

Finance Office

University Policy and Review Process Guide

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Prepared by:

The Office of Internal Audit

**University Policy Review Process Guide
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What's In This Guide

Over the past year, Adelphi University began an initiative with Baker Tilly, LLP to review our inventory of University policies. A primary objective of the review was to conduct an independent review of our policies and assess whether such policies needed revision in order to better reflect practices as well as changes in laws or regulations. Additionally, we wanted to benchmark our policies against best practices in the industry to ensure that we did not have any significant gaps in our policies. Baker Tilly provided a number of recommendations for our consideration and we have worked with the University community to evaluate the recommendations and modify our current policies.

We have completed this process and have compiled University policies into a single University Policy Library (UPL). The UPL is accessible to the community via operations.adelphi.edu/policies.

Given that the UPL will require ongoing support and maintenance, we have developed this Guide to assist in the process to review, update and maintain the UPL's content. This Guide describes the process, clarifies roles and responsibilities, and includes references and tools that can be used by the various participants to complete the process. This Guide has been reviewed and approved by the University's Executive Leadership (EL) team.

It should be noted that tools are mentioned throughout the guide and are shown in **red text**. Each mention functions as a link to the tool within the guide to make the tool readily available. We have included flow diagrams to depict the key aspects of the processes to develop, update and remove policies from the UPL. These diagrams can be found in Appendix H of the Guide. We encourage your questions, comments and suggestions for ways to continually improve the Guide so that it is helpful to the people who have a role in the University Policy Review Process. Your comments should be forwarded to Jim Perrino, Executive Vice President of Finance and Administration (jperrino@adelphi.edu), as he has been designated the member of the EL team to oversee the UPL.

What is a University Policy?

A University policy states the University's position on a particular issue. A University policy connects the University's mission to the everyday actions of its community and clarifies the institution's expectations of its individual members.

University policies meet all of the following criteria:

- Have broad application throughout the University
- Enhance compliance with regional and specialized accrediting and licensing bodies
- Help achieve compliance with applicable law and regulations, promote operational efficiencies, support the University's mission and/or reduce institutional risks
- Mandate actions or constraints and, where necessary, reference specific procedures for compliance
- Have been approved by the appropriate individuals.

There are other policies that only apply to portions of the University community and do not meet all of the criteria above. These may be departmental, office or school policies. This Guide does not apply to such policies.

Separate, detailed instructions or procedures necessary to comply with a University policy are not included in the policy. Instead, procedures are maintained separately on the webpage of the office designated with responsibility and are accessible through a link included in the text of the policy. Similarly, the webpage of the responsible office should include a link to the policy.

A University policy does not include the text of applicable law and regulations. When this information is necessary for compliance with the policy, it will be accessible from links within the policy. A list of the policies in the UPL is presented in Appendix A of this Guide.

What are the Roles and Responsibilities in the University Policy Review Process?

There are several roles and responsibilities in the University Policy Review Process. A description of each group or individual is presented below:

Responsible University Officials

Responsible University Officials are the "Policy Owners (PO)." They lead University organizations for which existing policies are in place or new policies may be written in the future. They are responsible for the content of their policies and for maintaining their policies in current status. As such, they are responsible for comprehensive and limited reviews of the policies for which they are the owners. The **Responsible University Officials** will work with the Policy Library Assistant to coordinate any updates the policies need.

Policy Review Committee (PRC)

The **Policy Review Committee** will primarily be comprised of the **Responsible University Officials** and will meet a minimum of three times each fiscal year. The PRC provides guidance and advice when University policies are newly written or revised to reflect material changes in the University's business practices or changes in applicable laws or regulations. The Policy Review Committee also coordinates the review and revision of existing University policies and developing and documenting new University policies. Members of the PRC are presented in Appendix E of this Guide.

Policy Approvers (PA)

Policy Approvers are the University's EL team who must approve policies that have been newly written or revised to reflect material changes in the University's current policies. The **Policy Approvers** receive the policy recommendations from the **Policy Review Committee** and not from Policy Owners directly. Once the **Policy Approvers** have approved these policies they are made effective, implemented and published to the University community. If deemed necessary by the President, the policy may also be approved by the Board.

Policy Library Assistant (PLA)

The **Policy Library Assistant** will coordinate scheduled policy reviews with Policy Owners and address all updates to existing policies. New policy requests are received by the **Policy Library Assistant** for review. Policy requests will be added to the agenda of the next **Policy Review Committee** meeting; however, if immediate action is needed, the request will be coordinated with the Chair of the Policy Review Committee to achieve a timelier outcome.

How the University Policy Process Works

When are University policies reviewed?

- There are two types of policy reviews: comprehensive and limited.
- All University policies must be reviewed comprehensively at least once every five years.
- A small number of policies are reviewed comprehensively every year rather than once every five years.
- All policies will undergo a limited review in all other years to determine they are current.
- Any University policy may be updated at any time if changes in the University's business practices or the applicable law and regulations warrant this action.
- **Appendix A - List of University Policies** includes a recommended schedule for review.

Who is responsible for reviewing University policies?

- Policies are reviewed and revised as necessary by the **Responsible University Official** who is the PO.
- The **Responsible University Official** coordinates the review and revision with policy stakeholders, which could include other University offices.

Reviewing a University Policy

What is done during a comprehensive policy review?

Both policy reviews (comprehensive and limited) require completion of various activities, with the comprehensive review steps being more detailed and usually involving additional members of the community or outside counsel. We have provided a summary of the tasks that should be performed in a comprehensive policy review below. See Appendix H-3 for the flowchart of the Policy Library Review and Updates.

1. Notify

By August 31 of each fiscal year, the **Policy Review Committee** will provide each **Responsible University Official (the “policy owner”)** with their Schedule for Review of University Policies. The schedule lists the type of review required in the current fiscal year (Comprehensive or Limited) for the policies for which the **Responsible University Official** is the “policy owner.”

2. Determine

For each policy scheduled for comprehensive review in the current fiscal year, the Responsible University Official will use the **University Policy Review Checklist for Comprehensive Review** to determine if material changes need to be made to the policy. The **Responsible University Official** may conclude that one or more policies scheduled for a comprehensive review needs no changes based upon the criteria included in the **University Policy Review Checklist for Comprehensive Review**.

3. Inform

The **Responsible University Official** will complete their Schedule for Review of University Policies to inform the **Policy Review Committee** of the status for each of their policies as follows:

- No Changes
- Minor Changes - those which do not change the guidance provided by the policy, including (but not limited to), modifications to job titles, phone numbers, email addresses and website links
- Material Changes - those which are needed as the result of changes in the University’s business practices or the applicable law or regulations
- Delete - those which are no longer needed and should be removed from the UPL.

The **Responsible University Official** will forward the completed Schedule for Review of University Policies to the **Policy Review Committee** by September 30.

4. Work Plan

For those policies undergoing comprehensive review that need material changes, the **Responsible University Official** will develop a work plan that will include a timetable for completion of the policies’ revision and publication during the current fiscal year.

5. Format

All policies that undergo comprehensive review must be formatted in accordance with the **Policy Template**, whether or not any other changes to the policy are necessary. The **Responsible University Official** will determine the deadline by which the reformatting will be complete.

6. Review

The **Responsible University Official** will provide a draft of the new policy to the **Policy Review Committee**. The **Policy Review Committee** will review the draft policy and provide recommendations regarding its content as appropriate. If outside counsel review is necessary, the **Responsible University Official** will be so informed and will work directly with outside counsel to respond to questions and recommendations regarding the content of the draft policy. Upon receipt of outside counsel's written approval of the new policy, the **Responsible University Official** will forward a copy of the approved policy to the **Policy Review Committee** along with a copy of counsel's approval. In the event that further changes are made to the draft revised policy subsequent to counsel's review, outside counsel should be engaged again to review those changes.

7. Approve

If the work plan for the policy's revision includes review by the **Policy Review Committee**, it will be included on the Committee's meeting agenda. After the policy is reviewed by the **Policy Review Committee**, the **Responsible University Official** will obtain the written approval of the policy by the applicable **Policy Approvers**. Subsequently, the Office of Information Technology (IT) will publish that revised policy and announce on its website that the policy has been materially revised.

8. Educate

The **Responsible University Official** is responsible for promotion, education and training about the revised policy and any related procedures for the University community. The Office of Internal Audit can provide advice and guidance in these areas.

What is done during a limited policy review?

A limited policy review will be completed annually to ensure that all policies have been updated for less significant matters. A summary of the tasks that should be performed in a limited policy review are listed below.

1. Notify

By August 31 of each fiscal year, the **Policy Review Committee** will provide each **Responsible University Official** (the "policy owner") with their Schedule for Review of University Policies. The schedule lists the type of review required in the current fiscal year (Limited or Comprehensive) for all of the policies for which the **Responsible University Official** is the "policy owner."

The policies that are not due for a comprehensive review during the current fiscal year are required to undergo a limited review to determine that they remain in current status. For a policy to be considered in current status, there must be no material changes in the University's business practices or the applicable law and regulations affecting the policy.

For each policy scheduled for limited review in the current fiscal year, the **Responsible University Official** will use the **University Policy Review Checklist for Limited Review** to determine if material changes need to be made to the policy. Even if there are no material changes in the University's business practices or the applicable law and regulations, the policy should be reviewed and updated as necessary for modifications to job titles, contact information (phone numbers, email addresses, etc.) and links to other University policies and procedures.

2. Inform

The **Responsible University Official** will complete their Schedule for Review of University Policies to inform the **Policy Review Committee** of the status for each of their policies as follows: no changes; minor changes; material changes; or deletion.

The **Responsible University Official** will forward the completed Schedule for Review of University Policies to the **Policy Review Committee** by September 30.

3. Send

When the revisions to policies requiring minor changes are completed, the **Responsible University Official** will email these policies to the **Policy Review Committee**. It is best to send individual policies to the **Policy Review Committee** as their revision is complete rather than wait until all policies are revised and send them as a single group.

4. Complete

For policies requiring minor changes, revision of all such policies will be complete and emailed to the **Policy Review Committee** by November 30.

What happens after a University policy is revised?

Policies that have been revised to reflect material changes in the University's business practices or changes in the applicable law or regulations are required to be reviewed by the **Policy Review Committee** at one of its three meetings during the fiscal year. Subsequently, the **Responsible University Official** obtains approval of the policy from the appropriate **Policy Approvers** during an Executive Leadership meeting and forwards the approved version of the policy to the Policy Library Assistant. The Policy Library Assistant will coordinate with IT for publication on its **website**.

Writing a New University Policy

The following activities outline the process for developing a new University policy. Appendix H-1 has a flowchart of the procedures for New Policy Development and should be referenced for further guidance.

- 1. Propose**

The **Responsible University Official** (the “policy owner”) will present the case for a new University policy to the **Policy Review Committee**. When presenting a new potential policy, the **Responsible University Official** should complete the Policy Impact Assessment (see Appendix C). The Policy Impact Assessment includes considerations as to why the new policy is needed, who is impacted by the policy, the resources needed to implement the policy, the stakeholder involvement needed, and training and communication needs with implementation. The **Policy Review Committee** will jointly arrive at a decision as to whether a new policy is necessary or if other alternatives are more appropriate.
- 2. Schedule**

If the Policy Review Committee agrees that a new policy is necessary, they will set a schedule for its development and approval. In setting the schedule, they will identify stakeholders who should participate in drafting the new policy. Review by the **Policy Review Committee** will also be included in the schedule, if necessary. They will also identify **Policy Approvers**.
- 3. Draft**

The **Responsible University Official** is responsible for managing the drafting of the policy and adherence to the schedule. The stakeholders will collectively draft the policy according to the current **Policy Template** while following the schedule for its preparation and approval. Drafting a new University policy requires careful consideration of how its content interacts with existing University policies. It is important to coordinate the content of a new policy with that of existing policies so that the guidance they provide is consistent and not contradictory. The **Policy Review Committee** will be available to provide guidance to the **Responsible University Official** during the drafting of the policy.
- 4. Review**

The **Responsible University Official** will provide a draft of the new policy to the **Policy Review Committee**. The **Policy Review Committee** will review the draft policy and provide recommendations regarding its content as appropriate. The **Policy Review Committee** will also determine if the policy requires outside counsel’s review. If outside counsel review is necessary, the **Responsible University Official** will be so informed and will work directly with outside counsel to respond to questions and recommendations regarding the content of the draft policy. Upon receipt of outside counsel’s written approval of the new policy, the **Responsible University Official** will forward a copy of the approved policy to the **Policy Review Committee** along with a copy of counsel’s approval. In the event that further changes are made to the draft revised policy subsequent to counsel’s review, outside counsel should be engaged again to review those changes.
- 5. Approve**

If the work plan for the policy’s revision includes review by the **Policy Review Committee**, it will include this review on the Committee’s meeting agenda. After the policy is

reviewed by the **Policy Review Committee**, the **Responsible University Official** will obtain the written approval of the policy by the applicable **Policy Approvers**. The **Policy Approvers** are the Executive Leadership team, which meets weekly. The President is responsible for determining whether the policy also needs to be approved by the Board of Trustees. If so, approval from the Board of Trustees must also be obtained. Subsequently, IT will publish that revised policy and announce on its website that the policy has been materially revised.

6. Educate

Subsequent to written approval of the policy by the **Policy Approvers**, IT will publish and announce the policy on its website. The **Responsible University Official** is responsible for promotion, education and training about the policy and any related procedures for the University community. The Office of Internal Audit can provide advice and guidance in these areas.

The first step is a discussion between the Responsible University Official and the **Policy Review Committee** to determine whether it is appropriate to prepare a new policy based upon the criteria listed in the section of this guide entitled **What is a University Policy?**

Who can help me with this process?

The **Policy Review Committee** coordinates the review, revision and publication of existing University policies as well as the preparation of new policies. Contact the **Policy Review Committee** with any questions or requests for guidance.

Appendix A – List of University Policies

Sorted By Policy Name

Policy Name	Responsible University Official	Fiscal Year of Review
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Appendix B - University Policy Review Checklists

Policy Review Checklist for Comprehensive Review

In general, University policies represent the University's intention with respect to an issue of institution-wide applicability. As such, policies often remain unchanged from year to year. They are more likely to change over a period of years as University business practices and applicable law and regulations are modified. Please consider the following as you review the current version of your policy and make the necessary revisions.

1. Does the policy reflect current University business practices with respect to the topic?
2. Is the policy current with respect to the University's responsibilities under current law and regulations?
3. Is the policy language clear? Does the policy include definitions for terms that are used in specific ways? Avoid the use of language that conveys that actions are taken with total certainty, such as "ensure," "always" and "never."
4. Does the policy follow the current **Policy Template**? When a policy undergoes a comprehensive review, it is mandatory that it is revised to conform to the Policy Template. The objective in requiring this revision is to bring uniformity over a period of years to the University's policies which will make them easier to use.
5. Are implementation procedures accessible by links, rather than included in the policy?
6. Is there a link to the policy from your organization's web page? Additionally, is there a link to your organization's web page from the policy? Is the content of the policy consistent with the content of your organization's web page? Is the content of the policy consistent with other University publications, such as the University Bulletin or the Faculty Handbook?
7. Is information listed in the policy's *Related Information* section current, specific and useful? It is not required that the policy includes a link to the text of the applicable law or regulations. Instead, to maximize the usefulness of the policy, it may be preferable to make available a layperson's explanation of the law or regulations as well as other guidance materials prepared by government agencies, industry organizations, etc. Furthermore, do not include links to general government agency sites, etc. (for example nsf.gov).
8. Are all links correct and current? Is contact information complete and current?
9. Does the policy reflect current practice and technologies currently in use?
10. Is the guidance in the policy consistent with the direction included in other University policies? Should the policy be combined with other University policies to simplify policy compliance? Can the policy be eliminated because it does not rise to the level of a University policy (as described on page 4)?
11. Should the policy be internal-facing (e.g., require an Adelphi login) or external-facing (e.g., accessible to the public)?

12. Are all dates listed in the Document History of the policy updated and accurate as possible? If the policy origination date is not known, indicate "Not Available."

Policy Review Checklist for Limited Review

The purpose of a limited review is to determine that a policy remains current.

A limited review of a policy includes the following steps:

1. *Determine the following items of information are current* and update them as necessary:
 - Contact information (phone numbers, email addresses, etc.)
 - Job titles
 - Links to web pages within the University
 - Links to web pages outside the University
 - Document History fields in the policy template (see Attachment F), including the policy origination date
2. Determine whether a policy requires revision due to changes in one or more of the following:
 - University business practices
 - Applicable law or regulations
 - Other University policies
3. Determine whether any of the changes in #2 above are sufficiently material to require a work plan and timetable for revision and publication of the policy.

Appendix C – Policy Impact Assessment

Policy Title:
Submitted by:
Contact Email:
Contact Phone:
Date:

Complete each of the sections below in 250 words or less:

- I. **Background** (What is the general guidance to be communicated? Is this a new or revised policy? Why is this policy necessary? Who is the policy owner?)
- II. **Policy Statement** (Briefly state what guidance to the University community this policy sets forth.)
- III. **Reason for Policy** (Why is this policy needed? Are there any time constraints for implementing this policy?)
- IV. **Overview of Policy Content** (Briefly, who will benefit from the policy? Who will be affected? What are key roles and responsibilities?)
- V. **Impact on the University** (What is the general cost - human capital, technology, dollars, time - for implementing this policy? What office/department will incur this cost? What processes will have to change once this policy is implemented?)
- VI. **Key Stakeholders** (Who should be consulted for comment before implementing this policy?)
- VII. **Training and Communications** (What training, communication and/or education should occur to ensure successful implementation?)
- VIII. **Other Key Matters** (Include important dates and provide additional information or data not provided earlier.)
- IX. **Presentation** (Will this policy be reflected internally or externally?)

Appendix D - Responsible University Officials and Policy Approvers

Policy Review Committee (refer to Appendix E)

Policy Approvers As deemed appropriate and can include the following:

Board of Trustees

Faculty Senate

Executive Leadership team

Appendix E - Policy Review Committee

The **Policy Review Committee** (PRC) is a subset of the Operational Excellence Council and includes a number of **Responsible University Officials** (the “policy owners”). The members of the PRC may be rotated over time. PRC members have the following responsibilities:

- Present to the Committee new University policies and policies with material changes for which they are the **Responsible University Official**.
- Review and advise on policies brought to the Committee.
- Recommend appropriate steps for communicating information about these policies to the University community.
- Apply their collective knowledge of the University and their judgment in considering these questions about the policies brought to them for review and advice:
 - Are they reasonable and likely to operate as intended?
 - Do they take into account all of the University activities, organizations and people they are likely to affect?
 - Do they conflict with other University policies or guidance materials maintained outside of the University policy process?
 - Could they have unintended consequences that have not yet been identified during the policy review process?

The PRC meets three times during the fiscal year: November, February and May. They will elect a Committee Chair and will address urgent policy needs as they arise. If necessary, they are empowered to review and move draft policies forward that are of an urgent need. Any urgent requests for policy approval would be addressed through the PRC Chair. The PRC can review via email to expedite the process, subject to the PRC Chair’s discretion.

Members of the committee work as a team, with a collective broad understanding of specialized areas of the University. In addition, members can appoint individuals as alternates or in addition to them depending on the policies that are being reviewed. Membership of the Policy Review Committee come from:

- Chief Administrative Officer and Associate Vice President
- Chief Financial Officer and Associate Vice President
- Vice President of Diversity and Inclusion
- Associate Provost for Faculty Advancement and Research
- Assistant Vice President and Dean of Student Affairs
- Chief of Staff
- Registrar
- Director of Risk Management

Appendix F - Policy Template



Policy Title

Policy Statement

Required - Provide a brief introductory description of this policy.

Reason for Policy

Required - Describe the purpose of this policy and what it is intended to accomplish or govern.

Who is Governed by This Policy

Required - Describe who this policy affects.

Policy

Required - Include the full text of the policy. For subheadings within the policy, please use the style "Heading 2," and use "Heading 3" or smaller for any inner subheadings.

Definitions

This section should define any terms used in the policy that are important to compliance or that might be misunderstood. Defined terms should be capitalized.

If this section is not required for this policy, please use the following text: This policy does not have definitions associated with it at this time. Upon periodic policy review, this area will be evaluated to determine if additional information is needed to supplement the policy.

Procedures

Place links to associated procedures here.

If this section is not required for this policy, please use the following text: This policy does not have procedures associated with it at this time. Upon periodic policy review, this area will be evaluated to determine if additional information is needed to supplement the policy.

Forms

Include links to any forms or templates related to this policy. Forms related to procedures should be linked directly from the procedures.

If this section is not required for this policy, please use the following text: This policy does not have forms associated with it at this time. Upon periodic policy review, this area will be evaluated to determine if additional information is needed to supplement the policy.

Related Information

List and link to layperson summaries, if possible, of applicable law or regulations. Links to other University policies that affect this policy should be included.

If this section is not required for this policy, please use the following text: This policy does not have related information at this time. Upon periodic policy review, this area will be evaluated to determine if additional information is needed to supplement the policy.

Policy Owner

Required - Provide the following information for the primary owner of this policy.

Name:
Title:
Office:
Phone Number:
Email:

Secondary Contacts

Required - Provide the following information for any individuals, in addition to the policy owner, who can answer questions about this policy.

Contact	Telephone	Email

Document History

Required - This section must contain the following dates or placeholders for future dates.

- Last Reviewed Date:
- Last Revised Date:
- Policy Origination Date:

Who Approved This Policy

This section should include the name and title of each Policy Approver.

Tags

Provide relevant keywords to this policy pertaining to the audience, topic, and/or owner.

Additional Information for Policy Library

Required - Who Should Have Access to This Policy?

Should this policy be publicly accessible, or should access be locked down to one or more of the following internal audiences?

- The entire internal community (anyone with an Adelphi account can view)
- Students
- Faculty
- Staff and Administration
- Other (please specify)

Appendix G – Template for Policy Library Webpage

The UPL will include all policies that have been created and formalized into the standard template. Each policy will be available with a link, and the links will take the user to the documented policy.

During the policy creation, the **Policy Review Committee** will determine whether the policy should be forward-facing or only allow access to members of the University community. Based on this determination, a login may be required once the user clicks a link.

Each policy will be marked with specific tags indicating who the policy applies to and the process area. The policy library will be able to be sorted to view:

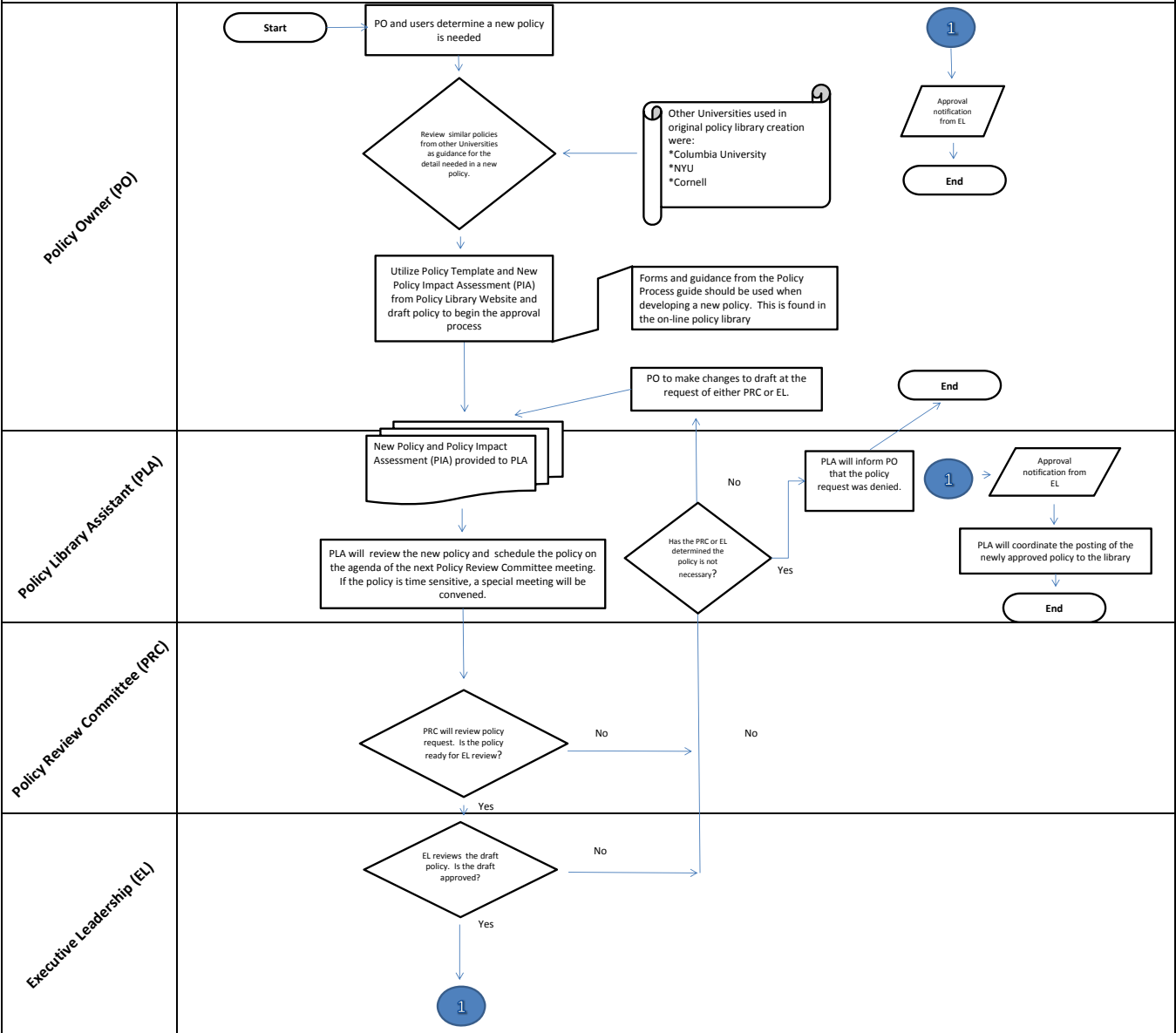
- > Alphabetical listing of all policies
- > Policies associated with a specific tag (e.g., faculty, staff, student)
- > Policies associated with a process area (e.g., Financial Affairs, Alumni)

Appendix H

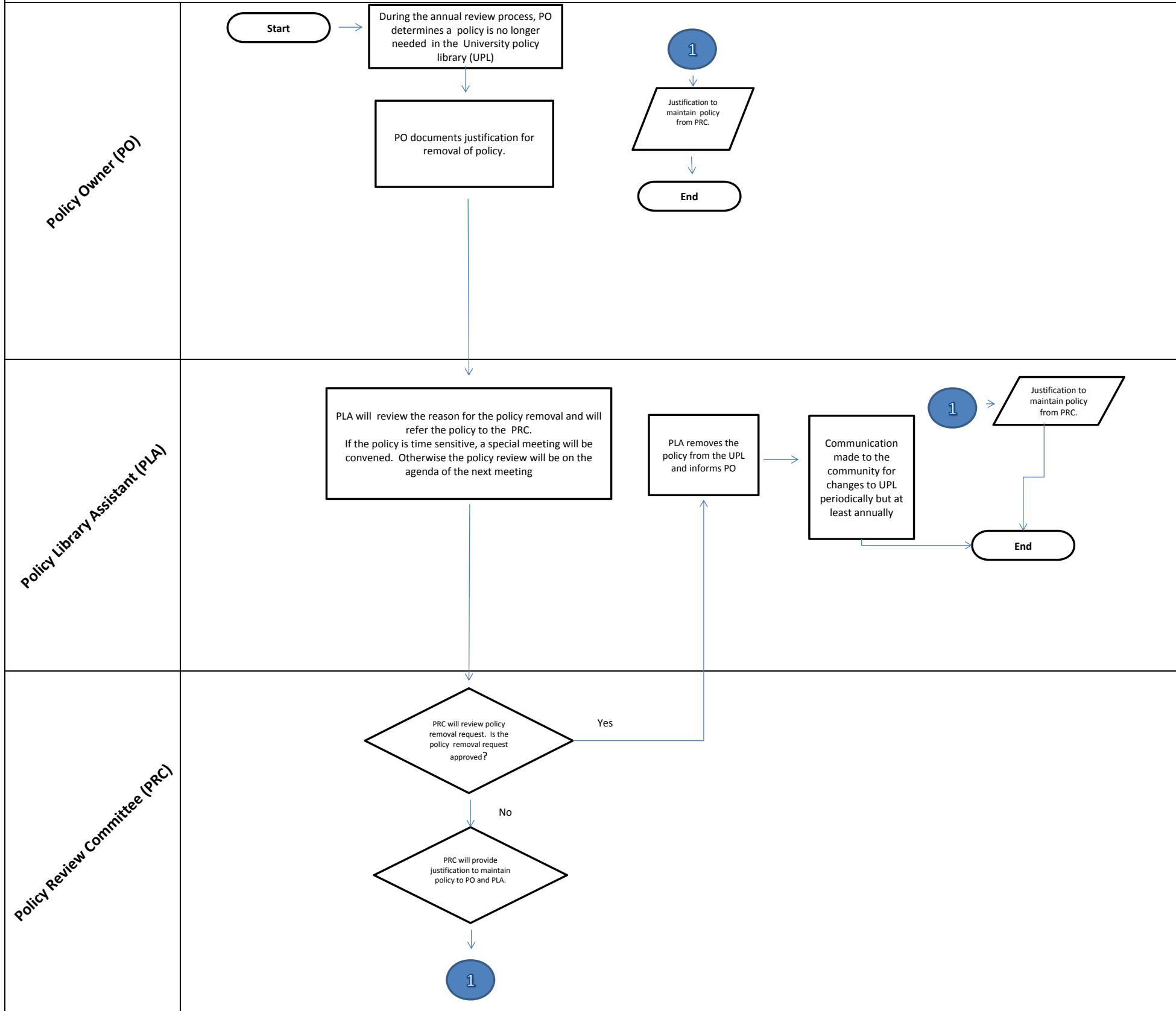
Flow Charts for Three Procedures for Policies

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New Policy Development and Approval Process



Policy Removal from the Library



Policy Library Review and Updates

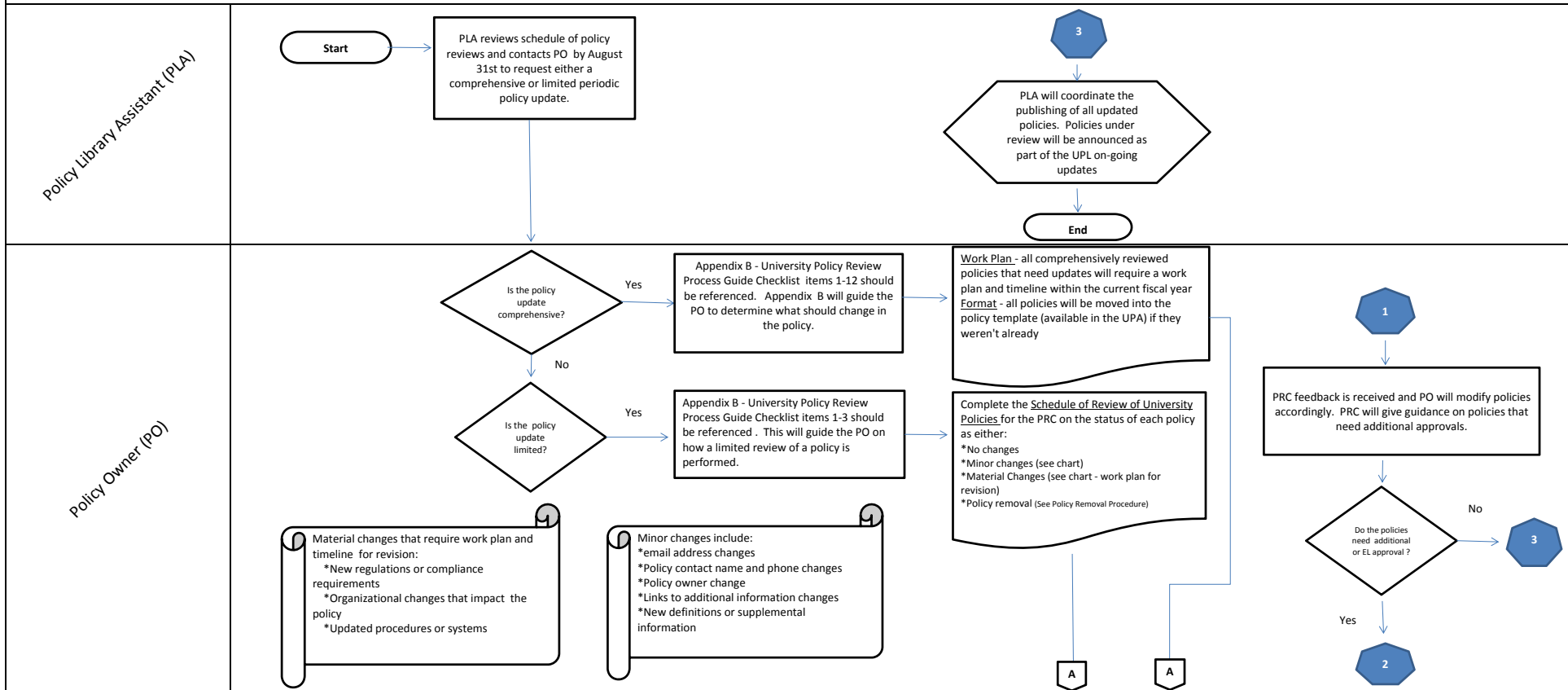
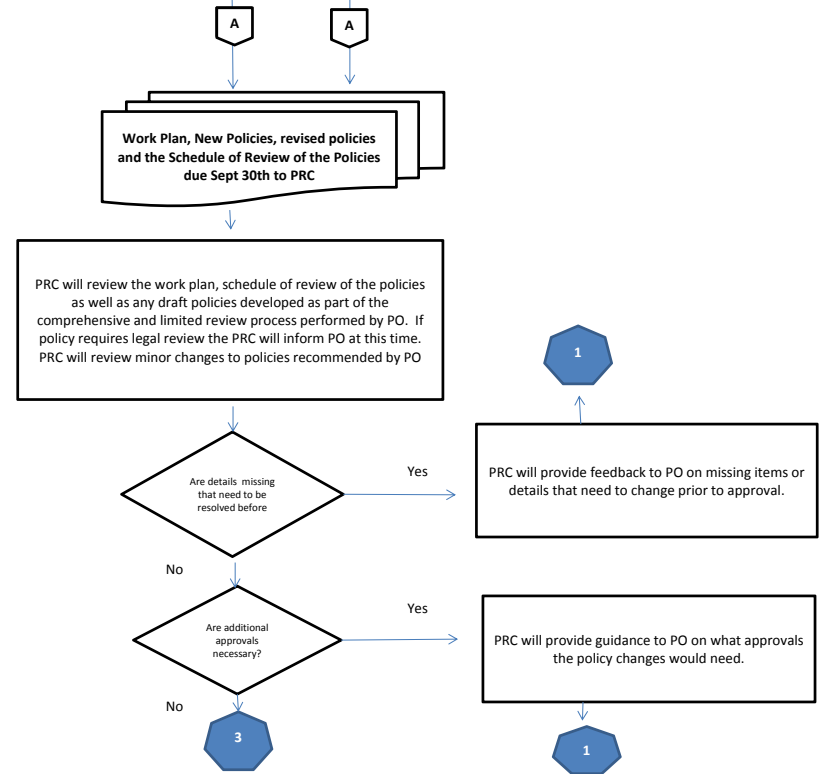


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Policy Review Committee (PRC)



Executive Leadership (EL) or Policy Approvers

