I. BACKGROUND AND POLICY

A policy is a written statement that serves to respond to legal or regulatory requirements, sets forth courses of procedure or action, and/or provides administrative direction to ensure the orderly and effective functioning of Eastern Virginia Medical School (EVMS). A policy may apply departmentally, to a certain group of employees or individuals, school wide, or another combination. In order to maintain a consistent process and format, all policies must be approved by the Eastern Virginia Medical School (EVMS) Board of Visitors (the "Board") in accordance with the process outlined herein.

II. POLICY DEVELOPMENT

A. Draft. Once the need for a new or revised policy has been identified, the authorized individual in the sponsoring department should draft the proposed terms or changes to the policy, including any applicable procedures that outline how the policy goals must be accomplished, and submit the document for review to the Office of the General Counsel at OGC@evms.edu along with any policy related forms, guides, or other supporting documentation. The sponsoring department will then be contacted by the OGC to discuss the procedure for approval and any required timelines.

B. Review. All policies, whether new or revised, must be reviewed by the EVMS Office of the General Counsel ("OGC"). Note that documents containing only "procedures" are still policies and must be submitted to the OGC for review. The OGC is charged with:

1. Reviewing the policy for conflicts with existing policies;

2. Reviewing the policy for legal sufficiency;

3. Circulating the policy to other departments that might be affected and/or may need to review or provide input on the policy;

4. Ensuring the policy is consistent with the EVMS policy Format; and

5. Rewriting the policy as necessary.

Once the policy has been reviewed/edited by the OGC, it will be returned to the sponsoring department for final review prior to submission for required approvals as set forth in Section C below.

C. Approval. All new and revised policies must be approved by the Board before being posted or disseminated unless exempted pursuant to Section D below. Prior to obtaining Board approval, each policy must first be submitted to a Board Committee for review and recommendation to the Board for approval. The OGC shall work with the sponsoring department to ensure that the proposed policy is submitted to a Board Committee as follows:

1. Finance Committee – all financial policies including Materials Management and payroll policies.

2. Academic and Student Affairs Committee – all policies related to education and accreditation and non-education policies that relate only to students.

3. Audit and Compliance Committee – all other policies that do not fit into one of the Committee categories above.

Once recommended for approval by the appropriate Committee, the policy will be submitted for Board review and approval at the next regular Board meeting. If approved by the Board, the policy will be assigned a "Board Approved" date, which shall be the effective date unless another date is specified, and returned to the sponsoring department for dissemination in accordance with Section E below.

D. Exceptions to Approval.

1. Policies that do not have material changes, those that are being revised to update a citation to a law, rule, or regulation that has changed, or those that have been Board approved in the past and are being revised to correct typographical or other minor errors may not require Board approval. Determination as to whether a revised policy needs to be submitted for approval is at the discretion of the OGC. In the event that such a determination is made, the policy shall retain its last Board Approved date and the OGC shall track all such changes.

2. Policies that must meet regulatory deadlines by a certain date and policies that are deemed crucial or needed immediately for any area of EVMS operations, but that have not yet come before a Committee and/or the Board, shall be temporarily exempt from Board approval and shall go into effect immediately upon approval by the OGC. In such event, the policy shall be submitted for approval at the next regular Committee and/or Board meeting and, if approved, shall be assigned an effective date in addition to a Board Approved date.

E. Dissemination and Maintenance.   Once approved, the sponsoring department is responsible for ensuring that:

1. The policy is announced and provided (either by pdf attachment or link) to the audience to which the policy applies (i.e. the department, students, or school wide as applicable);

2. The policy is posted to the EVMS internal website;

3. ;Necessary implementation training session(s) are conducted;

4. The policy is enforced;

5. The policy is reviewed at regular intervals; and

6. Policy revisions are tracked with archived policies to be kept in accordance with the sponsoring department's record retention schedule.

III. POLICY DELETION

Policies that have been deemed outdated and replaced with a new policy, those that have been transferred from one department to another and/or those policies that have been deemed obsolete, must be deleted by Board action. To delete a policy the sponsoring department must email the OGC with an explanation as to why the policy should be deleted and/or replaced. Upon deletion, the sponsoring department is responsible for notifying any affected employees or departments of the deletion.

IV. QUESTIONS

All questions related to this policy and/or whether or not a document may be considered a policy and subject to review and approval should be directed to the OGC at OGC@evms.edu.