

UNIVERSITY OF HARTFORD

University of Hartford Policy on Policies¹

Policy Title: Policy on Policies Policy Number: 1.1
Responsible University Office: Office of the General Counsel
Responsible Officer: General Counsel
Original Issue Date: TBD Date Last Reviewed: _____
Revision History: NA

Policy Statement

A University policy (“*Policy*” or “*Policies*”) is a governing statement that is critical to the operations of the University and must:

- meet at least one of the following criteria:
 - generally has broad application throughout the University;
 - is mission-critical;
 - helps achieve compliance with applicable state and federal laws and regulations, as well as required policies of outside organizations or accrediting agencies (*e.g.*, NCAA, NEASC, *etc.*); or
 - manages material institutional risks;
- mandate actions or constraints, and contain specific requirements for compliance with the Policy;
- be officially sanctioned through the University process for approving a Policy; and
- be presented in a University-approved format (see **Appendix A**).

The University is governed by its own Policies and local, state and federal law. The University must adopt Policies and related Procedures (see definition below) when applicable governmental laws, regulations and ordinances do not provide specific guidance or offer directives necessary for the University’s efficient and effective operation. The University has discretion to formally develop, approve, and issue each Policy in a consistent format, to be maintained as part of a central Policy repository.

Each Policy is subject to change at any time. Upon conflict between a Policy and a Department-Level Protocol (see definition below), the Policy controls. A department must neither maintain non-Policy text – on any website that the department manages – that purports to be Policy, nor adopt any Department-Level Protocol that is in conflict with any applicable governmental law, regulation or ordinance.

¹ These policies do not apply to the creation or modification of university academic policies set forth in the Manual of Academic Policies and Procedures, faculty policies set forth in the Faculty Policy Manual, or to any policy that the Board of Regents by its own action enacts which may have their own defined protocol.

Each Policy being proposed – or change being proposed to any current Policy – must follow the **Procedures for Implementing this Policy** (see below).

The University reserves a right at any time to modify, delete or add any Policy for reason that the University reasonably determines to be appropriate.

Violation of a Policy may result in disciplinary action up to and including termination.

Reason(s) for the Policy

It is considered a best practice to establish a Policy to provide overall structure and guidance on the promulgation of all other Policies. The purpose of this Policy is to define the steps by which a Policy is developed, approved, promulgated, maintained and revised. Through a consistent Policy process and format, the University can best ensure that each Policy:

- is consistent with the important academic mission of the University as an institution of higher education;
- is properly developed and regularly updated to remain compliant with laws and regulations;
- is compliant with generally accepted accounting and reporting standards;
- promotes operational efficiency;
- reduces institutional risk; and
- is easy to find, read, and understand.

This Policy provides direction to any individual engaged in developing and maintaining any Policy, and defines the requirements that must be followed when drafting, approving, and revising that Policy.

Primary Guidance to which this Policy Responds

Not applicable.

Who is Governed by this Policy

All staff and faculty are expected to comply with this Policy.

Definitions

“Policy” further means an official directive of broad and direct application across all units of the University. As such, a Policy imposes binding obligations on faculty, students and/or staff, as applicable. The purpose of a Policy is to ensure through uniform requirements and standards, (i) compliance with applicable laws, and regulations, (ii) adoption of operational efficiencies and best practices, and/or (iii) promotion of mission-centered values and objectives.

“Department-Level Protocol” means an operational guideline that does not meet the definition of a Policy, but is nevertheless useful and important to the University’s operation.

“Responsible Officer” means a University Officer (see definition below) whose operational authority most directly relates to an applicable Policy’s implementation.

“University Officers” means the University’s President, and each President-designated person, currently including:

- the Provost;
- Vice President of Finance and Administration;
- Vice President, General Counsel and Secretary, or then-current equivalent designation(s);
- Vice President for Institutional Advancement; and
- Vice President for Student Affairs.

“Policy Coordinator” means the University’s Compliance Coordinator, or other designated person, who is responsible for managing the Policy development process, maintaining the official Policy format (template) and managing the central repository of University Policies. The Policy Coordinator also assists each Policy owner (*i.e.*, Responsible Officer) in editing drafts of Policy documents, and guiding each Policy through its development and approval processes.

“Procedure” means a minimal action that applies across the University community to help guide compliance and fulfill a Policy’s principles.

Contact

Office of the General Counsel

Related Documents, Forms and Tools

Standard Template for Sample Policies (see **Appendix A**)

Policy Web Address

<http://www.hartford.edu/policies>

Related Policies (indicate with web link, as applicable)

None

Procedures for Implementing this Policy

This Policy establishes general review and approval requirements for each Policy. The process outlined below is intended to help ensure that each Policy is consistent, clear, widely disseminated, and easily accessed, and that it provides practical direction to the broad range of University operating units.

Responsibility for Creating Policies

A request for establishment of a new Policy may be initiated by an individual department, operating unit, University Officer, or other body and individual as appropriate.

The University's Compliance Committee ("CC") is normally responsible for reviewing and commenting on each new compliance-related Policy draft (*i.e.*, one whose scope is primarily directive, rather than one whose violation might subject a University employee to internal discipline). If a need for specialized expertise related to the proposed Policy is perceived by any of the above constituencies, then the CC must endeavor in good faith to consult with persons with that expertise. The CC must then forward comments and suggestions to the Responsible Officer for further consideration.

Every Policy, however, must be sponsored by either a University Officer or under delegation from a University Officer to a senior administrator with the responsibility for creating and implementing Policies as required in that administrator's area of responsibility.

In all cases, the Policy draft must list at least one University Officer by title as the Responsible Officer, who is accountable for the accurate and well-articulated formulation, issuance and timely updating of the Policy. That draft may list more than one Responsible Officer; and so long as one is a University Officer, the other may be a senior administrator appointed by the University Officer. The Responsible Officer oversees development of each Policy subject to this Policy's process and assures that each action step is completed. The Responsible Officer is also responsible for reviewing and approving proposals for new Policies, and the Responsible Officer's signature concludes the process of review of each new Policy before submission to the President or the University Officers for final approval.

Formulating and Approving a Policy

The process for formulating and reviewing a Policy may vary depending on the Policy's primary constituency, institutional traditions and bylaws, as well as relevant external legal constraints. For example, the Faculty Senate normally reviews any academic Policy that appears in the Faculty Policy Manual.

Each Policy should be drafted in the format provided in this Policy's **Appendix A** (with any addition that is appropriate to the draft Policy's context). Sufficient time must be permitted to allow for draft Policies to be vetted among various stakeholders across the University, as determined in each case by the President or the University Officers.

Before a Policy's adoption, a legal review must be conducted by the Office of General Counsel, which is responsible to review and comment on each new Policy and revision to ensure its propriety from a legal and contractual perspective. The Office of General Counsel is authorized to make minor corrections or updates without going through the entire approval process.

After this review has been completed, the draft Policy is submitted by the Responsible Officer or that officer's delegate to the President and University Officers for final review and approval. If approved, the Policy may then be issued by the Responsible Officer to the University community.

Under exceptional circumstances the University Officers may determine that Regents' oversight is appropriate for a particular Policy.

Organization and Numbering of Policies

Each Policy is assigned to a category and numbered in accordance with the category to which it is classified, as follows:

Category	Numbering
Governance	1.1, 1.2, 1.3, . . .
Academic	2.1, 2.2, 2.3, . . .
Employment, Benefits and the Workplace	3.1, 3.2, 3.3, . . .
Facilities, Equipment and Property	4.1, 4.2, 4.3, . . .
Financial	5.1, 5.2, 5.3, . . .
Information Technology	6.1, 6.2, 6.3, . . .
Operational	7.1, 7.2, 7.3, . . .
Public Safety and Environmental, Health & Safety	8.1, 8.2, 8.3, . . .
Sponsored Programs	9.1, 9.2, 9.3, . . .
Student	10.1, 10.2, 10.3, . . .
Athletics	11.1, 11.2, 11.3, . . .
Other categories as needed	

Publication and Distribution of Policies

The Responsible Officer is charged with publishing and distributing approved Policies and Procedures on the appropriate pages of the University website and by other means as deemed appropriate. The Policy Coordinator is responsible for creating and maintaining a central Policy webpage with links to all Policies. Each Policy must be maintained on or in a designated University network drive. Each new or significantly-revised Policy must be announced by e-mail or released in a memorandum by the Responsible Officer to all University employees. However, the Policy must have completed the development process described in this document, and must be included in the University’s central Policy repository.

Amendments to University Policies

The Responsible Officer for each Policy also is charged with keeping the Policy up to date. Accordingly, the Responsible Officer should ensure appropriate review of the Policy by its annual review date, as necessary to assure that the Policy reflects obligations imposed by current laws and best practices. The Policy Coordinator must help assure that Responsible Officers review and update Policies as needed. The Policy Coordinator must then notify the Office of General Counsel of any updates and establish a new annual review date (even if no update is required). Except when the process or authority for making changes to a Policy is included in the Policy itself, amendments must follow the same process outlined above for initial issuance. A Responsible Officer may initiate a review of existing Policy at any time.

Enforcement

The University’s Internal Audit department is responsible to audit for applicable compliance.

APPENDIX A: Standard Template for Sample Policies

Policy Title: _____ Policy Number: _____

Responsible University Office: _____

Responsible Officer: _____

Original Issue Date: _____ Date Last Reviewed: _____

Revision History: _____

Policy Statement (generally no more than 3 to 5 sentences)

- a. Describe the scope of application of the policy, either:
 - i. across all of the University; or
 - ii. within a specific department or business unit
- b. Describe the circumstances or conditions under which the policy applies.
- c. Describe the requirements the policy mandates.

Reason(s) for the Policy (generally no more than 8 to 10 sentences)

- a. State whether this proposal recommends a new policy or any revision to an existing one.
- c. Include any legal, regulatory, financial, or operational challenges or circumstances, or other changes in the surrounding operating environment, to which the proposed policy responds.
- d. Describe the problem or conflict that the policy will address.
- e. Describe how the proposed policy will solve the problem.
- f. Where relevant, describe the connection between the proposed policy and the University's mission, vision or values, in context to its established administrative policies.

Primary Guidance to which this Policy Responds

Who is Governed by this Policy

- a. Identify each office, department, institution or constituency (*e.g.*, student, faculty, staff, or community) most likely to be significantly affected by the proposed policy. Representatives with pertinent functional expertise from within these groups will be consulted during the development and review processes. For example, consider whether to consult with any of the following offices or constituencies during the development of this initial proposal and while drafting and revising the proposal:
 - Administration
 - Internal Audit Office
 - Controller's Office
 - Deans and Department Chairs
 - Faculty Senate or the full faculty
 - Human Resources Development
 - Information Technology Services
 - Public Safety
 - Office of the Treasurer
 - Student Government Association
 - Subject matter experts
- b. Identify any key operating activities or functions that will be affected by the policy. The Officers will be involved in the review process.
- c. Describe any changes in University operating processes or culture that may result from implementation of this policy.

- d. Identify the resources (human, financial, physical, operational, technological, or other) necessary to implement this policy, or to assure its compliance.
- e. Specify any new systems (managerial, technical, operating, *etc.*) that the subject organization or any other University office or unit will have to develop or acquire, and which offices or institutions will have to acquire them, along with the funding source for each acquisition.

Definitions (if applicable)

- a. Define any words, expressions or abbreviations used within the policy that are unfamiliar or technical, or that have a specialized meaning.
- b. Each word (or expression's first word) should be listed in alphabetical order.

Contact(s) (name, title, department, phone no., email address)

Related Documents, Forms and Tools

- a. Include any other related documents that led to a proposal of the policy, or that provide helpful information (contracts, guidelines, professional standards, surveys, *etc.*)
- b. Describe how the proposed policy complements or supports the objectives, standards, or requirements of any of the documents listed above.

Policy Web Address

Related Policies (indicate with web link, as applicable)

- a. List any related University policies, as well as any related local, state, or federal legislation or administrative regulations, and provide a copy or electronic link to each.
- b. Specify any potentially overlapping or conflicting provisions between the proposed policy and the related policies, legislation, and regulations listed above, and describe how the proposed policy addresses those conflicts.

Procedures for Implementing the Policy (can be attached)

- a. Summarize how the policy will be implemented or enforced.
- b. Outline briefly each action step, activity or mechanism through which the requirements of the policy will be implemented or enforced, and the roles accountable for each.
- c. Note any one-time requirements related to initial implementation.

Responsibilities

Summarize the responsibilities of each University office or officer named in the policy.

Training and Education

Describe any training or educational program necessary to support implementation or compliance, and the plan for conducting that program.

Effective Date

- a. State the target effective date for the proposed policy.
- b. Identify any factor that affects the target effective date.
- c. In particular, describe any factor that might delay implementation, or that supports rapid adoption of the policy.