

Formulation and Approval of University Administrative Policies

Effective Date: January 20, 2006

Revised: March 2009

Policy Statement

This policy outlines the University's protocols for evaluating, formulating, revising, approving, issuing and maintaining administrative policies. This policy defines a University administrative policy, explains the standardized policy format and explains the relationship of procedures and forms to administrative policies.

Reasons for the Policy

This policy on administrative policies promotes:

- Consistent process and format for policies
- Appropriate level, scope and frequency of attention to administrative policies
- Clarity, transparency and shared understanding of administrative policy protocols

Primary Guidance to Which This Policy Responds

There is not a primary policy to which this policy responds. It is consistent with best practices.

Responsible University Office & Officer

The Office of the Executive Vice President for Finance is responsible for the maintenance of this policy, and for responding to questions posed regarding this policy.

Revision History

This policy was established in January 2006. It was revised in March 2009.

Who Is Governed By This Policy

All staff, faculty and students at the University—or anyone working on behalf of the University—who play a role in the evaluation, formulation, revision, approval, issuance or maintenance of administrative policies managed by departments that report to the Senior Executive Vice President.

Who Should Know This Policy

Senior Executive Officers, Deans, Vice Presidents, Chairs, Directors, Senior Administrative Officers, Departmental Administrators.

Exclusions & Special Situations

All conflicts of interest policies, including administrative conflicts of interest, are managed through a separate policy and procedure. The University Trustees, President, Senior Executive Vice President and General Counsel, as a situation warrants and at their discretion, may develop, revise and issue University administrative policies in a manner separate from the protocols outlined in this policy.

Policy Text

Columbia University has embarked upon a long-term initiative that entails: a comprehensive review of all administrative policies; an annual policy development program; a standard process for the development, revision, and approval of administrative policies; a standard policy format; and a central repository for all administrative policies.

Definition of Administrative Policy

Administrative policies are those policies that are managed by administrative departments reporting up to the Senior Executive Vice President, and meet one of the following descriptions:

- A University policy on an administrative topic that part of compliance for certain City, State or Federal policies. (Examples: evidence of measles, mumps, rubella immunization as a registration requirement for students, consistent with NYS Dept. of Health regulations; documentation requirements for certain international students and scholars receiving non-compensatory stipends, consistent with Social Security Administration regulations.) In these situations, the city, state or federal government promulgate policies/laws/regulations that lay out fairly strict guidelines and little interpretation, and it is the University's policy to be in compliance with their requirements.
- A University policy that governs a business transaction. (Examples: business travel, use of bank accounts, leaves of absence, signature authority.) These policies are often informed by broader governing policies and have compliance as a goal, but they also are developed in response to a broad set of business needs.
- A University policy that outlines a required procedure for an administrative transaction or activity. (Examples: quarterly and annual close of financial records; retroactivity for personnel and payroll transactions) These policies usually are in response to a need for a specific, consistent way of doing something.

Administrative policies are considered separate from educational and research policies.
Administrative policies are considered separate from governance policies.

Annual Policy Program

Each year the members of the Executive Staff for central administration will decide upon the policy work for their respective departments. This work may include new policies, revisions to existing policies and continuation of policy work from the previous year. An executive may, at his or her discretion, amend the policy program during the course of the year. The goal of the annual policy program is to: promote policy work as a regular, ongoing part of University administration; decide upon and communicate policy priorities; and facilitate the tracking of progress on policy work. The policy program will coincide with the calendar year.

Scoping of Development Work

- Each Executive will work with his or her staff to finalize the scope of work for each policy that is part of the policy program. Scope includes:
- Description of the policy that would define parameters for the work

- A set of key questions to answer and/or issues to resolve
- Sub-topics to be included in the work
- Whether review and revision of related procedures and forms will be part of the work

A worksheet that incorporates these components is in the Appendix.

Policy Development Work

The policy development work will be the responsibility of the Responsible Office. The Responsible Office may conduct the work themselves; engage others from around the University in the evaluation, formulation and revision work; or hire someone to do all or part of that work on their behalf.

A required step in the development work is the review by the Administrative Policy Advisory Council. This group, comprised of administrators from schools and departments as well as a representative from the Provost's office, will provide feedback on operational impact, compliance, fit with other policies, and other concerns. The Council will assess the readiness of a policy for final approval. The Council is not required to make consensus recommendations. The feedback of the Council should be written up and become part of the file for the draft policy that will go to the Policy Approval Committee. It is the responsibility of the Responsible Office to determine the response to the feedback provided by the Administrative Advisory Council. The Responsible Office is encouraged to seek out additional feedback from other constituencies, in addition to the formal feedback from the Administrative Policy Advisory Council, as part of the development work. A roster of the Administrative Policy Advisory Council is in the Appendix.

The Responsible Office should also inform the General Counsel's Office, early in the development work, about the topics to be addressed in the work on the policy so the General Counsel's Office can identify any concerns and/or issues for consideration. A contact for the General Counsel's Office is in the Appendix. The Responsible Office should have at least one subsequent review of the draft policy prior to its submission for final approval to the Policy Approval Committee.

Procedures, forms, and user guides can be reviewed by the Administrative Policy Advisory Council for feedback, but are not required to be submitted as part of the approval process. The Responsible Office will have the responsibility and authority to approve procedures, forms and user guides.

Policy Format

As administrative policies are reviewed, they should be re-written in accordance with the policy format that has been created as part of this policy. The policy format template is in the Appendix.

In accordance with the new policy format, procedures, forms, and user guides should be included in the appendix of the policy document, not in the policy text.

Policy Approval

Administrative policies will be reviewed for final approval by the Policy Approval Committee, which will include the Executive Vice President for Finance, the Executive Vice President for Student and Administrative Services, Executive Vice President for Facilities, and the General Counsel. Subject to any requirements of the University's governing documents or limitations imposed by the University Trustees or President, this group has the authority to approve administrative policies. This group also has the authority to reject a proposed policy and require revisions and resubmission of a draft policy for their review. This group will determine the process, schedule and format of submissions to them. The Policy Approval Committee will also determine whether a policy should be re-circulated on a regular basis after the initial dissemination (e.g. annual circulation of a policy to all faculty and staff.) A roster of the Policy Approval Committee is in the Appendix.

Policy Dissemination

Once policies have been approved by the Policy Approval Committee, they will be sent to the Administrative Policy Advisory Council for dissemination, as well as back to the Responsible Officer for departmental distribution. Approved policies will be kept in the Administrative Policy Library.

Policy Library

The central administration of the University maintains a central, online repository for administrative policies. The repository contains all policies that have been approved by the Policy Approval Committee.

Responsibilities

Executive Staff – responsible for setting and tracking the progress of the annual policy program.

Responsible Officer – responsible for determining scope and work plan for policy review; responsible for completion of plan and submission of proposed changes to Policy Review Committee; responsible for approving procedures, forms and user guides.

Responsible Office – responsible for carrying out work plan, soliciting feedback on proposals, including submission of proposal to Business Officers Group for feedback.

Administrative Policy Advisory Council – responsible for providing feedback on proposed policy changes, particularly on operational impact; responsible for providing written feedback for inclusion in packet submitted to Policy Review Committee.

Policy Approval Committee – responsible for final approval of administrative policies; responsible for providing feedback and direction on policies not approved.

Definitions

Administrative policy - those policies that are managed by administrative departments reporting up to the Senior Executive Vice President (see more detailed definition on page 2).

Policy Library - an online repository of administrative policies that: contains the full text of policies; is organized by categories and searchable by key words; contains URL links to related procedures and forms for policies.

Contacts

University Administrative Policies – Anne Sullivan, Executive Vice President for Finance, 212-854-4038, asullivan@columbia.edu;

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