



CORNELL UNIVERSITY  
POLICY LIBRARY

# Formulation and Issuance of University Policies

## POLICY 4.1

Volume: 4, Governance

Chapter: 1, Formulation and  
Issuance of University Policies

Responsible Executive: Executive  
Vice President for Finance and  
Administration

Responsible Office: Vice President  
for Financial Affairs and University  
Controller

Originally Issued: March 1993

Revised: May 16, 2002; April 10,  
2007, November 20, 2007

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## POLICY STATEMENT

Cornell University formally approves, issues, and maintains in a consistent format, official university policies in a central policy library. Individuals engaged in developing and maintaining university policies must follow the requirements outlined in this document for drafting, approving, revising, and withdrawing university policies.

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## REASON FOR POLICY

University policies must be thoroughly reviewed, maintained, and made available to the university community to promote practicality, compliance, and accountability.

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## ENTITIES AFFECTED BY THIS POLICY

-All units of the university

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## WHO SHOULD READ THIS POLICY

- Unit heads and administrators
- Individuals considering issuing, revising, or assisting the drafting of a Cornell University policy

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## WEB SITE ADDRESS FOR THIS POLICY

- This policy: [www.dfa.cornell.edu/dfa/treasurer/policyoffice/policies/volumes/governance/policies.cfm](http://www.dfa.cornell.edu/dfa/treasurer/policyoffice/policies/volumes/governance/policies.cfm)
- University Policy Office: [www.policy.cornell.edu](http://www.policy.cornell.edu)

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### CONTACTS

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Direct any general questions about University Policy 4.1, Formulation and Issuance of University Policies to your unit's administrative office. If you have specific questions, call the following office(s):

<b>Subject</b>	<b>Contact</b>	<b>Telephone</b>	<b>E-mail/Web Address</b>
Policy Clarification and General Information on Policy-Making at Cornell	University Policy Office	(607) 255-6837	<a href="mailto:cornell-policy-office@cornell.edu">cornell-policy-office@cornell.edu</a> <a href="http://www.policy.cornell.edu">www.policy.cornell.edu</a>

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## DEFINITIONS

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<b>Editorial Committee</b>	Ad hoc committee of individuals, including representatives of the Weill Cornell Medical College, whose regular job functions include responsibility for the subject of a new or revised policy, and who, therefore, are selected to provide input on its content and assist its re/writing.
<b>Entities Affected by This Policy</b>	All units of the university are governed by university policies, although some units who have unique circumstances surrounding their operations (such as the Weill Cornell Medical College) may, with the permission of the EPRG, establish separate procedures for fulfilling these policies.
<b>Executive Policy Review Group (EPRG)</b>	Standing committee of university executives who provide institutional review and approval of impact statements and final drafts of proposed, full policy documents. The committee members are appointed by the Executive Vice President for Finance and Administration (EVP) and comprise vice provosts, vice presidents and deans, the University Auditor, University Counsel, and executive representation from the Weill Cornell Medical College. The EVP or his or her designee chairs the meetings, which typically occur on a quarterly basis.
<b>Impact Statement</b>	Brief, confidential document that proposes a new policy or major revisions to an existing policy. The document describes the background, justification, and the likely impact of the new or revised policy. It is presented by the responsible executive to a meeting of the EPRG.
<b>Interim Policy</b>	Provisional policy document issued when a university policy is needed within a time period too short to complete the process described herein. Is in effect for at least 6 months with possible extensions of six-month increments. In the case of a new policy, this document comprises the sections on the front page of the policy document template with information from the approved impact statement. When the EPRG has approved the impact statement proposing substantial revisions to an existing policy, the interim policy may comprise the full document.
<b>Policy Advisory Group (PAG)</b>	Standing committee of senior university administrators and others who review full drafts of all proposed, new and substantially revised policy documents, so that the documents achieve maximum practicality and can be recommended to the EPRG for approval. Comprises senior administrators from across the university, who are appointed by the Vice President for Financial Affairs and University Controller, who oversees the UPO.
<b>Policy Statement</b>	Statement on the front page of a policy document that encapsulates the policy's purpose, namely its core provisions or requirements.
<b>Policy Principles</b>	An expansion of the Policy Statement, this section of the policy document details the policy's substance, namely its core provisions or requirements.
<b>Policy Procedures</b>	Minimal actions that apply across the university community to fulfill the policy's principles, contained in a designated section of the policy document. Where the EPRG deems appropriate, these actions may be tailored to the unique administrative requirements of a unit, such as those of the Weill Cornell Medical College. Will not include details,

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### DEFINITIONS, continued

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	such as the responsible office's protocol, nor actions that are optional or only desirable. This latter category of information may be provided in the Appendix section of the policy document.
<b>Promulgation</b>	Official declaration that a policy is in effect.
<b>Reason for Policy</b>	Statement on the front page of a policy document that encapsulates why the policy exists. Identifies the institutional risk, university mission or value, or any legal or regulatory requirements the policy addresses.
<b>Responsible Executive</b>	Unit head that creates, implements, and gains compliance for, or "sponsors," a university policy that falls under his or her jurisdiction. Depending on the scope of its subject matter, a policy may have more than one responsible executive.
<b>Responsible Office(s)</b>	Office(s) designated by the responsible executive(s) to develop and administer a policy, communicate with and train the university community in its requirements, and execute its timely updating and revisions.
<b>Stakeholder</b>	Individual, function, or organization identified in the impact statement for a proposed policy, whose university role or professional expertise relates to the subject of the policy, and who, therefore, is consulted for comment on its draft.
<b>Unit-Level Policies</b>	Policies of colleges, departments, or operating units that do not meet all characteristics of a university policy. (The UPO is not staffed to provide unit-level policy support.)
<b>University Policy</b>	Official university directive that: <ol style="list-style-type: none"> <li>1. Mandates requirements of or provisions for members of the Cornell University community, and provides procedures for implementation</li> <li>2. Has broad application throughout the university (including the Weill Cornell Medical College)</li> <li>3. Enhances the university's mission, reduces institutional risk and/or promotes operational efficiency</li> <li>4. Has been reviewed and approved by a committee of university executive officers, typically the Executive Policy Review Group (EPRG)</li> <li>5. Is sponsored by at least one university executive</li> <li>6. Help achieve compliance with any applicable laws and regulations</li> </ol> Also, see the Note below.
<b>University Policy Document</b>	The official record of a university policy that is presented in a standard format or "template" to facilitate consistency, clarity, and conciseness. The front page of the document template carries the "Policy Statement." Included in the rest of the document is the "Principles" section, which details the fundamental provisions or requirements of the policy; and "Procedures," which specifies the tasks required to deliver these provisions or requirements. Where the EPRG deems appropriate, these tasks may be tailored to the unique administrative requirements of a unit (such as the Weill Cornell Medical College). While the Principles section expresses the immutable purpose of the policy, the Procedures section is susceptible to change, particularly when new technology or best practice emerges.

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### DEFINITIONS, continued

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	Official policy documents carry the seal of the university on the first page.
<b>University Policy Office (UPO)</b>	University office charged with stewardship of the policy development process and of the official policy template, editing drafts of policy documents, guiding policies through the development process, and maintaining a central repository of university policies.

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◆ **Note:** There are some policies that predate this policy, and so, as yet, have not been through the entire process outlined herein. They remain official university policies and, in time, are expected to complete this process.

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### RESPONSIBILITIES

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<b>Editorial Committee</b>	Guided by the impact statement approved by the EPRG, provide technical assistance to the responsible office in drafting a policy.
<b>Executive Policy Review Group (EPRG)</b>	<p>Apply an institutional perspective to the review and approval of impact statements and, upon the recommendation of the PAG, of full policy drafts of both new and substantially revised policies, in particular, their principles. Approve an impact statement as agreement that a proposed policy may be promulgated on an interim basis. All impact statements may be approved, but not all such approvals constitute consent to issue as an interim policy.</p> <p>Approve finalized, full policy draft for promulgation.</p> <p>Typically, meet once quarterly.</p> <p>May consult with the president of the university and/or other senior executives of the university.</p>
<b>Policy Advisory Group (PAG)</b>	<p>Review and make recommendations to draft policies presented by responsible offices, so that these documents, as written, achieve practicality and consistency within the context of Cornell's operations.</p> <p>Agree on finalized, full policy draft to be forwarded to EPRG for approval.</p> <p>Typically, meet once monthly.</p>
<b>Responsible Executive</b>	<p>Be accountable for the substance of policy documents, namely the provisions and requirements of, and compliance with university policies under his or her jurisdiction.</p> <p>Accordingly:</p> <ul style="list-style-type: none"> <li>• Identify the need for and purpose of a policy in relation to a subject that falls under his/her jurisdiction</li> <li>• Designate a responsible office to develop and administer the policy</li> <li>• Determine how stakeholder comments on drafts of the policy should be incorporated</li> <li>• Approve final drafts of all impact statements and policy documents before they are presented to the EPRG, PAG, stakeholders, and the university community for review, approval, comment, promulgation, or compliance</li> <li>• Present policy documents, including impact statements, to the EPRG</li> <li>• When the related impact statement has been approved by the EPRG, may request that a policy be promulgated on an interim basis</li> <li>• Conduct timely reviews of existing policies under his or her jurisdiction</li> <li>• Where appropriate, advise EPRG of intent to withdraw an existing policy or to consolidate with another policy</li> </ul>
<b>Responsible Office</b>	<p>When requested by the responsible executive to develop a policy, form an editorial committee to provide technical assistance.</p> <p>Assisted by the UPO, draft the impact statement.</p>

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### RESPONSIBILITIES, continued

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	<p>Guided by the approved impact statement, provide the content for full policy drafts, assisted by the editorial input of the UPO.</p> <p>Work with the UPO in putting policy drafts through the standard policy review cycle and making the resulting changes to the document.</p> <p>At appropriate times in the policy drafting process, in consultation with the responsible executive, seek, and, consider incorporation of stakeholders' input.</p> <p>Consult with the responsible executive while drafting a policy, so that the content continues to reflect the policy's original purpose.</p> <p>Lead the establishment of any new support systems needed to achieve community compliance with new or substantially revised policies.</p> <p>Inform the university community on new, revised, or withdrawn policies, and provide training as necessary.</p> <p>Consult with the responsible executive to update existing policies on a timely basis.</p>
<b>Stakeholder</b>	<p>When invited by the responsible executive or responsible office, comment on a draft policy in relation to its likely impact on members of the Cornell community.</p>
<b>University Policy Office (UPO)</b>	<p>Design, implement, and review a document template, process, and system for developing, reviewing, issuing, storing, and revising university policies.</p> <p>Generally guide the responsible executive and responsible office through the policy development process.</p> <p>Provide the structure, formatting, expression, and other editorial aspects of documents to assure their clarity and coherence.</p> <p>Lead the process for reviewing and approving draft policies, involving control of draft documents and engagement of the EPRG and PAG.</p> <p>Arrange and chair PAG meetings.</p> <p>Consult with the responsible executive and responsible office to determine when revisions to an existing policy should be presented to the PAG or EPRG for review and/or approval.</p> <p>Issue a university-wide announcement to promulgate or, where appropriate, withdraw a university policy.</p> <p>Initiate review of policies whose requirements and/or provisions have been in effect for five years or longer.</p> <p>Maintain a repository of all university policies, including control of all official versions.</p> <p>May share best practice on Cornell's policy development activity with other institutions.</p>

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## PRINCIPLES

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### Overview

With the approval of the executive leadership of the university, a unit head may use policy-making as a tool for establishing requirements of the university community that relate to his or her jurisdiction. In this way, university policies connect the university's mission to individual conduct, clarify institutional expectations, support compliance with laws and regulation, mitigate institutional risk, and enhance productivity and efficiency in the university's operations.

Cornell has established a standard policy document and review process to achieve consistency, appropriateness, and ease of understanding of, ease of access to, and compliance with university policies. The university charges the University Policy Office with the responsibility to manage this standard document and process and related systems, and to assist others to engage them effectively.

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## PROCEDURES

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◆**Note:** There are some polices that predate this policy, and so, as yet, have not been through the entire process outlined herein. They remain official university policies and, in time, are expected to complete this process.

### Proposing a Policy

Policy is employed by “responsible executives,” namely unit heads, to support the missions of their units to the university. Any individual or unit may identify the need for a new policy, but at least one responsible executive must agree to sponsor its development and be accountable for the content of its principles and procedures. The responsible executive(s) will appoint (a) responsible office(s) to consult with the University Policy Office (UPO) in developing that policy. The responsible office(s) will develop an impact statement on behalf of the responsible executive, assisted by the UPO. Key stakeholders, who will be consulted during the policy drafting process, will be listed in this impact statement. As with all policy documents, the responsible office will provide the content, while the UPO will be responsible for the editorial aspects of the impact statement. The responsible executive will approve the final draft of the impact statement before it is distributed to members of the Executive Policy Review Group (EPRG) for review and approval.

The impact statement, which proposes the establishment of a new policy or major revision to an existing one, will be presented by the responsible executive to the EPRG for review and approval. To provide the EPRG with information on which to base this approval, the impact statement will include the justification for this proposed new or revised policy, a list of stakeholders who will be consulted during drafting, and the anticipated impact on the university.

The “Policy Statement” and “Reason for Policy” sections from an EPRG-approved impact statement may be used to produce an interim policy document.

### Developing a Policy

The EPRG-approved impact statement is used to guide the drafting of the full policy document, which is accomplished by the responsible office, assisted by the editorial committee and the UPO. The responsible office controls the content of the policy document, while the UPO provides the editorial aspects and converts the draft into the standard policy template.

When the responsible executive has approved this draft, he or she will share the document with those stakeholders identified in the impact statement for their comment. This feedback must be considered by the responsible office who, along

## Formulation and Issuance of University Policies

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### PROCEDURES, continued

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with the responsible executive, will determine whether and how these responses will be incorporated.

#### **Reviewing and Approving a Policy**

With the responsible executive's approval, the UPO will distribute the draft of the policy document to members of the Policy Advisory Group (PAG) in advance of a PAG review meeting. The responsible executive or the responsible office will present the draft policy to the meeting, where the document will be reviewed for practicality and clarity. After the PAG meeting, the UPO and responsible office will review and make accepted changes proposed by the PAG. Then, the PAG will recommend that the EPRG approve the reviewed document.

With the responsible executive's approval, the UPO will distribute the final draft of the policy to members of the EPRG in advance of the EPRG meeting. The responsible executive will present the final policy draft to this meeting, where the EPRG will deliberate on final approval of the policy, in particular its principles. The UPO and responsible office will make changes as directed by the EPRG.

Once the EPRG and the responsible executive have approved the document, the UPO will note on the document the date of final approval as the date the policy was "Originally Issued," and will promulgate the policy to the university community through a formal announcement.

#### **Updating a Policy**

On an as-needed basis, the responsible office will request that the UPO make routine changes (such as new contact names, position titles and e-mail or Web addresses) to an existing policy document. The UPO will note the date of such changes next to "Updated" on the policy document.

#### **Revising a Policy**

Changes to the policy's substance, or principles, must be approved by the EPRG, based on the submission of a new impact statement, and may be announced, or "promulgated," to the university community by the UPO. Significant changes to procedures must be reviewed by the PAG and may be announced to the university community by the responsible executive. Review of the entire policy will be conducted at least every five years by the responsible executive, as prompted by the UPO. The extent of any changes resulting from this review will determine the review process. The UPO will note the date of all revisions next to "Revised" on the policy document.

Revised policy documents will be presented showing changes, unless these changes are so substantial as to make this impractical. In this event, the existing policy

## Formulation and Issuance of University Policies

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### PROCEDURES, continued

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document and the document with the proposed revisions will be provided to the EPRG at the time of review.

#### **Communicating, Promulgating, and Training**

The UPO will issue an announcement of a new or substantially revised policy. In the case of a new policy, this announcement will constitute its promulgation. The responsible office will deliver any additional communication or training, and will assist the responsible executive to establish any support systems necessary to achieve ongoing compliance.

#### **Establishing an Interim Policy**

When a policy is needed within a time period that does not allow for complete drafting and review of the policy document as outlined in this document, the responsible executive may request the EPRG to allow promulgation of that policy on an interim basis. The EPRG must give explicit permission to issue a policy as interim.

An interim policy document comprises the sections of the front page of the policy document template with information from the approved impact statement. When the EPRG has approved the impact statement proposing substantial revisions to an existing policy, the interim policy document may comprise the full template.

Interim policies are effective for six months, up to a maximum of 12 months. Extensions beyond this period must be approved by the EPRG. This date may be extended in six-month increments. To derive the benefits of a standard policy document and the full review cycle, the interim policy must complete the process outlined in this document, preferably, within one year of the issuance of the interim policy.

#### **Withdrawing a Policy**

In special circumstances, a responsible executive may deem it appropriate to withdraw an existing policy or consolidate with another policy and will inform the EPRG of this intent. The UPO may issue an announcement of a withdrawn policy. The responsible office will deliver any additional communication.

#### **Compliance**

The responsible office assists compliance through the establishment of normal business practices, some of which will be outlined in the policy's procedures, which support implementation of the policy. Routine human resources procedures also may assist compliance. The University Audit Office employs policies as a measurement tool in regular assessments of university operations. In addition, communications with and training of the university community will facilitate compliance.

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## PROCEDURES, continued

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### **Applying Policies to Unique Administrative Arrangements**

The policies outlined in this document apply across the university; however, if the EPRG agrees, the procedures that support those policies may be tailored to the special administrative arrangements of a unit. For example, a policy's procedures for the Weill Cornell Medical College may differ from those for Cornell's Ithaca campus.

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## FORMS AND TOOLS

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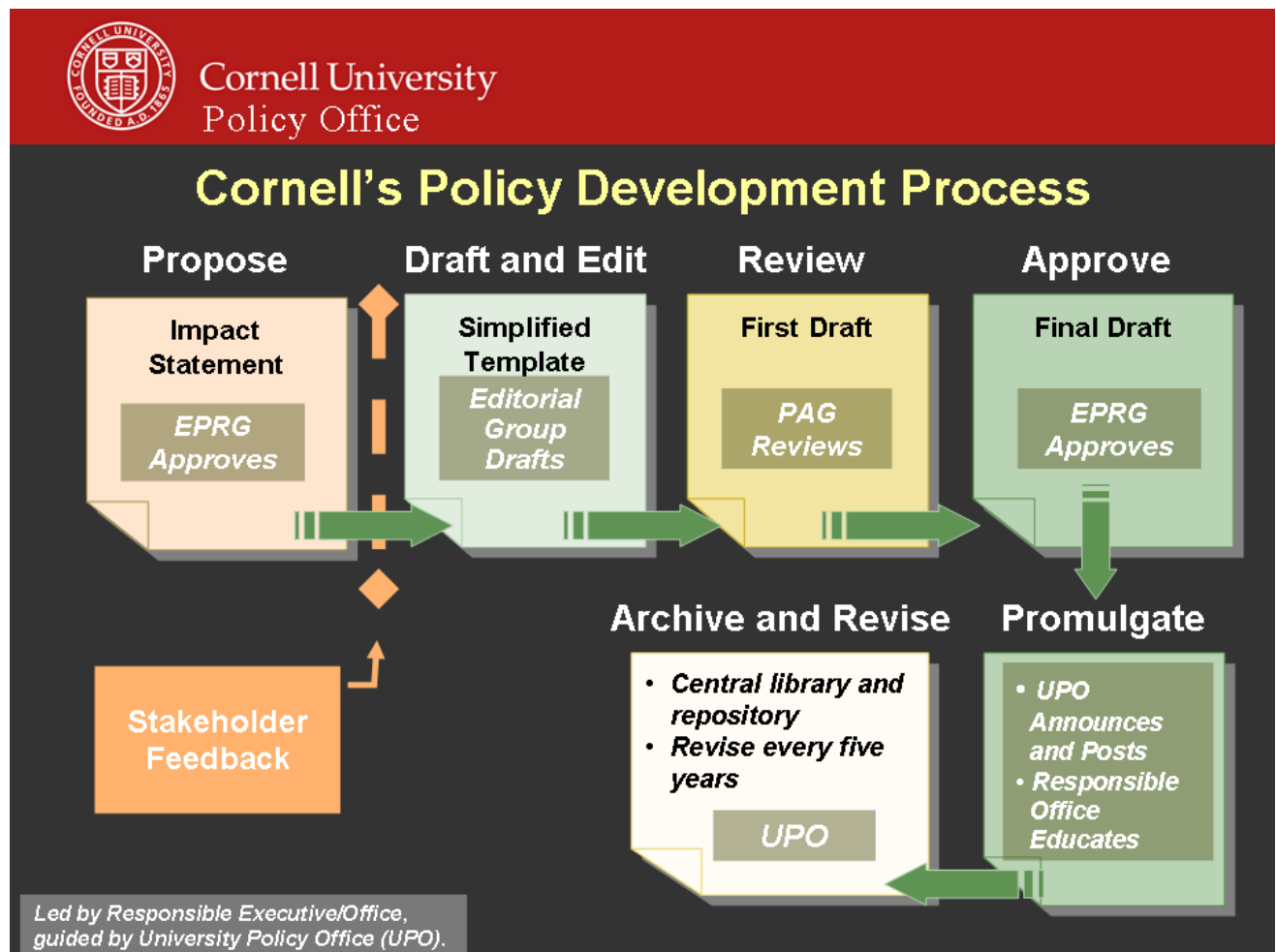
Name	Location
Policy Tool Kit, including impact statement and policy document templates	<a href="http://www.dfa.cornell.edu/dfa/treasurer/policyoffice/development/">www.dfa.cornell.edu/dfa/treasurer/policyoffice/development/</a>

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### APPENDIX

The following process diagram outlines Cornell University's policy development process.



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