to express basic values of the University, enhance the University’s mission, improve coordinated compliance with applicable laws and regulations, promote operational efficiency, and/or reduce institutional risk. It includes criteria as mandated by the UNC-Chapel Hill policy template. Clear ownership of the policy is required—the owner should be an individual or a specific role within the policy drafting unit.

- (a) University Policy—Has application throughout the University, informs someone outside the unit of rights and responsibilities, or regulates the actions of the unit as it interacts with other units on campus. A University Policy takes precedence over unit or school policies.
- (b) Unit Policy—Has application only within the unit (i.e., applies only to unit employees, staff, and students working for or studying at the unit). A Unit Policy can further limit or specify but cannot contradict a University Policy.

Standards: The acceptable methods that may be used to achieve policy implementation. While procedures provide specific instructions for units (e.g., how to encrypt data in the HR department), standards set overarching minimum requirement that must be met by all (e.g., what encryption methods should be used throughout the university). Standards are created by the issuing unit and changes do not go through the same review or approval process as policies.

Procedures: The specific operational processes required to accomplish an action that necessitates specific instructions. Procedures often pertain to implementing policy. Procedures may also provide guidance for behavior on issues that are not dictated by policy. Procedures are created at the unit level and changes do not go through the same review or approval process as policies, but procedures that impact multiple units may need additional review or feedback before being implemented.

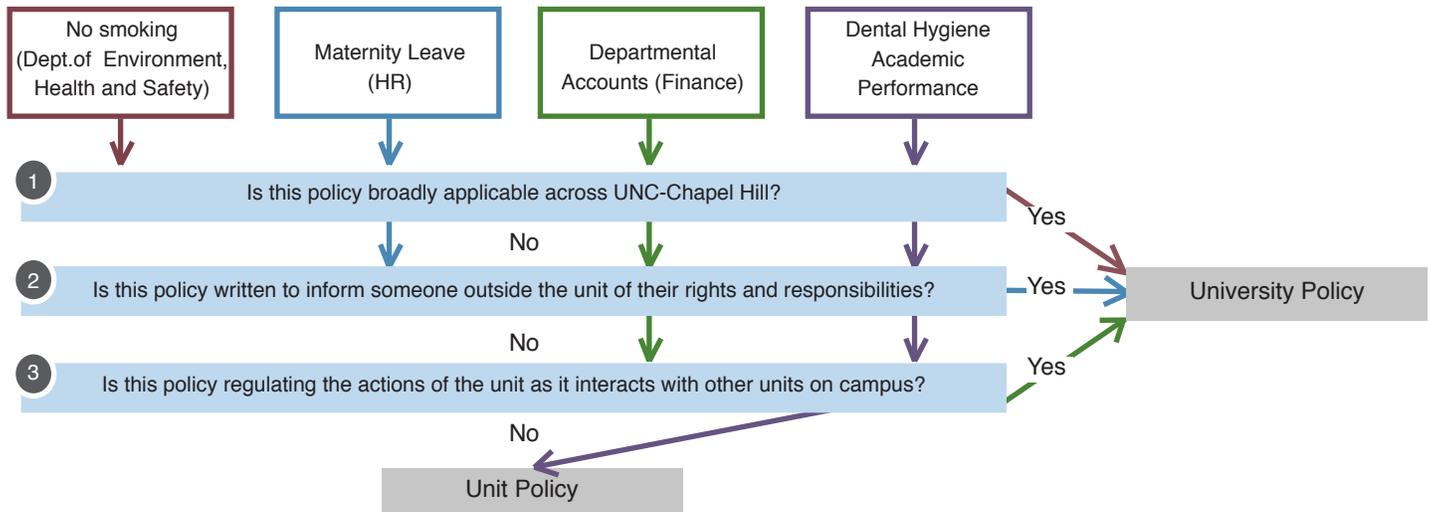
These definitions were informed by a combination of Parthenon-EY’s review of UNC-Chapel Hill’s policy definition, benchmarking research, and internal discussions with the Working Group.

The proposed definition of “policy” represents two key changes from the current policy definition, as stated in the Policy Development, Approval, and Publication policy. First, the Working Group adjusted the language associated with these definitions to create more robust and specific guidance for users (including a definition for procedures and standards that can accompany policies). Second, this definition simplifies the universe of policies, by reducing the tiers of policies from three to two:

- **Current State:** three tiers of policy based on who policies apply to AND who approves policies.
- **Future State:** two tiers of policy based on who policies apply to.

The following diagram shows the process to determine if a policy should be a university or unit policy. For example, in Figure 5 below, since “Dental Hygiene Academic Performance” (1) is not broadly applicable across UNC-Chapel Hill, (2) is not written to inform someone outside the unit of rights and responsibilities, and (3) does not regulate the actions of the unit as it interacts with other units on campus, it should be classified as a unit policy.

Figure 5: Policy Type Decision Tree



These changes will allow UNC-Chapel Hill to simplify the policy review and approval process (detailed in Section IV.G.). The Working Group believes that these changes will be more intuitive and easier to understand for users, and easier to manage for those creating, reviewing, and updating policies.

IV.E. Policy Template

In the future state, policies should also be presented in a standardized format, specifically in a pre-determined template, to ensure comprehensiveness and consistency for users. While UNC-Chapel Hill currently has a policy template that covers key policy elements and critical information, it is not widely used and could provide additional guidance for policy writers.

As shown in Figure 6, the Working Group proposes a template that includes five main sections: (1) Policy Title, (2) Introduction, (3) Policy Statement and Procedures, (4) Policy Administration, and (5) Important Dates. Section 1 will contain the name of the policy. Section 2 will contain information on the purpose of the policy, applicability, regulations, and relevant definitions concerning the policy. Section 3 will provide the actual policy statement, as well as exceptions, FAQs, and useful links. Section 4 will contain administrative information about which unit and which title(s) are responsible for the policy. Section 5 will keep track of when the policy was first put into effect and the last time it was reviewed.

Figure 6: Policy Template

Policy Template	
Policy Title	
<ul style="list-style-type: none"> Name of the Policy 	
Introduction	
Purpose*	
<ul style="list-style-type: none"> Brief statement about the topics or purpose of the policy 	
Who Policy Applies To*	
<ul style="list-style-type: none"> Who and/or what the policy applies to; lists groups who must know and adhere to the policy 	
External Regulations & Consequences (if applicable)*	
<ul style="list-style-type: none"> External driver for the policy (e.g., federal, GA, accreditation) with link to regulation if available 	
Definitions & Acronyms (if applicable)*	
<ul style="list-style-type: none"> Definition of keywords and terms used in the policy 	
Policy Statement & Procedures	
Policy Statement*	
<ul style="list-style-type: none"> Policy statement that meets the criteria of policy definition 	
Exceptions/Exclusions (if applicable)*	
<ul style="list-style-type: none"> List of common exceptions to the policy; how exceptions are handled 	
FAQS (if applicable)	
<ul style="list-style-type: none"> Info that anticipates likely questions and provides answers 	
Link to Standards & Procedures (if applicable)	
<ul style="list-style-type: none"> Standards and procedures are separate but linked in the policy. Nomenclature matches policy to procedure (e.g.: Policy 1.2 would have Procedure named 1.2.1) 	
Policy Administration	
Issuing Office	Policy Contact
<ul style="list-style-type: none"> Which office is responsible for issuing and updating this policy? 	<ul style="list-style-type: none"> Who in the office is responsible for this policy?
Important Dates	
Effective Date	Last Reviewed
<ul style="list-style-type: none"> MM-DD-YYYY 	<ul style="list-style-type: none"> MM-DD-YYYY
<p>Note: <i>Fields marked with an astrick (*) must go through review and approval process for material changes (determined by issuing office and policy office)</i></p>	

In addition to the template itself, each policy should have a robust record of background and history as shown in Figure 7; some information will be public while other information will require administrator access. Previous versions of the official policies should be accessible through the public-facing website, and each policy should be searchable through tags to content areas, issuing office, to whom the policy applies, and alphabetically by policy title. The choice of the policy content area will be informed by the issuing office listed in the Policy Administration section of the policy template. Administrator access should enable access to review, approval, and change history as well as the policy risk-level, the review cycle, and the relevant offices that act as key stakeholders in the policy review and approval process.

Figure 7: Policy Template Background

Background and History
Public Access
History
<ul style="list-style-type: none"> • Can access old versions of official policies
Administrator Access
Topic Area Risk Level
<ul style="list-style-type: none"> • Based on the risk framework, what is the topic risk level associated with this policy? Determines recommended review cycle and how important/essential compliance is with the relevant policy.
Review Cycle (if applicable)*
<ul style="list-style-type: none"> • Timing for recommended policy review and updating
Relevant Offices
<ul style="list-style-type: none"> • Which offices are stakeholders in the approval and review process?
Review, Approval and Change History
<ul style="list-style-type: none"> • Records of the dates and a brief description of the stakeholders, groups, or individuals who reviewed/ vetted the policy; the approvers of the policy, individuals who approved the policy prior to the official who gave the final approval; and any changes that are made to the policy after initial promulgation.
Content Area
<ul style="list-style-type: none"> • List of relevant content areas (e.g.: academic, athletics, finance, student life etc.) <p>Note: Fields marked with astericks (*) must go through review and approval process for material changes (determined by issuing office and policy office)</p>

IV.E.Web-based Policy Repository

To ensure consistent, efficient, and effective policy life cycle management, it is important for UNC-Chapel Hill to automate its policy development and review process. The benefits of having a central policy repository address many of the issues Parthenon-EY heard from UNC-Chapel Hill stakeholders during initial interviews. First, it will make it easier for individuals to find the policies they need to do their jobs (currently finding these relevant policies takes a significant amount of time). Second, it will increase transparency and allow for comparisons of policies across units (or even across universities). It will bring to light conflicting policies, redundant policies, and confusing policies. Finally, it will highlight differences in policy among units. While some units may need to strengthen their policies, a central policy repository will highlight to units where there is opportunity for policy rationalization or additional flexibility within certain policies.

The University currently does not have a tool capable of managing its complex policy environment, and the process is decentralized and manual across the institution. A final decision on whether to build or buy this web tool should be made by key stakeholders, once the feasibility of a coordinating office is determined and leadership is appointed. This decision will be one of the critical early decisions that the new office will need to make for this process to move forward successfully. However, the Working Group has researched a number of

external vendors, as well as prepared a list of system requirements for this web tool (regardless of whether it is built internally or purchased).

The proposed system requirement list was informed by vendor demos and interviews with benchmark institutions and with key UNC-Chapel Hill stakeholders. A full list of the requirements can be found in the Appendix under “UNC-CH Policy Management System: System Requirements.” The most important requirements that emerged from this process include:

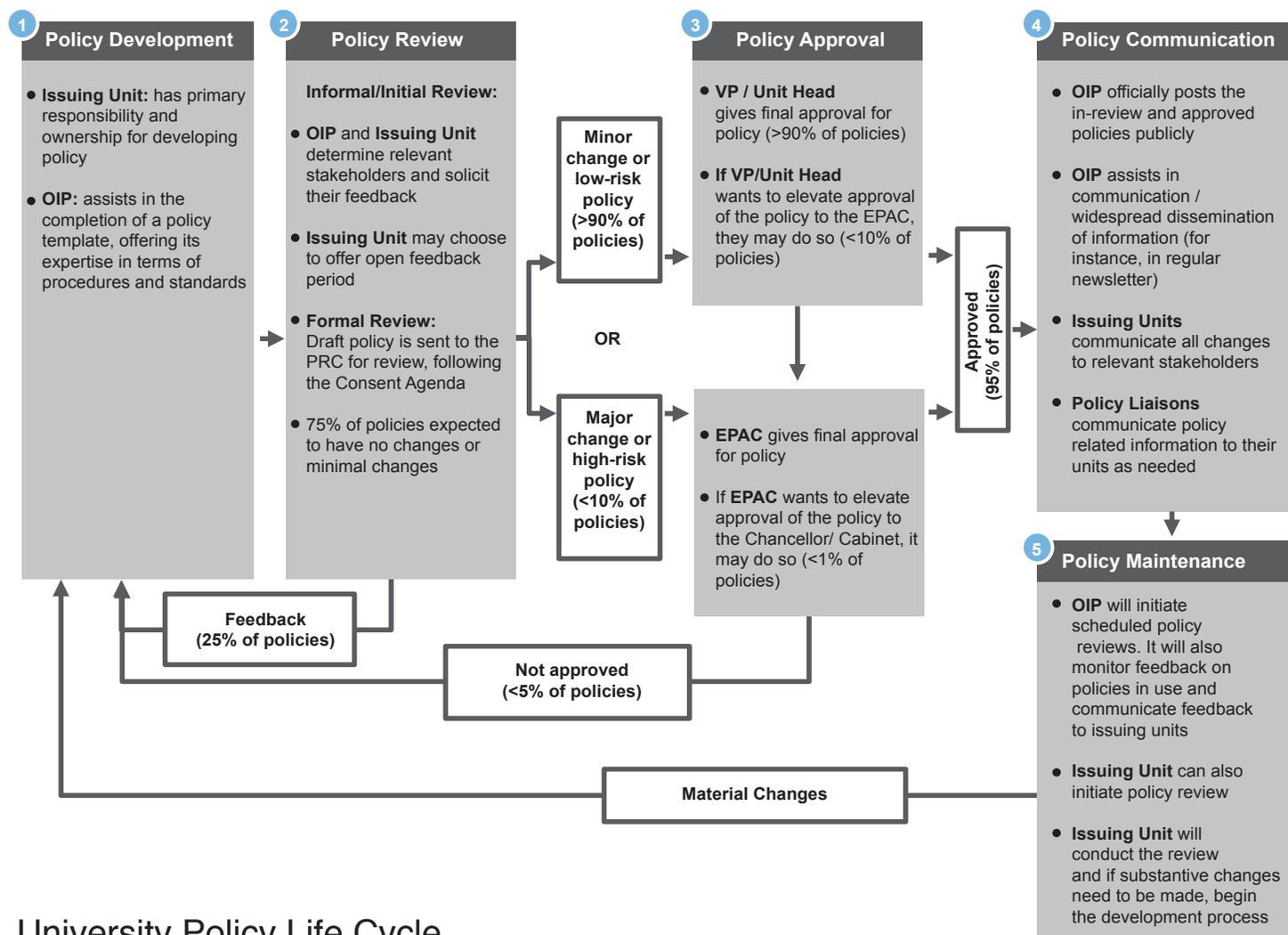
- **Accessible:** Allows for differentiated levels of access, for example, public (viewable without login) and restricted (viewable/editable only by owners and designees in the workflow) documents; and passes UNC-Chapel Hill IT security risk assessment.
- **User-friendly:** Provides an easily searchable repository with multiple intuitive paths for search/sort; and addresses all appropriate accessibility requirements for ADA compliance in a highly facilitative manner.
- **Powerful yet easy-to-use workflows (the system will integrate these features over time):** Gathers and tracks edits and comments to policies as they are developed or revised; logs all changes to documents with user and timestamp; provides accountable workflow with full audit trail; maintains archive of decommissioned policies; and sends automated reminders when a policy needs to be reviewed and updated.

IV.G. Policy Approval Process

Determining an appropriate approval process for administrative policies will be an important early step for a coordinating office. Academic policies already have robust approval processes but will need policy additions and changes to feed into the repository, and people working on academic policies may find the office a valuable resource.

The Working Group has designed a draft version of a policy life cycle for both university and unit policies. Process designs were initially developed by the Consultant based on research with benchmark institutions. The life cycle of the university policy will have five stages as depicted in Figure 8.

Figure 8: University Level Policy Life Cycle



University Policy Life Cycle

1. Policy Development

Groups Involved: Issuing Unit, OIP

Process: Issuing units are the content experts on particular issues and policies. They should also feel ownership of the policies that their office issues. As a result, the issuing unit has the primary responsibility for drafting policy. However, the OIP will also be involved in this stage as needed.

OIP representatives will be experts in policy process and management. As a result, they have a vital role to play in helping units draft policy, suggesting language, determining if policies are confusing, and generally serving as a resource to the units to improve the quality of the policy. Benchmark institutions have commented on how effective it is to have experts in policy (not unit content) partner with the content experts to draft effective policies. The OIP will also serve as the voice of objectivity and reason, ensuring consistency at least in the spirit of policy-making between units. With some units, the OIP will likely need to encourage the strengthening of policy drafts. With others, it will likely need to discourage the creation of new policies, and encourage the use of exceptions. It is critical that policies at UNC-Chapel Hill serve the institution, making it possible for community members to accomplish their goals, in addition to mitigating risk. This service-oriented office must maintain visibility across units to play this role.

2. Policy Review

Groups Involved: Issuing Unit, OIP, Relevant Stakeholders, Policy Review Committee (PRC)

Process: The review process begins even during the development process. The Issuing Office and OIP should jointly determine which key offices should be involved in the drafting itself or give initial feedback on the policy. For instance, policies with a legal component will likely always have representation from the Office of University Counsel during this initial phase. This part of the review period will function much the way things happen at the University today, albeit with the OIP helping coordinate the process and facilitating the involvement of relevant stakeholders.

The second component of the review process, however, is new and more formalized. In order to provide broader opportunity for units across campus to give feedback on policies that may affect them in unintended ways, the OIP will send draft policy to the PRC for feedback. This committee, as discussed in Section IV.C., will be made up of a policy liaison from each unit. Each policy liaison will bring the perspective of his or her unit to the policy review, including considering whether the policy will have any unintended consequences of which the policy authors should be aware. This group will operate under the principle of a “Consent Agenda.” This means that when a new/updated policy is sent (electronically) to the PRC, the group will be given a deadline for feedback. It is up to the policy liaison whether they will review and engage with the policy. But if they do not send feedback by the deadline, it will be assumed that they consent with the policy as is.

For the vast majority of policies, units will likely consent without question. However, it is critical that the units have the option to provide feedback. In the limited number of cases where some or all units do feel that a policy is in need of significant edits, they are able to give their feedback electronically, or during optional periodic meetings of the PRC (frequency to be determined by the OIP). The OIP will monitor engagement levels of policy liaisons on the PRC. If there are questions as to whether a unit liaison is properly fulfilling his or her role on the PRC, the OIP will have the ability to raise that question through appropriate channels.

Benchmark institutions all have a body equivalent to the PRC. They comment on the value of this group, saying every policy that has gone through PRC review has been dramatically improved. It is important to note: policies will not have to have consensus from the PRC to move forward to the approval phase. The PRC is one of the ways in which to bring the best information possible to the policy authors/owners, but PRC members do not have veto power over individual policies. Given that policies are often messy and quickly become unclear and ineffective if they are made broad or vague enough to satisfy all stakeholders, it is critical that those involved in this process prioritize clarity and specificity over consensus.

3. Policy Approval

Groups Involved: Issuing Unit, OIP, Executive Policy Approval Committee (EPAC)

Process: After a policy is reviewed by the PRC, and revised if needed, the policy must be approved. For the vast majority of policies (>90%), the VP/Unit head (or a delegate) of the issuing office has approval responsibility. For more difficult/sensitive policies (<10%), the VP/Unit head or the PRC has the ability to escalate the approval to a new sub-group of the Cabinet – the Executive Policy Approval Committee (EPAC). The EPAC is made up of representatives from HR, Finance, Legal, and the Provost’s Office and should serve

as the final approval authority for these more difficult/sensitive policies. In extremely rare cases (<1%), the EPAC may escalate approval to the Chancellor or the entire Cabinet if necessary.

4. Policy Communication

Groups Involved: Issuing Unit, OIP

Process: Communication about policies has a number of components. First, there is the communication during the policy development and review period. The OIP will spearhead these communication efforts, keeping up-to-date information on its website and in regular email newsletters about which policies are in development/review. Secondly, communication of newly approved policies and changes to existing policies is critical. The OIP will similarly communicate approvals via posting on its website and regular newsletters. The Issuing Office and Policy Liaisons will also have a critical role in communicating newly approved policies. The Issuing Office can also communicate new or changed policies to affected audiences as needed. Policy Liaisons will be responsible for understanding who in their units is affected by approved policies and communicate to those individuals as appropriate. The issuing office will assist with drafting content, answering questions, and providing training as appropriate given the policy. The most effective benchmark practice found here is a monthly newsletter from the policy office to the Cabinet and units detailing which policies have changed over the past month and policies in the pipeline for review in the next month.

5. Policy Maintenance

Groups Involved: Issuing Unit, OIP

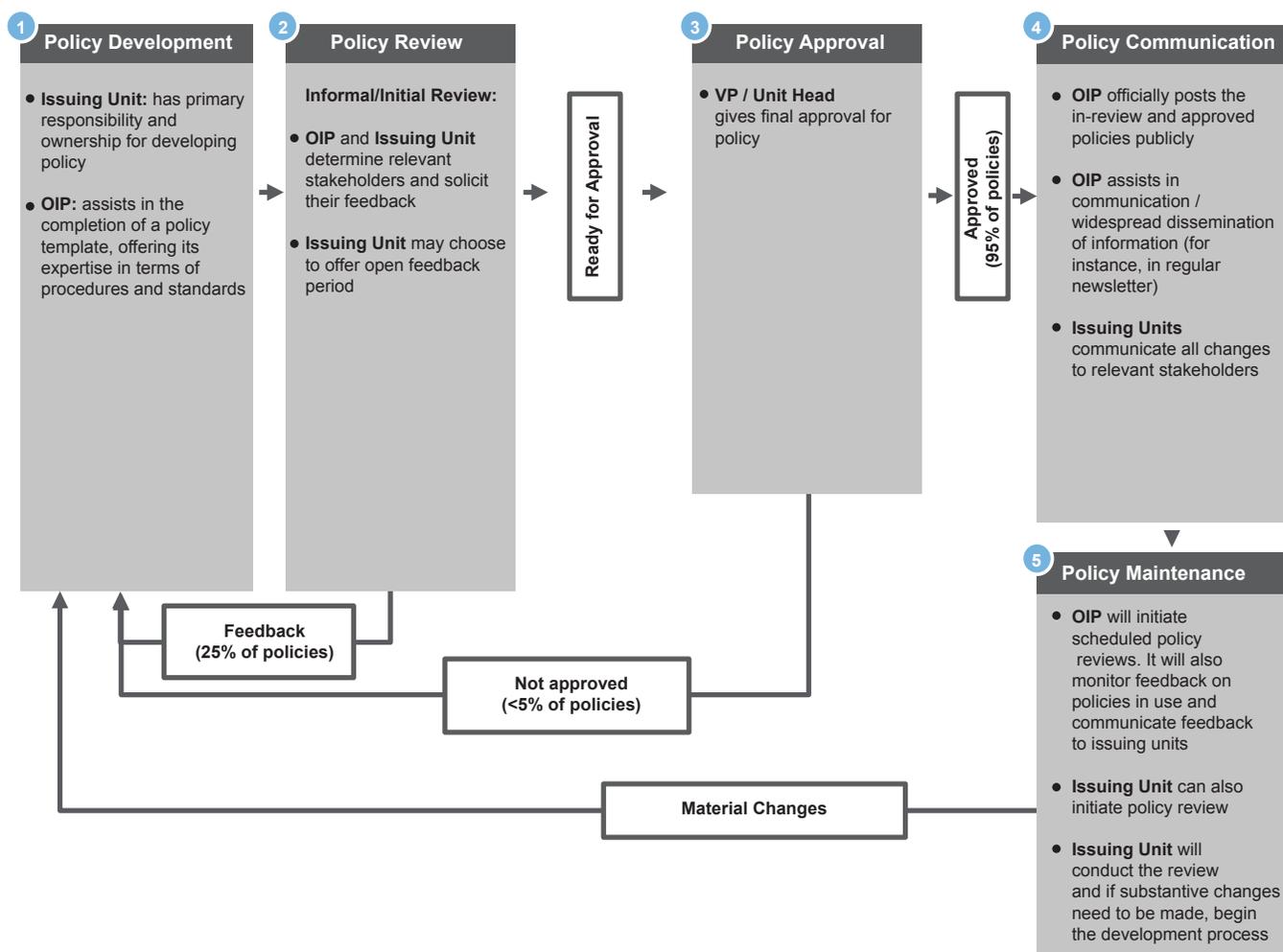
Process: The final component of this stage is the review and maintenance of the policy once it is in place. The OIP will be responsible for collecting feedback from users across campus who may have particular insights into how a particular policy is functioning in practice. The OIP can collect this information and provide it to the Issuing Unit.

The OIP will also monitor the length of time since the most recent policy review (as compared to its proposed review cycle, which would be based on the tier of the policy and potential risk level associated with it) and initiate reviews (by contacting the Issuing Unit) of policy at intervals that are appropriate. Issuing Units may also initiate a review of policy based on feedback that there are issues with how it is working in practice, or because they have a need to do so (law change, technology change, etc.).

The review would result in either keeping the policy as is (because it continues to serve its purpose and is up-to-date), amending the policy, or decommissioning the policy. Material amendments and decommissioning a policy would need to go through the review and approval process depicted above.

Benchmarks have the most difficulty with this stage. Most have set a regular schedule for review of all policies. They comment that this is ineffective due to the large number of policies that require review—the units disregard them. A risk-based approach that limits the number of policies under more frequent review should help address this concern.

Figure 7: Unit Level Policy Life Cycle



Unit Level Policy Life Cycle

Unit policies will go through a simplified, but similar process to university policies, given that they only apply to the unit issuing them. It will still be critical that issuing units work with the Office of Integrity and Policy, and ensure policies are captured on the central repository site.

1. Policy Development

Groups Involved: Issuing Unit, OIP

Process: This stage looks much like the development stage for the university policies. The issuing unit will drive the process, but will alert the OIP that it is undergoing this process and using the OIP in a consultative role as needed.

2. Policy Review

Groups Involved: Issuing Unit, OIP, Relevant Stakeholders

Process: The review phase is simplified for unit policies. It will still contain a period where relevant stakeholders will be consulted for assistance with drafting and feedback, as needed (facilitated by the OIP). However, the policy need not be reviewed by the PRC given that the policy will not affect any unit except the unit issuing it.

3. Policy Approval

Groups Involved: Issuing Unit, OIP

Process: All unit policies will be approved by the VP/Unit head (or delegate). OIP will play a coordinating and consultative role as needed.

4. Policy Communication

Groups Involved: Issuing Unit, OIP

Process: The communication process is similar to that of the university policies, but does not involve the Policy Liaisons (aside from the one in the issuing unit) or the same level of proactive communication across units. The OIP will track unit policies in development and approval and post the status of these policies on its website and in its regular newsletter.

5. Policy Maintenance

Groups Involved: Issuing Unit, OIP

Process: The maintenance process is identical to that of the university policies. The OIP will be responsible for collecting feedback from users across campus that may have particular insights into how a particular policy is functioning in practice. This feedback will likely come mainly if not exclusively from within the unit. The OIP can collect this information and if needed initiate a review of the policy by the Issuing Unit.

The OIP will also monitor the length of time since the most recent policy review (as compared to its proposed review cycle, which would be based on the tier of the policy and potential risk level associated with it) and initiate reviews (by contacting the Issuing Unit) of policy at intervals that are appropriate. The results of these reviews would result in either keeping the policy as is (because it continues to serve its purpose and is up-to-date), amending the policy, or decommissioning the policy. Material amendments and decommissioning a policy would need to go through the review and approval process depicted above.

Academic Policies

The processes above are primarily intended for administrative policies. Academic policies typically have their own development and approval process already established, and it is not the intention of the Working Group to create additional hurdles to the development and approval of academic policies. However, it is important that two key elements of the life cycle above be applied to academic policy development processes.

First, the OIP must be informed of new academic policies. The OIP can be a valuable asset in policy drafting (if needed), coordination with key stakeholder groups, and communication. The OIP will post all academic policies to the central repository and include them in the regular email updates it prepares. It will also collect feedback on all policies to understand how they are functioning in practice, and thus will be able to provide valuable information to the Educational Policy Committee (EPC), Faculty Council, and other academic policy groups on whether policies need to be revised or reviewed.

Secondly, academic policy owners must send any anticipated academic policy changes to the PRC for review, in a similar manner to administrative policies (facilitated by the OIP). From the Working Group's discussions with the EPC (the Working Group imagines this to also be true of any other academic policy-drafting groups around campus), it is clear that individuals want academic policies to achieve their intended outcomes and to not lead to a multitude of unintended consequences. The challenge these groups face is knowing where to go and whom to consult on these issues. The PRC is an entity created specifically for this purpose, made up of both academic and administrative perspectives. The Working Group believes the PRC can be a valuable resource in academic policy creation and should be used as such.

While the above processes are intended as a draft for consideration, the Working Group would like to highlight several key principles that inform this draft:

- Units must own the policies they generate, whether they are university policies in that they apply across the institution or unit policies that apply only to the related unit.
- University policies must go through a formal approval process.
- Approval processes are intended for material changes.
- Policy liaisons serve two key functions, providing key information to improve policies and serving as communication conduits about policies and policy change back to their units.
- Leaders need to be able to escalate critical decisions. This does not mean they no longer own the implementation and management of the policies but rather allows individual unit leaders to get full institutional support.
- A senior body that is not the entire Chancellor's Cabinet would enable leaders to more efficiently receive feedback and support and increases the odds that people will seek such critical feedback and backing.

IV.H.Risk Framework

In addition to facilitating management of policies and the repository, a coordinating office could serve as a valuable resource to the University and to individual units for conceptualizing policy risk and management. For example, when seeking to envision how the proposed policy ecosystem would apply to a real-life policy environment Section 5, the Working Group developed a possible risk framework for understanding and assessing the potential risk of different policies. Such tools and frameworks can provide important resources to help units put the appropriate amount of resources behind policy efforts and can help the institution more effectively balance the need for policies to limit behavior that creates risk while supporting work that helps the University achieve its mission.

V. Pilot Area Findings and Recommendations

The Working Group acknowledges that policy implementation involves addressing complicated situations that often do not fit neatly within written policy documentation. A policy ecosystem must be flexible enough to work in a real-life setting, providing guidance and structure where needed to mitigate risk and encourage consistency without being overly constraining.

Effective policy should focus on supporting the actions and needs of the University rather than restricting and creating barriers to completing the work of the University. To assess whether our proposed ecosystem meets this test, the Working Group and Consultant explored policy focus areas as a pilot test of ecosystem ideas. The Chancellor's Cabinet identified focus areas where exploration could benefit the University beyond our test. The focus areas were not the product of any identified gaps or deficiencies. Instead, they were chosen because of their overarching importance to the University.

Three focus areas were identified for exploration:

- **Policy Governance in the College of Arts and Sciences:** Review the development and implementation of policies which focus on the undergraduate academic experience in the College of Arts and Sciences (student policies as governed by the Undergraduate Bulletin and relevant faculty policies).
- **Office of the Registrar:** Review the interpretation and application of relevant undergraduate policies, particularly the office's role in the policy ecosystem, as it relates to University policy for undergraduate students.
- **Undergraduate Academic Policies:** Review the coordination and consistency of policy implementation across Schools that offer credit-bearing courses for undergraduates, including the College of Arts and Sciences, Friday Center for Continuing Education, Gillings School of Global Public Health, Kenan-Flagler Business School, School of Dentistry, School of Education, School of Information and Library Science, School of Media and Journalism, School of Medicine, Department of Allied Health Sciences, School of Nursing, and Summer School.

Based on discussions with units related to the focus areas, 73 policy topic areas were identified that are associated with the focus areas. The proposed risk framework (see Appendix B) was used to categorize these policy areas based on potential risk and enable a way to prioritize additional investigation and discussion. Twelve of the policy areas had high potential risk and would benefit from a review of the current process controls. These areas were explored in depth with 13 different University units to determine if current practices were robust in managing financial, regulatory, and reputational risk regardless of their performance against benchmarks. They were also compared to five benchmark institutions, all of which were public flagship universities.

UNC-Chapel Hill practices were in line with the five benchmark institutions, although a few best practices from benchmarks emerged. Similarly, UNC-Chapel Hill process controls are strong when run through the topic risk framework, developed by the Working Group. This assessment found that UNC-Chapel Hill handles these high risk areas well, while offering suggestions for improvements to strengthen them further. For the full analysis, see the Phase II Pilot Unit Analysis report provided by the Consultant.

While the Working Group was pleased to be able to provide analysis that could serve multiple interests for the University, our focus was on how the exploration of real policies in these focus areas could inform our policy ecosystem recommendations. We were pleased that no major issues were discovered with our proposed policy ecosystem, but we did uncover several important lessons.

Lessons Learned:

1. Separating policy from procedure (or standards) will be a difficult but critical task in the standardization of policy. A coordinating group should build competency in this activity, working across units to drive the execution associated with this task.
2. Having the right individuals in each unit to help parse these differences and provide missing information is key. Without these content experts, a coordinating group will be unable to complete the policy templates. The units and coordinating group should be held to a regular frequency of meetings until this process is complete.
3. A dedicated, coordinating group must do the legwork to kick off these discussions, however. Stakeholders within the units already have day jobs. While they can be asked to comment on and provide feedback on the standardization process, relying on them to do the execution will create delays in the process.
4. There is inconsistency in how units think about and manage risk. An objective coordinating group will need to play a critical role in helping units achieve a similar level of balance between protecting against risk and creating effective processes for individuals to easily do their jobs.
5. Policy making cannot always achieve consensus. Clarity and specificity should not be sacrificed to achieve acceptance by all stakeholders. The ecosystem design ensures that policy authors receive information and feedback to help them craft policies, but that feedback should not be mistaken for veto power.
6. The service orientation of this office will be established by its first leader. However, persistent and consistent communication of the mission and values of this office over its lifetime (beyond the first leader) will be critical to it remaining a service organization.
7. Policy management work is never “done.” While the majority of the cleanup can happen over a finite period, maintaining a robust system requires time and ongoing investment.

Overall, exploration of the pilot areas reinforced the Working Group’s initial findings and the potential benefits of our recommendations. We were able to refine some elements of the policy ecosystem, but the primary benefit was to develop a deeper understanding of the challenges of implementing any ecosystem. An ecosystem change is a major initiative for any institution. Even with the significant support that units showed for our recommendations, implementing a new policy ecosystem will take persistent leadership, consistent communication, and frequent interaction to ensure the ecosystem helps rather than hinders.

VI. Implementation Recommendations

Our recommendations applied two constraints: we wanted solutions that fit within the political and cultural context of our institution and that were efficient. Applying other lenses to the institutional analysis would yield different results, and we hope the following information provides institutional leadership with the information it needs to adjust the perspective or factor other constraints in order to make the most effective decisions for the University.

If the policy ecosystem were implemented as proposed, two phases must be considered: 1) Building the infrastructure to support a “steady-state” of policy ecosystem management and 2) Standardizing policies and loading them into the web-based repository. Both efforts are significant, but they can and should be completed concurrently.

IV.A. Build Policy Ecosystem Infrastructure

At the center of the recommended policy ecosystem infrastructure is a coordinating office or function managing and supporting policies for the University. Following the joint recommendation between the Ethics and Integrity Working Group and the Policy and Procedures Working Group, this function would reside with a newly formed Office of Integrity and Policy.

The total office would require 6 FTE, which includes one cabinet-level leader, one manager/director for awareness and promotion, one manager/director for monitoring and reporting, and one manager/director with two support staff for policy management. Based on corresponding positions within the University, the total personnel cost (including 30% fringe) would be about \$800,000 to \$1,200,000 per year:

- Chief Officer: ~\$145K-\$250K (~\$189K-\$325 with fringe) – 1 FTE
- Director/Manager: ~\$109K-\$153K (~\$142K-\$199 with fringe) – 3 FTE
- Staff: ~\$70K-\$108K (~\$91K-\$140K with fringe) – 2 FTE

The Working Group anticipates that the office could be fully staffed within 18 months. The first hire should be the Chief Integrity and Policy Officer, and the Officer’s first hire should be the Director/Manager for policy management.

In addition to staffing, the web-based repository needs to be designed and built. Purchasing policy management software can range from \$50,000 to \$250,000 in subscription fees. Our goal would be to provide a solution that would serve the University for the next 5 years for \$100,000. One of the early decisions of the OIP would be to work with ITS to define requirements and determine the best technical solution to meet the University’s needs. Once identified, a solution can likely be in place within 12 months.

VI.B. Update the Policy on Policy Development, Approval, and Publication

The Policy Development, Approval, and Publication policy provides the framework for how policies are approved and managed at the institution. It is at the heart of our current policy ecosystem, and updating the policy is a core element to implementing a new policy ecosystem. Updating the policy will not only put in place a new approval process but will also establish the policy liaison system across units. Finally, it will put in place a more efficient process, for approving policies that need the highest level review. The Working Group believes updating the policy should be one of the first major efforts of the Chief Integrity and Policy Officer and that it could be completed within the first six months of the person being appointed. Work on this effort could begin immediately and could be undertaken concurrently with other efforts.

VI.C. Standardize and Catalog University Policies

The University has over 1,600 policies that are publicly available and likely many more that are not available online. Standardizing all of these policies is a significant effort, not just for a coordinating office but also for all the units that own these policies. We recommend the OIP play an active role in facilitating standardization and uploading of policies. This will increase the central cost of this effort, but such an approach should also be more efficient overall, yielding fast and more consistent results for less total cost to the institution.

The effort of migrating standardized policies to a web-based repository includes working with units to put policy wording into the standard template and then uploading the policy. The goal would be to migrate as many policies as possible using the current language of the policy. Some policies will need to be updated before they can be meaningfully translated to a standard template. These will need to go through a rewriting and review process that will take significantly longer. Policy drafting and updating is a time-consuming process, and we need to anticipate significant effort for both the OIP and responsible unit when policies need to be updated.

Based on effort estimates and models provided by the Consultant, the Working Group estimates that the staffing cost for completing the effort internally would be from \$600,000 to \$900,000 and would take two years (see Figure 10 for annual breakdown). This assumes the Policy Management function of the OIP dedicates 50% of their time to the transition effort, and temporary contract employees are hired to complete the remainder of the effort. The timeline could be faster if more contract employees are hired, but units across the University will not likely be able to allocate enough resources to meet a faster timeline.

The transition effort could also be supported through outsourcing. While the initial costs would be higher, this could enable a faster start for the transition effort. Outsourcing could include facilitating the management of the effort or doing work on the policy standardization. The most effective mix of outsourcing would depend on how quickly the University wanted to move the effort forward and how quickly hiring of key OIP roles could happen. Another outsourcing option would be to have a consultant run a pilot with a single group to manage and support the standardization effort of that unit's policies. This could provide more accurate insight into the costs, timeline, and challenges of the transition effort.

Figure 10: Approximate Implementation Costs

	Year 1	Year 2	Year 3	Year 4	Four Year Total
Office of Integrity and Policy	\$700,000	\$1,025,000	\$1,025,000	\$1,025,000	\$3,775,000
Policy Migration	\$400,000	\$400,000	--	--	\$800,000
Web Repository	\$100,000	\$50,000	\$50,000	\$50,000	\$250,000
Total	\$1,200,000	\$1,475,000	\$1,075,000	\$1,075,000	\$4,825,000

Note: Costs for each year could vary significantly based on final compensation for staff. Estimates for the OIP range from \$800K to \$1.2M annually, and estimates for migration range from \$300K to \$450K annually.

A full, detailed analysis of the financial and timeline assumptions can be found in the Implementation Analysis report provided by the Consultant.

VI.D.Rationale for Recommendations

In order to best understand what is possible for the University, the Working Group first considered options without factoring budgetary, resource, or other constraints. While we know these constraints and considerations are real, we wanted to envision the possibilities so University leadership could most effectively place policy opportunities within the full context of University needs. The Working Group considered a number of implementation options and presents the following additional considerations so that the recommendations can be understood and weighed against competing needs within the institution.

Chief Integrity and Policy Officer Role

We recommend that the Chief Integrity and Policy Officer role be a cabinet-level position. This position reinforces now and into the future the strategic priority of supporting a culture of ethics and integrity and providing a policy management foundation that supports this culture. Another benefit of a cabinet-level position is that other cabinet members would spend less effort implementing policy changes and managing policies going forward. Even considering financial limitations, we believe investing in a senior level leader is important for the success of the overall effort.

Positioning the leader of the coordinating office at a lower level risks making the efforts tactical rather than strategic, both symbolically and practically. Policy management could become more about categorizing policies rather than implementing the most effective policies. In other words, what the office can accomplish may be greatly diminished. Further, the office could become an operational unit rather than a policy management unit. A senior-level leader can help ensure operational roles function within appropriate units rather than the unit identifying the need.

The symbolic message of the role is important both internally and externally. Internally, it can emphasize within our University community the need to know, understand, and abide by the policies we put in place. Externally,

it can speak to our commitment to effective policy and to aligning our operations and policies with the many federal, state, and local rules and regulations that govern our work. Higher education is under scrutiny to demonstrate compliance with internal policies and procedures. A coordinating office that supports a culture of ethics and integrity and maintains a focus on effective policy sends a different message internally and externally if it is not headed by a senior level leader.

Inclusion of All Policies

One of the driving factors of cost is the number of policies that are managed by the coordinating office and included in the repository. The Working Group explored different ideas for restricting policy definitions or rethinking inclusion of all policy levels. The maximum benefit of a policy repository can only be achieved if all policies are included. Most universities, however, do not include all policies in their repositories. Our proposed definition of university policy significantly increases the number of policies that would be considered “university policies.” The benefit of not including all policies under the proposed definition would be negligible. We could redefine “university policy” to a narrower interpretation, which is common even in the benchmark institutions reviewed. Our proposed definition, however, is an accurate reflection of the purview of a policy. Any narrowing would have to be about potential risk or other measures that can change over time and be difficult for faculty, staff, and students to discern. Having policy categories or definitions that are difficult to understand contributes to challenges in finding and using policies. One of the key benefits of a policy repository is that it enables people to find any and all policies that apply to their situation. This is the key benefit that campus stakeholders cited when considering the benefits and challenges of the Working Group recommendations.

The University could implement a narrower set of policies within the repository, which would reduce the staffing cost required to support policy management (see Figure 11 for annual breakdown). While not inconsistent with other universities, the Working Group does not recommend this approach and would instead recommend expanding the timeline for implementation. If the timeline for migrating policies to the repository were expanded, initial implementation costs could be reduced and adjustments could be made in forthcoming years to ensure the cost of effort matches the value being received. For example, updating policies to a standard template carries many benefits but is also a significant expense. Starting with a smaller effort to migrate policies as is to a repository where they can be categorized and found could reduce implementation costs and the University could then assess the value of standardizing all policies.

Figure 11: Approximate Implementation Costs for Expanded Timeline Implementation

	Year 1	Year 2	Year 3	Year 4	Four Year Total
Office of Integrity and Policy	\$700,000	\$860,000	\$1,025,000	\$1,025,000	\$3,610,000
Policy Migration	\$100,000	\$60,000	\$60,000	\$60,000	\$280,000
Web Repository	\$100,000	\$50,000	\$50,000	\$50,000	\$250,000
Total	\$900,000	\$970,000	\$1,135,000	\$1,135,000	\$4,140,000

Distribution of Transition Effort

As described above, the effort of standardizing policies within a template and migrating them to a repository is considerable. The Working Group's recommendation places a significant amount of that effort within the coordinating office. We discussed reducing support within the office and expecting units to do more of the work on their own. While this would reduce the cost of establishing and maintaining a coordinating office, it would reduce the ability of that office to maintain service orientation. More importantly, the total cost to the University would likely be greater and the quality of finished work less. Having the coordinated office do as much of the work as feasible should be more efficient and should provide more consistent and higher quality results.

Other Coordinating Office Functions

The current recommendation for a coordinating office includes three director/manager level positions, one for each of the major functions. It may be possible to combine some functions, at least in the short term, in order to reduce initial costs. For example, the Chief Integrity and Policy Officer could play the primary role for awareness and promotion and delay hiring a director. Or the role of clearinghouse for reporting concerns and violations could be combined with components of awareness and promotion, and the identification of policies that need updating could be focused on policy management, which might require two director positions rather than three.

The Working Group is not recommending any of these solutions but rather pointing out that limiting or redefining the scope of specific roles and timeline of fulfilling those roles could have an impact on the short- and long-term costs of implementing the overall recommendation. The Working Group cannot speak in detail to the likely consequences of changing the staffing for Awareness and Promotion or Monitoring and Reporting.

VII: Conclusion

Over the past eight months, the Working Group has met with a large number of stakeholders across campus and strived to understand our current policy environment and what we can do to improve that environment. We were pleased to find that our review did not reveal lapses in policy implementation and that there are many models of effective policy implementation and execution across campus. We did, however, find that the current ecosystem is inconsistent and difficult for people to navigate.

We believe implementing our recommendations would reduce risk by making policy and policy implementation more consistent and transparent, enabling people to more easily and quickly find and use policies that are applicable to their circumstances and needs. Additionally, providing a web-based repository of policies and establishing a service-oriented function or office will also significantly improve overall operations and efficiency by fostering development of policies supportive of the University and the faculty, staff, and students who carry out the important work of the University.

Changing the policy ecosystem at a large and complex institution is a major task that would take several years to fully complete. Our recommendation proposes a financial investment from the University and from individual units within the University. During feedback sessions, individual units reported that their investment through policy liaisons could provide significant benefit to their operations. The Working Group recognizes that financial and other considerations may present a need to modify our recommendations and seeks to provide as much information as possible to enable senior leadership to make effective decisions regarding how best to manage policy. We hope the five principles identified in the recommendation provide a clear guide while still giving the University the flexibility it needs to make appropriate decisions in the context of the diverse interests, needs, and priorities across the institution.

The Working Group would like to thank the many campus stakeholders who provided valuable time and feedback that were critical to developing our recommendations. We also thank the Chancellor's Office and campus leadership for their support. The willingness of people across the University to engage fully in this process speaks to the commitment of the institution and its people. The Working Group is confident that this commitment to create the strongest and most effective policy environment will continue to guide policy and policy implementation into the future.

VIII: Appendices

UNC-CH Policy Management System Draft System Requirements

Introduction:

UNC Chapel Hill seeks to establish a single web-accessible repository for policies, procedures, and related governance documents to centralize and improve document management and accessibility.

Purpose: This requirements document is intended to set out the functional and non-functional feature requirements for a database and web application

- ▶ Document Conventions and Definition of Key Terms
 - ▶ Governance Document: University and Unit policies, and all associated Procedures, or other closely-related documents.
 - ▶ Permanent Repository: In many cases, the retention requirement for policies is extremely long. Taking applicable Records Retention requirements into account, as well as the need to produce superseded versions of these documents, we will treat the application as a “permanent repository”

Intended Audience: Stakeholders in the policy management process at UNC, potential vendors or developers who provide solutions in this area.

Initial Requirements:

The web-accessible repository must have certain features and functionality immediately. These features will determine how stakeholders find and reference policies housed in the repository.

System Requirements

- ▶ General
 - ▶ Must be a system built for the purpose (must be a system for the management of policies, not a re-purposed or general-purpose document management system or other type of system).
 - ▶ Must not require implementation of any other system that would be redundant with existing campus systems (ex. HR, Student, or Finance system). UNC seeks a standalone single-purpose system.
 - ▶ System shall be built with a phased approach, prioritization of features to be determined during project planning phase.
- ▶ Database requirements
 - ▶ [Platform standards, DB system standards]
 - ▶ Will adhere to all applicable UNC IT security requirements and standards
 - ▶ May be cloud-based or locally hosted
- ▶ Document metadata
 - ▶ Required fields:
 - Unique reference number
 - Title
 - Description
 - Who is impacted

- Creation date of file
- creation/authorization date of document
- all review dates
- all revision dates
- all revision authors
- revision history notes
- next needed review date
- multiple categories with ability to have custom categories
- ability to have multiple categories for one policy
- keywords
- responsible departments
- document type, file type,
- related document links (to other stored documents and to external locations)
- related legislation/regulation links
- governing standards links
- log of suggestions made to policy, who made suggestion, related actions/resolution.
“Legislative history” and “Next Updates” notes.

Access and Security Requirements

- ▶ Must provide granular role-based access to contents differentiating at least view, edit, and delete functions and applicable to single documents and document collections.
- ▶ Must log all changes to documents with user and timestamp.
- ▶ Must provide for public (viewable without login), secured (viewable only with login), and unpublished (viewable/editable only by owners and designates in the workflow) documents.
- ▶ Must integrate with Shibboleth for use of UNC SSO (Onyen)
 - ▶ Should include provisioning/deprovisioning based on attributes associated with the Onyen. (In other words, provisioning of access based on affiliation type and other attributes, as well as deprovisioning of access based on LOSS of affiliation or other attributes should happen automatically rather than requiring manual provisioning/deprovisioning by an administrator).
- ▶ Must pass UNC IT Security risk assessment

Availability Requirements

- ▶ Must allow for export of all documents and document metadata into common transition formats for archiving or migration to future solutions without additional development or payment required to do so.
- ▶ Must retain documents either permanently or with configurable purge function to ensure adherence to records-retention requirements.

Document Management

- ▶ Allow document categorization by type, by owner, by defined category, by significant date (last-revised, origin, assigned review-date...)

Public-Facing Views

- ▶ Shall integrate in look-and-feel with UNC web site seamlessly.
 - ▶ May allow customized views for placement on department/school pages maintaining the central look and feel

- ▶ May allow view of Department policies only, or other application-admin-customized views (for example, Student Affairs may publish a view showing all policies applicable to students on their web page, the Privacy Office may publish views of only Privacy-related policies on their page, etc.)
- ▶ Must allow linking directly to policy documents in the repository (this may be through URL search string).
- ▶ Shall provide intuitive interface for all viewers of public, published policy documents
 - ▶ Search and sort
 - ▶ Full text searching of all documents
 - ▶ Keyword searching/sorting of all documents for tagged terms
 - ▶ Configurable display of documents by assigned category
 - ▶ Shall not search or display document history or superseded/unpublished documents to public or to unauthorized users.
 - ▶ Shall allow application-admin configurable section for display of new/priority messages and documents in prominent page placement.
 - ▶ Display of in-progress review and revision status along policy development workflow
 - ▶ Shall provide login/back-end access link from front page.
 - ▶ Clear and intuitive linking of related documents (policies, procedures, and standards)
- ▶ Document context
 - ▶ When displaying a document, provide configurable views of metadata (all document metadata should be available as an option, but the selection should be configurable by the application admin. For example, the application admin may choose to make available Origin date, last revision, next review, and document owner department but may not choose to make available document owner email, document owner may then choose only to make the last-revision date visible to a viewer).
 - ▶ Show clearly assigned categories the document falls under, including major display categories such as “Student” “Employee” “IT Policy” “Finance” etc. May be through display in a tabbed view or any other clear mechanism.
- ▶ Ease of use
 - ▶ Provide multiple intuitive paths for search/sort to permit user to find document lists or specific documents with one to two clicks.
 - ▶ Address all appropriate accessibility requirements for ADA compliance in a highly-facilitative manner.

Future Requirements:

These requirements govern the workflow processes of key stakeholders involved in updating/editing policies. These workflow processes can be handled manually initially, but should eventually be automated once they are established and functioning well. The requirements below may be altered/removed as needed as these workflow processes become solidified.

System Requirements

- ▶ Document metadata
 - ▶ Required fields:
 - Log of suggestions made to policy, who made suggestion during policy development period, related actions/resolution. “Legislative history” and “Next Updates” notes.
 - Area to enter feedback on implementation of the policy (any issues, suggestions)

Document Management

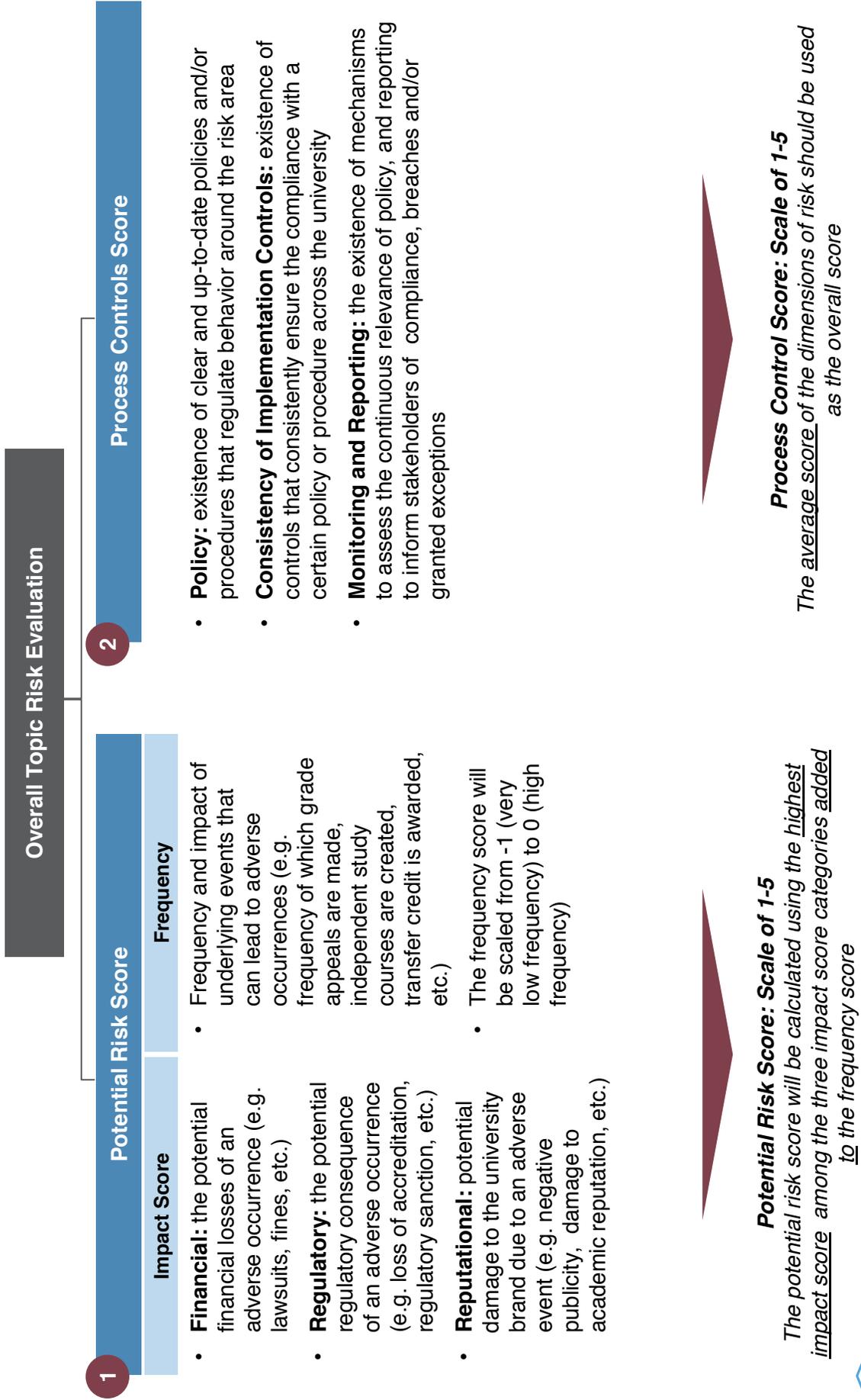
- ▶ Log all document changes including new document, line-by-line comments and changes, replacement of media, deletion of media, by user and with time-stamp.
 - ▶ Maintain logs for the lifetime of the document
 - ▶ Logs shall be accessible and searchable by at least application admins
- ▶ Allow viewing of all document versions and reversion to saved or previous versions.
- ▶ Allow multiple document “owners”
- ▶ File format transfer. When a document is uploaded in any common format, system must convert automatically to then-current other document types for viewing or management (ex. Upload of .docx should convert to HTML (view) and PDF (print) versions)
- ▶ Provide granular configurable workflows for document review, approval, and decommissioning.
 - ▶ Workflows shall be applicable to specific documents, groups of documents (by owner, document type, and by other categories as defined by the application admins)
 - ▶ Workflows shall provide a trackable, straightforward mechanism for document sharing with outside individuals (those who are not users of the system).
 - ▶ This mechanism shall allow inclusion of edits, comments, and approvals by the outside individuals.
 - ▶ Shall provide notification system to alert users via email to changes in documents, upcoming significant dates (review dates, etc.).

Public-Facing Views

- ▶ Document context
 - ▶ Allow logged-in users to opt-in to become policy stakeholders during next review/revision cycle or to receive notifications of actions taken on specific policies
- ▶ Ease of use
 - ▶ Integrate with UNC web search so that documents display from a search on the main UNC page.

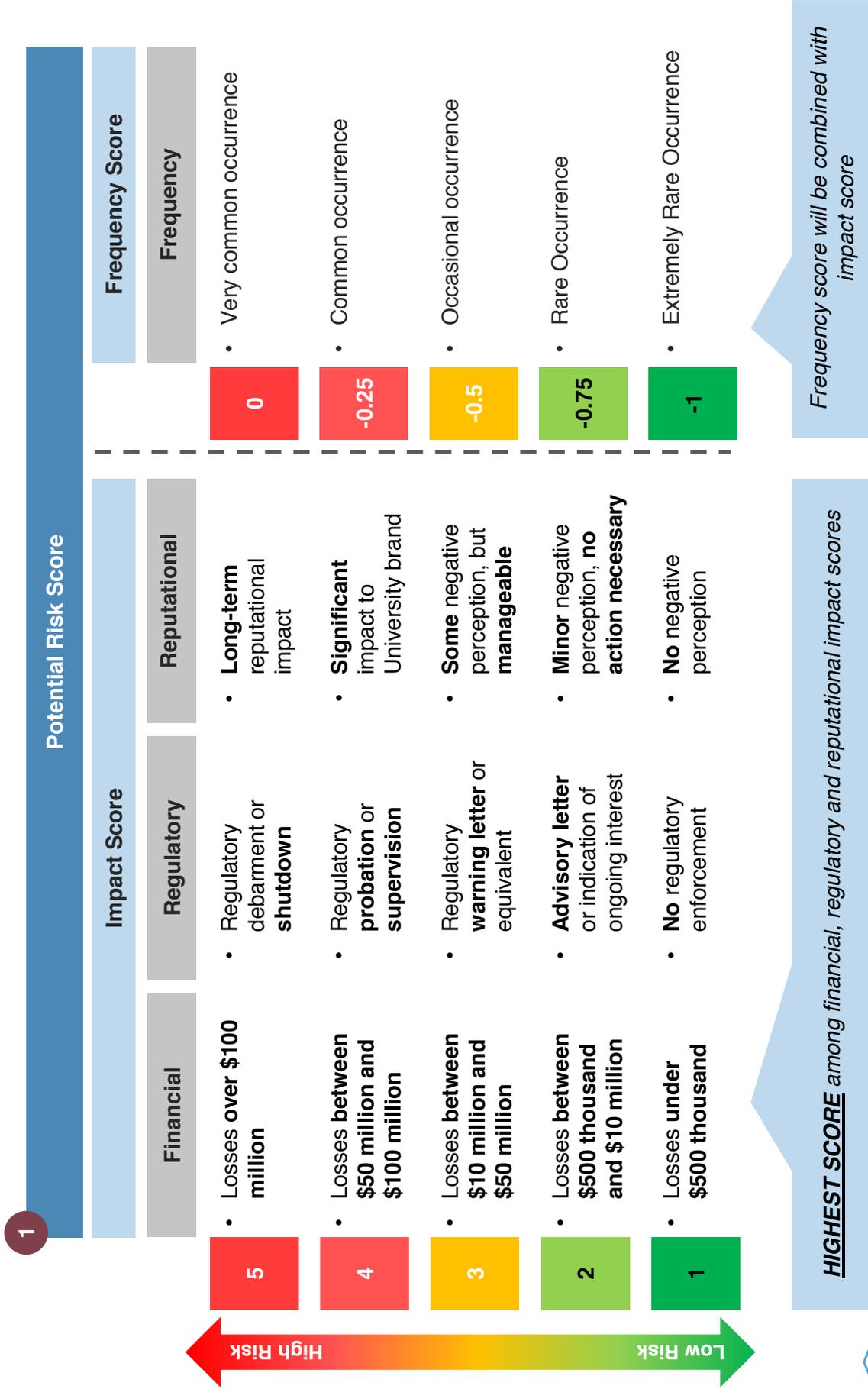
Topic Risk Framework

A risk framework is made up of two components – a potential risk score and a process control score



Topic Risk Framework

The topic risk assessment takes into account the potential damage of three types of impacts caused by adverse events and the frequency of these events



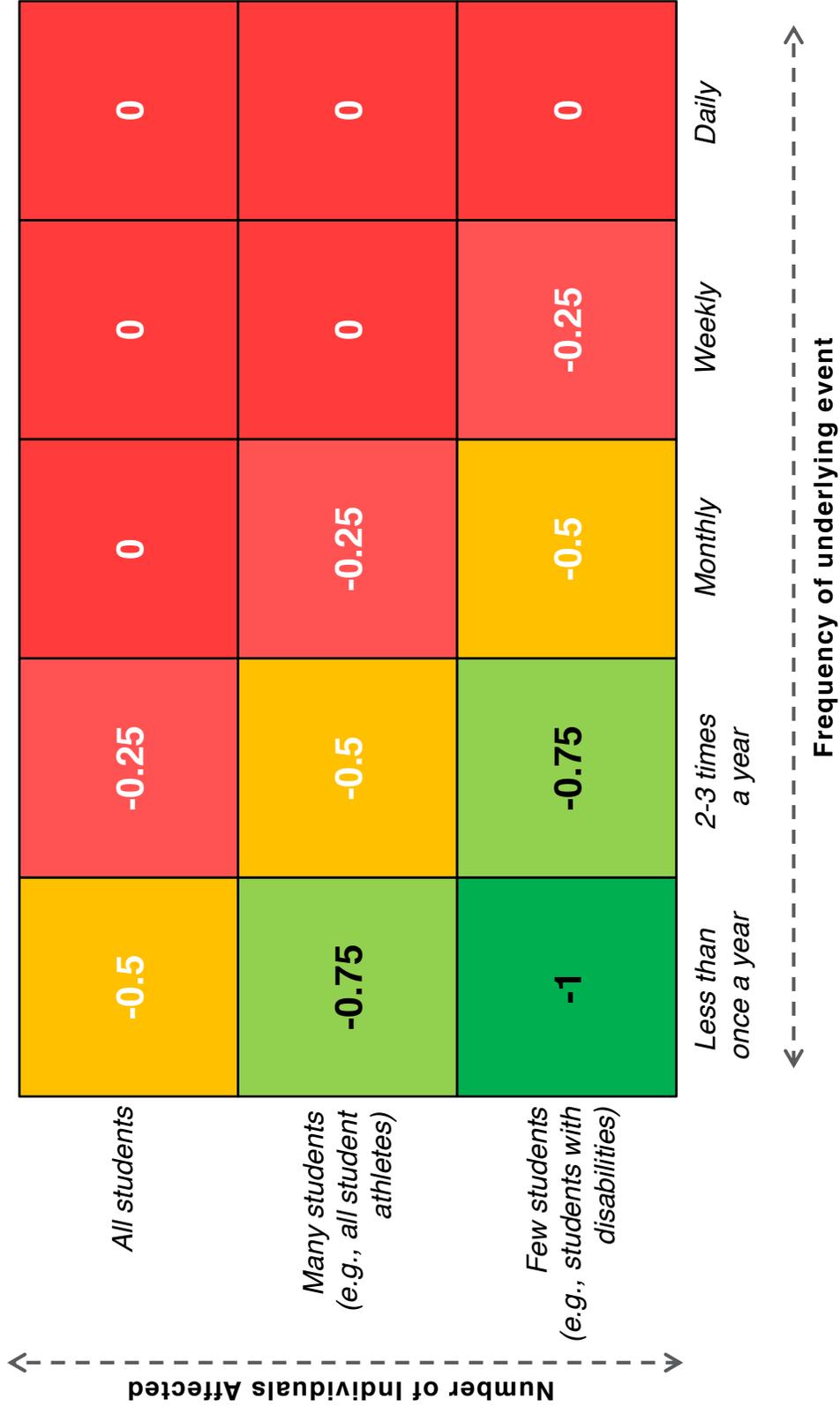
Source: Benchmark 6; Parthenon Analysis



Topic Risk Framework

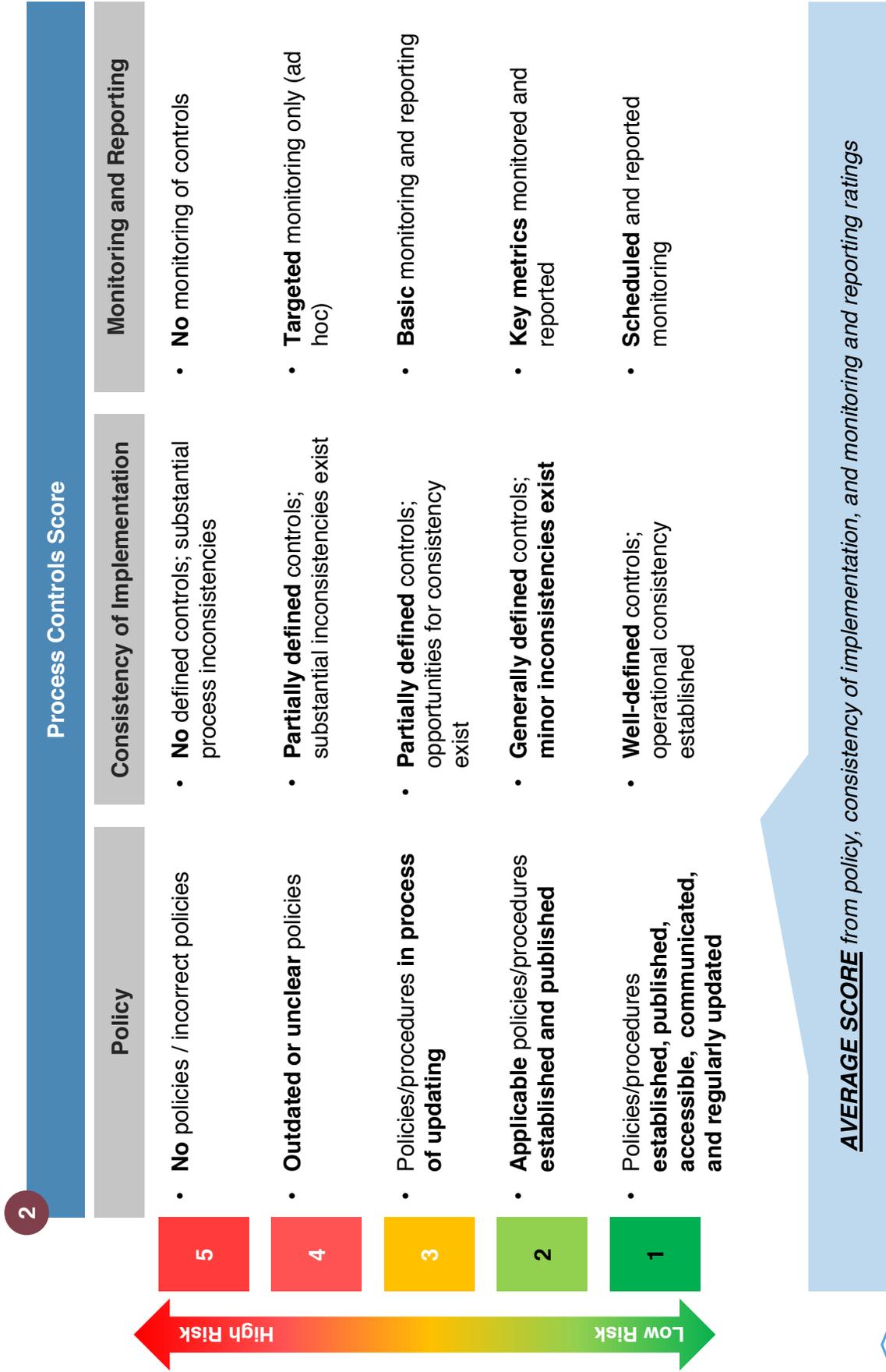
The frequency rating is scored from 0 to -1; it takes into account both the number of students affected and how often the underlying event occurs

Frequency Score Assessment for Policy Topic Area



Topic Risk Framework

The process controls assessment considers the current state of the policy, consistency of implementation, and monitoring and reporting mechanisms



Topic Risk Framework

Once assessed, the potential risk score and process controls score are combined to assign an area with a degree of “riskiness”

- The appropriate action to take in regards to any given topic area is determined by a topic area’s potential risk level, as well as the effectiveness of the current controls surrounding it
- While topic areas with effective controls and low risk can be subjected to periodic reviews without additional monitoring, high potential risk topic areas demand closer supervision to ensure a solid control process, even if controls are already in place
- In instances where no effective controls are in place, topic areas low potential risk topics should be periodically evaluated to ensure they remain low risk, and high potential risk topics should merit action

