



University Policy Development

Policy	2-001.6
Responsible Authority	Vice President, Compliance, Ethics, and Risk
Initiating Authority	President
Effective Date	5/2/2023
Date of Origin	2/1/2004

APPLICABILITY/ACCOUNTABILITY

This policy and related procedures are applicable to all members of the university community.

POLICY STATEMENT

The University of Central Florida is committed to fostering and promoting an ethical culture of compliance and accountability with applicable state and federal statutes, regulations of the Florida Board of Governors, and university regulations. The university communicates expectations for ethical conduct and compliance with laws through its Code of Conduct and through the development of policies and related procedures. This policy outlines the requirements for the initiation, development, implementation, ongoing review, and retirement of university policies and procedures. Members of the university community are required to follow and uphold the Code of Conduct, all applicable policies and procedures, and to comply with this policy when creating and maintaining university policies and procedures.

University policies require review by the University Policies and Procedures Committee (Committee) and approval by the president before becoming effective except in those circumstances when an emergency policy is required and approved by the president. The University of Central Florida Policies and Procedures Manual is the official repository of university policies and related procedures. It may be reviewed online at <http://www.policies.ucf.edu>. University, Compliance, Ethics, and Risk maintains the Policies and Procedures Manual and is responsible for retention and destruction of policy documents in accordance with applicable law(s).

Emergency Policies

In the case of an immediate or substantial need, such as a national health concern or time-sensitive legislative requirement(s), the president may adopt an emergency policy, effective immediately upon the president's signature. Emergency policies will be considered temporary until the immediate or substantial need is no longer necessary or until the emergency policy becomes a permanent policy. Emergency policies must be reviewed by the Committee through the normal procedures indicated in this policy within one year after becoming effective.

Local Policies

Local policies that apply only to a specific college, division, department, or unit do not require Committee review or the approval by the president and will not be included in the University of Central Florida Policies and Procedures Manual. Local policies must not duplicate or conflict with university policies, or university regulations. University regulations and policies will always take precedent over a local policy. If a local policy conflict exists, University Compliance, Ethics, and Risk will review the local policy to determine if the local policy should exist. If it is determined that the local policy should exist, the conflicting element(s) of the local policy must be revised or removed.

DEFINITIONS

Initiating Authority. The president or appropriate vice president(s) responsible for oversight of the development and implementation of the policy. The Initiating Authority is the sponsor of the policy and may also be the Responsible Authority.

Life Cycle of a Policy. Describes the process to be followed for managing each individual policy, including instructions for initiation, development, approval, implementation, evaluation, and retirement when appropriate.

Local Policy. A college, division, departmental, or unit policy that meets the unique needs of and applies only to that specific area.

Minor Revisions. Minor revisions are those changes that do not alter the scope or application of an existing policy and, therefore, do not require approval by the Committee. Examples of minor revisions include, but are not limited to, title changes for individuals or departments, spelling corrections, address changes, form changes, updated weblinks, and procedural changes.

Policy. A policy articulates requirements and expectations for behavior, actions and activities of the university community. A policy may require or prohibit an action, support compliance with applicable laws and regulations and/or mitigate risk. Policies must not conflict with statutes, rules, or regulations applicable to the university. Policies should include related procedures when appropriate.

Responsible Authority. The appropriate director or department, division, college, unit head, or vice president who is responsible for developing and implementing the policy, including ensuring the accuracy of the subject matter, training appropriate audiences, enforcing and monitoring compliance with the policy, and timely review of the policy. The Responsible Authority may also be the Initiating Authority.

Stakeholder. A person, unit, department, or division within the university community interested in the terms and operation of the policy because it directly affects their role, responsibilities, and/or operations at the university.

Substantive Revisions. Revisions that alter the scope or application of an existing policy and, therefore require review by the Committee and approval by the president through the process outlined in this policy.

University Policies and Procedures Committee (Committee). A Committee designated and appointed by the president to act as the central body for making recommendations regarding the creation, updating, and management of university policies. This Committee will include the vice president for compliance, ethics, and risk, the chief human resources officer or designee, and other representatives appointed by the president. The general counsel or designee and the chief audit executive or designee will serve as ex-officio members on this Committee in a non-voting capacity. The vice president for compliance, ethics, and risk serves as the chair of this Committee.

PROCEDURES

A. Initiation and Approval of New or Revised University Policies

The need for a new policy, substantive revisions to an existing policy, or the elimination of a policy is identified by the president, a vice president, or a representative of the Committee. Minor revisions do not require approval and may be requested at any time during the life cycle of a policy. During the policy initiation phase, an analysis is performed to determine the potential impact to the university and to stakeholders and identify subject matter experts.

- (1) Under the direction of the Initiating Authority, the Responsible Authority will draft the new or revised policy following the procedures in Section B below.
- (2) When the Responsible Authority has a working draft of the new or revised policy, they must acquire stakeholder feedback. Stakeholder feedback can include impacted offices or input from a work group or committee. Feedback must also be requested from the [Faculty Senate](#) and the [College Policy Liaisons](#). Both groups should be provided a one week time frame to respond. Feedback and comments should be considered when finalizing the draft.
- (3) Upon approval of the final draft policy by the Initiating Authority, the Responsible Authority shall submit the policy to University Compliance,

Ethics, and Risk with a Draft Policy Submission Cover Memo Form to initiate the policy review process. The Draft Policy Submission Cover Memo Form must include a summary of the new policy or revisions, references to regulatory requirements (if applicable), a list of stakeholders who participated in the review process, and any changes to the Initiating or Responsible Authorities.

- (4) University Compliance, Ethics, and Risk and the Office of the General Counsel will review the draft policy prior to submitting it to the Committee for review. During this initial review process if either office identifies content that requires additional edit or clarification, University Compliance, Ethics, and Risk will return the policy to the Responsible Authority to appropriately address. Once addressed, the Responsible Authority will resubmit the policy to University Compliance, Ethics, and Risk.
- (5) Draft policies will be published for two weeks in the policies and procedures library for review and comment by the university community. At the time it is published, University Compliance, Ethics, and Risk will send a notification email to all individuals subscribed to the Policies Posted for Public Comment listserv announcing that a policy has been posted. Employees may subscribe to the public comment listserv via the [Policies and Procedures webpage](#).
- (6) Upon completion of the two week comment period, University Compliance, Ethics, and Risk will collect and distribute the comments to the Committee and the Responsible Authority for consideration.
- (7) The Initiating Authority, Responsible Authority, or designee will present the policy to the Committee during a meeting. When the Committee is satisfied that the proposed policy is in an acceptable form, and that all public comments have been reviewed and considered, the chair of the Committee will call for the Committee to approve the policy. If approved, the Committee will forward the final draft to the president for review and approval. If the policy is not approved by the Committee, it will be referred back to the Responsible Authority for additional editing based on Committee feedback.
- (8) Following the Committee's approval, the policy is signed by the Initiating Authority and the Chair of the Policy and Procedures Committee signifying that the current draft is recommended for approval by the president. The final draft is then submitted to the president for consideration and approval. If the policy is not approved by the president, the chair of the Committee will work with the applicable Responsible and Initiating Authorities to address the president's comments.
- (9) Upon receipt of the president's approval and signature, University Compliance, Ethics, and Risk will incorporate the approved policy into the Policies and Procedures Manual.
- (10) The Responsible Authority, Initiating Authority, or designee will distribute communications on the new or revised policy, provide training to the university community as appropriate, and enforce the policy.

B. Instructions for Drafting New or Revised University Policies

Policies and related procedures must be submitted on the policy template listed under FORMS and must include the following information:

- (1) **Subject**
The Subject is the title of the policy and should reflect the specific topic addressed in the policy.
- (2) **Responsible Authority**
The Responsible Authority is the appropriate director or department, division, college, unit head, or vice president who is responsible for developing and implementing the policy, including ensuring the accuracy of the subject matter, training appropriate audiences, enforcing and monitoring compliance with the policy, and timely review of the policy.
- (3) **Applicability/Accountability**
The applicability/accountability section should contain a statement that explains who is required to comply with the policy.
- (4) **Policy Statement**
The policy statement describes the purpose, key requirements and expectations of the policy. This section must contain a statement regarding the consequences of noncompliance, including disciplinary actions, when appropriate.
- (5) **Definitions**
Definitions shall be consistent across all university policies. Please refer to the [University Policy Glossary](#) for existing policy definitions.
- (6) **Procedures** (if needed to implement the policy)
Procedures outline the process to follow in order to comply with the policy.
- (7) **Initiating Authority**
The president or appropriate vice president. No other individuals may initiate a policy.

Policies may also contain the following information as necessary or applicable:

- (1) **Preamble**
This section is included when the policy is lengthy and requires a summary at the beginning.
- (2) **Table of Contents**
A table of contents should be included for lengthy policies to provide an overview of the policy's contents and organization and to allow the reader to go directly to a specific section of the policy.
- (3) **Background Information**
Background information should be included when providing history, impact, or additional regulatory information provides a deeper explanation for the need for the policy. In particular, regulatory drivers should be described in this section.

(4) **Related Information or Documents**

This section contains a list of relevant documents, laws, regulations, and/or other related policies that aid in supplementing the policy.

(5) **Contacts**

This section contains the contact information where members of the university community should direct questions regarding the policy. This information should include department name, address, phone number, email address, and website information, as applicable.

(6) **Forms**

Any forms that are referenced and used as part of the policy shall be listed in this section.

C. Annual and Five-Year Review of Existing Policies

Each university policy must be reviewed annually by the Responsible Authority to ensure that it remains current and relevant. Should the policy require substantive revisions, the Responsible Authority will follow the procedures set out in Section A above. Minor revisions do not require approval and may be requested at any time during the life cycle of the policy.

Every five (5) years the Responsible Authority must submit the policy, regardless of whether edits are required, to the Committee for the Committee's review following the procedures in Section A above.

D. Dissemination of New, Revised, and/or Emergency Policies

All new, revised, and/or emergency university policies will be announced by University Compliance, Ethics, and Risk via a broadcast email message to all university employees upon approval and signature by the president. Policies will be added to the [Policies and Procedures Manual](#). When an emergency policy is revised, the broadcast email message announcing the revisions will include a hyperlink to a tracked edited version of the emergency policy.

E. Maintenance of the Policies and Procedures Manual

University Compliance, Ethics, and Risk will maintain the Policies and Procedures Manual.

FORMS

[Policy Template](#)

[Draft Policy Submission Cover Memo Form](#)

RELATED INFORMATION

[Policies and Procedures Manual](#)

[Policy Library Glossary](#)

[Policy Lifecycle and Workflow](#)

CONTACTS

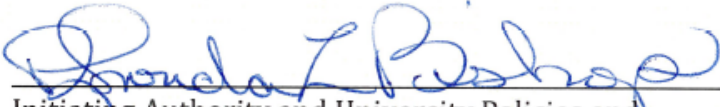

University Compliance, Ethics, and Risk

4365 Andromeda Loop North

Orlando, FL 32816-0001

complianceandethics@ucf.edu

<https://compliance.ucf.edu/>

POLICY APPROVAL (For use by the Office of the President)	
Policy Number: 2-001.6	
 Initiating Authority and University Policies and Procedures Committee Chair	Date: <u>4/13/2023</u>
 President or Designee	Date: <u>5/2/2023</u>

History 2-001 2/1/2004, 2-001.1 8/4/2004, 2-001.2 9/20/2004, 2-001.3 10/18/2006,
2-001.4 10/31/2013; 2-001.5 1/4/2016