## **UNT System Enterprise Employee Training Governance Guidelines**

University of North Texas System Regents Rule 05.400 Employee Training and Education authorizes the System Administration and component institutions to develop policies related to employee training and education. This rule recognizes that faculty and staff employees across the UNT System (Enterprise) have training and education obligations that are specific to their institution's mission and their role, as well as general obligations shared by all employees within the System. The purpose of these Employee Training Governance Guidelines (Guidelines) is to establish a framework that facilitates the consistent development and delivery of high-quality training by adopting standards for the accessibility, approval, coordination, formatting, naming, scheduling and style associated with training and education offered across the Enterprise.<sup>1</sup>

#### **Definitions**

- 1. Training and Education. "Training and Education" means content developed for the purpose of increasing the general or specific knowledge and skill of an employee of the Enterprise, that is required by UNT System or component institutions.
- 2. Enterprise Training. "Enterprise Training" means training that applies to all full and part-time employees of the UNT System.
- 3. Institutional Training. "Institutional Training" means training that applies to all full or parttime employees of a specific component of the UNT System.
- 4. Role-Based Training. "Role-Based Training" means all training that applies to full and part-time employees of the Enterprise who perform a specific function or responsibility.
- 5. Training Owner. "Training Owner" means the office, unit, or position responsible for the development of the training and coordinating its publication.

#### **Employee Training and Education Cycle**

The UNT System Enterprise employee training and education cycle consist of four stages: Identification, Development, Distribution, and Documentation. This systematic approach facilitates training that is consistent in quality and style, accessible for employees with disabilities, considerate of the training and work obligations of employees across the Enterprise, and compliant with applicable federal and state laws, UNT System Regents Rules, UNT System Regulations and institutional policies.

<sup>&</sup>lt;sup>1</sup> UNT System Regents Rules and UNT System Regulations take precedence if there is any conflict between these Guidelines and the rules and regulations, or federal or state law.

**A. Identification.** The criteria in this section should be used when identifying the employees who are expected to complete the training, the official authorized to designate training as being mandatory, and the Training Owner.

#### 1. Training Designation and Scope.

- a. <u>Enterprise Training</u>. Training that is required by law (including Executive Order), federal or state agency mandate, UNT System Regents Rule, UNT System Regulation, or a UNT System Chancellor directive applicable to all employees of the Enterprise. Only the Chancellor or the Chancellor's designee may designate training as applicable to all employees of the Enterprise.
- b. <u>Institutional Training</u>. Training that is required by law (including Executive Order), federal or state agency mandate, an accrediting body, institutional policy, or directive by the Chief Executive Officer (CEO) of a specific institution to all employees of the institution. Only the CEO of the institution or the CEO's designee may designate training as applicable to all employees of the institution.
- c. <u>Role-Based Training</u>. Training that is required by law (including Executive Order), federal or state agency mandate, accrediting body, UNT System Regulation, institutional policy, guideline, corrective action, remedial action (e.g. Internal Audit or Compliance finding, etc.), supervisor directive. Training may be designated as Role-Based by an individual in the employee's supervisory channel, including training recommended or directed by a unit authorized to assign corrective or remedial action.
- d. <u>Individual-Employee Training</u>. Training assigned to an individual employee for developmental purposes, or in association with disciplinary or remedial action. Training may be designated as Individual-Employee training by an individual in the employee's supervisory channel, including training recommended or directed by a unit authorized to assign corrective or remedial action.
- e. <u>Affiliated-Individual Training</u>. Training that an individual providing services to a component of the Enterprise is required to complete as part of the individual's affiliation with UNT System or a component institution. The CEO of the institution or the CEO's designee may designate training as Affiliated-Individual Training.

#### 2. Training Frequency.

a. <u>Required Trainings</u>. Required training must specify the frequency with which it must be completed. The frequency of Enterprise, Institutional and Role-Based Training is determined by the law, external agency mandate, UNT System Regents Rule, UNT System Regulation, institutional policy, accrediting body, or CEO Mandate that requires the training. In the absence of a specific frequency directed by the source, the CEO or designee, determines the frequency of the training and any associated deadlines.

- b. Other Trainings. The frequency with which non-required training should be completed is determined by the Training Owner.
- 3. <u>Training Owner</u>. The CEO or designee is responsible for determining the Training Owner. The subject of the training, those responsible for or aligned with the subject of the training, and factors related to effective development, distribution, and timely revision of the training should be considered in determining the Training Owner.
- **B. Development.** All training and education developed by a component of the Enterprise are expected to meet the minimum standards for overall quality, content, accessibility, usability, style and branding set out in these Guidelines. These standards should be communicated to third-party vendors during the procurement of training and education material.
  - 1. <u>Accessibility Review</u>. All employee training will be designed for accessibility. For training to be accessible, it must meet the requirements set forth in the ADA Quality Assurance Checklist, see Appendix A. Third-party vendors that provide training and education must certify, in writing, that the material complies with the Americans with Disabilities Act and Rehabilitation Act, as amended.
  - 2. <u>Naming and Inventorying Conventions</u>. Training that is developed within the Enterprise must identify the component institution and primary topic in the title of the training: <Entity> < -> <Course Title>.

Examples: HSC - HIPAA UNT Dallas - Values

All training delivered through a Learning Management System must be set up within the system with reportable field(s)/tags that identify whether the training is developed internally or externally and whether it is Enterprise Training or Institutional Training.

- 3. <u>Quality Control</u>. The Training Owner is responsible for ensuring training content is accurate, relevant to the mission and objectives, and provides the opportunity for learner engagement. Consideration should be given to instructional design elements which may include:
  - identifying the learning outcome (i.e. what the learner should know, be able to accomplish, or value after completing the training),
  - considering how the learner will most effectively achieve the outcome of the training through the use of materials/methods (e.g. in-person training, eLearning, print materials, video, visuals, charts, knowledge checks/quizzes, etc.), and
  - incorporating feedback from assessment/review of the training effectiveness and revising the content to enhance effectiveness.

All training will provide the course title, course description, and learning objectives at the

- beginning of the course. Training delivered electronically must comply with ADA accessibility requirements.
- 4. <u>Formatting and Style</u>. All training should follow the respective institution's brand policy and guidelines, as applicable.
- **C. Distribution.** The specific and general training and education obligations of the targeted audience should be taken into consideration when determining the timeframe in which training must be completed, including whether the training is required or discretionary.
  - 1. <u>Approval Protocols</u>. The content of all required employee training should be approved in accordance with the following protocols:
    - a. <u>Required Enterprise Training</u>. The Training Owner and UNT System Office of General Counsel is responsible for reviewing the content of Required Enterprise Training before it is submitted to the Chancellor for approval. The Training Owner and Office of General Counsel may determine whether another official or department should review the training.
    - b. <u>Required Institutional Training</u>. The Training Owner is responsible for reviewing the content of Required Institutional Training before it is submitted to the CEO for approval, and may determine whether another official or department should review the training. Institutions may include the Chief Institutional Compliance official in the review process, and should consult the Office of General Counsel before seeking approval of training that is required by federal or state law.
    - c. <u>Required Role-Based Training</u>. The Training Owner is responsible for reviewing the content of Required Role-Based Training before it is submitted to the CEO for approval, and may determine whether another official or department should review the training. Institutions may include the Chief Institutional Compliance official in the review process, and should consult the Office of General Counsel before seeking approval of training that is required by federal or state law.
    - d. Required Training for Individual Employees. The supervisory official who directs or is responsible for directing an individual employee to complete training as a corrective or remedial measure, including a recommendation or directive resulting from an audit or investigative finding, is responsible for reviewing the training unless it has been reviewed previously by a Training Owner as a required Enterprise, Institutional or Role-Based Training.
    - e. <u>Required Training for Non-Employees (Excluding Vendors)</u>. Each institution may designate the official or department responsible for reviewing training the institution requires non-employees to complete before providing services to the organization. The designated official or department is responsible for consulting the Office of General Counsel before determining training that is required by federal or state law, or contract.

2. <u>Distribution Reoccurring Enterprise Training</u>. Reoccurring Enterprise Training will be placed on a training schedule and distributed to the component institutions no later than January 1 each year. The training schedule will include frequency and show the dates each training opens and closes, and will be accessible to all employees.

Example:

Jan. 1 – Dec. 31 UNT System: P-Card Role-Based Every 2 years Oct. 5 – Dec. 31 UNT System: FERPA Select Employees Annually

- 3. Communication of Other System Required Training. The dates for distribution of other System training should be determined in collaboration with the Training Owner and the office designated by each component institution in order to give supervisors and employees adequate time to integrate the training deadline into their daily responsibilities. System Training Owners generally will notify component institutions no fewer than a forty-five (45) day notice in advance of distribution of training, except where federal or state law, or other circumstances dictate otherwise.
- **D. Documentation**. Individual employees are responsible for completing required training and for participating in discretionary training when assigned or appropriate within the established timeframe. Supervisors are responsible for monitoring and enforcing training obligations, including timely completion.
  - 1. <u>Noncompliance Procedures</u>. Learning Management System Administrators will send the Training Owner a report of all employees who have not completed the required training within seven calendar days after the deadline has been missed. A report also will be sent to the institution's chief compliance official.
  - 2. Enforcement of Training Responsibilities. An employee who fails to complete training required under the UNT System Compliance and Integrity Program Regulation shall not be eligible for discretionary salary increases during the year in which the training was not completed and will be denied access to information technology resources until training is completed. Employees who fail to timely complete training are subject to disciplinary action, including termination. Individual institutions may adopt institution-specific measures to ensure compliance with any Institutional Training obligations.
  - 3. <u>Enforcement of Governance Guidelines</u>. Institutional Chief Compliance Officials are responsible for developing and publishing a process for documenting when employees complete training, and for gathering information on the completion rates by department.
  - 4. <u>Employee Training Periodic Review</u>. All training in UNT System or a component institution's inventory must be reviewed a minimum of every three (3) years from the date it is approved for distribution. Each component is responsible for establishing a process for conducting this periodic review, including identifying the department responsible for ensuring its completion.

At a minimum, the review should evaluate whether:

- the training should continue to be required;
- content remains accurate;
- method of delivery is effective;
- learning materials are relevant to the mission and objectives;
- laws that relate to the training have been included and references are current;
- UNT System Regents Rules, UNT System Regulations, or institutional policies referenced in the training are current; and
- points of contacts, telephone numbers, organizational structure, titles, and links included in the training remain accurate.
- 5. <u>Exceptions</u>. Request for exceptions to these Guidelines may be submitted to the Chief Institutional Compliance official for review and submission to the CEO for consideration. Only the CEO may approve a request for an exception. All approved request will be forwarded to each Chief Institutional Compliance official in the Enterprise within a reasonable time after approval.
- **E. Review of Guidelines**. These Guidelines will be reviewed annually by Human Resources and the Chief Institutional Compliance officials for three (3) years from the date of adoption and every three (3) years thereafter.

The Chief Internal Audit Executive will be informed of any changes to the Guidelines that reasonably could be interpreted as significantly compromising the training framework related to training accountability and documentation, accessibility, content accuracy and relevancy, designations as mandatory or optional, scheduling/timing, and responsibility; monitoring of training inventories; and enforcement uniformity across the Enterprise.

#### References and Cross-references.

UNT System Regent Rule 05.400, Employee Training

UNT System Regulation 02.1000, Compliance and Integrity Program

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# APPENDIX A

### **ADA Quality Assurance Checklist**

When checking digital learning materials for accessibility standard WCAG-Web Content Accessibility Guidelines and TxDLA - Texas Distance Learning Association standards are utilized. The reviews entail the following:

- When the content is generated in Articulate 360 Rise or Storyline software a VPAT statement detailing its degrees of accessibility compliance is on file.
  - Where items on the software platform's VPAT indicated an item is only "partially met,"
    platform administers ensure that the specific platform features that did not meet
    accessibility standards are not used.
- Ensure learner can navigate the content using just the tab key and space bar as an option. (No mouse)
- Ensure that images have appropriate text alternatives.
  - o Is the text a minimum of 12 pt. font?
- Ensure that color contrast of materials is low-vision and colorblind accessible.
  - Ensure the contrast of text color to background color is accounted for.
    (Ex. Avoid pairing red/green and blue/yellow.)
- Ensure proper Alt Text is entered for all images.
- Ensure an appropriate header structure is used within documents.
- Ensure that hyperlinks within materials are provided in an accessible manner.
- Ensure video content includes closed captions and/or transcript.
- Ensure audio-only content has a text alternative.
- Ensure that attached documents are screen-reader accessible.