UNIVERSITY OF DENVER	UNIVERSITY OF DENVER POLICY MANUAL POLICY ON POLICIES	
Responsible Department: Business and Financial Affairs **Recommended By:** SVC Business and Financial Affairs, Provost and Executive Vice Chancellor, SVC Legal Affairs and General Counsel, and the Chief Risk and Compliance Officer **Approved By:** Board of Trustees	**Policy Number** RISK 1.10.040	**Effective Date** __/__/2026

I. INTRODUCTION

A. This Policy on Policies governs the development and oversight of all University Policies.

B. The University adopts University Policies to support internal controls, improve administrative efficiency, communicate expectations and requirements, and to comply with applicable laws, regulations, and ordinances.

C. This Policy authorizes senior administrators, including department and unit leaders, to recommend University Policies.

D. This Policy establishes processes and procedures for developing and implementing University Policies.

II. POLICY OVERVIEW

A. The Senior Vice Chancellor for Business and Financial Affairs, with the support of the Department of Enterprise Risk Management (ERM), is responsible for implementing this Policy. ERM coordinates the review and approval of new, revised and repealed University Policies.

B. With the exception of policies for which Board of Trustee review and approval is required, all University Policies must be submitted to the Chancellor for review and approval.

C. Prior to submission of any University Policy to the Board of Trustees, University Policies for which Board of Trustee approval is required must be submitted to the Office of General Counsel for review.

D. The University has established a standard policy format and review and approval

process for University Policies.

E. All University Policies must be consistent with applicable local, state, and federal laws and regulations, as well as Board-Approved Policies.

F. The Policy Library on the University Policy website contains all current approved University Policies. The Policy Compliance Manager in ERM manages the University Policy website.

G. All University departments and units must follow the processes set forth in this Policy for recommending new University Policies or the revision or retirement of existing policies.

1. For each University Policy there will be a Responsible Department identified as responsible for the development and implementation of such policy.

2. Divisions with separate division level policy webpages may not post duplicate versions of any University Policy on the division webpage(s).

3. Departments or units may develop local policies, whether or not a corresponding University Policy exists.

a. If a corresponding University Policy exists, the department or unit may adopt a more, but not less, restrictive local policy, except as prohibited by the applicable University Policy or local, state, or federal laws and regulations.

b. 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.

4. In the event of a conflict between a department or unit level policy, procedure, or practice and the applicable University Policy, the applicable University Policy controls.

III. PROCESS OVERVIEW

A. Policy Advisory Committee

1. The Policy Compliance Manager will distribute proposed drafts of new University Policies and substantially revised University Policies to the Policy Advisory Committee (PAC) for review and comment prior to submission for final approval pursuant to this Policy.

2. The Policy Advisory Committee (PAC) is comprised of representatives from various campus units, both academic and administrative.

3. The SVC for Business and Financial Affairs and ERM will facilitate identification of

PAC members and the work of the PAC.

4. The PAC members consult with the University community on proposals for new and substantially revised University Policies with the objectives of:

   a. considering whether they are necessary and aligned with institutional missions, goals and priorities;
   b. confirming that policies are concise, consistent in format and scope, and easy to understand;
   c. identifying constituencies and other policies that may be affected; and
   d. making recommendations in response to such proposal(s).

B. New, Substantially Revised, or Removed Policies

1. The Responsible Department:

   a. develops and reviews drafts of new policies within its purview, as well as any of the Responsible Department's existing policies recommended for substantial revision or removal from the Policy Library; and
   b. consults with faculty and staff stakeholders who may share responsibility for implementing the applicable University Policy as part of the development, revision, or removal process.

C. New and Substantially Revised Policy Process

1. A University Policy must conform to the standard template format.

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

3. Drafters of policies must avoid the use of the words "should" as it implies the action is optional.

   Example of what to avoid: "Each administrator should 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."

4. A brief description of the purpose of the revisions must be included in the "Purpose" of revision section when appropriate.

5. The Responsible Department will submit the draft to the Policy Compliance Manager in ERM for review and referral to the PAC.

6. The Policy Compliance Manager will:

a. distribute the draft policy for administrative review/comments to the PAC, Chancellor's Cabinet, University Council, and business officers;
b. post the draft policy on the Policy website under "Draft and Revised" for a minimum twenty (20)-day comment period prior to final approval; and
c. review, consolidate, and share comments received on posted policies with the Responsible Department.

7. The Responsible Department will work with the Policy Compliance Manager to address comments received about the draft policy. In situations where material changes are made to the posted draft in response to comments, the Policy Compliance Manager will initiate an additional review following the process in Section III.C.6 above.

8. Upon completion of the applicable review period(s), the Policy Compliance Manager will request that the SVC for Business and Financial Affairs or their designee submit the final draft of the policy to the Chancellor for review and approval; provided, however, that if it is a policy that requires the approval of the Board of Trustees:

a. the Chancellor will review and make a recommendation to the Board of Trustees for final approval; and
b. the Policy Compliance Manager will submit the draft of the policy to the Office of General Counsel for review prior to presentation to the Board of Trustees for approval.

9. Following the applicable Chancellor's and/or Board of Trustees approval, the Policy Compliance Manager will:

a. notify the Responsible Department for such policy that the policy has been approved;
b. provide notice of the policy approval to the "Recommend By" department leaders identified in the applicable University Policy; and
c. add the new or substantially updated University Policy to the University Policy Library website.

D. Expedited Policy Process and Non-Substantive Updates

a. When it is in the best interest of the University, drafts of new policies or those recommended for substantive revisions may be approved directly by the Chancellor using an expedited approval process. This includes policy development or revisions directly related to state or federal law.

b. Policies proposed for an expedited adoption may not be subject to the same sequential process for New and Substantially Revised Policies identified herein but do require adequate consultation with relevant University constituents, the Office of General Counsel, and the approval of the Chancellor.

c. For non-substantive revisions to University Policies, the Policy Compliance

Manager, with the approval of the SVC of Business and Financial Affairs, is authorized to make non-substantive updates, including but not limited to, updates to format, grammar, titles, and references.

E. University Policy Maintenance and Periodic Review

1. Responsible Departments are responsible for confirming that the University Policies for which they are responsible are up to date and revised as needed to reflect current practice and/or procedures.

2. Each University Policy will be reviewed by the Responsible Department, and revised as necessary, not less frequently than every five (5) years.

3. Retiring University Policies. The Responsible Department, in consultation with the Office of General Counsel and SVC for Business and Financial Affairs, may request that a University Policy be retired and removed from the Policy Library when a University Policy is obsolete or conflicts with applicable law, regulation, or ordinance. The Policy Compliance Manager will remove retired policies from the Policy Library; provided, however, that any Board-Approved Policies will be submitted to the Board of Trustees for removal approval.

F. University Policy Archive

ERM will maintain a policy archive containing all known copies of University policies including a history of revision dates.

IV. DEFINITIONS

A. "**Board-Approved Policies**" means University Policies reserved for matters of greatest significance to the University. The Chancellor, in consultation with the SVC for Business and Financial Affairs, will make the final determination regarding which policies should be submitted to the Board of Trustees for approval. Policies that are submitted to the Board for approval include those that relate to:

- University governance and describe the composition, powers, and duties of the Board of Trustees or the Chancellor;
- University By-Laws;
- Conflict of Interest or Code of Conduct;
- high-level University financial operations such as investments and the establishment of, or significant changes in existing, major University fiscal policies (e.g., capital expenditures).

B. "**Chancellor-Approved Policies**" means University Policies that articulate administrative and operating policies and procedures specific to a department, division, or administrative unit of the University, not contradicting the University's Bylaws and Board-Approved Policies.

C. **"Responsible Department"** means the University office, department, or unit responsible for sponsoring, implementing, enforcing and answering inquiries about a

University Policy. The Responsible Department may also be responsible for monitoring the effectiveness of and compliance with a University policy. In some instances, the term "division" may be used instead of "department" and so for purposes of this Policy, the term "division" and "department" shall have the same meaning. Similarly, for purposes of this Policy, department may also be used to refer to a business unit, college, or school.

D. "Policy Advisory Committee (PAC)" means the designated group of University employees charged with review and communication of the policy development process for all policies.

E. "University Policies" means official policies of the University applicable to the University community and approved in accordance with this Policy.

V. RESOURCES

Note: *Many department policies and procedures, although useful and important, are not considered University Policies. All departmental policies and procedures must be consistent with University Policies. Similarly, oversight of the development and implementation of policies, procedures, guidelines, and standards pertinent to specific University groups fall to the governing body for such constituency. Examples include the Guidelines on Appointment, Promotion, and Tenure (Faculty Senate), Office of Research and Sponsored Programs Policies (ORSP), as well as the Honor Code (Office of Student Rights and Responsibilities). All departmental, divisional, or group-specific policies and procedures must be consistent with University Policies.*

A. Office of Student Rights and Responsibilities oversees the development and implementation of the University Honor Code.

B. Faculty Senate oversees faculty specific guidelines, policies, and procedures, including the Policies and Procedures Relating to Faculty Appointment, Promotion, & Tenure (APT).

C. Office of Research and Sponsored Programs oversees University research and the policies and procedures applicable to research and sponsored programs.

Revision Effective Date	**Purpose**
9/28/20	Updated protocol and adopted as the University Policy on Policies
6/28/2021	Minor revisions
9/29/2021	Minor revisions to update link to policy website
__/__/2026	Revised to align policy with practice