Management of Campuswide Policies

Current Responsible Executive: Linda Williams, Associate Chancellor

Original Responsible Executive: William Webster, Vice Chancellor-Budget and Finance

Responsible Office: Chancellor’s Office
ucbpolicy@berkeley.edu

Contact: Questions about this policy may be directed to the Deputy Chief Ethics, Risk, and Compliance Officer at 643-4171

Policy Statement

Individuals responsible for developing, approving, interpreting, publicizing, or maintaining campuswide policies must comply with the procedures outlined herein.

Who Is Affected By This Policy

- Everyone at UC Berkeley

Who Administers This Policy

- Office of Ethics, Risk, and Compliance Services
- Compliance and Enterprise Risk Committee
- Staff responsible for developing, interpreting, maintaining, or publicizing policies
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Why We Have This Policy

In 2003, a comprehensive study by a Leadership Development Program team concluded that the campus needed a formal process for developing, approving, and promoting campuswide policies ("Policy Access: Campus Needs and Best Practices Project"). The study found that campuswide policies were difficult to find, did not always include clear implementing procedures, and frequently omitted contact information for help with interpretation.

This Policy on Management of Campuswide Policies sets forth a uniform process for policy creation, format, approval, and posting, and is intended to increase (1) operational efficiency, and (2) compliance with federal and state regulations and University procedures.

Academic Senate policies, as well as policies that control units (or subdivisions thereof) establish for their own operations are not governed by this document.

Responsibilities

Chancellor:
- Retains ultimate authority for campuswide policies.
- Works directly with Responsible Executives to issue emergency policies.

Executive Vice Chancellor and Provost, Associate Chancellors, Vice Chancellors, Chief Information Officer:
- Act as Responsible Executives for campuswide policies.
- Approve, deny, or return for revision campuswide policies generated by their control unit.
- Issue policies

Compliance, Accountability, Risk, and Ethics Committee (CARE):
- Receives quarterly updates from Office of Ethics, Risk, and Compliance Services concerning new or substantially revised policies and responds as necessary.

Compliance and Enterprise Risk Committee (CERC):
- Reviews and approves new policies and substantively-changed existing policies for impact on campus units and operations.
- Oversees CERC Policy Subcommittee.

Responsible Offices (see Glossary for definition):
- Review systemwide policies in their area to determine whether the policies require further interpretation or procedures at the campus level.
- Develop campuswide policies in areas where policies are needed but the Office of the President has been silent.
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- Make sure campuswide policies in their area are consistent with systemwide policies and federal and state regulations.
- Disseminate information about campuswide policies for which they are responsible.
- Promote compliance with policies for which they are responsible.
- Provide contact information to help members of the campus community with questions about a policy.

Office of Ethics, Risk, and Compliance Services:
- Appoints a Policy Coordinator for the campus.
- Determines whether a proposed policy is campuswide in scope and recommends alternate review and approval processes if the proposed policy is not campuswide in scope.
- Assists Responsible Offices in developing policies.
- Coordinates the approval process for policies.
- Disseminates information about campuswide policies.
- Helps members of the campus community find pertinent policies.
- Maintains an annual archive of campuswide policies.

Faculty, Staff, and Students:
- Accept responsibility for knowing and following applicable campuswide policies and procedures.

Procedures

DEFINING A CAMPUSWIDE POLICY

A campuswide policy meets one or both of the following criteria:

- It affects a broad range of the campus community, either because it is of general interest or applicability, or because one control unit establishes a set of principles and procedures that other control units must abide by;

- It coordinates compliance with applicable laws and regulations across control units, promotes operational consistency and efficiency, and/or reduces institutional risks.

Policy and procedures go together. A policy is a statement of governing principle(s). Procedures are the actions taken to implement those principles. Although procedures are subordinate to policy and are subject to change, they are incorporated into the campus’s standard policy template to make it easier for members of the campus community to find them and hence comply with the policy.
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DEVELOPING A CAMPUSWIDE POLICY

Every campuswide policy must be sponsored by a Responsible Executive, who appoints a Responsible Office to guide the policy through the steps described below.

Initially, the Responsible Office researches two questions:

1. Does the University or campus already have a policy on the subject?
2. What campus constituencies are affected by the policy?

If the University or campus has not issued a policy on the subject, the Responsible Office may develop a new policy.

If the University or campus has issued a policy on the subject, the Responsible Office determines whether the new policy is necessary. The Responsible Office may be able to achieve its goal by revising the existing policy or making other changes that do not require issuance or revision of a campuswide policy.

Campus policies and procedures may be more strict than systemwide policies, but not more permissive.

Assuming the new policy is necessary, the Responsible Office engages with campus constituencies affected by the policy and makes a good-faith effort to incorporate the concerns of those constituencies into the policy.

Policies should be easy for novices to understand. They should provide comprehensive direction in plain language. The emphasis should be on fundamentals (grammar and sentence construction) rather than flourishes. The campus’s Editorial Style Guide at http://identity.berkeley.edu/guidelines/berkeley-editorial-style-09.pdf serves as the usage and style guide. If the Editorial Style Guide does not answer the policy writer’s questions, the policy writer is encouraged to consult the 16th or later edition of the Chicago Manual of Style.

The Policy Coordinator

The Office of Ethics, Risk, and Compliance Services appoints a Policy Coordinator to assist in the development, approval, and announcement of campuswide policies. The Policy Coordinator has the following responsibilities:

- Work with Responsible Offices to confirm there is a need for their policy.
- Encourage Responsible Offices to consult with constituencies affected by their policy.
- Make sure proposed policies are understandable to novice readers.
- Make sure new policies are in the campuswide policy template (described below).
- When warranted, submit policies to campus counsel for review.
- Work with the Responsible Office to prepare proposed policies for review by the Compliance and Enterprise Risk Committee (CERC).
- Chair the CERC Policy Subcommittee.
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- Add the final versions of policies to the Official Campuswide Policies and Procedures Web site.
- Assist as necessary in publicizing policies.
- Report new policies to the Compliance, Accountability, Risk and Ethics Committee (CARE) on a quarterly basis.
- Send reminders to Responsible Offices if policies have not been reviewed during the previous five years and help Responsible Offices update policies as necessary.

The Compliance and Enterprise Risk Committee

The CERC reviews campuswide policies for their impact on the full range of campus departments and operations.

The Responsible Office brings a proposed policy to the CERC’s attention by sending the latest draft of its policy and a Proposal to Add or Change Policy form (see appendix) to the Policy Coordinator.

The CERC reviews campuswide administrative policies through the CERC Policy Subcommittee. The Policy Coordinator chairs the subcommittee. The rest of the subcommittee consists of:
- At least one representative from each Vice Chancellor (representatives do not have to be CERC members).
- A representative from the Academic Senate.
- A representative from the Office of Legal Affairs.
- A representative from the Chief Information Officer.
- CERC members who wish to participate in the subcommittee on either a continuing or ad hoc basis.

The CERC Policy Subcommittee meets separately from CERC. It reviews policies in whatever manner it chooses, but strives to respond within 30 days to requests for policy review. Responsible Offices may send representatives to CERC Policy Subcommittee meetings.

The Responsible Office is obligated to revise its policy in accordance with the CERC Policy Subcommittee’s review. Once the Responsible Office revises its policy, it re-submits the policy to the Policy Coordinator. If the Policy Coordinator determines that the CERC Policy Subcommittee’s suggested revisions have been adequately addressed, the Policy Coordinator puts the policy on the agenda for the full CERC’s next meeting. If the Policy Coordinator determines that the CERC Policy Subcommittee’s suggested revisions have not been adequately addressed, the Policy Coordinator works with the Responsible Office to make the revision more responsive. Either the Responsible Office or the Policy Coordinator may ask the CERC Policy Subcommittee for another review.

To the degree possible, the Policy Coordinator gives the CERC advance notice of policies the Policy Subcommittee is reviewing. Once the Policy Subcommittee has fully reviewed a policy, the Policy Coordinator puts the policy on the agenda for the next CERC meeting. After brief
discussion, the CERC votes on the policy. If the CERC does not approve the policy, the Responsible Office must work with the Policy Coordinator to address the full CERC’s concerns.

Policy Issuance

Once the CERC has approved a policy, the Responsible Executive may issue the policy to the campus. Although each Responsible Executive has authority to issue campuswide policies, ultimate authority for campuswide policies rests with the Chancellor.

At least five business days prior to intended policy issuance, the Responsible Office sends the Policy Coordinator the final version of the policy. The Policy Coordinator conducts one last grammar and style check on the policy (being careful not to alter content or meaning) and posts the policy to the Official Campuswide Policies and Procedures Web site in time for the Responsible Executive’s announcement of the policy.

EMERGENCY (FAST-TRACK) POLICY APPROVAL

Should an emergency require rapid formulation of a new campus policy or revision of an existing policy, the Responsible Executive submits the policy directly to the Chancellor, who may:

- Approve the policy immediately.
- Consult with various campus experts and constituencies before approving the policy.
- Return the policy to the Responsible Executive or Responsible Office for revision.
- Return the policy to the Responsible Executive or Responsible Office for submission through the regular policy approval process.
- Reject the policy.

Once the Chancellor approves a fast-track policy, the Responsible Executive transmits an electronic version of the policy to the Policy Coordinator for posting on the Official Campuswide Policies and Procedures Web site.

The fast-track approval process is intended for emergencies only and cannot be used to circumvent the regular approval process. Emergencies include imminent danger to human safety, to the financial well-being of the campus, or to the campus’s relationship with the larger community. Emergencies do not include policy changes mandated by federal or state legislation or by the Office of the President, unless said policy changes have themselves been made on an emergency basis and require immediate campus implementation.

PROMOTING AWARENESS OF CAMPUSWIDE POLICIES

New or revised policies are promoted primarily through the Official Campuswide Policies and Procedures Web site, which serves as the repository for all campuswide policies. If the
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Responsible Office wishes, the Policy Coordinator may post draft versions of pending policies to the Web site for public comment.

The Official Campuswide Policies and Procedures Web site should include a means to create voluntary listservs through which members of the campus community may be notified of policy changes within their areas of concern.

In addition to posting on the Official Campuswide Policies and Procedures Web site, the Responsible Office should publicize policies using Campus Administrative Memos and other such media as may be deemed effective.

Training in the particulars of a policy is handled by the Responsible Office.

INTERPRETING CAMPUSWIDE POLICIES

The office responsible for the administration of a campuswide policy designates an individual, telephone number, email address, or combination thereof as a contact for questions about the policy. This contact information is posted near the top of every policy and must be kept current by the Responsible Office. If more than one office is responsible for administering the policy, particularly in the area of procedure, the policy must list each Responsible Office, its area of responsibility, and contact information. It is expected that members of the campus community seeking clarification of policies will receive prompt, courteous, and clear responses.

MAINTAINING CAMPUSWIDE POLICIES

The Responsible Office is obligated to keep a policy up-to-date. A review should take place at least once every five years. The Policy Coordinator should send a reminder to the Responsible Office if a policy has not been reviewed during the previous five years.

When changes to a policy are necessary, the Responsible Office and Policy Coordinator determine whether the changes require approval. In general:

- Any change to the policy’s intent requires review by the CERC.
- Changes in procedure that significantly increase cost or workload distribution outside the Responsible Office’s control unit require review by the CERC.
- Clerical changes and changes in procedure that do not significantly increase cost or workload distribution outside the Responsible Office’s control unit do not require review by the CERC.

If the Responsible Office and the Policy Coordinator cannot agree whether changes in procedure require review, the question is referred to the campus’s Chief Ethics, Risk, and Compliance Officer for a final decision.

All campuswide policies, no matter when written or last updated, remain in effect as long as they are posted on the Official Campuswide Policies and Procedures Web site. Should a campuswide
policy become obsolete, the Responsible Office notifies the Policy Coordinator in writing that the policy can be rescinded. If the Responsible Office no longer exists, either the Responsible Executive or the Responsible Office that assumed the former Responsible Office’s policy-making duties notifies the Policy Coordinator in writing that the policy can be rescinded. The Office of Ethics, Risk, and Compliance Services creates an archive of active campuswide policies at the end of each calendar year.

**USING THE STANDARD CAMPUSWIDE POLICY FORMAT**

To ensure clarity and consistency, the campus uses a standard format for campuswide policies. The format, exemplified by this document, includes the following sections:

**Responsible Executive:** The title and name of the Chancellor, Executive Vice Chancellor and Provost, associate chancellor, vice chancellor, or Chief Information Officer sponsoring the policy.

**Responsible Office:** The name of the office(s) that will develop and administer the policy and be accountable for the policy’s accuracy, interpretation, and updating.

**Contact:** The individual, phone number, and/or email address that members of the campus community can go to for direct answers to questions about the policy. If different sections of the policy are best answered by different contacts, list the various contacts and what type of questions they should be called about.

**Policy Statement:** A capsule description (the shorter the better) of what the policy is.

**Who Is Affected By This Policy:** A list of groups within the campus community expected to abide by the policy, e.g. faculty, staff, students, or sub-groups thereof.

**Who Administers This Policy:** A list of staff by classification, functional title, or duty expected to develop, interpret, or enforce the policy and procedures related to it.

**Why We Have This Policy:** A brief (one single-spaced page or less) explanation of why the policy is necessary. Reasons can be ethical, philosophical, legal, regulatory, historical, financial, pragmatic, or any combination thereof. If serious consequences would result from failure to follow the policy, please describe them.

**Responsibilities:** A bulleted list of what every administrative unit involved in the policy must do, e.g. Deans and Directors must do A, B, and C; Departmental Business Officers must do D, E, and F.

**Procedures:** A series of steps, described in logical order and plain language, for carrying out the policy. Complex procedures should be presented in outline form. If there is a procedure for requesting exceptions to the policy, please include it here.
Web Site Address for This Policy: Where a reader can find an electronic version of the policy on the Internet.

Glossary: An alphabetical list defining in plain language terms in the policy that have a specialized meaning.

Keyword Index: A list of words a non-expert might use to find the policy through the search engine at the Official Campuswide Policy and Procedures Web site. (This field will not be displayed in the final version of the policy.)

Related Documents: Other policies or documents (such as federal and state laws or regulations) referred to in the policy or of interest to a reader who may want to investigate further. Please provide Internet links if they exist.

Appendix: Supplementary material that makes it easier for a reader to understand or comply with the policy. Forms referred to in the Procedures section of the policy may be attached as appendices if they are short; longer forms should be listed under Related Documents, with Internet links provided if possible. If the policy has more than one appendix, refer to each by letter in the text (Appendix A, Appendix B, etc.) and order them appropriately at the end of the policy.

Web Site Address for This Policy

http://campuspol.chance.berkeley.edu/Policies/PolicyonPolicies.pdf

Glossary

Campuswide Policy: A set of principles and procedures intended to govern actions affecting a broad range of the campus community. A policy is considered campuswide if (1) it is of general interest or applicability; (2) one control unit establishes a set of principles and procedures that other control units must abide by; or (3) it coordinates compliance with applicable laws and regulations across control units, promotes operational consistency and efficiency, and/or reduces institutional risks. Policies restricted to the Academic Senate, or to department or unit operations, are not considered campuswide policies and are not governed by this document.

Contact: The name, email address, and/or telephone number of the individual most capable of answering questions about the administration or interpretation of a policy.

Control Unit: The administrative domain of the Executive Vice Chancellor and Provost, Chief Information Officer, or a vice chancellor.
Guidelines: Shortcut, user-friendly versions of procedures, usually presented in a pamphlet, newsletter, or Web site.

Listserv: An automatic email distribution list. The list of email recipients can be compiled from an existing database, by asking people to sign up, or both.

Policy: A set of principles intended to govern actions.

Procedures: The actions necessary to carry out a policy.

Responsible Executive: The Chancellor, Executive Vice Chancellor and Provost, associate chancellor, vice chancellor, or Chief Information Officer responsible for developing campuswide policies within his or her area of jurisdiction.

Responsible Office: The office(s) that develop and administer a particular campuswide policy, and which is accountable for the policy’s accuracy, interpretation, and updating.

Related Documents

- Policy Access: Campus Needs and Best Practices Project
- Navigating UC Berkeley’s Business Environment: A Guide to Administrative Responsibilities
APPENDIX: PROPOSAL TO ADD OR CHANGE POLICY

1. What is the name of the policy? If this is a request to change an existing policy, also give the name and approval date of the existing policy (provide a copy or Web address if possible):

2. Name and office of the person submitting this form:

3. This policy affects (check all that apply):
   CONTROL UNITS                      CONSTITUENCIES
   [ ] Administration & Finance       [ ] Faculty
   [ ] Equity & Inclusion             [ ] Staff
   [ ] Executive Vice Chancellor & Provost [ ] Students
   [ ] Facilities Services            [ ] Alumni
   [ ] Research                       [ ] Affiliates
   [ ] Student Affairs                [ ] Visitors
   [ ] University Relations           [ ] Others (specify):
   [ ] Specific Entities within Affected Control Units:

4. Name and title of the Responsible Executive sponsoring this new or changed policy:

5. Name of the Responsible Office(s) accountable for the policy’s accuracy, interpretation, and updating:

6. If this is a new policy, summarize what it is and why it is needed. If this is a change to an existing policy, explain why the change is necessary:

7. Estimate the impact (financial, workload, etc.) of this policy on the campus:

8. List the names of any individuals or offices you have already consulted about this policy: