

LINCOLN UNIVERSITY

Policy:	Policy Development at Lincoln University of Pennsylvania
Policy #	HRM-140
Effective Date:	April 2025
Revisions:	
Next Review Date:	April 2026
Review Officer(s):	Office of Human Resources, Vice President, General Counsel & Secretary to the Board of Trustees
Status:	Approved by the LU Board of Trustees

I. Purpose

The purpose of this policy is to establish governing principles for the development and oversight of all University policies.

Lincoln University of Pennsylvania (or Lincoln) shall establish governing principles for the development of University policies, and ensure that University policies are concise, easily understood, and accessible to the University community. Policies that are accessible and easily understood will: (1) support the University's mission; (2) achieve accountability by identifying the offices responsible for the policies; (3) provide faculty, students, staff, and guests with well-developed expectations; and (4) transparently document how the University conducts business.

In addition to these principles, University policies must comply with applicable state and federal laws, regulations, and guidance governing state-related institutions in the Commonwealth of Pennsylvania, including the Pennsylvania Sunshine Act, Right to Know laws, and other relevant state educational regulations. Furthermore, the University is committed to maintaining transparency and public accountability in its policy development, making policies publicly accessible in accordance with Pennsylvania's public access requirements.

University policies shall be (1) presented in a common format; (2) approved by the authorized body; (3) maintained centrally in conjunction by the Office of the General Counsel and the Office of Human Resources (4) made accessible to the University community and public on the official University policies website; (5) linked electronically to procedures or resources for implementing the policy; and (6) kept current within the framework of an organized system of change control.

Policies must be distinguished from related procedures. Procedures or other implementing resources shall be clearly labeled to identify the policy that they supplement. Procedures and forms do not undergo the approval process set forth in this policy and may be revised and posted as necessary.

II. Scope

This policy applies to all University employees, members of the University community, and members of the Board of Trustees regardless of how categorized. Every employee, member of the University community, or Board of Trustee member charged with developing, approving, maintaining, managing, or publishing policies on behalf of the University shall comply this policy.

III. Roles and Responsibilities

The Office of the General Counsel and Human Resources

The Office of the General Counsel and the Office of Human Resources, work in tandem, and manages the process for developing, approving, and publishing all University policies in accordance with the standards and guidelines set forth in this policy and associated resources. The Office of the General Counsel is responsible for ensuring that

policies are consistent with applicable laws, regulations, governing policies, and other requirements including those specific to state-related institutions in Pennsylvania.

In certain instances, the Office of the General Counsel collaborates with the Pennsylvania Office of the Attorney General to ensure that policies comply with state law and to provide legal guidance on the University's status as a state-related institution. The OGC also ensures that policies do not create legal liability for the University and considers relevant state education laws in policy development. The President, with advice of the General Counsel, shall determine who has approval authority for each University policy according to applicable laws, regulations, and related policies. The OGC also determines whether a proposed policy fits the definition of and follows the requirements for a University policy. The OGC in conjunction with the Office of Human Resources (or HR Office), shall also manage the University's policy webpages, including the University's archived policies, and campus-wide communications regarding the approval of new or revised policies. Responsibility for policy interpretation ultimately rests with the General Counsel.

The Office of Human Resources

The Office of Human Resources plays a critical role in the development, review, and implementation of University policies, particularly those affecting faculty, staff, and workplace procedures. Human Resources ensures that policies align with employment laws, best practices, and University standards. Additionally, the Office of Human Resources collaborates with the Office of the General Counsel to assess the impact of policies on employees and provides guidance on compliance and training related to policy changes.

The Office of Human Resources develops and administers specified University policies and, if applicable, supplement standards, procedures, or guidelines. The HR Office is accountable for the accuracy of the subject matter, issuance, timely review, and updating of the University policy. The HR Office also ensures that the University policies for which it is responsible are consistent with other policies within its area, communicated properly, reviewed regularly, revised or updated as needed, and monitored for compliance and effectiveness.

President:

The President is responsible for final approval of university policies over which he or she has authority in accordance with Pennsylvania law or the policies and regulations of Commonwealth. The President may, in his or her discretion, delegate policy-approval authority to Cabinet members to issue and revise certain designated unit or department-limited policies. The President shall appoint a Responsible Office for all approved University policies.

Board of Trustees:

The University Board of Trustees is responsible for final approval of University policies over which it is authorized in accordance with state law and the policies or regulations of the Commonwealth of Pennsylvania. The Board of Trustees delegate discretionary authority to the President to approve administrative or unit policies, and interim policies, including revisions.

President's Executive Cabinet:

The President's Executive Cabinet is responsible for reviewing and recommending the approval or revision of university policies. The senior leadership or President's Executive Cabinet serves as the President's advisors on major issues such as operations, policy, regulations, programs and organizational structure.

Department Managers

All University managers shall ensure that employees are familiar and compliant with applicable laws and governing regulations, standards, and policies. For purposes of this section, the term "manager" includes vice presidents, associate and assistant vice presidents, deans, associate and assistant deans, directors, department heads, and supervisors.

IV. Governing Hierarchy-State Specific

The policy hierarchy is an overview of the documents that define and govern the University's activities. This

includes all internal policies, state regulations, and laws applicable to Lincoln University as a state-related institution in Pennsylvania. Policies must align with state guidelines, including regulations from the Pennsylvania Department of Education (PDE) and the Commonwealth of Pennsylvania's statutes governing semi-public universities.

V. Policy Template

The OGC shall develop a policy template that shall be used for all University policies. The template shall be clearly labeled and posted on the OGC and HR Office website for download and use by the University community.

VI. Requirements for Policy Development

Policies shall be drafted so that they are clear and concise. Policies shall contain sufficient information on the subject without being excessive in length. Detailed mechanisms or processes shall be included in supplemental resource documents and may be in the form of standards, procedures, guidelines, definitions, or other supporting resource.

The following sections should be included in each University policy as applicable. If there are terms that must be defined for the University policy to be understood, those terms and their definitions should be included in a "Definitions" section or document.

If there are specific consequences for not complying with a University policy, they should be addressed in the "Compliance" section. The following University policy sections are recommended, as applicable:

- Policy Title
- Purpose
- Scope
- Definitions
- Policy Overview
- Roles and Responsibilities

All policies should include the following information at the beginning of the policy:

- Policy Title
- Effective Date
- Revisions
- Next Review Date
- Review Officer(s)
- Status
- Any Resources and Supplemental Documents, as applicable, whereas this shall be added at the end of the policy

VII. Policy Approval

New or revised University policies will usually require development, review, and recommendation by the Office of the General Counsel, the Office of Human Resources, President's Cabinet, and approval by Lincoln University Board of Trustees, as determined by policies or regulations of Lincoln University of Pennsylvania. Specific review and approval procedures are set forth in the Supplemental Procedures for Policy on Policies.

Clerical or non-substantive revisions to existing University policies may be approved by the Office of Human Resources without full review and recommendation by the President's Cabinet.

Supplemental standards, procedures, or guidelines may initially be developed, revised, and approved as part of

the development, revision, and approval of a University policy, but may also be separately revised and/or updated without additional review by the President's Cabinet and/or approval by the LU Board of Trustees, in the discretion of the Office of the General Counsel and/or the President.

VIII. Interim Policies

Under exceptional circumstances, the President may issue interim University policies. Such circumstances may include the need to expedite the issuance of a University policy because of external compliance deadlines; developments that will, or could, significantly affect the safety or welfare of members of the University community; or where the step is necessary or desirable to facilitate orderly and efficient operations.

Interim policies may also require expedited consultation with state agencies or oversight bodies, particularly if they involve public funding, compliance with state education laws, or other matters governed by the Commonwealth of Pennsylvania.

Interim University policies will generally remain in effect for no more than six months from the effective date of their issuance; thus, the Office of General Counsel should promptly initiate the steps described above for review and approval of a final University policy. The HR Office and the OGC will post interim University policies, clearly designated as such, on the University's policy website. Interim policies become effective immediately upon approval by the President.

IX. Policy Rescission

A University policy shall be rescinded when (1) it becomes inconsistent with legal or policy requirements; (2) no longer reflects the University's practice; or (3) when the policy is consolidated into other policies. Only the authority that originally approved a University policy is authorized to rescind that policy. Approval of a revised version of a policy should serve to rescind previous versions of the same policy.

The Office of the General Counsel retains copies of rescinded University policies for reference and record-keeping purposes. Effective upon approval of this policy, the Office of the General Counsel shall prospectively maintain references to rescinded policies and clearly denote rescinded statuses on its official University policy site.

X. Publication of University Policies

All approved University policies, interim policies and supplemental policy resources or documents shall be published on the official University policy site. University policies published on or linked from the official University policy site shall be consistent with this policy.

If a unit wishes to include University policies on its website, it must do so by means of a link to the official University policy site. The official University policy site will be the only site that carries the assurance that the University policies posted on it are current and correct.

XI. Policy Review, Revision, and Updates

Every University policy shall be reviewed at least every year by the Office of Human Resources or Policy Owner, or more frequently, if necessary. The Office of Human Resources or Policy Owner shall propose revisions or updates as needed and maintain currency to comply with regulatory changes or changes in business operations.

University policies will also be regularly reviewed to ensure compliance with changes in state law, including updates from the Pennsylvania Department of Education and other state agencies. This is particularly relevant to policies affecting state funding, tuition, financial aid, and employment practices. All policy modifications will follow the same review and approval process as new policies to maintain compliance with regulatory changes from both state and federal sources.

The Office of the General Counsel shall oversee the review process. Policy modifications will follow the same review and approval process as for new University policies.

XII. Policy Review Process

The Policy Review Process at Lincoln University begins annually, or sooner if triggered by changes in laws or regulations. The Office of Human Resources (HR) or the Policy Owner will identify policies for review, with an initial assessment conducted by the Office of the General Counsel (OGC) and HR within 30 days. This assessment ensures compliance with state and federal regulations.

Once reviewed, proposed changes to the policies will be drafted by the Division, with the guidance of the OGC and HR, which should be completed within 45 days. This includes revising policies for legal compliance or feedback from stakeholders. Stakeholder consultation, including input from the President's Cabinet and other relevant parties, will occur over 15 days.

After stakeholder feedback, the policy will be reviewed by the President's Cabinet within 30 days, followed by a 15-day legal review by the OGC to ensure full compliance. The policy will then be submitted to the Board of Trustees for final approval, which should be completed within 30 days.

Once approved, the HR Office and OGC will communicate the changes to the University community and publish the policy on the University's official website within 15 days. The policy's implementation will be monitored continuously, with quarterly reviews to ensure effectiveness.

The policy review cycle will occur annually, with a structured system to ensure policies remain compliant and relevant to the University's needs.