

101: Policy on Policies

Policy Owner (name/title)	Risa Dickson, Interim President
Policy Steward(s) (name[s]/title[s])	Compliance Office
External/Internal Viewing	External

- I. Purpose
- II. Scope
- III. Definitions
- IV. Policy
- V. References
- VI. Procedures
- VII. Addenda

I. Purpose

The University of La Verne is committed to ensuring that all University Policies are managed in a manner that is compliant and consistent with legal and regulatory requirements, as well as with best practices as appropriate and applicable to the University, and aligns with the University's mission and values. This document outlines the standardized policy governance framework for the development, approval, implementation, maintenance, and deletion of University Policies at the University of La Verne, a private, non-profit institution.

The purpose of this policy is to ensure that all university policies are clear, consistent, accessible, and aligned with the university's mission and values while remaining compliant with state and federal laws and regulations. The policy governance model's goal is to create clear ownership and accountability in the policy development and implementation process; enable an efficient and collaborative policy management process; and ensure policies are kept up-to-date and maintained in a central, accessible repository to increase awareness and visibility to mitigate risk.

II. Scope

This policy applies to all University Policies, including those affecting students, faculty, staff, and administration. University Policies supersede guidelines, practices, rules, handbooks, or procedures at the college, department, program, or office level.

Amendments to the Faculty Handbook are governed by the process set out in that Handbook.

III. Definitions

Addendum/Addenda: An Addendum is additional policy content, published or referenced, in Section VII of a University Policy. Addenda can be added to policies without revising the parent policies and must be approved through the Policy Approval Process.

Approval Date: The Approval Date is the date a University Policy proposal is approved by the appropriate approving body.

Approving Body: The Board of Trustees and Officers of the University, as outlined in the University Bylaws, are all authorized approving bodies for University Policies.

Bylaws: The governing rules and regulations established by the Board of Trustees that govern the internal affairs of the University and outline the roles, rights, and responsibilities of its members. Bylaws are broad governance rules for the entire organization that supersede any and all other university policies.

Extraordinary Circumstances: Extraordinary circumstances are conditions that necessitate the immediate updating of policies in order to effectuate a legal requirement. In these instances, the President, Provost, General Counsel, Institutional Compliance Officer, and Executive Director of Human Resources are authorized approving bodies of changes to policy due to extraordinary circumstances.

Guideline: Guidelines set principles or best practices the organization, employees, and/or business units should follow under particular circumstances. Guidelines are not policies, but help facilitate compliance with policies and thus should comport with policies.

Non-substantive Revision: A non-substantive revision is an administrative change to an existing policy or policy proposal to correct typographical and grammatical errors, change policy format, and/or update University or reference information. A non-substantive revision will be noted in a policy's History section as "Editorial."

Policy: A policy is a formal rule statement of the University. Policies are usually broader in scope, addressing a single topic, to provide a framework for decision-making and ensure consistency and compliance with legal and ethical standards.

Policy Approval Process: The Policy Approval Process is the series of policy development steps for creation, review, revision, deletion, and approval, which include legal review of drafts, and review by relevant stakeholder bodies.

Policy Owner: A Policy Owner is the individual ultimately responsible for developing, maintaining, implementing, communicating, and reinforcing the policies within their area(s) of responsibility, as well as the processes/procedures related to the policies they own. Authorized Policy Owners include Vice Presidents/Chief-level positions/Executives in charge of a university unit who can then delegate policy ownership to the head of a specific department.

Policy Steward: A Policy Steward is an individual or committee who, under the director of a policy owner, facilitates the development and advancement of a policy proposal through the Policy Approval Process. Policy Stewards work with the Policy Owner(s). They are usually, but not always, subject or experience experts, who can assist in research and writing policy, and documenting the process/procedure to carry out related policy(ies). Authorized Policy Stewards include director-level management positions or other designee as determined by policy owner **OR** full-time employees who are subject matter experts (reporting to the policy owner) **OR** chair or other representative of a subject matter committee or governing body (e.g., Faculty Senate, Staff Senate).

Procedure: A procedure outlines step-by-step instructions for implementing or following the rules set forth in a policy. A procedure also defines approved forms.

Protocol: Protocols are a specific set of steps to be followed in a particular situation. Protocols are more specific and detail-oriented, outlining the exact steps to be taken in a given scenario, and are designed to ensure efficiency and effectiveness in carrying out specific tasks or processes. (e.g. Emergency response protocols.)

Responsible Office: Office responsible for operationalizing, monitoring, and enforcing the policy (may or may not be the same office as the Policy Owner's office).

Subject Matter Expert (SME): An individual or an office that has specialized expertise in a particular area and is expected to be consulted during the policy development and/or update process.

Substantive Revision: A Substantive Revision is a change that alters the intent, scope, meaning, or application of a University Policy.

IV. Policy

4.1 Roles and Responsibilities

4.1.1 Policy Owners. Policy Owners are ultimately responsible for: Prioritizing policy development within their area(s) of responsibility; Reviewing and overseeing university policies within their area(s) of responsibility, and appointing policy stewards; Directing and coordinating policy research and input from stakeholders, SMEs, affected parties, and responsible office(s); and Authorizing the posting of the final policy to the University Policy Library.

4.1.2 Policy Stewards. Policy Stewards are charged with: overseeing the development of a new policy draft and outlining the procedure to carry out said policy, under the Policy Owner's direction and guidance; Providing active policy management (updates/revisions) to comply with the cyclical review requirements; Conducting policy research and soliciting input from stakeholders and SMEs; Working with Policy Owner and Responsible Office to address questions or concerns; and Assisting Policy Owner to secure approvals from appropriate approving bodies.

4.1.3 Responsible Office. The Responsible Office is responsible for operationalizing, monitoring, and enforcing a policy. The Responsible Office may or may not be the same office as the Policy Owner's office. For example, Human Resources owns the mandatory training policy

but a responsible office might be Campus Safety to carry out required safety trainings. The Policy Owner and the Responsible Office are responsible for working together to ensure the policy is being followed.

4.1.4 University Community. All members of the university community are responsible for adhering to university policies and providing feedback as stakeholders. Violations in adherence to policy may result in disciplinary action in accordance with relevant procedures.

4.2 All Policy ownership lies with Policy Owners. Policy Owners and Policy Stewards are responsible for drafting, reviewing, updating, or deleting policies, on a regular basis, within their area(s) of responsibility.

4.3 The University shall maintain a searchable library of current policies accessible through the University's website. Current University Policies are posted on the University Policy Library webpage (laverne.edu/policies). Within the Policy Library, the University may provide an archive of revisions and access to previous versions of policies, as well as accurate recording of approval and implementation dates. To the extent possible, policies that interface or cover related content shall be linked.

4.4 Policies may not exist except at the University level. Divisions, colleges, departments, programs, offices, etc. may have guidelines, practices, handbooks, and standard operating procedures if they comport with University Policy.

4.5 University Policy will be considered, evaluated, or revised according to the following priority and precedence:

- 4.5.1** Federal and State legal requirements and/or administrative or applicable governing body regulations (e.g., NCAA)
- 4.5.2** University of La Verne Board of Trustees Bylaws and Policies
- 4.5.3** Accreditation requirements
- 4.5.4** University Policies
- 4.5.5** College/Division rules, regulations, procedures, guidelines, etc.
- 4.5.6** Department/program and office rules, regulations, procedures, guidelines, etc.

4.6 Any University employee, subject matter expert, or student can submit a Policy Action Request Form (see link in Section V, References). Policy Action Request Forms are to be submitted in order to request policy creation, revision, non-substantive revision, or deletion.

4.6.1 Policy Creation. Requests for a policy to be created can be proposed by any member of the university community. Proposals must include the rationale, objectives, and potential impact of the policy.

4.6.1.1 Drafting. A new policy proposal will be assigned to a Policy Owner, who will assign a Policy Steward and draft the policy in consultation with relevant stakeholders and SMEs. The draft should follow the university's standard policy template and Policy Approval Process as outlined in Section VI, Procedure.

4.6.2 Revision or Regular Review of Policy

4.6.2.2 In collaboration with Policy Owners, the Compliance Office or its designee coordinates regular and ongoing review of University Policies.

4.6.2.3 A university policy should be reviewed regularly after the Approval Date. It is the responsibility of the Policy Owners to ensure their policies are reviewed on an appropriate cadence to keep the policies current with university practice and legal requirements.

4.6.2.4 Policy reviews should involve appropriate Policy Owners, Policy Stewards, University stakeholders, SMEs, affected parties, the responsible office, and focus on the following:

- Compliance with applicable law, regulations, and University of La Verne Board of Trustees Bylaws and Policies.
- Consistency with other university policies covering related content.
- Alignment with changes to procedures and/or business practices
- Effectiveness of the policy to assist in accomplishing the university's mission.
- Currency of information and format.

4.6.3 Non-substantive Revision of Policy

A non-substantive revision to an existing policy does not constitute the enactment of a new or revised policy and does not change the approval or effective dates of such policies.

4.6.4 Policy Deletion and Archiving

4.6.4.1 Policies may be deleted if they are no longer relevant or necessary.

4.6.4.2 A Policy that is no longer effective, required, or that has been subsumed by another Policy may be recommended for deletion by any University entity or employee.

4.6.4.3 Policies may be recommended for deletion and removal when they come up for their regular review cycle.

4.6.4.4 Deleted policies will be removed from active status on the University Policy Library and archived.

4.8 Policy Approval

4.8.1 University Policies and policy action requests proceed through the Policy Approval Process as outlined in Section VI, Procedures. Exceptions include extraordinary circumstances (Section 4.8.4) and non-substantive revisions (Section 4.6.3).

4.8.2 University policies will be submitted for final approval to authorized approving bodies. The Board of Trustees is the approving body of the faculty handbook, policies related to the fiduciary responsibility of the Board, and other policies deemed appropriate and necessary by the President of the university. The Board of Trustees delegates approving authority for all other operational policies to the President, who can in turn delegate approving authority to the other Officers of the University (i.e., Provost, CFO, or COO).

4.8.4 Extraordinary Circumstances

When circumstances require action to create, revise, or withdraw a University Policy within a shorter or different timeframe than can be accomplished through the standard

Policy Approval process, the President may determine that a policy shall be put into effect without prior presentation to the divisions, colleges, departments, programs, committees, councils, or other representative bodies, and/or without the prior approval by, or consultation with, stakeholder groups and SMEs that would otherwise be required. Any policy put into effect in such a manner may subsequently be presented to the stakeholder groups and approving bodies at the next available opportunity for ratification, recommendations, or presented as an informational item.

If a recommendation or requirement of a regulatory agency, statutory or regulatory change, or judicial or administrative mandate creates the need for a new policy, policy revision, or policy retirement, legal counsel may advise the policy owner and stewards to make needed policy changes and present such changes for approval to the President's Cabinet and/or Board of Trustees in the most expeditious manner possible, including foregoing other input and approval measures.

4.9 Implementation and Communication

Policy Owners are responsible for ensuring appropriate communication regarding policy updates and changes.

Policy Owners are responsible for ensuring the implementation and enforcement of their respective policies, either directly or via the Responsible Office.

V. References

1.1 [*Policy Writing Guide*](#)

1.2 [*Policy Template*](#)

1.3 [*Policy Action Request Form*](#)

VI. Procedures

6.1 Policy-related procedures begin via Policy Owner initiation, the submittal of a Policy Action Request, or General Counsel initiation.

6.1.1 A Policy Owner must notify the Compliance Office or its designee of the Policy Owner's intention/need for policy action.

6.1.2 Requests to create, revise, or delete a Policy or Policy Addendum/Addenda shall be submitted to the Compliance Office or its designee using the approved Policy Action Request Form, including the reason for the requested action, summary of the request, and impacted stakeholders.

6.1.2.1 The Compliance Office or its designee will coordinate with the Policy Owner who determines whether the requested policy action shall move forward in the Policy Approval Process.

6.2 If the requested policy action is approved, the Policy Owner and Steward will initiate and lead the shepherding of the policy draft through the Policy Development and Approval Process.

6.3 Policy Development and Approval Process

6.3.1 When a new policy is proposed, the Compliance Office or its designee will assign a Policy Owner. The Compliance Office or its designee will work with the Policy Owner and Policy Steward to steer them through the Policy Development and Approval Process.

6.3.2.1 A policy template and writing guide will be provided to the assigned Policy Owner and Steward(s) to draft the new policy or provide a markup draft of the policy revisions.

6.3.2.2 Policy Addendum/Addenda (new, cited, or revised) must be drafted and submitted at the same time as the parent Policy to progress in the Policy Approval Process.

6.3.2 For new policy or addendum development, or for existing policy revisions, the Policy Owner and Policy Steward(s) work with appropriate stakeholders, SMEs, and affected parties to draft the new policy or desired revisions.

6.3.4 After the drafts or initial revisions have been completed, the Policy Owner submits the policy or addendum draft to the University Management Council (UMC) for review.

6.3.5 Following feedback and revisions from UMC discussions, the Policy Owner submits the draft policy or addendum to the Office of General Counsel.

6.3.5.1 The Office of General Counsel will determine what, if any, revisions are required to comport with relevant laws and regulations. Recommended revisions must be accepted, or not accepted, by the Policy Owner and/or Policy Steward before the policy draft may progress.

6.3.6 Following the Policy Owner's review of General Counsel's requirements and recommendations, the Policy Owner may request posting the policy, or an aspect therein, for public comment. The Provost will have the final decision whether or not to post an academic policy for public comment, and the President will have the final decision whether or not to post any other policy for public comment.

6.3.6.1 If a policy is posted for public comment, it will be available for a minimum of 14 business days and up to 30 business days for Public Comment. Any University employee or student may comment or suggest changes to the Policy draft during the Public Comment period.

6.3.6.2 Following the Public Comment period, the Policy Owner and/or Steward will review and consider feedback, and make revisions, as they deem appropriate.

6.3.7 The Policy Owner will submit the penultimate draft to the appropriate approving body(ies).

6.3.7.1 Academic or Academic-related policy drafts must be approved by Faculty Senate, Faculty Assembly, and the Provost, unless processed under Sections 4.6.3 or 4.8.4.

6.3.7.2 Non-academic related policy drafts must be approved by the President, CFO, COO, or Board of Trustees unless processed under Sections 4.6.3 or 4.8.4

6.3.8 Once a policy receives approval from the appropriate approving body, the Policy Owner will send the final policy document to the Compliance Office or its designee to update the policy's history log and publish the final document to the Policy Library.

6.4 Non-Substantive Revision

6.4.1 Non-Substantive (i.e., editorial) revision is an administrative change to an existing policy or addendum to correct typographical and grammatical errors, change policy format, and/or update University or reference information.

6.4.2 A non-substantive revision to an existing policy does not constitute the enactment of a new or revised policy, and does not require review by General Counsel or a public comment period or re-approval from an approving body.

6.4.3 Non-substantive revisions must be approved by the Policy Owner who then authorizes the Compliance Office or its designee to update the Policy on the Policy Library webpage.

6.5 Deletion of a Policy

6.5.1 A Policy that is no longer effective, required, or that has been subsumed by another Policy may be recommended for deletion by any University entity or employee. Policies may be recommended for retirement when they come up for their regular review cycle.

6.5.2 The Policy Owner will review the recommendation and direct, if appropriate, the Policy deletion through the same review steps as the Policy Approval Process.

6.5.3 If the Policy recommended for deletion requires revision to another University Policy in order for the Policy to be deleted, the revised University Policy shall progress through the Policy Approval Process simultaneously, or prior to, the deletion of the Policy recommended for deletion.

VII. Addenda

[Addenda A: Policy Development, Review, Approval Process – RACI Chart](#)

History

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