



## POLICY

**Title:** Adoption of University Policies, University Operating Procedures and University Guidelines

### Policy Statement

The University wishes its governing documents be readily available by all members of the UVM community. As such, the University will adopt University Policies, University Operating Procedures (UOPs) and University Guidelines through a uniform process and will utilize a standard, approved format. University Policies, UOPs and University Guidelines will be available through a single website.

### Reason for the Policy

The "Adoption of University Policies, University Operating Procedures and University Guidelines" ("the Policy") is designed to assist the University in: (i) serving its mission and achieving its goals; (ii) maintaining accountability on the part of Responsible Officials (RO's) and members of the University community; and (iii) providing clear, easily understandable, and current resources, guidance and best practices on standards and requirements.

### Applicability of the Policy

This Policy applies to responsible officials ("RO's") and other University administrators who play a role in the development and adoption of University Policies, University Operating Procedures ("UOPs") and University Guidelines.

### Definitions

**Policy Advisory Team (PAT):** The PAT reviews and provides feedback on all Policy Impact Statements as well as new or significantly revised policy or UOP drafts. The PAT also helps ensure that new or revised University Policies and UOPs follow an approved format and process, are current, align with existing governing documents, and are approved by the respective RO. Members of the PAT include:

- General Counsel
- Vice President for Operations and Public Safety
- Chief Internal Auditor
- Director for Compliance Services (team lead)
- Director of Labor Relations & Employment Services
- Director of Risk Management & Safety

Policy Review Group (PRG): The PRG is comprised of Deans, Directors, Department Heads, Chairs, Union Representatives and leaders of University Governance Groups. For University Policies, UOPs or University Guidelines requiring Board review and/or ratification, it also includes the Board Chair or Chairs of Trustee Committees.

Policy/UOP list (the List): The List includes (i) all active University Policies and UOPs along with scheduled review dates for University Policies and UOPs, (ii) active University Guidelines, and (iii) University Policies and UOPs identified for development or currently in draft.

Resource Page: A Resource Page is generally a separate web page or document that contains links to related University Policies, UOPs, University Guidelines, forms, additional resources and other information related to a specific topic. Resource pages consist primarily of best practices designed to simplify/streamline compliance.

Responsible Official (RO): A senior institutional official, typically a Vice President, who has responsibility for the oversight of specific programs, activities, conduct, or endeavors.

Revisions: Changes to existing University Policies, UOPs or University Guidelines. There are three levels of revisions:

Level 1: Housekeeping Revisions: Revisions reflecting non-substantive or technical corrections or clarifications. Examples include grammatical edits, formatting, adding reference links, changes to contact information, or clarification of existing procedural processes.

Level 2: Minor Revisions: Revisions that may include some operating changes, but do not impose new responsibilities for affected units or individuals. Those operational changes do not substantially change the existing responsibilities or materially affect individuals/departments/units. Examples include minor procedural changes or changes in workflow.

Level 3: Substantial Revisions: Revisions that impose a change in scope or obligations set by the policy. These changes set new requirements, have a substantive operational impact on departments, schools or units, or hold individuals or entities to new or different standards or obligations. Examples include new accountability standards, additional procedural requirements or reassignment of responsibility to another RO.

Review Cycle: The review cycle is based on the academic year (June 1 – May 31). All University Policies and UOPs are formally reviewed within three academic years of the date of the initial approval or the date most recently reviewed or revised unless otherwise specified in the Policy or UOP. Review of University Guidelines and Resources Pages is done at the discretion of the RO responsible for the activity.

University Guideline: A University Guideline is an interpretation or elaboration of a University Policy or UOP issued by the RO or another University administrator who has responsibilities for administering the program, activity or operation that is the subject of the Policy or UOP. University Guidelines are generally applied throughout the University or to major components of the University. Guidelines that are developed by an individual unit and applied only to that unit are not considered University Guidelines under this policy.

University Operating Procedure: A University Operating Procedure, or a UOP, is a freestanding operational rule or set of steps that all persons engaged in the activities that are the subject of the UOP must uniformly follow. UOPs are generally applied throughout the University or to major components of the University. Procedures that are developed by an individual unit and applied only to that unit are not considered a UOP under this policy.

University Policy: A University Policy establishes principles and standards governing the conduct of UVM faculty, staff, and students in their capacity as members of the UVM community. Where specified, a University Policy may also apply to campus visitors, University affiliates, vendors or other members of the University community.

A University Policy is defined by the following criteria:

- It applies generally throughout the University or major components of the University;
- It facilitates compliance with internal or external standards or requirements; and
- It mandates or constrains action and it states the consequences for non-compliance.

While a University Policy may contain procedures that set forth the specific steps or means by which the policy is carried out, these procedures are not the same as a UOP. Procedures contained within a policy exist to ensure consistent and efficient application of the Policy.

## Procedures

### **GENERAL:**

The University follows a policy process that includes the following steps:

1. Identify need.
2. Develop and approve.
3. Publish.
4. Disseminate and train, attest and/or certify.
5. Review and revise.
6. Maintain.

RO's are required to oversee the initial development, as well periodic review and revision, of University Policies and UOPs relating to their business units and areas of responsibility. Advice regarding general legal obligations may be requested from the University Office of the General Counsel. Advice regarding specific compliance requirements or format may be obtained from the Office of Compliance Services.

Prior to developing a new University Policy or UOP, the RO, another responsible University administrator, or a member of the PAT fills out a [Data Sheet and Impact Assessment Form](#) (the "form") and submits it via email to [policy@uvm.edu](mailto:policy@uvm.edu). If the individual submitting the form is anyone other than the RO, a copy shall also be sent to the RO. Depending on the nature and extent of the revisions, the PAT may require an updated form be submitted. A copy of the form is attached to this Policy as Addendum A.

As the need for a new policy or substantial edits to an existing policy is identified, the form will be submitted to the PAT for review. RO's or other University stakeholders may be asked to participate in a

review as needed to address questions or to provide clarification on University Policies or UOPs for which they are responsible.

The PAT, in consultation with the RO, reviews forms and will either approve or deny the request.

IF DENIED, the PAT will provide reason for denial and will provide recommendations for alternative steps. Examples of recommendations/alternative steps include, but are not limited to, development of a department-level policy, development of a Guideline for an existing University Policy or UOP, or creation of an alternate means of guidance such as an informational brochure or web resource page.

IF APPROVED: Follow the procedures below for the specific document type.

University Policies, UOPs and University Guidelines will always supersede those of other units regarding issues of University-wide application and in the event of a conflict between policies. University Policies and UOPs shall be reviewed on a three-year schedule unless otherwise specified.

### **UNIVERSITY POLICIES:**

Once the form has been approved by the PAT, the RO will be responsible to draft the policy. Utilizing UVM's policy management software, the Office of Compliance Services shall assign the appropriate policy approval workflow. More guidance regarding the workflow including the process for disseminating drafts to the PRG can be found on the institutional policy website found here: <https://www.uvm.edu/policies>.

Once the policy has been finalized, the Chief of Staff to the President, Vice President for Legal Affairs and General Counsel is responsible for obtaining the requisite signatures for policies and for providing notice of availability of the Policy to the University community. The Office of Compliance Services is responsible for updating UVM's Institutional Policies website (<http://www.uvm.edu/policies/>). Once published, the RO is responsible for providing or coordinating the provision of training, targeted dissemination, and/or any required acknowledgements or certifications.

University Policies will be reviewed cyclically in accordance with the schedule maintained by the Office of Compliance Services and posted on its website (<https://www.uvm.edu/policies/z-policy-index>). Regardless of the review schedule, the RO is independently obligated to ensure that University Policies are up to date and current.

### **Adoption of Interim University Policies**

Under extenuating circumstances, an RO may issue Interim University Policies. Such circumstances may include the need to expedite the issuance of a University Policy due to external compliance deadlines; developments that will, or could, significantly affect the safety or welfare of members of the campus community; or where the step is necessary or desirable to facilitate orderly and efficient campus operations. In such a case, the RO must seek Presidential approval to issue an Interim Policy by means of a request sent in writing to [policy@uvm.edu](mailto:policy@uvm.edu). The Chief of Staff to the President, Vice President for Legal Affairs and General Counsel will present the request to the President for consideration.

Interim University Policies will generally remain in effect for no more than six months from the effective date of their issuance; thus, the RO should initiate the steps described above for adoption of a non-interim Policy promptly. Compliance Services will post Interim University Policies, clearly designated as such, on the Institutional Policies website.

## Policy Revisions

All new University Policies and all University Policies undergoing substantial revisions are subject to the procedures outlined above. There are three levels of revisions: housekeeping revisions, minor revisions and substantial revisions.

1. Housekeeping revisions may be made administratively under the discretion of the Director of Compliance Services.
2. Minor revisions may be made administratively, without following the process described above, when the Director of Compliance Services, following consultation with the RO and the General Counsel, determines that such revisions are non-substantive or do not significantly impact the rights or responsibilities of members of the University community.

For both housekeeping and minor revisions, Compliance Services shall maintain a record of the nature and extent of the revisions and the date revised.

3. Substantial revisions are handled in the same manner as a new policy as outlined above and require that all steps be followed.

## Retirement of University Policies

As University Policies are superseded by new University Policies or revoked by RO's, these University Policies will be retired and copies archived by the Office of Compliance Services.

### **UNIVERSITY OPERATING PROCEDURES:**

Once the impact form has been approved by the PAT, the administrator who principally oversees the activity in issue is responsible for drafting the UOP, in active consultation with unit colleagues and the administrator's supervisor. Utilizing UVM's policy management software, the Office of Compliance Services shall assign the appropriate policy approval workflow. The Vice President, Vice Provost or comparable official who is ultimately responsible for the activity must also review the UOP and either approve and adopt it, or expressly authorize the responsible administrator to adopt the UOP. After the UOP is finalized, the Chief of Staff to the President, Vice President for Legal Affairs and General Counsel will transmit the UOP to the Office of Compliance Services to format and post on the University UOP webpage (<https://www.uvm.edu/policies/z-policy-index>).

UOPs will be reviewed cyclically in accordance with the schedule maintained by the Office of Compliance Services and posted on its website (<https://www.uvm.edu/policies/z-policy-index>). Regardless of the review schedule, the RO is independently obligated to ensure that UOPs are updated as necessary and remain current.

### **POLICY/UOP REVIEW LIST (the List):**

A current list of University Policies, UOPs, and University Guidelines is maintained on the University Policy website. Current University Policies can be found here: <https://www.uvm.edu/policies/z-policy-index>. Current UOPs and University Guidelines can be found here: <https://www.uvm.edu/policies/z-policy-index>. The Office of Compliance Services in conjunction with RO's and OGC, maintains a separate list of University Policies, UOPs and University Guidelines under development, recommended to be developed, and scheduled to be developed. The Office of Compliance Services is responsible for maintaining the combined list. The list is updated on an on-going basis as University Policies, UOPs, and University Guidelines are identified for development, developed, modified or retired.

At least once annually (with periodic updates as necessary), the Director of Compliance Services will issue to RO's and their designees a combined list of University Policies & UOPs scheduled for development or review during the upcoming academic year as well as all current University Guidelines ("the List").

**UNIVERSITY GUIDELINES**

The administrator who principally oversees the activity at issue is responsible for drafting the University Guidelines, in active consultation with unit colleagues and the administrator's supervisor. The Vice President, Vice Provost or comparable official who is ultimately responsible for the activity must also review the University Guidelines and either approve and adopt them, or expressly authorize the responsible administrator to adopt the University Guidelines. Before adoption of the Guideline, the responsible administrator must consult with the Director of Compliance Services regarding any necessary or desirable additional circulation for comment. The administrator may exercise reasonable discretion in determining whether to post the Guideline externally to the unit. University Guidelines are reviewed and updated under the discretion of the responsible administrator or the Vice President or comparable official who is ultimately responsible for the activity.

**RESOURCE WEBPAGES**

Resource Webpages are developed at the unit level and are not governed by this policy. However, Resource Webpages must comply with existing policies related to the development of UVM webpages found here: [https://www.uvm.edu/drupalwebguide/policies\\_and\\_guidelines\\_uvm\\_websites](https://www.uvm.edu/drupalwebguide/policies_and_guidelines_uvm_websites). If a webpage with University-wide implications is needed, RO's shall consult with the Office of Compliance Services prior to development.

Contacts

<b>Questions concerning the daily operational interpretation of this policy should be directed to the following (in accordance with the policy elaboration and procedures):</b>	
<b>Title(s)/Department(s):</b>	<b>Contact Information:</b>
Office of Compliance and Privacy Services	B157 Billings Library 48 University Place (802) 656-3086 <a href="mailto:compliance@uvm.edu">compliance@uvm.edu</a>

Forms/Flowcharts/Diagrams

- [Data Sheet and Impact Assessment Form](#)
- [Standard Format for Policy Development](#)
- [Standard Format for UOP](#)

Related Documents/Policies

- [Annual Policy Review Process](#)

Regulatory References/Citations

- None

Training/Education

Training will be provided on an as-needed basis as determined by the Approval Authority or the Responsible Official.

## About This Policy

<b>Responsible Official:</b>	Vice President for Operations and Public Safety	<b>Approval Authority:</b>	President
<b>Policy Number:</b>	V. 10.1.2	<b>Effective Date:</b>	January 2, 2019
<b>Revision History:</b>	<ul style="list-style-type: none"><li>• V. 10.1.1 approved May 4, 2017</li><li>• Responsible official officially changed from the Director of Compliance Services and Chief Privacy Officer Director to the Vice President for Operations and Public Safety on November 11, 2021</li></ul>		

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*University of Vermont Policies and Operating Procedures are subject to amendment. For the official, approved, and most recent version, please visit UVM's [Institutional Policies Website](#).*



# UVM Policy and University Operating Procedure (UOP)

## Data Sheet and Impact Assessment Form

*\*Required for all new and substantive changes*

**INSTRUCTIONS:** Tab through to enter data. Hit your space bar to check a box.

Name of Policy or UOP:

**Background and Reason for Submission**

<b>1.</b>	<b>Please indicate whether submission is a policy or UOP and reason for submission.</b>	
	A: <input type="checkbox"/> Policy	<input type="checkbox"/> UOP
	B: <input type="checkbox"/> New policy/UOP	<input type="checkbox"/> Revised due to need
	<input type="checkbox"/> Policy/UOP update due to regular review cycle	<input type="checkbox"/> Policy or UOP being reclassified
<b>2.</b>	<b>Reasons for development or revisions (check all that apply)</b>	
	<input type="checkbox"/> Legal/Regulatory	<input type="checkbox"/> Operational/Efficiency <input type="checkbox"/> Financial
	<input type="checkbox"/> Technological	<input type="checkbox"/> Cyclical Policy Review <input type="checkbox"/> Health/Safety
	<input type="checkbox"/> Other:	
	For new policies/UOPs, please provide a brief explanation why this is necessary. For existing policies/UOPs, please provide a summary of revisions:	
	Are you requesting an expedited impact determination based on the limited nature of edits/revisions and minimal impact? (not available for <b>new</b> Policies/UOPs)	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>If yes, go to step # 21</i>
	For <b>NEW</b> policies and UOPs, has there been a review to determine whether an existing policy or UOP could be modified to address this new need?	
	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
<b>3.</b>	If known, identify the OGC policy contact.	

**Impact Assessment**

<b>4.</b>	<b>Who is affected by this Policy/UOP (i.e., students, employees, faculty)? Generally, these would be listed in the applicability section of the policy/UOP.</b>
<b>5.</b>	<b>Summarize what the new or revised policy/UOP will require of the University community. This description should include any new obligations, material changes to procedures, reporting obligations, etc.</b>
<b>6.</b>	<b>What Operational activities will be affected (e.g. business processes)?</b>



7.	<b>What additional resources will be needed to fully implement this? If financial resources (including FTEs) are anticipated, please estimate dollar amount. (financial, physical, human, space, technological)</b>
8.	<b>Identify the elements of UVM's <a href="#">Mission</a> or <a href="#">Strategic Vision</a> that this Policy/UOP/Guideline helps to achieve.</b>
	<input type="checkbox"/> UVM's Strategic Vision (Amplifying our Impact): <input type="checkbox"/> Ensuring Student Success <input type="checkbox"/> Investing in our Distinctive Research Strengths <input type="checkbox"/> Fulfilling our Land Grant Mission <input type="checkbox"/> UVM's Mission: <input type="checkbox"/> To create, evaluate, share, and apply knowledge and to prepare students to be accountable leaders who will bring to their work dedication to the global community, a grasp of complexity, effective problem-solving and communication skills, and an enduring commitment to learning and ethical conduct.
<b>Policy/UOP Development</b>	
9.	<b>The process expects responsible officials to engage key stakeholders throughout the development process. Please indicate who has been consulted (name and title) during the drafting of this Policy/UOP.</b>
10.	<b>Identify the risk assurance/subject matter experts who have been consulted during the drafting process?</b>
	<input type="checkbox"/> General Counsel <input type="checkbox"/> Risk Management <input type="checkbox"/> Compliance Services <input type="checkbox"/> Chief Risk Officer <input type="checkbox"/> Chief Internal Auditor <input type="checkbox"/> N/A
	<input type="checkbox"/> Other:
11.	<b>Specify any timing requirements (firm date that this must be posted). Policies that require implementation prior to full dissemination for comment may be adopted as interim.</b>
	Have/will you written/revised this Policy/UOP using Plain English?
	If no, why?
	Have/will you written/revised this Policy/UOP using gender-neutral pronouns/language?
	If no, why?

### Communications and Training

**14.** *In addition to the key stakeholders identified above, is additional communication or circulation needed before finalizing this Policy/UOP?*

Yes (specify below)       No (go to next question)

Specify:

**16.** *What types of communication and/or training activities will your office provide to build awareness and foster compliance with the Policy/UOP?*

**17.** *Are there any Guidelines that accompany this policy/UOP?*

Yes, please attach       No

**18.** *Is training related to this Policy/UOP or any of the processes required by regulation or law?*

Yes       No

**19.** *Does your office require assistance to meet communication/training needs?*

Yes       No

### Compliance Monitoring

**20.** *What oversight controls exist or are planned to monitor University compliance with this Policy/UOP?*

**21.** *Please indicate if you would like to request a consultation regarding establishing a Policy/UOP monitoring/compliance plan.*

Yes       No

### Contact Information

Responsible Official:

Individual Completing this form:

Individual that should be contacted regarding follow-up:

**Notes/Comments**

Is there anything else about this Policy/UOP that is important to be included in the process?

Submit completed forms to [policy@uvm.edu](mailto:policy@uvm.edu)

**\*\*\* DO NOT WRITE BELOW THIS LINE – FOR PAT USE ONLY \*\*\***

**APPROVAL**

Approved:  Yes  No

Verify Approval Authority:  President  VP (specify):  Board of Trustees

If Not Approved, Reason and Suggestions/Recommendations:

Additional Reviewers/Commenters (specify required or desired):