	UNIVERSITY OF DENVER **POLICY MANUAL** **POLICY ON POLICIES**	
Responsible Department: Business and Financial Affairs **Recommended By:** SVC Business and Financial Affairs and VC Legal Affairs **Approved By:** Board of Trustees	**Policy Number** FINA 1.10.040	**Effective Date** 9/29/2021

I.   INTRODUCTION

The Policy on Policies governs the development and oversight of all formal university policies. Administrators of University divisions are responsible for providing policies that ensure consistency, efficiency, and comply with pertinent local, state and federal laws. This Policy authorizes senior administrators to develop policies and outlines processes and procedures for doing so. Approved policies and procedures promulgated by senior administrators will apply to all members of the University community.

II.   POLICY OVERVIEW

All policies and procedures adopted for administrative and operational purposes are the responsibility of the Provost & Executive Vice Chancellor and appropriate Vice Chancellor.

University policies are formal policies and procedures for the University of Denver. The University uses a standard policy format and a uniform review and approval process for University policies to improve communication, promote administrative consistency and efficiency, and ensure compliance with pertinent local, state and federal laws as well as accreditation requirements. All policies and procedures must be consistent with existing Board-Approved Policies, state and federal laws and regulations, internal control guidelines, and must not contradict any other operating policies or procedures. All divisions must follow the procedures and processes outlined in this policy regarding the initiation and approval of new University policies or the revision or repeal of existing policies.

The University of Denver Policy Manual contains all current policies. The online site https://www.du.edu/policy is published by the Division of Business and Financial Affairs and contains all official, approved versions of policies for the University.

The University of Denver policy manual website will be considered the official policy version site in the event of a discrepancy between similar policies published by a department/division. Departments/divisions with separate policy websites should not have duplicate versions of DU policies. All division/department websites and paper

documents should reference the official policies at the University of Denver Policy Manual.

University policies in the Policy Manual are organized by division. The division head is considered the responsible officer for the development and implementation of that division's policies.

Each responsible officer will annually appoint a policy liaison who will serve as the main point of contact with the Division of Business and Financial Affairs for all policy related matters for the division/department.

The Division of Business and Financial Affairs coordinates the review and approval of new, revised and repealed University policies.

All University policies with the exception of Board of Trustee policies must be approved by the Chancellor.

Board of Trustees policies must be reviewed by the Office of General Counsel prior to approval by the Board of Trustees.

A current list of responsible policy officers and liaisons is published within the Policy Manual.

III.   PROCESS/PROCEDURE OVERVIEW

Proposed drafts of new policies, substantially revised policies and those policies recommended for repeal must be distributed to the Policy Advisory Committee (PAC) for review and comment prior to final approval. The Policy Advisory Committee (PAC) is comprised of representatives from various campus divisions including academic and administrative. The Division of Business and Financial Affairs will facilitate identification of PAC members and the work of the committee. The committee is charged with consulting with University offices on proposals for new, revised and repealed policies to consider whether they are necessary and aligned with institutional missions, goals and priorities; that policies are concise, consistent in format and scope, and easy to understand; to identify constituencies and other policies that may be affected; and to make recommendations to appropriate offices. The PAC also assists with dissemination and sharing feedback regarding policies.

Policies will be assigned a unique numbering architecture beginning with an abbreviation of the Division Name. (Example: Business and Financial Affairs Policies will begin with FINA 1.10.040 – *Policy on Policies*)

A. New, Substantially Revised or Repealed Policy Procedures

Drafts of new policies and those recommended for substantial revision or repeal must be developed and fully vetted within the administrative division.

As policies are developed to help improve communication, promote administrative consistency and efficiency, and ensure compliance with pertinent state and federal laws as well as state and regional accreditation requirements. Use of the words

"should" and "shall" is to be avoided as it infers the action is optional, which makes the need for the policy questionable.

Example of what to avoid: "Each administrator shall determine the appropriateness of such travel and the extent to which the University is to participate in defraying travel and subsistence expenses."

Example of what to state: "Each administrator will determine the appropriateness of such travel and the extent to which the University is to participate in defraying travel and subsistence expenses."

Where flexibility may be needed in the use of the words "should" and "shall", the responsible office will determine if circumstances justify deviation.

1. New, Substantially Revised or Repealed Policy Process

- The policy must conform to the standard template format.
- A description of the revisions should be included in the Reason for Revision section when appropriate.
- Use the words "must" or "will" rather than "should" and "shall" in the body of the policy.
- The responsible officer will forward the draft to the Business and Financial Affairs Office for review by the PAC.
- Policy drafts must be submitted at least ten business days before the next scheduled PAC monthly meeting for timely consideration.
- The PAC will review and recommend approval and/or revisions to the submitting administrative division.
- Business and Financial Affairs will distribute the finalized draft policy for internal administrative review/comments to appropriate divisions as needed.
- A ten-day comment period will be allowed prior to final approval. Consolidated comments will be forwarded by the PAC to the policy liaison and the responsible officer.
- The responsible officer will finalize the policy and submit it to Business and Financial Affairs for a second PAC review.
- After this review, the policy draft will be submitted to the Chancellor for final approval if it is a policy that does not require Board approval. Otherwise, the policy draft is submitted to the Chancellor for review and recommendation and then to the Board of Trustees for final approval.

Following the Chancellor's and/or Board of Trustees approval:

- Business and Financial Affairs will notify the responsible officer, the policy liaisons, and all affected divisions, if approved and make the required change to the University of Denver Policy Manual.
- For policies requiring approval of the Board of Trustees, Business and Financial Affairs will forward the policy to the Office of General Counsel for review prior to presentation to the Board of Trustees for approval.

B. Expedited Policy Procedures

Non-substantive revisions to existing policies may be approved directly by the Chancellor using an expedited approval process when the office of Business and Financial Affairs categorizes the revision as non-substantive. When it is in the best interest of the University, drafts of new policies or those recommended for substantial revision or repeal may also be approved directly by the Chancellor using an expedited approval process. This includes policy development, revision or repeal directly related to state or federal law.

1. Expedited Policy Approval Process

- The policy must conform to the standard template format.
- A description of the revisions must be included in the Reason for Revision section when appropriate.
- Use the words "must" or "will" rather than "should" and "shall" in the body of the policy.
- The responsible officer will forward the draft to the Business and Financial Affairs Office for review by the PAC with a request for an expedited review.
- Expedited reviews directly related to state or federal law will not be released to the community for review.
- Expedited policy requests must be allotted a minimum of ten days for review.
- After the PAC review, the policy draft will be submitted to the Chancellor for final approval if it is a policy that does not require Board approval. Otherwise, the policy draft is submitted to the Chancellor for review and recommendation and then to the Board of Trustees for final approval.

Following the Chancellor's and/or Board of Trustees approval:

- Business and Financial Affairs will notify the responsible officer, the policy liaisons, and all affected divisions of the results, if approved and make the required update or change to the University of Denver Policy Manual.

C. University Policy Maintenance and Periodic Review

Responsible officers must ensure that the division's policies and procedures are up to date and revised as needed to reflect current practice and/or procedures. Each University policy will be reviewed by the originating administrative division and revised as necessary at least every five years.

D. University Policy Archive

The Division of Business and Financial Affairs will maintain a policy archive containing all known copies of University policies including a history of revision dates (see example below).

Adopted/approved policies and procedures are open to examination and review by the Office of Internal Audit and the Office of General Counsel. Policies and procedures shall be consistently catalogued on the University's Policy website as the principle means of communication.

IV. DEFINITIONS

1. "**Board-Approved Policies**" - policies reserved for greatest significance to the University including, but not limited to, authorization of new building construction, sale and purchase of land or buildings, changes to tuition and fees, review and approval of the budget as well as claims to funds of the University.

2. "**Chancellor-Approved Policies**" - policies formulated by the Provost and Executive Vice Chancellor and the appropriate Vice Chancellor or Associate Provost overseeing functional areas that articulate administrative and operating policies and procedures specific to a division or administrative unit of the University, not contradicting the University's Bylaws and Board-Approved Policies.

3. **"Division"** - the Organizational entity within the University with responsibility for the development and maintenance of University policy.

4. **"Policy Advisory Committee"** – the designated group of individuals charged with ensuring the University of Denver has policies and procedures in place to guide the operation of the organization in a legal and ethical manner.

5. "**Policy Liaison**" - individuals designated by the responsible officer to serve as the main point of contact with the Division of Business and Financial Affairs for all policy related matters for the division.

Revision Effective Date	Purpose
9/28/20	Updated protocol
6/28/2021	Minor revisions
9/29/2021	Minor revisions to update link to policy site