A. PURPOSE

The purpose of this policy is to establish and guide the framework for emergency management (EM) programs at all Old Dominion University facilities.

B. AUTHORITY

Code of Virginia Section 23.1-1301, as amended, grants authority to the Board of Visitors to make rules and policies concerning the institution. Section 6.01(a)(6) of the Board of Visitors Bylaws grants authority to the President to implement the policies and procedures of the Board relating to University operations.

Code of Virginia Sections 23.1-803-805, as amended

Commonwealth of Virginia Executive Order 41 (2011)

Commonwealth of Virginia Emergency Services and Disaster Law of 2000, as amended

C. DEFINITIONS

Building Emergency Coordinator (BEC) – A designated building representative who carries out basic emergency response functions (evacuation facilitation, floor sweeps, accountability documentation) during an incident/emergency/event. BECs also serve as conduits with and ambassadors for the Office of Emergency Management (OEM) to assist with preparedness planning, training, conducting exercises, outreach activities, communication and emergency response, as necessary.

Business Impact Analysis (BIA) – A framework that identifies the University’s critical business functions as determined by departments and senior management, prioritizes these functions, and identifies information technology services that are required to support them. The BIA provides a framework that assists in the completion of various continuity plans, including the University’s Continuity Plan, Information Technology (IT) Disaster Recovery Plans (DRP), and IT System Risk Assessments.

Campus Community Emergency Response Team (C-CERT) – An individual preparedness program, created by the Federal Emergency Management Agency (FEMA), that educates people about disaster preparedness for hazards that may impact their area and trains them in basic disaster response skills, such as fire safety, light search and rescue, team organization, and disaster
medical operations. Classroom training and practical exercises prepare C-CERT members to assist others in their neighborhood or workplace following an event when professional responders are not immediately available to help.

**Common Operating Picture** – A broad view of the overall situation as reflected by situation reports, aerial photography, and other information or intelligence.

**Continuity of Operations (Continuity)** – A process of identifying the essential functions - including staff, systems, and procedures - that ensures the continuation of the University's ability to operate.

**Crisis and Emergency Management Plan (CEMP)** – The University's written framework for managing all-hazards incidents/emergencies/events.

**Designated Personnel** – Exempt and non-exempt employees who are required to work during an authorized closing because their positions have been designated by the hiring supervisor as essential to agency operations during emergencies.

**Emergency** – As defined by **Code of Virginia Section 44-146.16, as amended** “any occurrence, or threat thereof, whether natural or man-made, which results or may result in substantial injury or harm to the population or substantial damage to or loss of property or natural resources.”

**Emergency Action Plan (EAP)** – The written framework from which to facilitate individual or departmental emergency response actions during all-hazards incidents/emergencies/events.

**Emergency Coordination Officer (ECO)** – An individual appointed by the University to coordinate with the **Virginia Department of Emergency Management (VDEM)** and local emergency management partners, prepare and maintain the University’s Crisis and Emergency Management Plan, prepare and maintain internal plans and procedures, and continually work to enhance the resiliency of the University community.

**Emergency Management (EM)** – The coordination of efforts to prepare for and carry out the functions to prevent, minimize, respond to, and recover from incidents caused by natural hazards, human-caused hazards, and acts of terrorism.

**Emergency Management Accreditation Program (EMAP)** – A voluntary assessment and accreditation process for State and local government emergency management programs. Accreditation is based on compliance with collaboratively developed national standards.

**Emergency Management Cycle** – A system that provides for the management and coordination of prevention, mitigation, preparedness, response, and recovery activities for all hazards. The system encompasses all organizations, agencies, departments, and individuals having responsibilities for these activities.

- **Prevention** – Actions to avoid an incident or to intervene to stop an incident from occurring. Prevention involves actions to protect lives and property.
- **Mitigation** – Activities designed to reduce or eliminate risks to persons or property or to lessen the actual or potential effects or consequences of an incident.
- **Preparedness** – As defined in the **National Response Framework**, preparedness is the range of deliberate, critical tasks and activities necessary to build, sustain, and improve the operational capability to prevent, protect against, respond to, and recover from incidents. Preparedness is a continuous process requiring a whole community approach to be most effective.
• **Response** – Activities that address the short-term, direct effects of an incident. Response includes immediate actions to save lives, protect property, and meet basic human needs.

• **Recovery** – Activities that address the short-term and long-term needs and the resources to assist, restore, strengthen, and rebuild affected individuals, and the University community at large.

**Emergency Notification System (ENS)** – The University’s combined protocols, training, systems, and equipment used to provide emergency alert and notification to the University community.

**Emergency Operations Center (EOC)** – The physical location at which the coordination of information and resources to support on-scene incident management activities takes place.

**Exercise** – A test of plans, policies, and/or procedures intended to validate the planning and training process as part of a larger preparedness program. Exercises can be discussion-based, including seminars, workshops, and tabletops, and operations-based, including drills, games, and functional and full-scale exercises.

**Facilities** – Buildings, structures, parking lots, grounds and space owned or leased by the University.

**Hazard** – Something that has the potential to be the primary cause of an incident.

**Hazard Mitigation** – Any action taken to reduce or eliminate the long-term risk to human life or property.

**Incident** – An occurrence or event, natural or human-caused, that requires an emergency response to protect life or property.

**Incident Command System (ICS)** – A standardized, on-scene emergency management construct specifically designed to provide for the adoption of an integrated organizational structure that reflects the complexity and demands of single or multiple incidents. ICS is the combination of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure. It is designed to aid in the management of resources during incidents.

**Incident Commander (IC)** – The individual responsible for all incident activities. The IC has overall authority and responsibility for the management of all incident operations and is responsible for the management of all incident operations at the incident site.

**Mutual Aid Agreement** – Written agreement between agencies, organizations, and/or jurisdictions that they will assist one another on request by furnishing personnel, equipment, and/or expertise in a specified manner.

**National Incident Management System (NIMS)** – A system mandated by the Federal Homeland Security Presidential Directive (HSPD) #5 that provides a consistent, nationwide approach for governments (Federal, State, and local), voluntary agencies, and the private sector to work effectively and efficiently together to prepare for, respond to, and recover from incidents, regardless of cause, size, or complexity. NIMS uses a core set of concepts, principles, and terminology.

**Unified Command (UC)** – An application of the Incident Command System (ICS) used when there is more than one agency with incident jurisdiction or when incidents cross political jurisdictions.
Agencies work together through the designated members of the Unified Command to establish their designated Incident Commanders at a single Incident Command Post.

**Virginia Statewide Fire Prevention Code (VSFPC)** – A state regulation promulgated by the Virginia Board of Housing and Community Development in cooperation with the Virginia Fire Services Board, both Governor-appointed boards, for the purpose of establishing statewide standards to safeguard life and property from the hazards of fire or explosion arising from the improper maintenance of life safety and fire prevention and protection materials, devices, systems, and structures and the unsafe storage, handling, and use of substances, materials, and devices, including fireworks, explosives, and blasting agents, wherever located.

### D. SCOPE

This policy applies to all employees, students, volunteers, employees of affiliated organizations paid through the University, and visitors. Employees include all staff, administrators, faculty, full- or part-time, and classified or non-classified persons who are paid by the University. Students include all persons admitted to the University who have not completed a program of study for which they were enrolled; student status continues whether or not the University's programs are in session. Affiliated organizations are separate entities that exist for the benefit of the University through an operating agreement and include the Foundations, the Community Development Corporation, and the Alumni Association. Visitors include vendors and their employees, parents of students, volunteers, guests, uninvited guests and all other persons located on property owned, leased, or otherwise controlled by the University.

### E. POLICY STATEMENT

It is the policy of Old Dominion University to create and maintain a “culture of preparedness” throughout the University community. The University’s Office of Emergency Management (OEM) is responsible for adopting an all-hazards, whole community approach within its preparedness programs following State/Federal guidance and accepted standards and best practices within the EM field. This includes the adoption, implementation, and utilization of the U.S. Department of Homeland Security’s (DHS) National Incident Management System (NIMS) and Incident Command System (ICS, a NIMS component) as the framework from which University incident/emergency/event management activities are structured; the implementation of NIMS/ICS will be coordinated by OEM. Additionally, the University’s emergency management cycle will follow the Emergency Management Accreditation Program’s (EMAP) model of prevention, preparedness, mitigation, response, and recovery. To support inclusive emergency planning efforts, minimize duplication of effort, and promote a common operating picture, University departments are required to cooperate with OEM in coordinating and facilitating preparedness programs and initiatives.

**Departmental/Unit Planning Requirements**

All University departments are required to maintain a current, all-hazards Emergency Action Plan (EAP) and separate Continuity Plan, available as templates from OEM. The EAP serves as the written framework for facilitating individual or departmental emergency response actions during all-hazards incidents/emergencies/events. The Continuity Plan identifies departmental mission-essential functions and details the primary business functions and resources (facilities, human capital, and IT) needed to satisfy these functions when employed during certain operationally-disruptive scenarios. Department heads will designate a point of contact to work with OEM to complete/update their EAP/Continuity Plans; these Plans will be completed/updated annually by March 1 (Continuity Plan) and August 1 (EAP) and uploaded to the OEM SharePoint portal.
Directors/department Heads and individuals in supervisory roles are responsible for ensuring that personnel within their departments are aware of emergency management and fire safety plans, policies, and the procedures for reporting accidents, emergencies, and safety issues. They are also responsible for ensuring that Emergency Action Plans (EAPs) and Continuity Plans are developed in accordance with OEM guidelines and communicated to all unit personnel in order to ensure familiarity with and understanding of respective roles and responsibilities during all phases of the emergency management cycle. With guidance and support from OEM, Directors/Department Heads are responsible for coordinating annual EAP/Continuity Plan review, training, and exercises involving key staff members expected to participate in incident/emergency/event response and recovery activities.

Further, all individuals to which this policy applies share collective responsibility to maintain individual preparedness to further the overall resiliency of the institution. Members of the University community are strongly encouraged to prepare themselves accordingly for incident/emergency/event situations (whether on- or off-campus) by leveraging planning and training resources available through multiple University offices and departments, local and regional partners, the Virginia Department of Emergency Management (VDEM), and the Federal Emergency Management Agency (FEMA).

Roles and Responsibilities of the Office of Emergency Management (OEM)

In accordance with Commonwealth of Virginia Executive Order 41, the University is required to establish, adequately staff, and provide continuing programmatic funding support for the Office of Emergency Management (OEM). This department has been established within the Division of Public Safety and operates under the direction of the Assistant Vice President for Public Safety/Chief of Police, or designee, and in accordance with current Federal/State code guidance and best practices. OEM’s primary responsibility is to administer and maintain ongoing all-hazards planning, training, and exercise programs at the University, departmental, and individual levels, with the assistance of all relevant stakeholder departments and units as required by OEM.

Specific plans developed and managed by OEM include the Crisis and Emergency Management Plan (CEMP), University Continuity Plan, and Hazard Mitigation Plan. OEM is also responsible for coordinating the departmental Emergency Action Plan (EAP), continuity planning, training and exercise programs for all University units.

Training curricula delivered by OEM include NIMS/ICS/continuity planning, Campus Community Emergency Response Team (C-CERT), Building Emergency Coordinator (BEC), and various needs-specific courses. OEM is also responsible for testing the CEMP and University Continuity Plan by conducting an annual functional exercise.

During incident/emergency/event situations, OEM will coordinate overall management activities virtually (e.g. via email, teleconference, etc.) or physically at the incident site or the University’s Emergency Operations Center (EOC). OEM is responsible for maintaining, staffing with trained personnel, and securing needed support (e.g. Information Technology Services and/or Department of Computer Science computer/network equipment and technical assistance) to ensure operational readiness.

The University’s Associate Director of Emergency Management is designated the primary Emergency Coordination Officer (ECO) and the Chief of Police is the alternate ECO. The ECO will work with the Virginia Department of Emergency Management (VDEM) and applicable local jurisdictions on emergency preparedness activities.
OEM will work with local, regional, State, Federal, and various community partners to promote information and share resources as appropriate. Additional OEM responsibilities include:

- Assisting with the management of the University’s Emergency Notification System (ENS) and associated protocols, training, and system testing;
- Coordinating the completion of the University’s Annual Preparedness Report;
- Promoting preparedness initiatives through presentations and other various outreach methods;
- Providing subject matter preparedness expertise to the University community;
- Coordinating with University departments that have key roles in incident/emergency/event preparedness/response/recovery activities.

OEM is also responsible for managing the University’s Fire Safety program, with tasks including:

- Adhering to all applicable Virginia Statewide Fire Prevention Code (VSFPC) code requirements;
- Conducting fire safety inspections;
- Coordinating fire drills (excluding the Office of Housing and Residence Life that facilitates residence hall fire drills);
- Collaborating with various stakeholders, including Facilities Management, Design and Construction, the Virginia State Fire Marshal’s Office (SFMO), and the City of Norfolk Fire Marshal’s Office;
- Facilitating fire safety educational outreach initiatives;
- Compiling annual fire safety report data for inclusion in the Annual Security and Fire Safety Report;
- Responding to emergencies at any ODU facility on a 24-hour basis; and
- Serving as the resident subject matter expert for fire safety issues/questions/concerns.

Emergency Management Program Oversight

Proper whole community oversight of the University’s emergency management initiatives allows the program to keep pace with the changing needs of the University community and assists in maintaining an ongoing culture of preparedness. Old Dominion University’s emergency management program is overseen by the Safety and Security Policy Committee and the Emergency Management Advisory Committee. Additional oversight is provided in the form of an annual preparedness program self-assessment reportable to VDEM.

1. Safety and Security Policy Committee (SSPC)

   The University Safety and Security Policy Committee is a standing operational committee appointed by the Vice President for Administration and Finance to serve as a coordinating and policy body, with responsibility for establishing the framework for an overarching University safety, security, and emergency management program for all ODU facilities.

2. Emergency Management Advisory Committee (EMAC)

   The Emergency Management Advisory Committee (EMAC) is an operational committee appointed by the Assistant Vice President for Public Safety/Chief of Police and reporting to the Safety and Security Policy Committee. Chaired by the Associate Director of Emergency Management, the Committee is responsible for providing operational oversight, coordination, and leadership for improving and furthering the University’s emergency management programs under the strategic policy direction of the SSPC. The committee will
periodically evaluate the preparedness position of the University and develop appropriate planning, training, response, and mitigation strategies designed to reduce risks and to continually enhance the resiliency of the University community.

Outreach

Visibility and proactive outreach are critical to the success of the University’s emergency management program. Initiatives and programs to promote a culture of preparedness may include but are not limited to: the design and maintenance of a comprehensive OEM website, an engaged social media presence, the creation/ordering/distribution of printed media and preparedness equipment, presentations and involvement at University events (orientations, retreats, training sessions, etc.), and partnerships with other higher education/municipal OEMs/academic and research departments/military installations/other public and private agencies to leverage mutual preparedness interests and funding opportunities to enhance the University’s preparedness position and perspective.

F. PROCEDURES

1. Planning

A coordinated, all-hazards, whole community planning effort creates the foundation of the University’s preparedness program. OEM’s primary responsibility for preparedness is to facilitate, with the assistance of all relevant stakeholders, the development and maintenance of incident/emergency/event plans, policies, and procedures to further the resiliency of the University community.

a. University Plans

i. Crisis and Emergency Management Plan (CEMP)

Code of Virginia Section 23.1-804, as amended, requires institutions of higher education to develop, adopt, and keep current a written crisis and emergency management plan that outlines the framework for how the University responds to incidents/emergencies/events at its facilities. The plan will include a provision that the Department of Criminal Justice Services and the Virginia Criminal Injuries Compensation Fund will be contacted immediately to deploy assistance in the event of an emergency as defined in the emergency response plan when there are victims as defined in Code of Virginia Section 19.2-11.01, as amended. The Department of Criminal Justice Services and the Virginia Criminal Injuries Compensation Fund will be the lead coordinating agencies for those individuals determined to be victims, and the plan will also contain current contact information for both agencies.

The President and Vice President for Administration and Financer are required annually to (i) review the institution’s CEMP; (ii) certify in writing to VDEM that the President and Vice President for Administration and Finance have reviewed the plan; and (iii) make recommendations to the University for appropriate enhancements to the plan.

Every four years, the University will conduct a comprehensive review and revision of its CEMP to ensure the plan remains current, and the revised plan will be presented to the Board of Visitors for formal approval. Such review will also be certified in writing to the Virginia Department of Emergency Management (VDEM). The University will coordinate with local emergency management organizations (Cities...
of Norfolk, Hampton, Portsmouth, and Virginia Beach), as defined by Code of Virginia Section 44-146.16, as amended, to ensure integration with respective local emergency operations plans.

ii. University Continuity Plan

As required by Commonwealth of Virginia Executive Order 41 (2011), the University will maintain a current Continuity Plan, using VDEM’s template. The Continuity Plan identifies University mission-essential functions and details the primary business functions and resources (facilities, human capital, and IT) needed to satisfy these functions when employed during certain operationally-disruptive scenarios. The annual University Continuity Plan revision process will be completed by April 1 of each year, and an electronic copy of the plan will be submitted to VDEM.

iii. Business Impact Analysis (BIA)

The Business Impact Analysis defines certain critical information needed to complete and complement the University Continuity Plan. Elements considered include University critical business functions, necessary supporting resources, acceptable downtime, and restoration goals. Managed by the Information Technology Services department, the BIA is reviewed and updated by business stakeholders annually and is subject to a triennial formal assessment and comprehensive update with the assistance from OEM and other University departments/units as needed.

iv. Hazard Mitigation Plan

A complementary document to the CEMP, the Hazard Mitigation Plan assesses and ranks the hazards, risks, and vulnerabilities inherent to the University. All hazard types (natural, human-caused, and technological) are considered in the plan development process. The hazards, risks, and vulnerabilities identified in the Hazard Mitigation Plan are used as the foundation from which to design and develop various University planning, training, and exercise programs. The Hazard Mitigation Plan, valid for five years after creation, is updated periodically by OEM with University community input.

b. Annual Preparedness Assessment Report

In accordance with Commonwealth of Virginia Executive Order 41 (2011), the University will conduct an annual assessment to gauge the University’s level of preparedness in the following major areas: physical security, continuity of operations planning, information technology security, document protection, human resources preparedness, training, and interoperable communications. The completion of the Annual Preparedness Assessment will be coordinated by OEM and the report submitted to VDEM by October 31 of each year.

2. Training

A comprehensive training curriculum is an essential component in furthering the preparedness goals of the University’s emergency management program. Based on their roles and responsibilities in University incident response/recovery, select designated personnel may be subject to participation in any or all of the following curricula: National Incident Management System (NIMS), Incident Command System (ICS), continuity planning,
Campus Community Emergency Response Team (C-CERT), and/or Building Emergency Coordinator (BEC). Other training courses may be developed and offered to University staff on a periodic basis. OEM, with assistance from other key departments, coordinates the University’s preparedness training program.

All training will be facilitated in a classroom setting by OEM staff, local partners, and/or State/Federal instructors, or delivered in an online format.

a. National Incident Management System (NIMS)

Key designated personnel will receive required NIMS training (in accordance with Commonwealth of Virginia Executive Order 41 (2011)) commensurate with their level of involvement in various incidents/emergencies/events that may impact the University community. NIMS training exposes participants to the doctrine, concepts, principles, terminology, and organizational processes (including the Incident Command System – ICS) of the Federal incident response model from which State and local response platforms are derived.

b. Incident Command System (ICS)

Designated personnel subject to NIMS training will also receive required ICS training (in accordance with Commonwealth of Virginia Executive Order 41 (2011)) commensurate with their expected level of involvement in various incidents/ emergencies/events that may impact the University community. ICS training details the manner in which the University, in part or as a whole, responds to and recovers from incidents/emergencies/ events using a consistent and flexible organizational command and control structure. Basic ICS training will be broadly offered for awareness purposes; more targeted/ advanced courses will be arranged/facilitated for certain key staff expected to serve in an Incident Commander capacity and/or staff the EOC.

c. Continuity Planning

Key designated personnel as well as all Director-level and other appropriate staff will also receive required annual training on the University’s and/or departmental Continuity Plan(s) in accordance with Commonwealth of Virginia Executive Order 41 (2011). Continuity plan training discusses elements of University and/or departmental Continuity Plans, including basic business continuity methodology, staff roles and responsibilities, mission-essential functions, and orders of succession.

d. Campus Community Emergency Response Team (C-CERT)

Campus Community Emergency Response Team (C-CERT) training, an optional program open to all members of the University community, educates participants about disaster preparedness for certain hazards that may impact their areas and trains them in basic emergency response skills, including fire safety, light search and rescue, ICS, disaster medical operations, and disaster psychology, among others. C-CERT benefits include life-long applicable skills that promote an increased awareness for individual preparedness responsibilities and the potential capability to utilize team members to augment response efforts during University incidents/emergencies/events.
e. Building Emergency Coordinator (BEC)

Annual Building Emergency Coordinator (BEC) training applies to select designated staff on each floor and/or area of all ODU-owned or occupied facilities that perform emergency planning and response activities respective to their floor/area/building. BEC training involves many of the same elements of the C-CERT program – including basic emergency response skills, fire safety, and ICS – and may also include evacuation, accountability, sheltering/securing in place, suspicious person/package/activity awareness, and other general preparedness activities.

f. Additional Training

Additional training opportunities will be made available to the University community on a periodic basis, whether in a classroom or online delivery format. Subject matter experts may be requested to facilitate training on topics such as: workplace violence/active threat, suspicious person/package/activity awareness, personal emergency preparedness, fire safety, outdoor safety, computer safety, and others.

3. Exercises

A tiered exercise program tests, validates, and identifies areas for sustainability and improvement in existing plans, procedures, protocol, and training. Smaller-scale exercises include discussion-based seminars, workshops, tabletops (TTX), and “games,” while more complicated operations-based exercises consist of drills, functional exercises (FEs), and full-scale exercises (FSEs). Post-exercise After-Action Reports/Reviews (AARs) provide data necessary for Corrective Action Plans (CAPs) to bridge functional/awareness gaps in plans/policies/procedures and address training sufficiency. Larger University exercises or those involving participation from multiple non-ODU entities should be developed using the U.S. Department of Homeland Security's (DHS) Homeland Security Exercise and Evaluation Program (HSEEP) doctrine. OEM coordinates the University and departmental exercise program.

a. Annual University Functional Exercise

The Commonwealth of Virginia requires all institutions of higher education to conduct an annual functional exercise to test its CEMP and Continuity Plans according to Code of Virginia Section 23.1-804, as amended, and Commonwealth of Virginia Executive Order 41 (2011) and certify the completion of same in writing to the Virginia Department of Emergency Management (VDEM). Functional exercises (FEs) typically involve significant participation within and outside the University community and simulate highly stressful yet plausible incident/emergency/event conditions, generally within an EOC environment. OEM is responsible for the coordination (enlisting departmental assistance as needed), facilitation, and reporting of annual FEs.

b. Fire Drills

OEM will coordinate and document fire evacuation drills twice annually for all University-owned buildings. The Office of Housing and Residence Life will coordinate and document fire evacuation drills four times annually for all residence hall facilities. Drill scheduling will be coordinated through OEM.
c. Departmental Exercises

Annual EAP/Continuity Plan exercises are designed to test staff awareness and sufficiency of existing departmental emergency response and business continuity plans. Exercises are usually tabletop in format and involve incident scenarios that are plausible and relevant for the unit. Delivery of departmental exercises is coordinated and facilitated by OEM.

d. Other Exercises

Shelter/secure-in-place drills, emergency notification system drills and other tests of University/departmental plans/policies/procedures will be coordinated, developed, and facilitated by request or on an as-needed basis by OEM and applicable stakeholders.

G. RECORDS RETENTION

Applicable records must be retained and then destroyed in accordance with the Commonwealth’s Records Retention Schedules.

H. RESPONSIBLE OFFICERS

Assistant Vice President for Public Safety/Chief of Police

I. RELATED INFORMATION

FEMA National Disaster Recovery Framework (NDRF)
FEMA Comprehensive Preparedness Guide 101 Version 2
Homeland Security Presidential Directive (HSPD) #8
The Robert T. Stafford Disaster Relief and Emergency Assistance Act, Public Law 93-288, as amended
National Fire Protection Association (NFPA) 1600 Standard on Disaster/Emergency Management and Business Continuity Programs
Emergency Services and Disaster Law of 2000, Virginia Code Title 44, Chapter 3.2, as amended
Commonwealth of Virginia Emergency Operations Plan, September 2012
Commonwealth of Virginia Information Technology Risk Management (ITRM) Standard SEC520-00
University Policy 1010 – Absence of the President
University Policy 1020 – Closure of the University Due to Inclement Weather and Emergencies
University Policy 3012 – Safety and Security Policy
POLICY HISTORY
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Policy Formulation Committee (PFC) & Responsible Officer Approval to Proceed:

/s/ Rhonda Harris  
Responsible Officer  
November 17, 2015
Date

Policy Review Committee (PRC) Approval to Proceed:

/s/ Donna W. Meeks  
Chair, Policy Review Committee (PRC)  
August 25, 2015
Date

Executive Policy Review Committee (EPRC) Approval to Proceed:

/s/ David F. Harnage  
Responsible Oversight Executive  
December 8, 2015
Date

University Counsel Approval to Proceed:

/s/ R. Earl Nance  
University Counsel  
December 14, 2015
Date

Presidential Approval:

/s/ John R. Broderick  
President  
December 14, 2015
Date

Policy Revision Dates:  
December 14, 2015

Scheduled Review Date:  
December 13, 2020