Overview: The Office of Regulatory Affairs and Compliance “ORAC” is responsible for the policy development process, retention of the policies and necessary forms, and maintenance of the information on the Handbook of Operating Procedures ‘HOP’ website. The ORAC is also responsible for procedure, ensuring implementation and administration, and, when appropriate, enforcement of written policies. The ORAC and Office of Legal Affairs are responsible for the final decision regarding approval/disapproval or adoption of any new policy or existing policy undergoing a substantial revision.

Section 1  Process for Development of New Policy or Substantial Revision of Existing Policy

1.1  Proposal Phase

A policy owner or delegate may propose a new HOP policy or substantial revision to an existing HOP policy at any time.

For an existing HOP policy, the standard for determining if a change must be routed through the policy development process is whether the change qualifies as a substantial revision. A “substantial revision” means a change in the scope, application, or terms of a policy that have significant impact. “Significant impact” means a change in the daily life, operations, responsibilities, procedures, or expectations for one or more key communities, including students, faculty and staff.

Changes that broaden or narrow the scope of an existing policy, or that alter its substantive terms, may constitute a substantial revision if those changes otherwise satisfy the standard set out above.

Changes in the scope, application, or terms of a policy that serve to lessen the impact of a policy or that reduce the existing requirements do not constitute a substantial revision.

Changes to a policy’s appendices, forms, or on-line tools or processes, through which the substantive terms of a policy are implemented, do not constitute a substantial revision for purposes of this definition, unless those changes have a significant impact as defined above.
1.2 Drafting Phase

Upon approval by a department head, the responsible party (policy owner) should contact the ORAC in order to obtain the appropriate policy template. The policy owner then drafts the policy or provides revisions in red-line version, using the approved template. The policy or policy revisions are to be returned to the ORAC. The ORAC will assist with drafting as necessary, to maintain consistency in language and tone with other institutional policies.

The ORAC will determine the suitability of the policy for the HOP or, alternatively, as a departmental policy.

The ORAC will set targeted timelines for reviews, approvals, and notifications to the policy owner. The ORAC will contact the Office of Legal Affairs for further assistance in drafting, as necessary, and will notify the policy owner of the policy’s pending inclusion in the HOP. The ORAC will also provide recommendation to policy owners on respective committees to which the proposed new policy or revised policy should be presented for notification.

1.3 Approval Phase

The policy owner will work with the ORAC to obtain approval from the Office of Legal Affairs, pertinent stakeholders, and ORAC. The ORAC will review, provide comment, and circulate to the Office of Legal Affairs for final approval.

1.4 Implementation and Education

The ORAC will notify the policy owner of implementation and may assist with coordination or facilitation of appropriate education regarding the changes to affected parties.

Section 2 Non-substantial changes to an existing HOP policy

If an update is needed for an existing policy due to a change in law or other policy, or if an error is discovered, the policy owner should notify the ORAC immediately. If discovered by the ORAC, the policy owner will be notified. Depending upon the nature of the change, either the policy owner or the ORAC may make revisions. The ORAC will provide final approval and notify the policy owner that the revisions have been made and posted to the HOP.

Editorial amendments and legal updates may not necessitate further approval or notification. However, if notification is necessary, the ORAC will coordinate with the policy owner regarding distribution to affected parties.
Section 3  Periodic Review

From time to time, a review of an existing policy may be appropriate either by the ORAC, responsible department, or policy owner. Such review should address the legality of the policy under current law, applicable UT System and/or Institutional policy, and overall applicability and legibility. The ORAC maintains all HOP policies internally in accordance with institutional retention schedules.

Section 4  Contact Information

The contact for this procedure is the ORAC, compliance@uthscsa.edu, 210-567-2014.

Section 5  References

UT System Policy Development and Maintenance Guide –

Handbook of Operating Procedures –
http://uthscsa.edu/hop2000/

New and Revised Institutional HOP policies –
http://uthscsa.edu/compliance/memos.asp