

**BURRELL COLLEGE
OF OSTEOPATHIC MEDICINE
POLICY MANUAL**

SECTION: General Administrative

BCOM Policy 2001

TOPIC: Creation, Modification & Maintenance of Policies

Approval Date: 01/13/17

Revised/Effective Date:
01/2017, 10/12/17

Approved: Signature on File
President

Page 1 of 6

PURPOSE

This document encompasses the procedural steps for creation, modification and maintenance and communication of policies, and is designed to enhance institutional ethics and integrity, operational efficiency, best practices, effective decision making, and compliance with appropriate statutes and regulations throughout the Burrell College of Osteopathic Medicine (BCOM).

SCOPE

The Board of Managers has delegated full authority for policy and procedure approval to the Board of Trustees. The Board of Trustees has delegated approval of certain policies, and of all procedures, to the President or his/her designee. This procedure applies to all BCOM personnel, and deals with the documentation and format of all official policies and procedures, and the forms used to execute and/or follow these policies.

RESPONSIBLE POLICY OFFICIAL(S):

The Responsible Policy Official(s) for this policy includes the President, Dean/Chief Academic Officer (CAO), and any employee specifically delegated by these individuals to oversee the development and administration of this policy.

DEFINITIONS

Responsible Policy Official (RPO): The administrator assigned under this policy to coordinate the development, modification, review and elimination of policies and procedures within an assigned area of responsibility. The RPO acts under authority delegated from the Board of Trustees to the President and Dean/Chief Academic Officer to the RPO.

POLICY

The development and maintenance of policy and procedures within BCOM shall include the review and recommendation of representatives of all BCOM divisions to the Dean/Chief Academic Officer and the President. A Policy and Procedure (P&P) Committee has been established under the authority of the President and Dean/Chief Academic Officer to fulfill this objective.

The P&P Committee is charged to perform three primary functions: (a) to serve as an advisory body made up of representatives from major divisions within the College; (b) to ensure that both policies and procedures are thoroughly reviewed prior to creation of, modification of, and approved and implemented according to this procedure, effectively communicated to College stakeholders, and periodically reviewed for modification and maintenance; and (c) to oversee the development and effective dissemination of procedural manuals which are not in conflict with approved policy, but rather support compliance with policy and good operating practices. Any College stakeholder may approach the P&P Committee with a request for a policy or procedure to be reviewed in accordance with the guidelines in this document.

Membership and chairmanship of the P&P Committee is assigned by the President and Dean/Chief Academic Officer, as needed.

POLICY CREATION AND DEVELOPMENT

A policy may be initiated by a Responsible Policy Official with the authority and responsibility for the subject area addressed within the policy. BCOM stakeholders may propose certain policy development or modification to a Responsible Policy Official, but are not authorized to proceed further in policy development outside of the process identified in this document. The Responsible Policy Official will supervise the development and composition of the policy, and may designate and authorize others to assist. Responsible Policy Officials will review, update and seek approvals for all policies, as appropriate. In developing or amending a policy, the Responsible Policy Official will confer

with other College personnel who may be significantly affected by the policy, or who have relevant expertise in the subject matter. Responsible Policy Officials may consult with the President and/or the Dean/CAO, and the College's external legal resources as necessary, at any stage in the development process and in interpreting policies that have been adopted.

Effective Date

All approved policies and procedures will have a default effective date of the following July 1, unless an earlier effective date is deemed to be in the best interests of BCOM by the President and Dean/Chief Academic Officer.

Policy Format

Each policy description will contain the following sections, in the following order, as appropriate:

PURPOSE:

The Purpose section briefly describes the intended application of the policy, and details the intention and objective of the policy therein described.

SCOPE:

The Scope section describes the functional areas, groups, and activities to which the policy pertains.

RESPONSIBLE POLICY OFFICIAL(S):

The Responsible Policy Official(s) section identifies the employee who has official responsibility for the policy.

DEFINITIONS:

The Definition section states the precise meaning of specific terminology used in the policy document.

POLICY:

The Policy section describes the policy, outlines any specific, policy-related procedures, and the operational steps required to conform to the policy.

ATTACHMENTS:

Forms referenced in a policy will be included as part of the policy

RECOMMENDATIONS AND APPROVALS:

Each policy draft will pass through a series of review steps, outlined in this document, prior to being presented for approval by ratifying College Officials. The applicable reviewers will be determined by the type of policy, as indicated in the approval matrix. Reviewers will forward a policy with one of three recommendations, to which comments may be appended: (a) recommend approval, (b) recommend approval with modifications as submitted, and (c) recommend disapproval. The full recommendation packet of documentation will be forwarded to the designated approvers as supporting information.

Policy Coding

Policies will be numbered using a four-digit consecutive number with the first digit representing the Policy category and the last three digits a sequential number of the Policy in that category. Subsections may be created within categories as necessary.

College policies will be classified within one of the following numbered categories:

1000	Board Policies
2000	General Administration Policies
3000	Student Administration Policies
4000	Human Resources Policies and Procedures
5000	Business Policies
6000	Academic Policies

7000	Research and Scholarly Activity Policies
8000	Ancillary Operations
9000	Financial Aid Policies

Policies will be categorized by the final level of approval required: Institutional and Departmental. Board Policies (category 1000 which are considered institutional), require Board of Trustees approval. All other policies are departmental. General Administration Policies (category 2000), Student Administration Policies (3000), Human Resource Policies and Procedures (4000), Business Policies (5000) and Financial Aid Policies (9000) require the President's approval; and Academic Policies (6000) and Research Policies 7000) require the Chief Academic Officer's approval, as outlined in [Policy Authority](#) .

In all categories, the President will forward any policy to the Board for its approval if it is a policy required by COCA or other external regulatory bodies, or if in the President's professional judgment, it is in the best interest of BCOM for the Board to approve any specific policy or procedure.

Creation of Policies

To develop a new policy, the Responsible Policy Official, working with appropriate collaboration, creates the formatted policy document and submits a draft version for review per the approval matrix below.

The approval chain for each policy will be determined by category and scope of the draft policy. For example, an Academic Policy would be initiated by the Associate Dean of Academic Affairs, and circulated to the Faculty Council for their review and discussion, then to the Policy and Procedure (P&P) Committee, and finally to the Dean/CAO and President. This process is summarized in the Approval Matrix.

Draft policies will be labeled as drafts, and circulated as such, until a final version is agreed upon and circulated for final recommendation and approval signatures. Any comments or additional recommendations for change made during the review process will require that the policy be rerouted for approval. No policy is finalized until the final level of approval as indicated in the Approval Matrix has been documented. Control of documentation of approval of policy is delegated to the Executive Assistant to the President and Chief Academic Officer.

The Executive Assistant, or designate, ensures that the approved or revised policy is posted on the BCOM website and retains an electronic and hard copy of the original policy document in secure locations.

All employees will be advised timely when policies are available on the BCOM website. The same process will be followed for revision or elimination of policies.

Maintenance and Revision of Policies

All policies will be reviewed on an annual basis to ensure that they are applicable and correct. The review process is initiated by the Policy Committee Chairperson, using the Policy Form and checking the box marked "Periodic Review." The document will be circulated to the appropriate personnel for review, and reviewers will make changes, as necessary and appropriate, on the circulated copy, and return the form to the Responsible Policy Official; this includes policies deemed to be retired/deleted.

If necessary, the Executive Assistant will initiate a revision of the policy, as described above in "Revising Policies", and a copy of the Policy revision will be circulated for final approval, as per the protocol described above.

Revising Existing Policies

An existing policy that requires updating/revision must be accompanied with a Policy Review/Approval Form. A working copy of the existing policy can be obtained by e-mailing the Executive Assistant. A working copy of the policy will be provided, noted as draft, dated and the name/initials of the person requesting the copy. The recommended revisions will also be "tracked" so that changes are evident to the reviewers.

Timeline for Policy Review

It is the goal of this procedure that each policy proposed by a Responsible Policy Official will not remain in the review process longer than 60 days. The review process is summarized below, with a schedule in support of this goal. In all cases, the approving office will rely upon the negative assurance of the reviewing bodies: failure to request more time for review prior to the end of the allotted scheduled time will be taken as assent with the last proposed policy draft by the approver.

- P&P Committee review of documents submitted by Responsible Policy Official: 10 business days
- Responsible Policy Official revision of documents based upon P&P Committee recommendations, including returning to advisory groups for reworking of document: 10 business days
- P&P Committee review of resubmitted documents: 5 business days
- Approver review of documents with P&P Committee recommendations: 3 business days
- Second-level approver review of documents: 3 business days

Approval Matrix

The Responsible Policy Official for each category of Policy will be as indicated below, or as otherwise designated by the President and/or Dean/CAO. As noted, the President will forward any policy to the Board for its approval if it is required by COCA or other external regulatory bodies, or if in the President's professional judgment, it is in the best interest of BCOM for the Board to approve any specific policy or procedure*.The approval process is outlined in the matrix below:

Policy Category	Responsible Policy Official	Approvers
Board	President and/or Dean/CAO or Executive Assistant	CAO, President, Board
General Administration	President and/or Dean/CAO or Chief Financial Officer	CAO, President
Business	Chief Financial Officer	CAO, President, Board*
Human Resources	Director of Human Resources	CAO, President, Board*
Student Administration	Student Affairs Dean/ Associate Dean for Graduate Education/Representative(s)	CAO, President, Board*
Academic Policies	Academic Affairs Dean/Representative	CAO
Research & Scholarly Activity	Director of Research & Scholarly Activity/Representative	CAO
Financial Aid	Director of Financial Aid	CAO, President, Board*

*Will be forwarded to the Board as deemed appropriate as noted above.

ATTACHMENTS

Policy Review/Approval Form

6. Why is a change being proposed? Include any external or internal triggering events, such as a change in federal regulations, addressing a new risk, etc.	
7. Are there other existing administrative policies that overlap or are closely related to this policy? If yes, which one or ones?	
<input type="checkbox"/> Yes If yes, list Policy title(s): <input type="checkbox"/> No	
8. Please quantify the impact of the new or revised policy or procedures.	
Cost to develop and implement	
Ongoing costs	
Audience directly impacted	
Number of employees/students/or others	
Processing time at the individual or dept. level	
Other (please describe)	
9. If this a new policy or revisions are significant, outline the communication plan that will be used to inform affected stakeholders about this revised policy/procedure(s).	
10. Check those items below where you have confirmed that the policy revision is in alignment with:	
<input type="checkbox"/> Board Policy and Bylaws	<input type="checkbox"/> Federal and/or state laws <input type="checkbox"/> Other _____
11. Frequency of Comprehensive Review:	
<input type="checkbox"/> 5 year	<input type="checkbox"/> Special (term) Frequency: _____
12. Additional information and/or comments:	
13. This policy was reviewed by: (list committees, departments, organizations, etc.)	
RESPONSIBLE POLICY OFFICIAL _____	DATE: _____
DEAN(S) _____	DATE: _____
P & P COMMITTEE _____	DATE: _____
BOARD OF TRUSTEES _____	DATE: _____
OTHER _____	DATE: _____
For Policy Administration Use Only	
Received _____	Sent to P&P C for Review: _____ Policy Posted: _____
Policy Repealed: _____	Official Live Policy Date: _____ P&P C Approved: _____
Policy Review Date: _____	Procedure Review Date: _____