



# SAINT VINCENT COLLEGE

## Policy on Policies

### Purpose

Saint Vincent College creates and maintains policies to establish responsibility, integrity, and accountability in support of the mission of the College and in compliance with state, local, and federal law. The Policy on Policies is intended to ensure a transparent process for the creation, approval, review, and revision of college policies, to facilitate broader community awareness of and engagement with such policies while increasing compliance and accountability, and to promote institutional consistency in the presentation and spirit of policies.

Individuals engaged in developing and maintaining college Policies must follow the requirements outlined in this document for drafting, approving, revising, and withdrawing college Policies.

### Scope

This policy applies to the entire Saint Vincent College community, including all employees, volunteers, visiting scholars, contractors, visiting researchers, consultants and other individuals who work for or visit Saint Vincent College.

### Policy Record

1. Effective Date: May 1, 2024
2. Approval: Fr. Paul Taylor, O.S.B.
3. Policy History: No prior Policy
4. Policy Owner: Office of Legal Counsel

### Policy

#### 1. Introduction

College policies align operations, set behavioral expectations across the College community, and communicate policy roles and responsibilities. Policy owners or drafters have the important task of reaching the intended audience with policies that are clear, easy to read, and provide the right level of information for the individuals specifically affected by the content. If users understand a policy, they are more likely to follow it and incorporate it into their daily work.

Saint Vincent College uses a standard policy template that organizes the information in a consistent manner across all policies. This document and the attached appendices provide explanations and guidelines for each of the policy sections to make it easier to begin drafting policy and procedures.

The College Policy Library can be accessed at “College Policies” on the College’s public website and internal portal. Policies and related information take precedence over inconsistent

information from other sources, such as handbooks, other publications, or other College websites.

The Office of Legal Counsel is available to assist College departments and personnel in their efforts to identify policy needs and draft policies that satisfy those needs. A **College Policy Drafting Guide** is provided in Appendix A.

## **2. Establishing College Policy**

The College Policy Coordinating Committee (CPCC) facilitates the approval process for all College Policies.

College community members are encouraged to identify areas that may need a policy with college-wide applicability. Individuals interested in developing a policy should submit a proposal to and consult with their Division/Department Chair or Director. The Division/Department Chair or Director will evaluate the proposal and determine if it meets the criteria below.

The College's policies reflect its philosophies, values and mission and provide guidance for decision-making and enforcement. The College establishes broad policies when appropriate in accordance with the criteria below.

For more information on the process for policy review and approval, see **Policy Review and Approval Process**, Appendix B.

A College-wide policy must:

- (a) Mandate requirements of or provisions for members of the College community (at times the requirements may extend to external individuals who use College resources or services, as appropriate);
- (b) Have broad application throughout the College;
- (c) Enhance the College's mission, reduce institutional risk and/or promote operational efficiency;
- (d) Be reviewed and approved in accordance with the process set forth in Appendix B;
- (e) Be sponsored and maintained by at least one College Vice President or designee;
- (f) Help achieve compliance with any applicable laws and regulations.

Policy owners should consult with representatives from target audiences and/or core constituents during the development phase of both new and significantly revised policies. Individuals designated with policy maintenance responsibility must periodically review and monitor their policies and procedures for accuracy, efficiency, and effectiveness. Policy owners must also ensure that all monitoring and enforcement activities are appropriate for the level of risk managed.

## **3. Distinction Between College Policy and Department Policy**

College policies should be distinguished from procedures and practices and/or from policies within a department or unit. In the event of a conflict between a college policy and a procedure, practice, or department or unit policy, the College policy supersedes.

Departments or units may develop local policies, regardless of whether a corresponding College policy exists. If a corresponding college policy exists, they may adopt a more, but not less, restrictive local policy, except where a college Policy specifically prohibits units from establishing policies that differ from the corresponding college policy or where the local policy runs counter to the purpose of the corresponding college policy. However, to avoid confusion, departments and units should carefully consider the need to label such a document “policy,” and instead, use labels such as “process,” “protocol,” “guidelines” or “procedures” wherever possible to make clear that the document only applies to the particular department or unit.

Departments and units may not develop local policies that are inconsistent with Saint Vincent College policies, mission, strategic plan, or its Catholic, Benedictine values.

College policies and their subsequent revisions (other than non-substantive changes or updates) must be formally signed by the President or designated college official, and after they have been so approved, they have college-wide applicability and are enforceable.

#### **4. Responsibilities**

College President - officially approves all college-wide policies. The President may present a proposed policy to the President’s Cabinet for additional input or to inform them of approved policies or a policy direction in general. The President may also delegate, when appropriate, approval of certain policies to other members of the President’s Cabinet, however, the President maintains ultimate responsibility for all policies.

College Policy Coordinating Committee - serves as an advisory group to the President and the President's Cabinet on all matters related to policies. The Committee will work to accomplish the following:

- (a) To inventory periodically and review all college policies to provide consistency in the format, clarity in the substance of those statements and continued relevance and modernity.
- (b) To discern and distinguish between college policies, department and unit policies, procedures, protocols, guidelines, or statements and prevent conflicts between them.
- (c) To develop and monitor policies required by law or other external regulations to help achieve effective compliance.
- (d) To create and maintain a central online repository to serve as the official location of all current college policies and the resource of archiving prior versions.
- (e) To develop and administer a process for proposing, formulating, vetting, approving, disseminating, revising, amending, and deleting (when obsolete) college policies.
- (f) To assist in the communication, education, and enforcement of policies, procedures, guidelines, or statements.
- (g) To recommend processes for enforcement of College Policies.
- (h) To ensure that college policies, procedures, guidelines, and statements are consistent with the mission of the College and its Catholic and Benedictine values.

Policy Owner – identify areas within divisions/departments that may require a written college policy. The policy owner is responsible for following the guidance in Appendix A and the process outlined in Appendix B to draft and seek policy approval.

## Definitions

- (a) “Policy Owner” is the individual, department or unit, or office that has been assigned responsibility for maintaining a policy. This person may also be the individual who drafts a policy proposal.
- (b) “Procedure” is a written statement that provides for the implementation of an established policy or other prescribed steps necessary to carry out management philosophy, guiding or governing principles and/or compliance with regulatory requirements and relevant law. A procedure can provide a process to accomplish tasks or reach a goal. College procedures may be limited to a department or unit and do not necessarily require formal approval, but they must remain consistent with College Policy.
- (c) “Purpose” is a statement describing why the policy exists (i.e., mitigates institutional risk, supports institutional mission and values, meets legal or regulatory requirements of the policy).
- (d) “Scope” is to whom a policy applies.
- (e) “College Policy” is a written statement that provides direction and assistance to the members of the Saint Vincent College community in the conduct of college affairs. A policy is a written expression of management philosophy, guiding or governing principles, and/or compliance with regulatory requirements and relevant law.
- (f) “College Policy Coordinating Committee” is the advisory group to the President and the President's Cabinet on all matters related to policies. Led by the Office of Legal Counsel, the Committee has delegated authority from the President to establish College Policies and in doing so will strive to foster collaborative policy formulation. Membership includes the Office of Legal Counsel, and two individuals appointed by the President. The Committee may monitor compliance, but responsibility for compliance with policies resides with individual Deans and Vice Presidents and their designees.

## Appendices

Appendix A – Policy Drafting Guide

Appendix B – Policy Creation, Review and Approval Process

## **Appendix A**

### **Policy Drafting Guide**

This Policy Drafting Guide sets out the structure and provides a standard template to be used when drafting a college-wide policy. This guide describes the sections and information that need to be included in any policy. Below are descriptions of each required section, as well as tips, samples and more.

#### **Policy Title**

This section provides the official title of a policy. The title must identify the key purpose of the policy, in as few words as possible. The naming convention is the name of the policy (i.e., its subject), followed by the word "policy."

#### **Purpose**

The information in this section answers the question as to why the policy exists. Key areas that may be addressed include:

- legal or regulatory reasons
- description of conflict or problem the policy will resolve
- overall benefits
- reasons related to the College's Benedictine mission and College Strategic Plan

#### **Scope**

This section specifies to whom the policy applies. The scope answers the questions – who is the primary audience? Who needs to follow this policy? While college policies have college-wide applicability, they may apply more specifically to one or more groups. Examples: College staff, faculty, contractors, volunteers, undergraduate and/or graduate students, etc.

#### **Policy Record**

This section shows the background and history of the policy document and notes any actions taken, along with the date, with respect to the policy. It should include the effective date, the name of the person who approved the policy, the policy history, and the policy owner.

##### **Effective Date**

This is the date on which the earliest version of a substantially similar policy that provides a policy statement for a particular topic went into effect. The effective date of new policies or those that have substantially changed from previous versions should be the date that the current version was approved by the President, or when it is due to be implemented. (For example, certain new policies that may require significant cost expenditures for compliance may have a delayed effective date, where such delay is meant to allow for proper planning.)

##### **Approval**

This section records the date on which the proposed version of the policy is most recently approved by the President.

##### **Policy History**

This section tracks the history and amendments to a policy since its original date of approval. Whenever possible, each subsequent approval date should be accompanied by a list of what changes and updates were made to the policy.

If the proposed policy is the first document addressing a particular subject matter, the text should read: "Approved in its original form: [Approval]"

Additional text may be included to clarify that the University had procedures in place to ensure compliance in a particular area prior to enactment of a University Policy.

*Example: “The Saint Vincent College FERPA policy was first issued in 2006; however, Saint Vincent College has over the prior decades provided students their notification of rights by annually publishing those rights in the Student Handbook.”*

### **Policy Owner**

This section designates a College official (by position, not name) and office as being responsible for the general oversight of a policy that naturally falls within the official’s or office’s areas of responsibility. The responsible official may delegate operational responsibility to a policy owner. Depending on the scope of the subject matter, a policy may have more than one responsible officer, i.e., more than one policy owner.

### **Policy**

This is the most important section of the policy. The policy itself – or, in other words, the College’s policy statement -- is ultimately a statement from the Office of the President conveying an idea endorsed by the College, or an official Saint Vincent College position. It provides direction for the intended audience. Questions that are typically answered through the policy statement include: In what situation(s) does this policy apply? What are the major conditions or restrictions? What are the expectations of those affected? Are there exclusions or special situations?

Below are guidelines for the policy owner/drafter to keep in mind when drafting the policy statement:

- Sentences and paragraphs must be clear and understandable for the given audience.
- Acronyms may be used if spelled out completely the first time the phrase is used.  
*Example: College Policy Coordinating Committee (CPCC)*
- Use strong action words (will, must, are responsible for, etc.). Avoid using “shall” in the policy statement.
- If the policy statement is lengthy or has different subsets, consider using numbering/lettering or some outline format to help guide the reader.
- Use inclusive, non-gendered language when possible.

### **What Not to Include**

- The policy statement should not include background details on the policy nor should it contain procedural steps. Procedures are a means of implementing policy and can be included, instead, in an appendix to the policy (with the intention that such appendix can be updated from time to time, as necessary); sometimes specific procedures may be left to the determination of a specific unit, department, or office.
- Avoid using a specific label, such as the name of a software product. Generic terms are more sustaining and require less maintenance (i.e., less updating of the policy).
- Similarly, avoid the use of individual names. Instead, use the more ambiguous or generic office or position title.
- Avoid using specific contact information in the policy statement itself, unless required by law or regulation, or considered best practice. Contact information should be included in an appendix instead (with the intention that such appendix can be updated from time to time, as necessary).

### **Reference Documents**

A list of resources that support the specific policy. These documents may be explicitly referred to in the policy or simply helpful to the readers' understanding of it. The documents may be internal or external, such as references to state or federal laws. Common examples are:

- Related procedures;
- Links to college-wide forms used/referenced in following the policy and associated procedure;
- Handbooks that may contain additional information;
- Related documents and sources of additional information, including final reports, meeting minutes, or other key background documents;
- Citations to specific federal or state law or regulations.

The list of related information will be displayed in an order defined by the policy owner, typically in order by importance or level of involvement in the policy. Please be sure that any linked sites remain live. Outside websites should only be linked if you have confirmed that they are accessible (i.e., meet web accessibility requirements).

### **Definitions (as needed)**

A list of unique terms that, by being defined, add to the reader's understanding of the basic policy or procedures. This is the appropriate section in which to define unfamiliar or technical terms, or terms with special meaning within a particular policy. The list of definitions should be posted in alphabetical order.

### **Appendix/Appendices (as needed)**

More than one appendix may be attached to a policy, to house information that need not be included in the policy statement itself (i.e., a high-level pronouncement of the College's philosophy on a matter) but rather is more procedural or informational in nature. For example, a process for implementing the policy may be included in an appendix or contact information for those most involved in carrying out a policy or answering questions about it.

Appendices can be modified from time to time, as needed, to reflect updated processes, changed contact information, etc., without going through the formal policy approval process.

## Appendix B

### **Policy Creation, Review and Approval Process**

The following outlines the policy process beginning with a division/department assessment and ending with Presidential approval. These steps should be followed for both identification and drafting of new policies as well as amendments and updates to existing policies.

In limited situations, certain policies -- including those mandated by federal or state statute, or the College President or Board of Directors -- may be "fast-tracked." A fast-tracked policy may not necessarily follow the above steps sequentially, but still requires adequate consultation with relevant College constituents and approval by the President.

#### **Step 1: Division/Department Assessment and Audit**

- Periodically review University-wide policies in your area of responsibility. Determine whether:
  - The policy is relevant, up to date, and currently in effect. If such is the determination, no additional steps are necessary.
  - The policy is relevant and necessary but needs to be updated or revised to better reflect actual Saint Vincent College policy or practice, or to comply with certain laws or regulations. If such is the determination, then:
    - In consultation with relevant campus constituents and the CPCC, make necessary revisions, being sure to use Word's tracking feature to track any changes to the policy as currently approved. (Keeping the changes in a tracking/redlined format enables CPCC and others to review them). Document reasons/justification for those changes.
    - Recommend that the policy be approved in its revised form.
  - The policy is no longer relevant or in effect. If such is the determination, then formally recommend that the policy be removed from the College Policy Library and be archived.
- Identify any gaps or problems areas within your department that you feel or know should have the support of a college policy.
  - In consultation with relevant campus constituents draft a new policy that addresses the gap. Put the policy into the policy template and briefly note reasons that the policy is necessary.
  - Recommend that the policy be approved and added to the College Policy Library.

#### **Step 2: Initial CPCC Review**

CPCC reviews the Division/Department's policy determinations and offers recommendations regarding campus stakeholders/constituents who should be consulted in reviewing an existing division/department policy or in development of a new policy.

#### **Step 3: Division/Department Consultation**

Division/department consults with relevant campus stakeholders/constituents per Step 2 above.



#### **Step 4: Present to CPCC**

Upon completion of consultation/review as set forth in Step 3, division/department presents those policies and corresponding recommendations to the UPCC for final review. (For simple updates to an existing policy, the multiple layers of CPCC review – i.e., Step 2 and Step 4, as presented here – may not be necessary.)

#### **Step 5: Final CPCC Review**

The CPCC will consider the submitted policies and incorporated feedback and affirms that the review process has been satisfactorily followed. The CPCC will recommend that the Division/Department submit the policies to the President for final disposition or recommendation for further action.

#### **Step 6: Presidential Approval**

The policy owner or VP for their unit under which the policy falls should present the CPCC-recommended policy to the President for approval. For the meeting with the President, the Office of Legal Counsel will provide a policy approval form for the President to sign. If the President so determines, the policy may also be shared with President's Cabinet.

Note that, for mere updates to the contact information in a policy, or non-substantive and technical updates to a policy, the President's approval is *not* required. However, the President should be notified of the update.

#### **Step 7: Recording**

Upon approval, the Division/Department must report back to the UPCC with the final/official approval authority and date. This information will be incorporated into the final policy template and the policy will be published by the Office of Legal Affairs.