

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 EVMS Board of Visitors (the “Board”) or as delegated 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, 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”). 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; Rewriting the policy as necessary; and
5. Determining the level of approval required in accordance with Section C below.

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.

C. Approval. Unless exempted pursuant to Section D below all new and revised policies must be approved by the Board or by the relevant committee or body as delegated by the Board as follows:

1. *Board Approval*. 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:

- a. Finance Committee – all financial policies including materials management and payroll policies.
- b. Academic and Student Affairs Committee – all institution level policies related to education, accreditation, faculty matters, and student affairs.
- c. 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 Board 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.

2. *Delegated Committee Approval.* Authority for the approval of policies may be delegated by the Board to School of Medicine or School of Health Professions standing committees subject to review of the proposed Policies by the OGC in accordance with Section II(B) above. Delegations may only be made by amendment to this policy and have been approved as follows:

| Type of Policy | Delegated to: |
|--|---|
| School of Medicine academic policies (e.g., curriculum, grades, electives, clerkships, duty hours, technical standards) | Medical Education Committee of the School of Medicine |
| School of Medicine policies on student progress towards graduation (e.g., decisions on academic standing, enforcing academic and professionalism policies) | Student Progress Committee of the School of Medicine |
| School of Medicine admissions policies (e.g., academic qualifications, transfer requirements, admissions procedures) | Admissions Committee of the School of Medicine |
| School of Health Profession admissions policies | Each Admission Committee for the School of Health Professions degree programs |
| School of Health Professions curriculum policies | School of Health Professions Curriculum Committee |

If approved by the delegated committee, the policy will be assigned an “Approved” date, which shall be the effective date unless another date is specified, and returned for dissemination in accordance with Section E below.

D. Exceptions to Approval.

1. Revisions to Board approved policies that are not substantive in nature require OGC review in accordance with Section II (B), but do not require additional Board approval. Examples of non-substantive changes include improvements or changes to the process or procedures included in a policy, updates to a citation of law, rule, or regulation; changes to align the policy with other EVMS policies; and name, title, format and grammar edits. 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, OGC shall add a “last updated” date and shall track all such changes.

2. New policies or revisions to policies that are required to 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 submitted for posting in the EVMS policy repository;
2. The policy is announced and provided (either by pdf attachment or link) to the audience to which the policy, or any revision thereto, applies (i.e. the department, students, or school wide as applicable);
3. Necessary implementation training session(s) are conducted;
4. The policy is enforced; and
5. The policy is reviewed at regular intervals as required by applicable law or regulations.

III. POLICY DELETION

Policies that have been deemed obsolete, replaced with a new policy, or transferred from one department to another, must be formally deleted. To delete a policy the sponsoring department must email the OGC with an explanation as to why the policy should be deleted. Board approved Policies must be deleted by Board action. 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.