

Procedure for the Development of Institutional Documents

Effective: 2022.08.01

I. Purpose

This Procedure establishes a general review and approval procedure for the University Institutional Documents (e.g., policies, procedures, standards, and guidelines). Institutional Documents promote the adoption of uniform standards in accordance with applicable laws and regulations, serve to promote mission-centered values and objectives, and to ensure the adoption of operational efficiencies and best practices.

The process outlined below is intended to help ensure that such Institutional Documents are well written and clear, communicated, easily accessed, and that they provide practical direction to the University community (e.g., trustees, faculty, administrative staff, student support services staff, students, stakeholders, third-party, suppliers and vendors).

II. Governing Documents Affected by the Procedure

This Procedure is for the development and approval of Institutional Documents that have an impact on University-wide operations and employees (administrative, student support services, and faculty) and the student body.

The Glossary of Terms in the *Institutional Compliance and Integrity Program* provides the definitions to the terms most used in this Procedure.

III. Development of Institutional Documents and Approval Process

- 1. The Board of Trustees, University President, Compliance Director, an University officer or supervisor may identify a need for an Institutional Document or the review of an existing one because:
 - a. it is a legal or regulatory requirement,
 - b. it is required by an accreditation standard, or
 - c. it is desirable as a best practice.
- 2. The University officer with oversight over the office or unit with primary responsibility for the operationalization of the new or reviewed Institutional Document (the "Sponsor") is responsible of:

- a. discussing the need for a new Institutional Document or the review of an existing one with the University President,
- b. draft, or assign another person to draft, the proposed Institutional Document using the approved template,
- c. identifying and consulting with other administrative offices, student support services offices, and academic units that may be affected for comments,
- d. submitting the draft to the appropriate governing bodies (e.g.: Board of Trustees committees, Academic Board, Administrative Board), and
- e. authorizing that the draft be submitted to the Compliance Director to initiate the review and approval process.
- f. communicating the approved Institutional Document to the constituent groups.
- 3. The Sponsor may delegate tasks 2(b) though (d) and (f) to another member of his or her office or unit or to the Compliance Liaison, but he or she may not delegate tasks 2(a) and (e).
- 4. The Compliance Liaison is responsible for submitting a completed *Statement of Purpose* together with the draft to the Compliance Director via email at cumplimiento@sagrado.edu. The Compliance Liaison is responsible of maintaining the Sponsor informed of all compliance matters including the status on the review and approval of Institutional Documents.
- 5. The Compliance Director reviews the draft and makes the necessary and appropriate changes and recommendations.
- 6. The Compliance Director and the Compliance Liaison will engage in constant communication until the draft is finalized.
- 7. The Compliance Director will send the agreed draft to the General Legal Counsel for legal review and approval.
- 8. Once approved by the General Legal Counsel, the Compliance Director will send the draft to the Sponsor, with a copy to the Compliance Liaison, for approval and authorization to send the draft to the University President.
- 9. The Compliance Director will send the draft to the University President for his or her review, comments, and approval.
 - a. Minor comments and corrections will be modified by the Compliance Director and sent back to the University President.
 - b. Questions and comments that entail a substantive review will be sent back to the Compliance Liaison. The Compliance Director and the Compliance Liaison will continue engaged in a working dialogue until the draft is approved by the University President.
- 10. If the University President does not approve the draft, the Compliance Director will inform the Compliance Liaison and the Sponsor in writing.

IV. Authorized Signatory

The following table shows the University Officers that have authority to sign Institutional Documents.

Type of Institutional Document	Authorized Signatory
Policies	University President
Procedures	Sponsor
Standards	Sponsor
Guidelines	Sponsor

The University President and the Board of Trustees retain the authority to review, approve and sign, or abolish a particular Institutional Document.

V. Codification

All approved Institutional Documents will be codified into one of the following of categories: administrative, academic, or student services. The codification guide is included in the Attachment of this Procedure.

The codification has a unique number, year, type of Institutional Document (policy, procedure, standard, or guideline), and language. For example, document AB- 01- 2022- PS refers to a policy from the library written in Spanish and reviewed in 2022.

VI. Policy Official Repository

All Institutional Documents will be kept in the electronic repository maintained by the office of CAII that is accessible to the Sagrado community in the CAII page in the University portal at https://mi.sagrado.edu/ics and in Sagrado's web page https://cumplimiento.sagrado.edu for contractors and the public. The physical signed copy will be kept in the office of CAII and will be available for review upon written request.

VII. Policy Official Communications

Each quarter, the office of CAII will post a summary of the new and revised Institutional Policies and Procedures in the "CAII Bulletin" accessible to the Sagrado community in the CAII page in the University portal at https://mi.sagrado.edu/ics and in Sagrado's web page https://sagrado.edu/cumplimiento for contractors and the public. Administrative staff, student support services staff, faculty, students, and contractors are responsible for accessing and reading the CAII Bulletin.

VIII. Questions About this Procedure

Questions regarding the scope and interpretation of this Procedure should be directed to the office of Compliance, Internal Audit and Institutional Integrity at cumplimiento@sagrado.edu.

Universidad del Sagrado Corazón reserves the right to interpret this Procedure in its administration, implementation, and enforcement. If there is any ambiguity in any provision of this Procedure, Sagrado reserves the discretion to interpret it in accordance with the purpose for which it was established, the impact to Sagrado's operations and good faith, unless otherwise provided by law.

IX. Reporting Violations

Violations to this Procedure should be directed to the office of Compliance, Internal Audit and Institutional Integrity at cumplimiento@sagrado.edu. Any violations to this Procedure will be addressed in accordance with the Sagrado's policies and procedures.

Gilberto J. Marxuach Torrós

President

Attachment

Codification Guide for Institutional Documents

The table below includes the codification for each category.

Category	Initial
Academic	A
Library	AB
Faculty	AF
Distance Education	AD
Administrative	D
Communications	DC
Development & Alumni	DA
• Finance	DF
Operations	DO
Human Resources	DRH
External Resources	DRE
Safety	DS
Technology	DT
Student Services	E
Admissions	EA
Centro Sofía	ES
Financial Aid	EAE
Registrar Office	ER

Codification for the Type of Institutional Document

Policy	P
Procedure	R
Guidelines	G
Standards	S