

# HOWARD UNIVERSITY POLICY

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**Policy Number:** 200-005: Administration, Facilities and Public Safety  
**Policy Title:** HOWARD UNIVERSITY ENVIRONMENTAL POLICY  
**Responsible Officer:** Chief Operating Officer  
**Responsible Offices:** Office of the Chief Operating Officer  
Office of Environmental Health and Safety  
**Effective Date:** November 2, 2020

## I. POLICY STATEMENT

Howard University (the “University”) is committed to protecting the environment, preventing pollution, and creating a sustainable environment. This is reinforced in the University’s strategic plan, *Howard Forward*, with a commitment to use technology to “exceed standards for sustainability and environmental stewardship.”

The University takes reasonable, practical measures to integrate environmental considerations into decision-making associated with its research, educational, and facility management efforts, including:

- Identify and comply with Howard University’s environmental compliance obligations, including all appropriate environmental legislation, regulations, and other requirements.
- Implement, maintain, and continually improve the University’s Environmental Management System (EMS), guided by the principles of International Standards Organization (ISO) standard 14001:2015 to enhance environmental performance.
- Provide appropriate information, training and guidance to faculty, staff, students, and other University stakeholders to promote awareness of and compliance with environmental requirements and regulations.
- Maintain robust contingency plans to minimize the impact of foreseeable environmental incidents.
- Promptly report all accidents and/or incidents which could lead to pollution.
- Communicate this Environmental Policy to the University community and provide public access to the Policy.
- Provide the appropriate leadership, management, and resources to implement this Environmental Policy (the “Policy”).

## II. RATIONALE

Developing and implementing an Environmental Management System (EMS) based on the International Standards Organization (ISO) standard 14001:2015 helps the University minimize its environmental impact and comply with applicable laws and regulations. An EMS improves the University’s environmental performance, ensures compliance with environmental laws and regulations, and supports strong environmental stewardship. This Policy is an integral component of the University’s EMS.

### III. ENTITIES AFFECTED BY THIS POLICY

This Policy affects the entire University enterprise and any affiliated entities including, but not limited to, Howard University Hospital. It affects all staff, faculty, students, volunteers, and others who use University resources and applies to all University premises and other property where the University conducts business. It is mandatory reading for all persons responsible for the University's compliance obligations for environmental performance.

### IV. DEFINITIONS

For the purposes of this Policy, the following terms have the corresponding definitions:

- A. Environmental Management System (EMS)** – a framework, including processes and practices, enabling the University to provide assurance to management, employees, and external stakeholders that the University's environmental impact is being monitored and improved. An EMS encourages an organization to continuously improve its environmental performance through a commitment to environmental policy.
- B. ISO 14001:2015** – an international standard developed and published by the International Organization for Standardization (ISO) specifying the requirements for an environmental management system to enhance an organization's environmental performance. ISO 14001:2015 is intended for use by an organization seeking to manage its environmental responsibilities in a systematic manner that contributes to the environmental pillar of sustainability.
- C. Plan-Do-Check-Act Methodology** – operationalizes the stages of an EMS 1) Commitment and Policy; 2) Planning; 3) Implementation; 4) Evaluation; and 5) Review. Adopting this methodology ensures the University's continuous improvement in its environmental performance.
- D. EMS Process** – a repeating cycle based on the Plan-Do-Check-Act Methodology that assists the University to manage environmental risk and improve performance.

### V. ROLES AND RESPONSIBILITIES

The Responsible Officer assures the comprehensive, systematic, planned, and documented management of the University's environmental program via an Environmental Management System (EMS). The Responsible Officer assigns roles and responsibilities accordingly. The Responsible Officer receives periodic and regular reports on EMS performance. University leadership commits appropriate resources to support the EMS Process, which comprises the following components:

#### Plan

- Environmental Policy – codify the University's commitment to having an environmental management system. It establishes overall direction and key principles for action and is typically endorsed by senior management.
- Environmental Aspects – identify activities that may result in significant environmental impacts.

- Compliance Obligations – identify and understand all applicable legal and other obligations attributable to the environmental aspect.
- Environmental Objectives - identify specific goals and performance measures linked to the Environmental Policy. The University implements and maintains programs to achieve the objectives and targets delineated in the Policy.

## **Do**

- Roles, Responsibilities, and Authorities - commit resources to the EMS. Assign roles and responsibilities within the University at all levels. Ensure reporting to top management on EMS performance.
- Competence and Awareness - identify the skills and training necessary to perform work activities which may have environmental impact.
- Communication - identify and establish internal and external communication and reporting.
- Documented Information and Document Control - describe documentation which organizes and communicates elements of the EMS and ensure documents are controlled and maintained consistently.
- Operational Planning and Control - identify and manage key operations and activities consistent with policy, procedures, and objectives.
- Emergency Preparedness and Response - identify and plan for potential emergencies.

## **Act**

- Management periodically reviews performance measures and outcomes for suitability, adequacy, and effectiveness and provides reports to the Responsible Officer with recommendations, as needed.
- Management makes appropriate changes to policy, objectives, or other EMS elements to reflect changing circumstances, and reports them to the Responsible Officer.
- The University commits to continuous performance improvement in support of EMS.

## **Check**

- Monitoring and Measurement - monitor the key activities, processes, and systems to evaluate compliance status and measure performance on a regular basis.
- Evaluation of Compliance - establish, implement, and maintain procedures to evaluate compliance with applicable legal requirements.
- Nonconformity and Corrective Action - implement and maintain procedures to address potential deviations
- Documented Information – maintain, manage, and retain appropriate EMS records in accordance with regulatory requirements and University policy.
- Internal Audits - audit for EMS performance and conformance on a periodic basis.

## **VI. SANCTIONS**

All entities noted in Section III of this Policy must comport with the provisions of this Policy and the Environmental Management System. Failure to do so could subject the University to liability and possibly substantial penalties under current law or agreement with the District of Columbia. Disciplinary measures will follow the Employee Handbook, Faculty Handbook or Student Handbook or, in the case of vendors and contractors, the possibility of termination of business relationships with the University. This Policy was undertaken in connection with the settlement of an enforcement action initiated by the District of Columbia Department of Energy and the Environment.

## **VII. RESOURCES**

Related information:

[www.howard.edu/policy](http://www.howard.edu/policy)

[U.S. Environmental Protection Agency \(EMS\)](#)