



VCU

School of Medicine Creating, Approving, and Maintaining Policies

Policy Statement and Purpose

The Virginia Commonwealth University School of Medicine (SOM) is committed to supporting and promoting an ethical culture of compliance and accountability. The SOM follows all Virginia Commonwealth University (university) and Virginia Commonwealth University Health System (VCUHS) policies. At times, local policies for the SOM are required to meet unit specific needs and to follow relevant laws, regulations, and regulatory requirements.

This policy outlines the requirements and expectations for creating new local SOM policies. It also includes expectations for review, approval, maintenance and education/training for policies.

Stakeholders

All SOM members responsible for creating and maintaining policies and procedures should know this policy and familiarize themselves with its contents and provisions.

Definitions

1. University and VCUHS policies address university-wide governance, operational expectations and/or compliance with applicable laws, regulations, and procedures.
2. Interim policies are provisional and fulfil and an emergent need which requires implementation pending the usual approval process.
3. Local SOM policies meet the needs of, and generally applies to or impacts a unit, division, department, or the SOM. Polices should clearly articulate the organizational unit(s) to which they are applicable.
4. SOM guidelines provide additional detail and direction on university policy and suggest a recommended or preferred course of action or behavior; they are generally relevant to implementing SOM policy and do not supplant the requirements of established policy.
5. SOM procedures include mandatory actions and processes necessary to comply with a policy, support compliance with applicable laws and regulations, and mitigate risk. Policies may or may not include procedures. For purposes of this policy, all references to policies include procedures unless otherwise noted.

Contacts

Each non-curricular SOM policy should clearly identify a point of contact responsible for the policy. The point of contact for this policy is the Vice Dean for the SOM.



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Policy Specifics and Procedures

- Curricular policies for the undergraduate medical education (MD) program must be approved by the Curriculum Council.
- The following process will be used for SOM non-curricular policies:
 - Changes to the SOM Faculty Bylaws and the SOM Faculty Promotion and Tenure Policy and Procedures policy require a vote by the School of Medicine faculty.
 - Departments are responsible for identifying processes for the creation, review and approval of local policies that are specific only to that department.

Interim Policy

An interim policy or revision to a standing policy may be made in urgent situations in order to meet accreditation, legal, regulatory, or remedial actions that are required. Interim approval may be obtained by the Vice Dean or Senior Associate Dean responsible for that area. Unless this is a time-limited need, the revised / new policy must be submitted for formal review and approval obtained within one year. The responsible office is responsible for education and training regarding the interim policy.

Creating New SOM Policies

1. Initiation Phase:

- Members of the SOM community including staff, faculty, and students may suggest the creation of a new policy, or revision to a current SOM policy.
 - These proposals for revisions should be submitted in writing to the senior leader identified as the responsible party for the respective policy.
 - In instances where the proposal is for the creation of a new policy, written proposals should be submitted to the senior leader for the organizational unit most likely to be responsible for the respective policy.
- Senior leaders, including department chairs, Faculty Advisory Council (FAC) members, Executive Committee (EC) members, Senior Associate Deans, and the Dean of the SOM, may bring forth a new policy for review and consideration.
- The Dean's Senior Leadership Team (DSLTL) will review the need for the proposed policy and identify other potential stakeholders.
- Following consultation with the DSLTL, the senior leader responsible for the policy will:
 - Review current SOM, university and VCUHS policies to ensure the proposed policy is not in conflict with other policies, duplicative, and necessary.
 - Ensure that the required resources to execute the policy are available.
 - Consider appropriate substantive requirements, the potential impact on SOM stakeholders, and other SOM policies either in final or draft form.
 - Contact the Office of University Counsel, as needed, for legal advice regarding the need, scope, and substantive requirements of the new policy.
 - Consult with other senior leaders to discuss the potential impact(s) on their organizational areas and alignment with other policies and procedures.

2. Review Phase:

The senior leader must complete the following procedures to acquire approval for a new policy:



- Submit the draft policy for comment to the DSLT, the FAC, and the EC as appropriate.
 - An executive summary of the proposed policy should accompany the policy, including: the reason for the policy's creation; general points covered in the policy; information noting the stakeholders, offices, or personnel that have provided input to the policy draft; other universities' policies or resources considered in drafting the new policy; and a general assessment of the policy's impact.
 - The DSLT will determine if a public comment period is required and, if warranted, the length of the comment period.
- Any policy with financial impact must be reviewed and assessed by the Senior Associate Dean for Finance and Administration.
- Utilize feedback from the DSLT, FAC, and EC to finalize the policy for submission to the FAC and Dean's Cabinet.

3. Approval

The final policy will be submitted to the FAC for review and recommendation and to the Dean's Cabinet which is responsible for providing approval, disapproval, or recommendations for change. Once approved by the Dean's Cabinet the Dean has final authority to accept the policy as submitted, or return for further revision. For changes to the SOM Faculty Bylaws and for SOM Faculty Promotion and Tenure Policy and Procedures, following the recommendations of the dean's cabinet, the policy will be discussed at SOM Faculty meeting and voted on by the Faculty.

4. Communicate, educate and train

The responsible senior leader will:

- Ensure the policy is available to the SOM community.
- Provide any procedures or guidance necessary to operationalize the policy.
- Provide education and training to appropriate audiences on the policy and provide ongoing education and training as needed.

5. Compliance Monitoring and Enforcement

The responsible senior leader is charged with monitoring compliance with policy requirements, identifying and reporting or addressing compliance issues, evaluating the policy's effectiveness at achieving desired results, and identifying the need for changes on an ongoing basis.

Ongoing Review and Revisions

The responsible senior leader should review policies on an ongoing basis and revise or retire policies as appropriate.

- If minor revisions are required to a policy, the senior leader will make the changes and post the revised policy.
 - Minor changes include: grammatical edits for accuracy or clarity, changes in hyperlinks, and updates to contact information.
- Revisions that are beyond minor, will be presented to the DSLT who will determine whether they are substantive and require review by the FAC, presentation at the EC, and a public comment period.



- For substantive changes, the final policy will be submitted to the FAC for review and recommendation and to the Dean’s Cabinet for approval, disapproval, or recommendations for change.
- Once approved by the Dean’s Cabinet, the Dean has the final authority to accept the policy as submitted, or return for further revision.
- For changes to the SOM Faculty Bylaws and the SOM Faculty Promotion and Tenure Policy and Procedures, following the recommendations of the dean’s cabinet, the policy will be discussed at SOM Faculty meeting and voted on by the Faculty.

Illustrative Figures

Process for Non-Curricular Changes and/or Policy Development

These figures outline the process described in the aforementioned policy as a quick reference for those needed to propose new or revised policies.

Figure 1: Non-Curricular Policy Changes

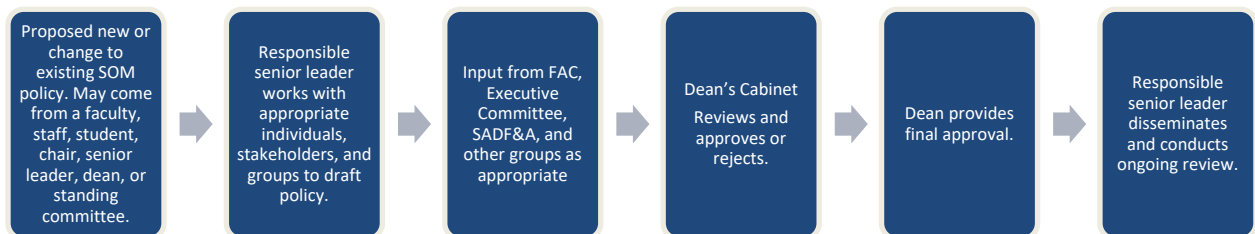
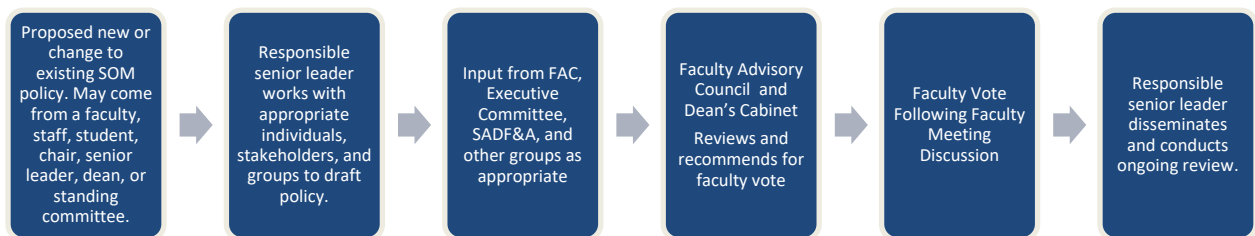


Figure 2: Changes to School of Medicine Faculty Bylaws or School of Medicine Faculty Promotion and Tenure Policy and Procedures



Policy Owner and Revision History

Policy Type: Local SOM

Responsible Office: Dean's Office

Responsible Senior Leader: Vice Dean

Current Revision Approved: November 1, 2023

Applicable Laws, Regulations & Standards

LCME Standards for Accreditation of Medical Education Programs Leading to the MD Degree:

- 4.6 Responsibility for Medical School Policies



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