

Policy on Policies

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General Description

Policy Summary:

This document outlines Trinity University's policy and standards regarding developing, approving, implementing, retiring, and maintaining University Policies and related Standards, Procedures, and Guidelines.

This policy seeks to create a standardized policy governance framework based on the following guiding principles:

- 1. Policies that align with and strengthen the University's mission, vision, and values and take account of higher education leading practices.
- 2. The policy governance model creates clear ownership and accountability in policy development and implementation.
- 3. The policy governance model enables an efficient and collaborative policy management process and recognizes the importance of engaging stakeholders in the development and review process.
- 4. Policies, procedures, and related resources are in a consistent and accessible format and written as clearly as possible
- 5. Policies are user-friendly, and organized, in a central repository to increase awareness and mitigate risk.
- 6. Policies and related resources are kept up-to-date and comply with relevant requirements

Purpose:

Trinity University is committed to ensuring that all University Policies and related resources aremanaged in a manner compliant and consistent with legal and regulatory requirements and theUniversity'scultureandvalues.

This policy defines a University Policy, explains the relationship to related resources, and describes the key expectations, requirements, and methodology throughout the policy lifecycle, including development, maintenance, retirement, and archiving.

Scope:

This policy applies to developing, approving, implementing, maintaining, and removing University Policies and related Standards, Procedures, and Guidelines. All faculty, staff, students, and contractors involved in developing, approving, implementing, maintaining, or retiring University Policies and related resources are expected to comply with this policy.

Any policy that applies to one or multiple departments, schools, or units must adhere to this policy's principles. Department, school, or unit policies must be reviewed against University Policies to ensure no provisions conflict with a University Policy. The parties accountable for drafting department, school, or unit policies are responsible for identifying and addressing such conflicts and mustcontact the Office of the General Counsel ("OGC").

The designated Policy Drafters for each department, school, or unit are responsible for identifying

and resolving any potential conflicts.

If a department, school, or unit policy conflicts with a University Policy, Standard, or Procedure,theUniversitypolicyprevails.

Consistent with longstanding practice and guidance, all school-specific documents related to academic policies or changes to them must be submitted in advance for review and approval by the Provost.

The Provost may authorize exceptions to such school-specific documents, interpret them, or amend, rescind, or replace them. If a school does not adhere to Trinity's academic Policies, the Provost will decide the appropriate remedy.

Exceptions:

The policy development procedure outline below does not apply to the following documents:

- Trinity University Board of Trustees Policies
- The Trinity University Faculty Handbook
- Course of Study Bulletin
- The Trinity University Student Handbook
- The Trinity University Student Organization Handbook

The Faculty and Student handbooks describe the policy amendment, development, and
process withinthosedocuments.

The Provost is responsible for the final approval of the Faculty Handbook.

The Vice President of Student Affairs (VPSA) is responsible for the final approval of the StudentHandbookandtheStudentOrganizationHandbook.

All documents considered exceptions to this process must undergo legal review by the Office of General Counsel before publication. Updates to these documents must be submitted to the General Counsel in Word format with tracked changes to show the amendments. Please allow seven (7) business days for the review process.

Responsible Department:

General Counsel Office

Policy Content

1 Policy Owners by Subject Matter

Policy Category	Policy Owner(s)
Academic Policies	Provost, University Curriculum Committee
Administrative Policies & Guidelines	President, General Counsel
Alumni Relations & Development Policies	VP for Alumni Relations & Development
Athletics Policies	VP for Enrollment Management
Booard Policies	Board of Trustees, President, General Counsel
Budget Policies	VP for Finance & Administration, Assoc. VP of Finance & Administration
Business Office Policies	VP for Finance & Administration, Assoc. VP of Finance & Administration
Diversity, Equity, Inclusion, and Belonging Policies	VP for People, Culture, and Community, CHRO, University EEO/Title IX Officer
Emergency Management Policies	VP for Finance & Administration, Emergency Mgmt. Coordinator
Enrollment Management Policies	VP for Enrollment Management
Faculty Policies	Provost, Faculty Senate
Human Resources Policies and Guidelines	VP for People, Culture, and Community Chief HumanResources Officer.
IT Policies	VP for Finance & Administration/Chief Information Officer

Legal Policies	General Counsel	
Payroll Policies	VP for Finance & Administration, Controller	
Risk Management Policies VP for Finance & Administration, Director of Management		
Safety Policies	VP for Finance & Administration, Director of Environmental Health & Safety	
Strategic Communications Policies	VP for Strategic Communications	
Student Policies	VP for Student Affairs	
TUPD	VP for Finance & Administration/TUPD Chief of Police	

2 Responsibilities

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	The President has delegated authority to the EPG to approve or reject proposed policies for creating, modifying or retiring policies.
	EPG consists of the Provost and the Vice President of Finance and Administration.
Executive Planning Group (EPG)	The General Counsel presents policies that have completed the review process to the EPG for consideration and approval. Additionally, the General Counsel offers legal counsel and advice on the discussed topics to the EPG as requested by the Provost and Vice President of Finance and Administration.
	The Executive Sponsor officially endorses and/or supports the Policy Owner in advancing University Policies and policy amendments through the policy process.
Executive Sponsor	The Executive Sponsor is either the President, General Counsel, or the Vice President responsible for the School, Department, or Unit proposing the policy creation, amendment, or elimination
Policy Drafter	The Policy Drafter is responsible for drafting a policy, managing its various stages of development,

	and handling subsequent modifications, revisions, or requests for additional information from EPG.
	The Policy Drafter and Policy Owner may be in the same role for a division or department.
Policy Owners	Policy owners are responsible for developing University Policies in their areas of responsibility. They should follow outlined steps, seek input, communicate policy rollout, provide training, respond to questions, review policies periodically, serve as key contacts for interpretation and approval, and update or retire policies when necessary.
	Policy Owners or their designees are also responsible for ensuring timely action when a policy is affected by applicable changes in federal and state laws or regulations or as deemed appropriate to support the University's mission.
President or Designee	The President, or their designee, can approve or disapprove any policy or policy amendment and require additional review or comment.
	The TCC serves in an advisory role on issues related to University Policy matters.
Trinity Compliance Committee (TCC)	Regarding the policy review process, each TCC member is responsible for representing their divisional or governance interests during TCC review/comment periods for draft University Policies and policy amendments. They are also responsible for consultation on University policy- related issues as they arise, and serving as a communications liaison within their divisional or governance group for University policy matters.
	The TCC is chaired by the University's Chief Compliance Officer/Associate Vice President for Finance and Administration. Other members of the committee include:

 Assistant Director: Parent Communications & Student Conduct Assistant Police Chief Associate Director of Human Resources Vice Provost Athletics/NCAA Compliance Officer Chief Information Officer, or their designee
 Director of Counseling Services Director of Environmental Safety Director of Financial Aid Director of Risk Management
 EEO/Title IX Coordinator Executive Director of Institutional Research Faculty Representative appointed by Faculty Senate Registrar

(3) Policy Development Procedure

1. Policy Creation or Amendment Need Identification and Drafting

Once a Policy Owner, Policy Drafter, or Subject Matter Expert ("SME") identifies the need for anew policy or a revision to a current policy, they should work with their division's designated Policy Drafter to draft a new policy or amendments to the current policy using the policy format.

The Policy Drafter and/or Policy Owner must consult with the Policy Owner for their division and the appropriate SMEs to gather guidance and understand impacts across departments and the Trinity University community. The Policy Drafter and/or the Policy Owner should identify the SMEs. The Policy Drafter must consult the SME before providing a final policy draft for stakeholder review.

New Policy - Create the Policy Draft in Word format using the policy template when drafting a new policy.

Amended Policy - Include a Word version of the amended policy with tracked changes turned on, i.e., redlines, to identify the changes made clearly.

Consult the following roles/offices, in addition to SMEs, before initiating the policy approvalprocessdiscussedinStep2:

- a. Policy Owner (the Policy Drafter must notify the Policy Owner, or their designee, that the proposed policy or amendments will be presented for review in the Policyon Policies process and obtain the Policy Owner's approval to proceed)
- b. Office of the Provost (if policy impacts faculty)
- c. Office of Human Resources (if the policy impacts employees)Office of People, Culture, and Community.
- d. Office of Inclusive Engagement
- 2. Initiating the Policy Approval Process

Once a division's Policy Drafter has created or amended a new policy, they should submit a Policy Memorandum to the Vice President of their Division and the Office of General Counsel with either the new policy or the amended policy with tracked changes as a Word attachment to the Policy Memorandum.

The Policy Memorandum requests the Policy Drafter respond to the following questions:

- a. Why is this policy creation, amendment, or retirement being proposed?
- b. Does the University already have a University Policy on or related to the subject?
- c. Please list the various campus constituencies that are affected by the proposed policy. Please affirm that you have:
 - 1. notified and obtained the approval of the Policy Owner or their designee to proceed with creating or amending this policy,
 - 2. conferred with the constituencies listed above, and
 - 3. provided those constituencies a reasonable opportunity to provide input on the draft attached to this policy memorandum by checking the appropriate box below.

□ I affirm that I have notified and obtained the approval of the Policy Owner or their designee, conferred with the constituencies listed above, and provided those constituencies with a reasonable opportunity to provide input on the draft attached to this policy memorandum.

- d. Is this proposed policy necessary to obtain/maintain compliance with applicable laws or regulations? If so, what are the requirements for compliance?
- e. Summarize the new policy or substantial changes to the amended policy in up to five

(5)bullet	points	below:
1			
2			

3.

- 4._____
- 5.

f. Please provide a 2-3 sentence statement explaining the changes that will be used for publication to Trinity TUDay for faculty and staff and an email to students if the EPG approves the proposed policy.

If the policy memorandum is declined by the Vice President of the Division or the Office of General Counsel, the policy drafter must revise the document according to the feedback provided by either the Vice President or the Office of General Counsel. After these revisions, the drafter must resubmit the policy memorandum for further consideration.

3. Stakeholder Review

This process involves a review of the policy by the TCC review and a legal sufficiency reviewbytheOfficeoftheGeneralCounsel.

The TCC will review policies for the following:

- Adherence to Trinity University values and culture, including a clear statement of accountability measures
- Consistency, integration, and impact on other policies
- Format, accessibility, style, and language
- Impact on students, faculty, and Staff, as well as external stakeholders
- Impact on University operations and culture

Each TCC member who reviews the policy must document their concurrence and approval.

After the TCC review, the Office of the General Counsel will review the policy for legalsufficiencyanddocumenttheirapproval.

If the Office of General Counsel declines the proposed policy, the policy drafter must revise the document in accordance with the feedback received during the TCC review process. Following these amendments, the drafter must resubmit the policy via the policy memorandum for further consideration.

4. Final Approval

After completing TCC and OGC reviews, the General Counsel will submit the final version totheExecutivePlanningGroupGroup(EPG)forfinalapproval.

When reviewing a new or amended policy, EPG may approve it as drafted, reject the proposal

entirely, or request additional information from the Policy Drafter for further consideration by EPG in rendering its decision.

5. Policy Adoption

EPG approval makes a new policy or policy amendment effective. After approval, the Office of General Counsel will add the new or amended policy to the Policy Library.

After the Office of the General Counsel confirms and communicates policy approval, the Policy Drafter will notify the campus community through university-recognized communication channels. The Policy Drafter will ensure that faculty and staff receive proper notice through Trinity TUDay and email TrinityStudents@trinity.edu to inform students of the new policy.

(4) Non-Significant Changes to University Policy

University Policy amendments not deemed a significant change will result in limited review to effectuate the change to the University Policy.

A non-significant change is defined as such: Amendments or corrections to the policy that are editorial, changes to reflect institutional and organizational reporting changes, Responsible University Official or Office changes, website links, paragraph and outline numbering, and references to new related laws, regulations, rules, executive orders, and other policies and procedures.

The Policy Owner will submit a Non-Significant Policy Change Memorandum and present it to the General Counsel for review. The Policy Owner will articulate the specific changes to be made in that memorandum and attach a copy of the draft amendment with the memorandum.

Once the General Counsel has reviewed and approved the Policy Memorandum, the updates will be inputted into Zavanta and submitted for review through the non-significant changes workflow. If approved, the changes will be implemented into the policy immediately without being forwarded to the TCC.

5 Interim Policy

An interim university policy may be implemented at the discretion of an Executive Sponsor when federal or state laws, regulatory actions, or compelling circumstances make expedited policy implementation prudent.

Upon implementing an Interim University Policy, the Vice President will notify the Trinity community of

the Policy via Trinity TUday

An Interim Policy is effective for up to six (6) months from the Vice President's approval, assuming the Policy Owner initiates steps to seek normal review and approval promptly. An Interim Policy is subject to renewal for a good cause upon the President's or his/her designee's approval.

6 Policy Distribution, Communications, and Training

The Policy's Executive Sponsor of the policy or their designee is responsible for communicating the University Policy, policy amendment, or policy retirement to key stakeholders through Trinity TUDay.

The Executive Sponsor or their designee is also responsible for facilitating any training required for successful policy implementation.

7 Policy Retirement

Changing circumstances may require the retirement of a University Policy. Before retiring, the Policy Owner will submit a memorandum to the General Counsel explaining the rationale for retiring the policy.

The policy will be immediately retired after the General Counsel reviews and approves it. The Policy Owner must communicate the policy's retirement through TrinityTuDay and to all students via email at TrinityStudents@trinity.edu.

8 Policy Retention

The policy Owners and the Office of the General Counsel shall retain previous versions of university policies according to the University's Records Retention Policy.

9) Periodic Policy Review

Policy Owners are responsible for reviewing and updating, as necessary, University Policies contained in their portfolio at least annually and taking appropriate action to make timely updates to policy content.

Terms & Definitions

Terms and Definitions:

Term:	Definition:
Academic Policies	Academic policies are policies that directly affect the pedagogical and

Term:	Definition:
	research mission of the University.
Administrative Policies	Administrative Policies are non-academic policies governing the University's operations.
School, Department, or Unit-Specific Policy	A policy developed by a school, department, or unit that only impacts or concerns that area, department, or unit.
Executive Sponsor	An Executive Sponsor is an executive officer, typically a Vice President or President's executive cabinet member, who officially advances and endorses a University Policy.
Executive Planning Group (EPG)	EPG consists of the Provost and the Vice President of Finance and Administration.
	The General Counsel presents policies that have completed the review process to the EPG for consideration and approval. Additionally, the General Counsel offers legal counsel and advice on the discussed topics to the EPG as requested by the Provost and Vice President of Finance and Administration.
Executive Cabinet	The Executive Cabinet includes the highest-ranking official who reports directly to the President and has final approval authority for a division's development, revision, or retirement policy.
Guidelines	Serve as recommendations to advise on best practices.
Handbooks	Handbooks contain policies related to a specific subject, such as faculty, student organizations, and student code of conduct information.
Non-Significant Change	Non-significant Policy Changes are amendments or corrections to the policy that are editorial, changes to reflect institutional and organizational reporting changes, Responsible University Official or Office changes, website links, paragraph and outline numbering, and references to new related laws, regulations, rules, executive orders, and other policies and procedures.
Interim Policy	Interim policies are provisional policies implemented in a situation that requires implementation without going through the official process (e.g., new legislation and incidents on campus).
Policy	A policy is a statement of management philosophy and direction established to guide and assist the University community in conducting University affairs.
University Policy	 A Univeristy Policy: is a governing principle that mandates or constrains actions, has an institution-wide application,

Term:	Definition:
	 undergoes significant change only according to shifts in material or legal circumstance, updates to applicable case law, or executive consensus regarding a change in the University's mission or goal, sets a reasonable course of action for the anticipated future, helps ensure compliance with applicable laws and regulations, reduces institutional risk, and is approved at the executive levels of the University (President or EPG) or Board of Trustees. A newly proposed or amended policy that does not meet the above criteria is not a university policy and is considered a school, department, or unit-specific policy.
Policy	The Policy Administrator is the General Counsel or their designee.
Administrator	
Policy Initiator	The Policy Initiator is any faculty, staff member, or student who identifies a University-level issue and develops a policy proposal.
Policy Library	The Policy Library is the central repository for all University Policies.
Policy Drafter	The Policy Drafter is responsible for drafting a policy and managing the various stages of its development and subsequent modifications and revisions. The individual(s) assigned to this role may differ depending on the policy area or category.
Policy Owner	The Policy Owner is the appropriate University officer (President, Provost, Vice President, General Counsel) whose jurisdiction covers the subject matter of the policy. The Policy Owner also includes the employee specifically delegated by a University officer to develop a University Policy. Policy Owners are responsible for ensuring that the policy follows internal and external standards and regulations defined in the policy.
Policy Template	The policy template referenced in this policy refers to the standardized format for creating or revising a University Policy.
Procedure	A procedure is a guideline or series of interrelated steps taken to help implement the policy.
Significant Change	A substantive changes means a change that is essential principle(s), scope, or application of a University Policy. Significant changes do not include changes that are (a) editorial, (b) related to organizational reporting change, (c) reformatting a policy or paragraph, (d) updating policy-related contacts, tools, resources, and reference citations, (e) made to bring clarity or grammar improvements, or (f) does not materially change the intent of the policy.
Standards	The mandatory rules supporting a Policy that is designed to be prescriptive.

Term:	Definition:
Stakeholder	Stakeholders are University community members affected by the University Policy being developed.
Student Policies	Student Policies are policies that directly affect student affairs at the University.
Subject Matter Expert ("SME")	A subject matter expert is an individual or office with specialized expertisein a particular area that must be consulted during the policy development or update.
University Procedures	University procedures identify the tasks and processes that must be followed to ensure quality, consistency, and policy compiance. A procedure demonstrates the "how" of the policy. Procedures involve specific required actions, generally presented in a high-level step-by-step description and the conditions under which those actions must be taken.
	 should identify and link to the applicable University Policy, should be written in a format that is easy to follow, using numbers or bullets to delineate steps to be followed, should be reviewed and updated as necessary to ensure agreement with the most recent revision to the policy, and generally, do not require formal approval by executive-level officials.
Trinity Compliance Committee (TCC)	The Trinity Compliance Committee oversees the University's compliance activities and programs to ensure they are reasonably designed, implemented, enforced, and generally effective in preventing and detecting violations of the law and regulations.
	For the policy development process, these individuals will review draft versions of policies a policy owner seeks to create, amend, or eliminate and make recommendations to the EPG on adopting the proposal.

Attachments

<u>Trinity Compliance Committee (TCC) Review Form</u> <u>Trinity University Policy Template</u>

Related Documents

Related Content:

Policy Memorandum Google Form Non-Significant Changes Policy Memorandum Google Form Policy Retirement Memorandum Google Form

Revision Management

Revision History Log:

Revision #:	Date:	Recorded By:	
v3.1	10/15/2024 8:28 AM	Pamela Mota	
v3.0	9/9/2024 1:53 PM	Pamela Mota	
v2.0	8/14/2023 8:38 AM	Holly Warfel	
v1.0	7/5/2023 9:39 AM	Holly Warfel	

Vice President Approval:

Name:	Title:
Claire Smith	Assistant Secretary to the Board of Trustees