

# New York University

## UNIVERSITY POLICIES

**Title:** University Policy Development and Management  
**Policy Number:** 01  
**Effective Date:** December 1, 2007  
**Issuing Authority:** Cheryl Mills, Senior Vice President and General Counsel  
**Responsible Officer:** Robert F. Roach, University Compliance Officer

### **Purpose of the Policy**

The purpose of this policy is to ensure that the process of policy development for University-wide policies (hereafter “University Policies”), as well as the form and dissemination of policies, meet University standards for consistency, compliance with laws and regulations, accessibility and understandability. Specifically, this policy guide defines the ultimate steps by which policies are promulgated at New York University (“NYU”).

University Policies should be kept current, and made available to all relevant operating units in a timely manner. Policies that are properly developed and easy to find, read and understand promote:

- excellence in our work;
- operational efficiencies and best practices across the University;
- compliance with applicable laws and regulations; and
- compliance with accounting and reporting standards.

### **Who Needs to Know This Policy**

All staff involved in University Policy development.

### **Policy Definitions**

#### *Senior Team*

The Senior Team is comprised of those individuals designated by the President, including the University President, Provost, Executive Vice President, Senior Vice President and General Counsel, Senior Vice President for Health, Chief of Staff and Deputy to the President, Senior Vice Provost for Planning, Dean of the Faculty of Arts and Sciences, Senior Vice Provost for Research, Senior Vice President for University Relations and Public Affairs, Counselor to the President, Senior Vice President for Business Development and International Strategies, Senior Vice President for Development and Alumni Relations, Senior Vice President for Undergraduate Education and University Life, Senior Vice President for Finance and Budget, and the Vice Provost for Faculty Affairs. The President may at any time modify the membership of the Senior Team.

## *University Policy*

Any policy that meets all of the following criteria is a “University Policy”:

- has broad application or impact throughout the University across schools and administrative units, including policies whose subject matter or budgetary impact requires review and approval by an executive officer;
- seeks to ensure compliance with applicable laws, regulations and standards, promotion of operational efficiencies, enhancement of the University’s mission, or reduction of institutional risks; and
- mandates or constrains actions.

Policies adopted pursuant to the process set forth in this document are intended to apply to University Overseas Programs, except where University Policies supplant or contravene existing foreign laws or regulations. In such instances, University employees should consult with the University’s Office of Legal Counsel to determine an appropriate course of action.

## *Procedures*

Schools, Colleges, or operating units may have additional policies applicable to those entities and they may adopt implementing procedures that assist them to fulfill University Policies. Such procedures should refer to the official policy document they seek to implement. Schools, Colleges, or operating units shall provide copies of such implementing procedures to the University Compliance Officer, who will assure their consistency with University Policies.

## **University Policy**

### *Responsibility for Creating Policies*

University Policies may be initiated by individual Schools, business units, the University Senate, members of the Senior Team, or other bodies and individuals as appropriate.

Every University Policy, however, must be sponsored by either a Senior Team member or pursuant to delegation from a Senior Team member to a senior administrator with the responsibility for creating and implementing University Policies as required in his/her area of responsibility. The Senior Team member shall be listed as the Issuing Authority in the header of the standard policy document. In all cases, the Issuing Authority shall designate a specific Responsible Officer, who will be accountable for the accurate and well-articulated formulation, issuance and timely updating of the policy.

### *Formulating and Approving a Policy*

The procedures for formulating and reviewing University Policies may vary from unit to unit, depending on the primary constituency for the policy, on institutional traditions and bylaws, and on relevant external legal or regulatory constraints. For example, academic policies, in particular those appearing in the Faculty Handbook, are reviewed by the Faculty Senate.

In each case, the policy should include a statement of the scope and issuing authority for the policy, and a legal, regulatory and compliance review by the Office of Legal Counsel and the Office of Compliance at Washington Square and/or the Medical Center, as well as by offices directly responsible for implementing any substantive aspect of the policy. After all relevant reviews have been carried out, the draft policy will be submitted for final review and approval by the Senior Team, and if appropriate by the University Trustees, prior to issuance to the University community.

### *Issuance of Policies*

The Responsible Officer is charged with issuing, publishing and distributing approved policies and procedures on the appropriate University website pages and by other means as deemed appropriate. The University Compliance Officer shall provide assistance with the Responsible Officer's proper distribution and publication of the policy. The University Compliance Officer is also responsible for creating and maintaining a central University Policy repository and a University Policy website page with links to all University Policies.

### *Amendments to University Policies*

The Responsible Officer for each University Policy also is charged with the responsibility for keeping the policy up to date. Accordingly, the Responsible Officer should ensure appropriate review of the policy periodically, as necessary to assure that the policy reflects obligations imposed by current laws, regulations, and best practices. The Office of Compliance shall help assure that the Responsible Officer reviews and updates policies as needed. Each policy will include the calendar year in which it was made effective so that it may be reviewed on a timely basis under this policy. Except when the process or authority for making changes to a policy is included in the policy itself, amendments must follow the same process outlined above for initial issuance.

### *Unit Policies and Procedures*

A School, College, or administrative unit may issue policies or procedures that relate to matters of interest only to that particular School, College or administrative unit or that set forth procedures by which the unit will carry out the University Policies. These shall be referred to generally as "unit policies and procedures." Unit policies and procedures are not "University Policies" and therefore are not governed by the procedures set forth in this policy. Unit policies should be reviewed and approved by the relevant Dean, Unit Head, or appropriate university officer prior to adoption. Units are encouraged to use the standard policy format to encourage uniformity of form and appearance for policies and procedures throughout the University. Schools, Colleges, or operating units shall provide copies of unit

policies and procedures to the University Compliance Officer, who will assure their consistency with University Policies.

*Supersession*

Unit policies or procedures may not be contrary to University Policies in language, purpose, intent or application. Any unit policy that is contrary to University Policies is void and will not be enforced.

*Reservation of Rights*

Nothing in this policy limits or circumscribes in any way the power and authority of the Board of Trustees or the President to issue, amend, or revoke University Policies on any matter.

**Notes**

**1. Dates of official enactment and amendments:**

Adopted by the University Senior Team on November \_\_\_\_, 2007

**2. History:**

None

**3. Cross References**

None

Appendix A

NEW YORK UNIVERSITY  
UNIVERSITY POLICIES

**Title:**

**Policy Number:**

**Effective Date:**

**Issuing Authority:**

**Responsible Officer:**

**Reasons for the Policy/Policy Purpose:**

**Who needs to know this Policy:**

**Definitions:**

**Policy:**

**Notes:**

**1. Dates of official enactment and amendments:**

**2. History:**

**3. Cross References**