

# University Policy on Policies

## PURPOSE

To establish standards for the development, approval, revision, and decommissioning of University Policies for the Storrs and Regional Campuses, and institution-wide policies that affect all campuses, including UConn Health. This policy aims to ensure that University policies are well defined, understandable, consistent with the University’s mission, values, and goals, and sanctioned by the University’s administrative authorities through standardized processes.

## DEFINITIONS

**Guideline:** Recommended guidance or additional information used to support policies and procedures, industry best practice, or intended to educate the workforce on how to achieve a desired outcome. Allows end-user discretion in interpretation, implementation, or use. Non-compliance with, or violation of, guidelines does not create the same level of risk.

**Policy Owner:** The unit, senior institutional official and/or designee responsible for authoring, implementing, maintaining, and monitoring a policy.

**University Senior Policy Council:** The University Senior Policy Council is a standing committee whose role is to review and approve new and revised University policies. The Senior Policy Council is comprised of the University President; Executive Secretary to the Board of Trustees; Chief of Staff; General Counsel; Chief Compliance Officer, Chief Human Resources Officer, Provost, and the Vice President for Finance and Chief Financial Officer. Others may be invited, as necessary.

**Procedures:** Operational processes established for the implementation of policies. If a policy is “what” the institution does, its procedures are “how” it carries out the requirements of a policy. Non-compliance with, or violation of, procedures may result in disciplinary action.

### Procedures

- outline required actions by objective and/or job function;
- state clearly and succinctly the step-by-step instructions that must be followed to implement policy effectively;
- specify the structure to enforce the policy;
- University Policy procedures shall not be revised without consultation with the Office of University Compliance.

**Revision, Editorial:** Includes modifications related to spelling, grammar, format, and updates to hyperlinks or URLs, contact information, references, titles of individuals and organizations.

**Revision, Non-substantive:** Includes modifications intended to enhance clarity without changing the intent of the policy, such as adding or modifying definitions, rearranging or re-wording sentences without changing their meaning or the policy's requirements for compliance.

**Revision, Substantive:** Includes significant modifications to the nature and/or scope of the policy that affect its requirements, principles, or intent.

**Senior Institutional Official (SIO):** The appropriate University officer (Vice President, Vice Provost, or similar) who has authority and responsibility for the area or activity to which a policy may apply.

**Stakeholder:** University members with expertise in the subject matter of the policy, or whose operations will be significantly affected by the policy.

**University Policy:** An official statement expressing the position of the University on an issue of university-wide importance. A university policy

- is a governing principle that mandates or constrains actions, establishes rights or obligations, or guides the decisions and actions of the University;
- has broad application;
- exists to achieve compliance with applicable laws, regulations, and organizational requirements; to promote operational efficiencies; to enhance the University's mission; to reduce institutional risk; and/or to promote ethical standards, integrity and accountability;
- is approved by the administrative authority of the University and/or the Board of Trustees

Policies that do not fit the criteria of a University Policy, such as individual unit policies, should be vetted through the appropriate Dean or Director for approval to ensure consistent application and to avoid conflict with any University or unit policies. Unit policies, procedures and guidelines shall not subvert, supersede, or contradict University Policies. Units should use a similar policy review process as outlined in this document. Please contact the Office of University Compliance or refer to the Policy website for assistance.

## **POLICY STATEMENT**

All University Policies shall be developed, approved, revised, and decommissioned in accordance with the procedures outlined in this Policy. In rare circumstances, exceptions to this process may be approved by the President in consultation with the University Senior Policy Council and notification to the Board of Trustees as may be warranted.

Individual units (e.g., colleges, schools, centers, institutes, departments) may create, communicate, maintain, and enforce policies that are applicable to their respective authority, as long as these are not in conflict with official University Policies.

## **PROCEDURES**

- I. New University Policy**
- II. Revising a University Policy**
- III. Decommissioning a University Policy**
- IV. Archiving University Policy**
- V. Expedited (Emergency) Policy Approvals**

### **I. New University Policy**

#### **1. Determine Need**

- A. University Policies should only be created when they define University values, institutional objectives or mandates; address federal or state law, regulations, or rules; or manage potential risk or liability.
- B. Any individual or unit may identify the need for a new University Policy. However, a Senior Institutional Official, in consultation with the Office of University Compliance, must confirm the need for the policy considering
  - whether the proposed policy meets the criteria of a University Policy as defined;
  - if an alternative such as workforce guidance or procedures is the most effective and efficient approach;
  - if existing University policy addresses or resolves the identified need;
  - implications of the policy including risks and costs (i.e., will adoption of the proposed policy require new resources or reassignment of existing resources?)

#### **2. Development**

- A. If a proposed policy involves matters within the purview of more than one senior institutional official, they will ensure consultation and coordination among appropriate leadership.
- B. The Senior Institutional Official may assign the development and administration of the policy to a responsible office or individual (Policy Owner).
- C. The Policy Owner is responsible for developing a draft policy in consultation with key stakeholders and University governance groups (e.g., University Senate, Deans Council). It is advisable that the Policy Owner convene a stakeholder policy development group to provide initial vetting of the proposed policy.
- D. University policy
  - must follow the Policy Template [\[link\]](#);

- should be written so that it is clear and concise with sufficient information on the subject without being excessive in length or complexity;

### **3. Engage the Office of University Compliance**

- A. Early in the development stages, the individuals or groups developing the policy must notify the Office of University Compliance.
- B. University Compliance is responsible for
  - stewardship of the policy development process to ensure consistency with existing policies, language, clarity, format and appropriate vetting and approval;
  - engaging the Office of the General Counsel as appropriate;
  - reviewing stakeholder and partner input;

### **4. Approval**

- A. Although the development or administration of a policy may be delegated, the SIO is responsible for ensuring all necessary approvals are obtained.
- B. Once the SIO is satisfied with the final policy draft, it must be forwarded along with a list of stakeholder reviewers to University Compliance at [policy@uconn.edu](mailto:policy@uconn.edu). University Compliance may consult with the Office of General Counsel for final review.
- C. For policies that apply to the Storrs, Regional and UConn Health campuses, University Compliance will coordinate review and approvals with the appropriate UConn Health policy committees before advancing the policy to the Office of the President.
- D. University Compliance will work with the Office of the President and the SIO to present the draft policy to the University Senior Policy Council for their review and recommendation to the President. There may be occasions when a University Policy requires review and approval by the Board of Trustees prior to adoption.
- E. The President, in consultation with the Senior Policy Council, will make the final determination regarding when a University Policy shall be presented to the Board of Trustees for approval. If so, the proposed policy will typically be assigned to one or more standing Board committees to review and approve before the proposed policy goes to the full Board for final approval. University Policies that advance to the Board for approval are often those that relate to:
  - University governance and describe the composition, powers, and duties of the Board of Trustees, the President, or University Senate;
  - University By-Laws (e.g., academic appointment and tenure; grievances; leaves of absence; naming of facilities; intellectual property; the establishment of new regional campuses, schools or colleges; expressions of dissent; and student residency);
  - Code of Conduct;

- high-level university financial operations such as investments and the establishment of, or significant changes in existing, major University fiscal policies (e.g., capital expenditures).

## **5. Publication & Notification**

- Once the University Policy has been approved, the SIO will collaborate with University Compliance to ensure the policy is posted to [policy.uconn.edu](http://policy.uconn.edu) (and [health.uconn.edu/policies](http://health.uconn.edu/policies) where applicable).
- The SIO shall oversee the communication, implementation, training, administration, and maintenance of the University Policies within their purview. The SIO must publicize and distribute the policy to the University community members to whom it applies and to offices with implementation requirements.
- Policies published to the University’s Policy site are the official and current versions.
- Members of the University community are responsible for familiarizing themselves and complying with University Policies.
- All new University Policies not requiring Board approval shall be shared with the Board of Trustees at the next regularly scheduled meeting as an informational item.

## **II. Revising a University Policy**

Regularly reviewing policies and procedures ensures that the University’s operations and administration are

- in compliance with new laws and regulations;
- current with new systems or technology;
- consistent with best practices.

### **1. Review**

- Policies must be reviewed at least once every three (3) years, or sooner if legal or regulatory requirements or changes in operational processes deem necessary. The senior institutional official, or designee, must ensure the periodic review and revision of policies related to their areas of responsibility.
- University Compliance monitors policies for compliance with the required review schedule.
- The senior institutional official must notify University Compliance at [policy@uconn.edu](mailto:policy@uconn.edu)
  - of necessary changes by providing a strikethrough or “redline” copy of the policy with proposed revisions;

OR

- if a review was conducted and there are no necessary changes.
- D. The date of review, even in the absence of revision, shall be noted in the Policy History of the document.

## **2. Revision Approvals**

University Compliance, in conjunction with the senior institutional official, will determine if the proposed revisions are editorial, non-substantive or substantive.

- A. Editorial revisions will be completed by University Compliance.
- B. Non-substantive revisions will be completed by University Compliance after notifying the University Senior Policy Council.
- C. Substantive revisions must follow the same review and approval process as a new policy.

### **III. Decommissioning a University Policy:**

When a policy is no longer needed or is more effectively combined with another policy, the responsible office will submit a formal request to the senior institutional official responsible for the policy. The senior institutional official shall confer with applicable University governance groups and subject matter experts as appropriate to ensure overall impact is considered. The senior institutional official will collaborate with University Compliance to seek formal decommissioning approvals. If there is disagreement as to whether a policy should be decommissioned, the University Senior Policy Council will decide.

University Compliance will remove decommissioned policies from the [policy.uconn.edu](http://policy.uconn.edu) website and inform the Senior Policy Council quarterly of decommissioned policies.

### **IV. Archiving a University Policy:**

University Compliance will work with University Archives to properly maintain the record. Policy Owners are strongly encouraged to retain policy records.

### **V. Expedited (Emergency) Policy Approvals**

The expedited policy approval process is reserved for policies that the President or the Senior Policy Council deem crucial for the health and safety of the University community, the continuity of University operations, to address legal requirements or significant institutional risk and, therefore, must be processed in a shorter time than possible through the established approval process.

In such cases,

- the President or the Board of Trustees identifies an emergency policy need and assigns a senior institutional official;
- the stakeholder review process may be bypassed, but the draft policy must be reviewed by the Senior Policy Council;
- the Senior Policy Council shall consider any immediate and significant impact on operations;
- emergency policies that apply to UConn Health shall be provided to the appropriate policy committees for expedited review and approval.

Unless a duration is specified in the Expedited Policy, all Expedited Policies will be reviewed in one (1) year by the Senior Policy Council to determine whether the policy should be extended, made permanent, or decommissioned.

## **REFERENCES**

[University Policy Template](#)

## **POLICY HISTORY**

Approved on March 30, 2022, by the Board of Trustees