

Vermont Information Technology Leaders	
Name:	Policy on Policies
Type of Document:	Policy
Type of Policy:	Corporate
Sponsoring Dept:	Administration
Sponsor:	CEO
Approving Official or Body:	Board of Directors
Effective Date:	March 22, 2022
Review Cycle:	Every five years

Purpose

The purpose of this policy is to ensure that VITL develops and maintains a set of policies that support its mission, ensure accountability by identifying responsibility, and provide clear and concise guidelines.

Scope

This policy is applicable to the development, approval, and maintenance of *all* VITL policies. This policy does not apply to operational procedures or guidelines, nor does it apply to governance documents such as the Bylaws.

Definitions

Administrator: The administrator is the individual designated with responsibility for ensuring current versions of all policy documents are made available as appropriate, and for ensuring all policies are reviewed on the designated schedule.

Policy: A policy is a statement of management philosophy and direction, established to provide guidance and assistance to VITL staff and board members in the conduct of VITL business. Policies are developed to mandate or constrain actions, ensure compliance with applicable laws and regulations, reduce institutional risk, enhance operational efficiencies, and promote ethical standards and integrity. Policies reflect the “rules” governing the implementation of a process.

Procedure: A procedure is a guideline or series of steps taken to help implement a policy. They will evolve as new tools become available, regulations change, customer needs shift, and risks are identified.

Sponsor: The policy sponsor is the member of the VITL leadership team whose is responsible for development and enforcement of policies falling under their jurisdiction. Sponsors must be a director or higher level.

Policy

1. Development

Policies may be drafted at the direction of a Sponsor, who is responsible for ensuring all policy development seeks input from all stakeholders.

Policies should be written in clear, concise, and simple language. All policies should be developed using the VITL’s standard policy format. It is recommended that policies and procedures be developed as separate documents

2. Approval

A final draft of any policy must be submitted to the CEO for their review and approval. If required, following approval by the CEO the proposed policy will be brought to the Board of Directors for their review and approval.

Policy Type	Description	Sponsor	Approving Official or Body
Business Compliance & Ethics	Policies concerning appropriate conduct and/or compliance with the law (e.g., Compliance Policy, Conflict of Interest, Whistle Blower, Records Retention)	CEO or CFO	Board of Directors
VHIE Data Access Policies	Policies that affect access to VHIE data not addressed in the VHIE Services Agreements (e.g., Secondary Use of Data Policy, De-Identified Data Policy, Data Governance)	CEO	Board of Directors
Corporate	Policies that provide the framework for organizational governance (e.g., Policy on Policies)	CEO	Board of Directors
Financial	Policies related to accounting, budgeting, procurement, travel, and other financial functions	CFO	Finance Committee, Board Notified
Human Resources	Policies impacting the working relationship with VITL and staff	CFO	CEO
Information Technology	Policies that cover systems, access, data, and related issues	Director of Technology	CEO
Operational	Policies that are related to the operation of the VHIE	Director of Operations	CEO

3. Availability

Once a policy is approved, an electronic copy will be forwarded to the Policy Administrator, who will ensure the copy is signed and made available to all staff. They will also ensure that any policies to be made available publicly are kept current on the VITL website.

4. Review and Maintenance

The Policy Administrator will maintain a schedule of policy review dates, notify Policy Sponsors of pending reviews, and ensure that reviews happen in a timely manner.

Minor amendments such as correcting typos, updating links and references, or modifying format may be made to all policies with the approval of the Policy Sponsor.

5. Decommissioning

If a Sponsor believes a Policy is no longer useful, applicable, or is better incorporated with another policy, they may do so with the approval of the Official or Body that originally approved the Policy.

Enforcement




Any employee, vendor, client, or contractor found to have violated this policy may be subject to disciplinary and/or legal action.

Review and Revision History

List dates when this policy is reviewed, and details of any changes made and their approval.

Date	Changes Made	Completed By
3/22/2027	Next Review Date	
3/22/2022	Board Approved	BOD

Approvals

	03-23-2022
Reviewed by Sponsor	Date
	03-23-2022
Approved by CEO	Date
	03-23-2022
Approved by Board of Directors	Date