

Policy Management Policy

Policy number: 101

Policy owner: University Policy Advisory Committee

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SECTION I. PURPOSE

The University of St. Thomas, acting through its board of trustees, officers, employees, colleges, schools, divisions, departments and other units, regularly adopts and updates policies that apply to members of the St. Thomas community. This Policy Management Policy:

- clarifies what constitutes a university policy;
- clarifies which university policies require approval of the St. Thomas president;
- sets forth the president's delegation of authority to designated positions, authorizing the employees holding such positions to approve certain categories of university policies without the president's direct approval of those policies; and
- clarifies the expectations that apply to all members of the St. Thomas community in connection with the development, approval, maintenance, revision and withdrawal of university policies.

This policy is intended to assure that university policies are readily identifiable and accessible to all members of the St. Thomas community who are covered by or responsible for interpreting and enforcing the policies; are clearly drafted and meet the policy objectives described in Section VI below; and are developed in a manner that is consistent with the principles of shared governance and transparency.

SECTION II. SCOPE AND APPLICABILITY

This policy governs the development, approval, maintenance, revision and withdrawal of all university policies. The expectations set forth in this policy apply to all St. Thomas students and employees (faculty, staff and student workers).

SECTION III. DEFINITIONS

When used in this policy, the following terms have the following meanings:

- a. A **policy** articulates standards or principles that set operational and behavioral expectations for persons covered by the policy. Policies are different from **procedures** or **processes**, which are statements or workflows providing for the implementation of a policy, or other steps necessary to carry out a management philosophy, governing principles or legal or regulatory requirements.
- b. A **university policy** is any policy approved by the St. Thomas board of trustees, president or other position or person to whom the president has delegated policy approval authority.

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- c. A **policy owner** is the position or unit responsible for the content and currency of a university policy, for implementation and maintenance of the policy and revisions, and for assuring there is appropriate training and communication about the policy on an ongoing basis. Every university policy has a policy owner.
- d. **Unit** means a college, school, division, department, office or similar unit within the organizational structure of the university.

SECTION IV. POLICY APPROVAL AUTHORITY

Consistent with the St. Thomas bylaws, the university president has sole authority to approve university policies (including policy revisions and withdrawals), unless the board of trustees has reserved such authority to itself. The president is permitted to delegate policy approval authority to other St. Thomas employees as the president deems appropriate.

The president hereby retains or delegates policy approval authority as set forth in this Section. The president retains authority to require revision or withdrawal of university policies approved pursuant to delegated authority, at the president's discretion.

University policies that are not described in the table below are subject to the president's direct approval, unless the president delegates approval authority to another person in writing.

Policy Category	Description	Authorized Approver
Institutional Policies	Policies that apply to all students and employees (faculty, staff and student workers) regardless of unit, that do not fall into another category below*	President (subject to the authority of the board of trustees)
Employee Policies	Policies that apply only to employees (faculty, staff and student workers), regardless of unit, and that do not govern areas of primary faculty responsibility as set forth in the Faculty Handbook*	President (subject to the authority of the board of trustees)
Staff Policies	Policies that apply only to staff employees, regardless of unit, and that do not govern areas of primary faculty responsibility as set forth in the Faculty Handbook*	President
Faculty Handbook	Documented standards and expectations with respect to areas of primary faculty responsibility as set forth in the Faculty Handbook, which are contained in the Faculty Handbook	President, following approval of the faculty in accordance with the terms of the Faculty Handbook
Academic Policies	Documented standards and expectations with respect to areas of primary faculty responsibility as set forth in the Faculty Handbook, which are not contained in the Faculty Handbook	President, following approval of the faculty in accordance with the terms of the Faculty Handbook
Unit Policies	Policies that address operational responsibilities and services managed by a particular unit (such	President's cabinet member with the most

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Policy Category	Description	Authorized Approver
	as enrollment, food service, government relations, or purchasing and payables) or apply only to employees and/or students of a particular unit, or to persons served by a particular unit, that set directions and expectations for fulfilling that unit’s operational responsibilities or for working, enrolling or receiving services from that unit	direct management responsibility for the unit establishing the policy
Student Policies	Policies that apply only to students in their capacity as students, or to student organizations, and that do not govern areas of primary faculty responsibility as set forth in the Faculty Handbook	President’s cabinet member with the most direct management responsibility for the unit establishing the policy
Student Worker Policies	Policies that apply only to student workers, regardless of unit, and that do not apply to other university employees	Chief human resources officer

* Covered persons under these policies also may include independent contractors, volunteers, licensees, visitors and/or trustees of St. Thomas, depending on the subject matter of the policy.

SECTION V. POLICY DEVELOPMENT, REVISION AND WITHDRAWAL

A. Regular Process

In order to be considered by the president for approval, university policies must be developed, revised and withdrawn in accordance with the policy management process specified in **Appendix A**. The process is coordinated by the University Policy Advisory Committee (UPAC), a standing committee of the university comprising the general counsel (who serves as chair of the UPAC); the chair of the Faculty Affairs Committee; one additional faculty member elected by the Committee on Faculty Nominations and Elections in accordance with the Faculty Handbook; the vice provost for academic affairs; the diversity and inclusion officer; the chief human resources officer or designee; and the vice president for student affairs or designee.

The development, revision and withdrawal of university policies that do not require the president’s approval are not required to follow the process in **Appendix A**, and the authorized approver may specify a process at the approver’s discretion (so long as the process includes meaningful consultation with the faculty, for those areas listed in the Faculty Handbook as meriting significant faculty consultation). Policy owners who undertake the development or revision of university policies that do not require the president’s approval are strongly encouraged to consult with the Office of General Counsel early in the process, to assure that any legal or compliance considerations are addressed and that the proposed policy, revision or withdrawal does not conflict with established university policies or policies under development for the president’s approval. The Office of General Counsel also can provide drafting assistance.

B. Fast-Track Process

From time to time, university policies may need to be revised to correct a typographical error, update a position title or reflect other changes in the university’s operating structure, or make other

non-substantive changes to maintain the currency of the policy. For institutional, employee and staff policies, such changes may be requested by the policy owner and implemented by the UPAC, without further approval of the president. For documented standards and expectations with respect to areas of primary faculty responsibility as set forth in the Faculty Handbook, such changes must be made in accordance with the Faculty Handbook.

In some situations, such as in a campus emergency, or upon substantial sudden changes in the university's operations or government or legal mandates, it may be necessary to rapidly establish, modify or withdraw a university policy. In such cases, at the president's discretion and as permitted by the terms of the Faculty Handbook, the president may approve a policy, revision or withdrawal following consultation only with the Office of General Counsel. Other steps in the policy management process specified in **Appendix A** will be followed to the extent consistent with timely implementation of the policy, and appropriate constituencies who did not have the opportunity to provide input prior to implementation will have the opportunity to do so after implementation. The president may approve subsequent policy changes as appropriate to incorporate such input.

SECTION VI. POLICY OBJECTIVES, CONTENT AND FORMAT

University policies are established to help assure that the decisions and actions of those covered by the policy:

- are consistent with the St. Thomas mission, convictions, vision and strategic objectives;
- comply with applicable legal and regulatory requirements;
- do not subject St. Thomas to operational, financial, legal, reputational or other risks that the university is unwilling to accept; and
- make efficient and effective use of St. Thomas resources, consistent with institutional priorities.

The content of university policies is expected to reflect these objectives. To ensure this and that covered persons can easily identify and understand the university policies that apply to them, all university policies approved or revised after the effective date of this policy must:

- Indicate the date of the policy's initial publication and (if applicable) the date of its latest revision;
- Identify the policy owner;
- Clearly identify the persons covered by the policy;
- Clearly articulate the operational directions and behavioral expectations established by the policy;
- Be consistent with the St. Thomas mission, convictions, vision and strategic objectives;
- Be consistent with applicable legal and regulatory requirements; and
- Include references to and attach procedures and frequently asked questions associated with the policy, if any.

In addition, university policies that are subject to the president's approval must follow a consistent format established by the UPAC, unless the policy is contained in the Faculty Handbook.

Unit policies, student policies and student worker policies may be more restrictive than other university policies and may set forth heightened requirements as compared to other university

policies. However, such policies may not conflict with policies approved by the president. In the case of a conflict, policies approved by the president will control.

SECTION VII. POLICY PUBLICATION AND ACCESS

The most current version of all university policies subject to the president's approval, along with any related procedures and FAQs, must be published in an electronic format in the University Policy Repository maintained by the Office of General Counsel. The most current version of university policies that are not subject to the president's approval must be published electronically either in the University Policy Repository or in another remotely accessible location (e.g., a website, shared drive or shared university system) that is easily located, searchable and accessible by (a) all persons to whom the policy applies and their supervisors, (b) the Department of Human Resources, (c) the Office of General Counsel, and (d) members of the UPAC. This assures that all persons covered by university policies and all St. Thomas employees whose responsibilities include the interpretation, enforcement and coordination of policies can easily find and access them.

Policies that have been superseded or withdrawn must be removed from publication or identified as no longer in effect. Access to university policies may be password-protected.

It is important that all copies of university policies that are published, distributed or referenced reflect the most current version of the policy. Accordingly, units may not duplicate, summarize or excerpt policies contained in the University Policy Repository on another webpage, in college or school handbooks, or in another electronic location. Instead, units may refer or hyperlink to the policy as titled and contained in the University Policy Repository. Exceptions may be granted on a limited basis, depending on the particular facts and circumstances, at the discretion of the Office of General Counsel.¹

SECTION VIII. POLICY MAINTENANCE

University policies must be reviewed on a regular basis, generally no less frequently than every three years, to assure the policy continues to be current and effective. Policy owners are responsible for carrying out the regular review of policies they own. The UPAC may establish and maintain a regular review schedule for institutional, employee and staff policies and will work with the Faculty Senate to consider an appropriate review schedule for academic policies and policies contained in the Faculty Handbook, in accordance with applicable terms of the Faculty Handbook.

¹ Once the policy repository is online, units will be given a designated period of time to delete any copies, summaries or excerpts of policies contained in the repository, or to replace them with appropriate hyperlinks.

Appendix A to Policy Management Policy

Policy Management Process for Policies Subject to the President's Approval

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University policies that are subject to the president's approval, as set forth in the university's Policy Management Policy, must be developed, revised and withdrawn in accordance with the designated process below. These processes are designed to meet both the spirit and letter of the shared governance principles set forth in the Faculty Handbook as well as to assure appropriate consultation with other university constituencies.

SECTION I. PROCESS FOR FACULTY HANDBOOK AND ACADEMIC POLICIES

- A. The initiation, review and approval of new or revised documented standards and expectations with respect to areas of primary faculty responsibility as set forth in the Faculty Handbook, and the elimination of unnecessary or outdated standards and expectations in these areas, will follow the process set forth in the Faculty Handbook.
- B. Before making a decision to approve, veto or remand a proposed new standard or expectation in an area of primary faculty responsibility, or the revision or withdrawal of an existing standard or expectation, the president generally will confirm with the executive vice president and provost that there has been appropriate consultation about the proposal with academic administrators, consistent with the shared governance principles articulated in the Faculty Handbook. In addition, the president generally will confirm that the Office of General Counsel has reviewed the proposal to assure that any legal and compliance considerations have been identified and addressed, and that there are no potential conflicts with other university policies. For efficiency, the president expects faculty, insofar as practicable, to consult with the executive vice president and provost, other appropriate academic administrators, and the Office of General Counsel about policy proposals before seeking the president's approval for the proposal. Faculty are strongly encouraged to initiate these consultations early in the process, so that any considerations raised can be addressed timely.
- C. This provision is not intended to prevent, delay or otherwise interfere with Faculty Senate consideration of proposals and amendments to them at meetings of the Senate. Faculty have discretion to determine whether and when to engage in such consultations, recognizing that advance consultations may expedite the president's approval of a proposal.
- D. After making the decision whether to approve the proposal, the president will communicate the decision to Faculty Senate leadership, the executive vice president and provost, and the general counsel. Faculty Senate leadership will have primary responsibility for the implementation of the proposal, including working with the Office of General Counsel to assure appropriate updates to the University Policy Repository.

SECTION II. PROCESS FOR INSTITUTIONAL, EMPLOYEE AND STAFF POLICIES

The establishment, revision and withdrawal of institutional, employee and staff policies must be sponsored by a member of the president's cabinet, following the process below:

- A. The sponsor initiates the process by sharing with the UPAC chair a brief description of the proposed new policy, policy revision or withdrawal, and the reasons for the proposal; the proposed policy owner; and a proposed timeline for implementation. This information may be communicated through a conversation or brief email; there is no required form or format.
- B. The UPAC chair will discuss the proposal with the sponsor. Depending on the proposal and circumstances, the UPAC chair may recommend consultation with the full UPAC about whether to proceed with the proposal.
- C. The sponsor will decide whether to move forward to develop the proposal and will notify the UPAC chair of the sponsor's decision. If the sponsor moves forward:
 - 1. The UPAC chair will notify the UPAC.
 - 2. The Office of General Counsel will be available to assist the policy owner to draft the new policy or revision. If the policy owner does not work with the Office of General Counsel to draft the policy or revision, the policy or revision must be reviewed by the Office of General Counsel before finalization to assure that any legal and compliance considerations have been identified and addressed, and that there are no potential conflicts with other university policies.
 - 3. The UPAC will be available to assist the policy owner to facilitate consultation about the proposal and related implementation plan with appropriate subject matter experts and St. Thomas constituencies (including but not limited to appropriate consultation with faculty on those matters identified in Chapter 1.B of the Faculty Handbook as meriting significant faculty consultation).
- D. When the policy owner is comfortable that the new or revised policy or the withdrawal proposal is ready for implementation, the policy owner will submit it to the UPAC along with a description of the consultation conducted and the proposed implementation plan.
- E. The UPAC will review the submitted policy, revision or withdrawal proposal. The UPAC will confirm the new policy or revision meets the policy objectives, format and content provisions set forth in the Policy Management Policy. It will review the consultation conducted and consider whether it was appropriate and sufficient in light of the proposed new policy, revision or withdrawal. Finally, the UPAC will consider whether the proposed implementation plan is appropriate. The UPAC may provide advice to the sponsor and policy owner about changes or additional consultation to assure compliance with the Policy Management Policy and this process.
- F. If the UPAC determines the policy, revision or withdrawal proposal satisfies the objectives, content and format requirements, has undergone appropriate consultation and otherwise complies with this process, it will submit the proposal to the president for review and a decision whether to approve and implement the new or revised policy or withdrawal.
- G. Before making a decision, the president generally will seek input and a recommendation from the president's cabinet, and the president may seek advice or recommendations from others at the president's discretion. After considering the recommendations received, the president will make the decision whether to approve the policy, revision or withdrawal and will communicate the decision to the UPAC chair.
- H. The UPAC chair promptly will notify the sponsor, policy owner and UPAC of the president's decision. The policy owner will have primary responsibility for the implementation of the policy, including working with the Office of General Counsel to obtain a policy number for the policy if one has not already been assigned and to make appropriate updates to the University Policy Repository.