Monroe Community College
STATE UNIVERSITY OF NEW YORK

2.29 Policy on Policies

Category: Administration

Name of Responsible Office: Institutional Compliance and Internal Audit

Title of Responsible Executive: Vice President, Institutional Advancement and Executive Director, MCC Foundation

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<ins> indicates inserted content

<del> indicates deleted content

Policy Statement

Through the leadership of the Board of Trustees and Executive Leadership Team (ELT), Monroe Community College establishes campus wide policies to create consistent practices and business operations, set behavioral expectations across the College, mitigate institutional risk, and communicate campus wide roles and responsibilities. MCC policies also promote compliance with applicable federal, New York State, and local laws or the State University of New York (SUNY) requirements. Individuals responsible for preparing, reviewing, revising, or retiring campus wide policies must comply with the requirements and procedures outlined in this document. Faculty, staff, students, and third parties who use or provide College resources or services must follow all applicable campus wide policies. **NOTE: Unless otherwise specified, College Policies are administered pursuant to authority delegated by the Board of Trustees.**

Policy

1.1 Scope

This policy applies to all policies governing the College's academic affairs, student services, administrative functions, and operational procedures. It encompasses new policy development, <ins> implementation, enforcement, periodic review or assessment, <del> ~~policy~~ revisions, and <del>~~policy~~ rescission <ins> or decommission. All College divisions, offices, and departments must adhere to this process when proposing, revising, or retiring policies.

<ins> All policy owners must route proposals through the designated shared governance bodies based on the policy domain Shared Governance Purview Matrix. Academic policies shall continue to follow already established academic policy review processes. The checklist below includes the Shared Governance Purview Matrix to identify the correct routing at the project's inception.

<ins> Shared Governance Purview Matrix

Policy Domain / Subject Matter	**Primary Shared Governance Body**	**Role / Level of Authority**
Academic Affairs, Curriculum, Academic Standards, Instructional Delivery, Student Academic Requirements, Faculty Academic Responsibilities	Faculty Senate / Academic Policies Committee (APC)	Required Formal Governance Review & Recommendation Vote (Prior to ELT Advancement)
Human Resources, Workforce Policies, Benefit & Personnel Rules	Special Committee on Administrative Affairs (SCAA)	Required consultation & formal review (coordinated via Executive Director of HR)
Administrative Searches, Reorganizations, Position Reviews	Special Committee on Administrative Affairs (SCAA)	Consultation & advisory review
Student Life, Student Services, Non-Academic Student Conduct	Student Governance / Designated Student Committees & Shared Governance Partners	Stakeholder consultation & advisory review
General Operations, Budget, Compliance, Facilities, IT	Relevant Shared Governance Committees & Subject Matter Experts	Stakeholder consultation & advisory review

1.2 Process Policy Creation and Review

Step 1: Initial Research and Consultation

- The Policy Owner, typically a subject-matter expert or designated staff member, begins the process by consulting with the policy division representative for guidance.
- To ensure adherence to proper procedures, the Policy Owner must utilize the Checklist for Creating a New Policy form (PDF), which outlines the necessary steps for policy development.
- The Policy Owner is required to discuss the justification for the new policy or any modifications to current policies with the Responsible College Officer to secure their support. The Responsible College Officer will then notify the President about the new policy or the proposed amendments.
- After securing support from the Responsible College Officer, the Policy Owner will identify and consult with key stakeholders, including, for example, faculty, administrators, staff, students, and relevant committees, to gather input and ensure their perspectives are considered.

Step 2: Stakeholder Review

- Prior to drafting a new policy or revising an existing policy, the Policy Owner must complete the Checklist for Creating New Policy form (PDF). The checklist must be maintained and updated throughout the policy development or revision process to document key decisions and approvals.
- The Policy Owner shall draft the proposed policy or revision using the approved Policy Template. All required sections of the template must be completed unless an exception is formally approved by the designated Responsible College Officer.
- The draft or revised policy must be distributed to relevant stakeholders (may include, as applicable, faculty, administrators, staff, students, and relevant committees, as well as institutional compliance personnel and legal counsel) for initial feedback. Revisions to existing policies must be made using the Microsoft Word **"track changes"** functionality to ensure transparency and auditability. Existing policies must also be reformatted, as necessary, to comply with the current policy template and formatting standards.
- Stakeholder feedback <del> ~~shall~~ <ins> must be documented and evaluated by both the Policy Owner and Institutional Compliance and Internal Audit office to improve clarity, feasibility, and alignment with institutional objectives and risk management considerations.
- The Policy Owner shall coordinate with the following reviewers to assess and document the legal, regulatory, compliance, financial, and operational impacts of the proposed policy or revision:
  - Executive Director of Human Resources and Organizational Development <ins> (who shall work directly with SCAA on all HR and workforce-related policies)
  - Chief Diversity Officer
  - Institutional Compliance Officer and Internal Auditor
  - Chief Financial Officer / Vice President of Administrative Services
  - <ins> Faculty Senate and its Academic Policies Committee (APC) for all policies related to academic affairs, curriculum, academic standards, and instructional policy.
  - Other relevant committees or subject-matter experts, as determined by the nature and scope of the policy, for example, legal counsel.

Step 3: Shared Governance Review

- <ins> Prior to advancing to the Executive Leadership Team (ELT) for final institutional approval, policies falling under the purview of specific governance bodies must be formally submitted for a governance vote or recommendation:

    - <ins> Academic Policies: Must be formally reviewed and voted upon by the Academic Policies Committee (APC) and Faculty Senate. Senate review is a required formal governance step, not discretionary stakeholder feedback.
    - <ins> HR / Workforce Policies: Must be formally reviewed in partnership with the Special Committee on Administrative Affairs (SCAA).

- The Policy Owner submits the draft of the proposed policy or revision via email to the Institutional Compliance and Internal Audit Office (complianceandaudit@monroecc.edu).
- The Institutional Compliance and Internal Audit Office shall coordinate with the President's Office to place the draft or revised policy on the Executive Leadership Team (ELT) meeting agenda for review and approval. The Responsible College Officer will present the policy to the ELT and may request the participation of the Policy Owner, as appropriate.
- The Institutional Compliance and Internal Audit Office will also distribute the draft or revised policy to shared governance leadership. Shared governance bodies may invite the Policy Owner to attend meetings to provide justification for the policy and to address questions or concerns.
- Upon ELT approval, the Institutional Compliance and Internal Audit Office will formally notify the College community of the proposed or revised policy. Notification will be issued through the *MCC Daily Tribune* and *Student Tribune*, initiating a 30-day College community review and comment period. <ins> This broad campus comment period is separate from, and occurs after, the formal shared governance leadership review and voting steps. The review and comment period will automatically close at the conclusion of the 30-day timeframe.
- Following the close of the College community review and comment period, the Institutional Compliance and Internal Audit Office, in coordination with the Policy Owner, will prepare an executive summary of comments received and document responses to substantive questions or concerns.
    - Any revisions made to the proposed policy or revision after the close of the College community review and comment period must be incorporated into a **redline version** of the policy. The redline document shall be included with the executive summary to ensure transparency and traceability of changes.
    - The Institutional Compliance and Internal Audit Office will distribute the executive summary and redline documents, if applicable, to the College community via the *MCC Daily Tribune* and *Student Tribune*, and will submit the executive summary to the MCC Board of Trustees for a first reading of the proposed policy.

Step 4: Approval by Board of Trustees

- The Institutional Compliance and Internal Audit Office shall prepare the draft of the proposed policy or revision for inclusion on the Board of Trustees agenda and will notify the Responsible College Officer of the scheduled review.
- The Responsible College Officer, and the Policy Owner if requested, shall attend the scheduled Board of Trustees meeting to present the rationale for the draft or revised policy and to respond to questions.
- If the Board of Trustees recommends revisions or raises substantive questions that require further evaluation, the draft or revised policy will be returned to the Policy Owner for further evaluation and, if necessary, recirculated through the applicable policy review process in accordance with the *Process of Policy Creation and Review*. If the Board of Trustees raises no objections or proposed revisions, the Institutional Compliance and Internal Audit Office shall prepare the appropriate resolution, and the policy will be presented for formal vote at the subsequent Board meeting.
- Upon Board approval, the Institutional Compliance and Internal Audit Office will publish the policy on the MCC Policies website and notify all relevant stakeholders of the Board of Trustees' action through established internal communication channels.

1.3 Interim Policies

The President may approve policies on an interim basis when exigent circumstances require the immediate establishment or modification of a College policy and the standard policy approval process cannot be completed within the required timeframe. <ins> To ensure that temporary measures do not inadvertently become permanent without thorough scrutiny, an interim policy shall remain in effect for a period not to exceed six (6) months from the date of issuance (or until it is formally adopted through the established approval process, whichever occurs first). <del> ~~An interim policy shall remain in effect until it is formally adopted through the established approval process or for a **period not to exceed twelve (12) months** from the date of issuance, whichever occurs first.~~

An interim policy may be renewed **no more than once**, for an additional period not to exceed six (6) months, and only upon written justification documenting the continued need for interim status and progress toward full adoption. <ins> Any request for renewal beyond this cumulative 12-month period is strictly prohibited unless approved by the Board of Trustees. If an extended renewal is sought from the Board, the relevant shared governance leadership body (e.g., Faculty Senate/APC or SCAA) must be consulted and provided an opportunity to submit an advisory statement to the Board regarding the extension. <del> ~~Any renewal beyond this period is prohibited unless approved by the Board of Trustees.~~

1.3.1 Interim Policies Expedited Review Process

In circumstances where exigency or emergency conditions prevent engagement with the full shared governance review process or convening a meeting of the full Board of Trustees within the required timeframe, the President and the Chair of the Board of Trustees, or their designee(s) as authorized under the Board Bylaws, may jointly authorize approval of an interim or expedited policy. An Expedited Review may be approved **ONLY** under one or more of the following conditions:

- To respond to changes in applicable federal, New York State, and local laws or the State University of New York (SUNY) requirements; **or**
- To ensure timely compliance with accreditation standards, directives, findings, or requirements issued by a recognized institutional accrediting body when immediate policy action is necessary; **or**
- To address situations in which an existing policy is noncompliant with current legal or regulatory requirements, or to respond to legal, regulatory, or enforcement actions; **or**
- To manage health or safety emergencies that present an immediate risk to students, employees, or the public; **or**
- To comply with federal or state mandates necessary to maintain the College's operational integrity.

1.3.2 Expedited Process

The Policy Owner, in collaboration with the Policy Division Representatives (PDR) body, will assess the scope, urgency, and implementation requirements of the proposed interim policy. Upon determination that an expedited review is warranted, the Institutional Compliance and Internal Audit Office will coordinate the review process with the following parties:

- <ins> Shared Governance Leadership (Faculty Senate/APC, SCAA, or other partners depending on domain purview)
- Executive Director of Human Resources and Organizational Development
- Chief Diversity Officer
- Institutional Compliance Officer and Internal Auditor
- Chief Financial Officer / Vice President of Administrative Services
- Any other relevant committees or stakeholders, as appropriate based on the subject matter of the policy

In alignment with the Executive Leadership Team (ELT) meeting schedule, the Institutional Compliance and Internal Audit Office will work with the President's Office to place the interim policy on the agenda for ELT review. The Responsible College Officer will present the interim policy to the ELT and may request the participation of the Policy Owner as needed.

- **NOTE: IF** no ELT meeting is scheduled in the near term, or if the next meeting occurs too far in the future to address the urgency of the change, the Institutional Compliance and Internal Audit Office will coordinate with the President's Office to electronically distribute the proposed policy to ELT members for immediate review and consideration.

The communication will include a concise summary explaining the rationale for invoking the expedited review process.

- Following consultation with the ELT, the President will determine whether the request for an expedited review is warranted.
- The President will convene an emergency meeting with the Chair of the Board of Trustees or their designee to review and approve the policy.
- If the Chair of the Board of Trustees or their designee raises no objections or proposed revisions, the Institutional Compliance and Internal Audit Office will proceed with publishing the policy on the MCC Policies website and will notify all relevant stakeholders through established internal communication channels.

1.4 Policy Maintenance and Review

- All policies must be reviewed no less than once every five (5) years to ensure continued relevance, effectiveness, and compliance with applicable laws and regulations.
- The Responsible College Officer is accountable for overseeing policy implementation and for recommending revisions or updates when necessary.
- Minor, non-substantive revisions, such as updates to terminology, titles, or formatting, may be approved administratively and do not require full governance review.
- Substantive revisions that materially affect the intent, scope, or applicability of a policy must undergo the full policy review and approval process. The Institutional Compliance and Internal Audit Office is responsible for administering the policy lifecycle, maintaining a centralized policy repository, ensuring timely publication of approved policies, and ensuring that superseded or outdated policies are properly archived and disposed of in accordance with retention requirements.

1.5 Compliance and Enforcement

- All College divisions and departments are required to adhere strictly to the established policy development and approval process. Failure to comply with the policy framework may result in delays, denial of proposed policies, or administrative corrective action.
- The Institutional Compliance and Internal Audit Office is responsible for overseeing policy implementation and for monitoring compliance with all procedural and governance requirements.
- Any concerns or suspected violations related to policy development or implementation should be reported to the appropriate responsible executive for review and corrective action.

1.6 Decommissioning a Policy

A. College Policies

If a Policy Owner determines that a College policy is no longer necessary, no longer effective, or would be more appropriately consolidated with another policy, the Policy Owner may formally recommend the policy for decommissioning. <ins> Because eliminating a policy can significantly alter institutional operations, decommissioning a policy shall be subject to the same stakeholder inputs, shared governance routing, and review processes as the establishment of a new policy. Such determinations must be supported by an assessment of legal, regulatory, operational, and institutional risks and impacts, conducted in consultation with the <ins> appropriate shared governance bodies (per the Purview Matrix), Policy Development and Review (PDR) body and any other relevant governance groups.

The Policy Owner shall coordinate with the Institutional Compliance and Internal Audit Office to obtain required approvals for policy decommissioning from the President and ELT, or from another duly authorized governing body, including the MCC Board of Trustees, as applicable. No policy may be decommissioned without documented approval from the appropriate authority.

The Institutional Compliance and Internal Audit Office must be notified upon identification of a policy proposed for decommissioning and is responsible for overseeing the formal retirement, documentation, and archiving of the policy in accordance with established records retention and governance requirements.

B. Division and Unit Policies

Division and Unit Policies may be decommissioned at the discretion of the Division or Unit head.

1.7 Definitions

- **Board of Trustees:** A subset of College Policies for which the Monroe Community College Board of Trustees serves as the policy owner and final approving authority. Board Policies establish institutional-level governance, fiduciary, or strategic direction and require formal adoption and amendment exclusively through Board of Trustees action in accordance with applicable statutes, SUNY requirements, and Board Bylaws.

- **College Policy:** A formally approved, written directive that establishes governing principles, requirements, and controls for College operations and ensures alignment with the College's mission, strategic objectives, and applicable legal and regulatory requirements. A document is considered a College Policy only if it meets **all** of the following criteria:

    - It has institution-wide applicability or a material impact across multiple divisions or departments of the College;

    - It is intended to ensure compliance with laws or regulations, promote operational consistency or efficiency, support the College's mission, or mitigate institutional risk;

    - It imposes required actions, prohibitions, or constraints and includes enforceable standards or procedures necessary for compliance; and

- It addresses subject matter requiring formal review and approval by the President and the Executive Leadership Team (ELT).

- <ins> **Shared Governance Leadership:** The designated representatives of MCC's recognized governance bodies who hold primary review or voting purview over distinct policy domains. This includes the Faculty Senate and its Academic Policies Committee (APC) for academic policy affairs, the Special Committee on Administrative Affairs (SCAA) for HR and workforce-related policies, and other shared governance partners as determined by the domain matrix.
- **Policy Owner:** The designated office, position, or role accountable for the lifecycle management of a policy, including drafting, review, approval coordination, communication, implementation oversight, enforcement, periodic review, revision, and decommissioning, in accordance with the Policy on Policies.
- **Procedure:** A documented set of specific steps, processes, or actions required to implement and operationalize a policy. Procedures provide detailed guidance for compliance and must be consistent with, and subordinate to, the associated policy.
- **Policy Division Representatives** (PDR) – A group of College employees designated by the Executive Leadership Team (ELT) to support and oversee the policy development and administration process. The PDR convenes as needed and serves as an advisory resource during policy drafting, review, and revision.
- **Responsible College Officer:** The executive administrator designated to sponsor and represent a policy before the Executive Leadership Team (ELT) and, where applicable, the Board of Trustees, and to ensure appropriate executive oversight.
- **Expedited Review:** A shortened policy review and approval process authorized in limited circumstances to address regulatory requirements, legal mandates, or emergency conditions requiring immediate action.
- **Interim Policy** – A policy approved by the President and the Executive Leadership Team (ELT) on a temporary basis when a policy must be established or revised within a timeframe that does not permit completion of the standard policy review process. An interim policy remains in effect for <ins> maximum duration <del> ~~determined~~ <ins> of six (6) months <del>~~by the President~~ and is subject to subsequent full review.

Responsibility

Vice President, Institutional Advancement and Executive Director, MCC Foundation

Contact Information

Vice President, Institutional Advancement and Executive Director, MCC Foundation

Other Related Documents

Checklist for Revising a Policy (PDF)

Checklist for Creating a New Policy (PDF)