

## **Procedure for the Review and Approval of Policies**

Effective: 2019.04.01

### **I. Introduction**

Sagrado (also referred to as “University”) requires that all policies and procedures be promulgated in accordance with Sagrado’s Mission and Vision and the requirements set forth in the *Policy for Review and Approval of Policies and Procedures*. Only those policies approved in accordance with this Procedure will be valid and enforceable. This Procedure is pictorially explained in the *Flowchart for the Review and Approval of Policies* that is attached and made part of this document; provided that in the event of conflict between the two, the written Procedure shall override the flowchart and govern.

### **II. Definitions**

1. *Academic Policies* are those which directly affect the pedagogical Mission of the University as defined in the Bylaws of the Academic Board.
2. *Administrative Policies* are non-academic policies governing the operations of the University as defined in the Regulations of the Administrative Board.
3. *Compliance and Integrity Officer* is the University officer responsible for executing and overseeing the duties and responsibilities defined in the Compliance and Integrity Program.
4. *Initiator* is one of the following persons who proposes a new Policy or a change to an existing one and commences the process for the review and approval of a Policy: a University full-time or part-time faculty member, regular administrative personnel, or a regular student.
5. *Policies* are guiding or governing principles to be followed/observed in the conduct of University affairs. Only those policies approved in accordance with this Policy will be binding and enforceable and will be published on the Policy and Procedures’ website. Policies apply to faculty, staff employees, students, contractors and visitors and whose scope extends to all University departments, work units, offices, residences and activities in campus and outside of campus but that have a direct or indirect impact to the University. Policies includes Academic, Administrative and Student Policies.
6. *Policy Advisory Council* are members of the President’s Executive Team responsible of reviewing a proposed policy to ensure that: it is consistent with Sagrado’s Mission, Vision and

Strategic Plan; required to be compliant with applicable law or other external regulations; or necessary to follow best practices in higher education.

7. *Procedures* are academic and non-academic procedures that provide for orderly implementation of Policies through specific, prescribed series of actions.
8. *Sagrado Portal (mi.sagrado.edu)* is the official internal (nonpublic) electronic platform and communication tool.
9. *Sagrado Web Page (www.sagrado.edu)* is the official external (public) electronic platform and communication tool.
10. *Student Policies* are those which directly affect the student body (full-time, part-time, international and special) including residents.

### **III. Process for Review and Approval of Policies**

1. An Initiator may commence the process for the review and approval of a Policy.
2. The Initiator must obtain the approval of the head of the academic or administrative unit (e.g.: Executive Vice-president for Academic Affairs for, or the responsible administrative unit Vice-president) in case he/she is a full-time or part-time faculty member, regular administrative personnel, or a regular student, prior to submitting the policy for review, unless the Executive Vice-president for Academic Affairs or the responsible administrative unit Vice-president is the Initiator.
3. The Initiator shall send the proposed policy to the Compliance and Integrity Officer who reviews the proposed policy and ensures that:
  - it is compliant with applicable law or other external regulations, and
  - it is in writing and using the approved template.
  - (a) If the proposed policy is not warranted, the Compliance and Integrity Officer shall respond to the Initiator the reasons for declining the proposed policy.
  - (b) If the proposed policy is warranted but requires modifications, the Compliance and Integrity Officer shall send the proposed policy to the Initiator to make the appropriate changes. The Compliance and Integrity Officer and the Initiator shall be engaged in the review process until the Compliance and Integrity Officer determines that the proposed policy is ready to advance to the next step in the review and approval process.
  - (c) The Compliance and Integrity Officer shall notify the Initiator and the head of the academic or administrative unit if (1) the proposed policy is ready to advance to the next step in the review and approval process, or (2) the proposed policy has been withdrawn and the reason.

4. Once approved by the Compliance and Integrity Officer to continue the process, the Compliance and Integrity Officer shall send the proposed policy to the Policy Advisory Council that reviews the proposed policy and ensures that it is:
  - consistent with Sagrado's Mission, Vision and Strategic Plan,
  - required for the University to be compliant with applicable law or other external regulations, or
  - necessary to follow best practices in higher education.
  - (a) If the Policy Advisory Council finds that the proposed policy is not warranted, the Compliance and Integrity Officer shall respond to the Initiator the reasons for declining the proposed policy.
  - (b) If the proposed policy is warranted but requires modifications, Policy Advisory Council shall send the proposed policy to the Compliance and Integrity Officer who will engage in a review process with the Initiator in order to make the appropriate changes to the proposed policy.
  - (c) The Compliance and Integrity Officer and the Initiator shall be engaged in the review process until the Policy Advisory Council determines that the proposed policy is ready to advance to the next step in the review and approval process.
  - (d) The Compliance and Integrity Officer shall notify the Initiator and the head of the academic or administrative unit if (1) the proposed policy is ready to advance to the next step in the review and approval process, or (2) the proposed policy has been withdrawn and the reason.
5. Upon approval by the Policy Advisory Council to continue the process, the Compliance and Integrity Officer shall send the proposed policy to the University President for his/her comments.
  - (a) If the University President finds that the proposed policy is not warranted, the Compliance and Integrity Officer shall respond to the Initiator the reasons for declining the proposed policy.
  - (b) If the proposed policy is warranted but requires modifications, President shall send the proposed policy to the Compliance and Integrity Officer who will engage in a review process with the Initiator in order to make the appropriate changes to the proposed policy.
  - (c) The Compliance and Integrity Officer and the Initiator shall be engaged in the review process until the President determines that the proposed policy is ready to advance to the next step in the review and approval process.

- (d) The Compliance and Integrity Officer shall notify the Initiator and the head of the academic or administrative unit if (1) the proposed policy is ready to advance to the next step in the review and approval process, or (2) the proposed policy has been withdrawn and the reason.
6. With the President's approval to continue the process, the Compliance and Integrity Officer shall send the proposed policy to one or more of the following University governing bodies for review and recommendations, as required by their respective By-laws and Regulations:
- Board of Trustees
  - Academic Board
  - Administrative Board
- (a) If any of the governing bodies finds that the proposed policy is not warranted, the Compliance and Integrity Officer shall respond to the Initiator the reasons for declining the proposed policy.
- (b) If the proposed policy is warranted but requires modifications, the corresponding governing body shall send the proposed policy to the Compliance and Integrity Officer who will engage in a review process with the Initiator in order to make the appropriate changes to the proposed policy.
- (c) The Compliance and Integrity Officer and the Initiator shall be engaged in the review process until the governing body determines that the proposed policy is ready to advance to the next step in the review and approval process.
- (d) The Compliance and Integrity Officer shall notify the Initiator and the head of the academic or administrative unit if (1) the proposed policy is ready to advance to the next step in the review and approval process, or (2) the proposed policy has been withdrawn and the reason.
7. Once approved by the corresponding governing bodies, the Compliance and Integrity Officer shall send the proposed policy to the University President for his/her final review, approval and signature. Under extraordinary circumstances, the President, with the advice of the Policy Advisory Council, may approve a proposed policy and inform the corresponding governing body(ies) as soon as possible or at a forthcoming meeting of the such governing body(ies).
8. The Compliance and Integrity Officer shall keep a record of the approved policies as well as those that were withdrawn and the reason therefor.
9. This Procedure shall be completed within ninety (90) working days, as defined in the Administrative Calendar, from the date that the Compliance and Integrity Officer first received the proposed policy from the Initiator. The University President may at his/her

discretion extend or reduce the time to review, comment, recommend and approve of a proposed policy.

10. After the signature of the policy by the President, the Compliance and Integrity Officer shall disseminate the approved Policy to the University community using the official University portal ([mi.sagrado.edu](http://mi.sagrado.edu)) and webpage ([www.sagrado.edu](http://www.sagrado.edu)), and any other media that best serves the objective of communicating the Policy (e.g. print or digital).


#### **IV. Reporting of Investigating Violations**

Violations to this Procedure or consultations on the scope and interpretation of this Procedure must be addressed to the General Counsel at 787.728.1515, ext. 1221, or by electronic mail at [cameliac.fernandez@sagrado.edu](mailto:cameliac.fernandez@sagrado.edu), or to the Compliance and Integrity Officer at 787.728.1515.

#### **V. Violations to this Procedure**

Universidad del Sagrado Corazón reserves the right to interpret this Procedure in its administration, implementation and application. Any violation of this Procedure by a student, faculty or staff or any other person may result in a disciplinary action that may include expulsion from the University (students) or termination of the employment relationship (faculty and administrative staff), or other appropriate legal actions.

If there is ambiguity in any provision of this Procedure, the University reserves the discretion to interpret it according to the purpose for which it was established, the impact on the operations of the University, and good faith, unless any law provides otherwise.

  
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**Gilberto J. Marxuach Torrós**  
President

# Flowchart of the Review and Approval Process for the Policies

