

# **Policy On Policies**

Policy CP008 Volume 2, College Responsible Administrator: General Counsel and Secretary of the College Responsible Office: Office of Policy and Compliance Issued: March 2016 Last Updated: February 2022

# **Policy Statement**

Policies are a body of shared knowledge used to strengthen, support and protect the Fashion Institute of Technology ("FIT" or "the college"). This policy addresses the process for developing, issuing and maintaining all FIT policies and applies to all college departments, employees and students.

# **Reason for the Policy**

This policy ensures that the FIT community has ready access to well-developed and understandable policies. Policies that are easy to find, read and understand will:

- Support the college's mission;
- Achieve accountability by identifying the offices responsible for policies;
- Provide employees and students with clear, concise guidelines;
- Document how the college conducts business; and
- Allow FIT to remain compliant with applicable laws and regulations.

# Who is Responsible for this Policy

- Office of Policy and Compliance
- Policy Advisory Group

# Who is Affected by this Policy

- FIT Divisional Vice Presidents, Deans and Department Heads
- All FIT employees and students

# Definitions

- **Employee Policies**: Employee Policies directly affect employees of the college unless otherwise specified by the particular policy. Employees include individuals working for all related FIT entities, including but not limited to the FIT Foundation and FIT Student Housing Corporation.
- Impact Statement: Brief, confidential document that proposes a new policy.

- **Policy**: A policy is a statement of management philosophy and direction, established to provide guidance and assistance to the college community in the conduct of college affairs. A college policy:
  - is a governing principle that mandates or constrains actions;
  - has institution-wide application;
  - changes infrequently and sets a course for the foreseeable future;
  - o helps ensure compliance with applicable laws and regulations;
  - o reduces institutional risk; and
  - is vetted through the Policy Advisory Group and approved at the executive levels of the college (vice presidents, general counsel, and the president) and in some instances includes the Board of Trustees.
- **Policy Administrator**: The Policy Administrator is the Director of Policy and Compliance.
- **Policy Initiator**: The Policy Initiator is any employee, or student, who identifies a college-level issue and develops a policy proposal. All policy proposals must be vetted and approved by the respective vice president.
- **Procedure**: A procedure is a guideline or series of interrelated steps taken to help follow/abide by the policy. College procedures:
  - should be written in a format that is easy to follow, using numbers or bullets to delineate steps to be followed, and
  - o generally do not require formal approval by the Board of Trustees.
- **Responsible Administrator**: The appropriate Cabinet-level officer whose jurisdiction covers the subject matter of the policy. This is usually the divisional and/or department head that creates, implements, administers or "sponsors" a college policy that falls under their purview. Responsible administrators are those who oversee and enforce the policy for which they're deemed culpable. Depending on the scope of its subject matter, a policy may have more than one responsible administrator.
- **Responsible Office**: Office(s) designated by the responsible administrator(s) to develop and administer a policy, communicate to, and train, the college community of its requirements and execute its timely updating and revisions. They also aid in enforcement. Depending on the scope of its subject matter, a policy may have more than one responsible office.
- **Stakeholder**: Members of the FIT community identified in the Impact Statement for a proposed policy, whose role or professional expertise relates to the subject of the policy, or whose area is directly affected by a policy, who, therefore, is consulted for comment on draft policies, or revisions.
- **Student Policies**: Student Policies are policies that directly affect students at the college.

# Principles

• Policies

Policies drive the various facets of FIT's culture--ethical, social, professional and legal. College policies will be:

- presented in a common format;
- o formally vetted through the authorized body;
- o formally approved by the authorized individuals;
- o maintained centrally and accessible to all interested parties; and
- kept current within the framework of an organized system of change control.

Policies will be clearly distinguished from related procedures according to the definitions section below. Internal policies that apply to the operations of individual divisions or departments may not conflict with college-wide policies but may be more restrictive. As identified in the particular policy, the responsible office will monitor compliance and facilitate remedies for noncompliance as directed by the policy.

#### • The Office of Policy and Compliance

The Office of Policy and Compliance is the central office responsible for policy management and for maintenance of the policy document library: FIT's College Policy Library. Primary reasons for one, central office overseeing policy development is to leverage best practices; maintain consistency, integrity and professional appearance of policy documents; and to maintain compliance with rules and regulations.

#### • Policy Advisory Group

The Policy Advisory Group (PAG) consists of cross-divisional representatives appointed by the President to guide the development of new policies, as well as the revision or deletion of existing policies. PAG has designated the Office of Policy and Compliance to coordinate the editing, review, issuance and archiving of all official college policies in 13 volumes in the College Policy Library.

#### • College Policy Library

To ensure ready access to college policies, FIT will maintain an official <u>College Policy Library</u> webpage with the most current, approved version of all policies and with links to related policies and documents. The documents on the College Policy Library web page will constitute the official, electronic depository for college-wide policies for FIT. The web page will follow the structure described below.

To maintain an organized system of change control and to ensure consistency throughout the college, individual departmental web sites should not contain separate copies or versions of college policies or applicable procedures. Instead, departmental web sites that reference policies and procedures must use hyperlinks to the documents on the official College Policy Library. This does not preclude departments from maintaining internal departmental policies and procedures on their intranet web pages, provided the internal departmental policies and procedures are not identified as official college policies and procedures, and do not conflict with official college policies.

#### • Structure and Organization of College Policies

The College Policy Library website will list all policies by name alphabetically on the Policy A to Z page. Policies will be assigned to one or more of the following volumes:

• **Volume 1 Academic Affairs and Faculty** – Policies that relate to faculty and the pedagogical mission of the college.

- **Volume 2 College** Policies that are of a general administrative or concerning appropriate conduct and/or compliance with the law.
- Volume 3 Communications and External Relations Policies that relate to media, public relations, marketing communication and government and community relations.
- Volume 4 Development Policies that relate to fundraising and donor records management.
- Volume 5 Enrollment Management and Student Success Policies applicable to status as a student.
- Volume 6 Facilities Policies concerning use and care of college property.
- **Volume 7 Finance and Fiscal Management** Policies related to accounting, budgeting, procurement, travel and other financial functions.
- **Volume 8 Governance** Umbrella policies that provide the framework for administration to implement and comply with the intent of the Board of Trustees.
- **Volume 9 Human Resources** Policies, rules and related procedures and information impacting working relationship with the college for all employee categories.
- Volume 10 Information Technology Policies that cover systems, access, data and related technological issues.
- Volume 11 Museum Policies that relate to the Museum at FIT.
- Volume 12 Research and Creative Activity Policies that relate to research and the Innovation Center.
- Volume 13 Safety and Security Policies concerning security and safety of employees, students, and others on campus.

#### • Board of Trustees Approval

The Board of Trustees does not involve itself in the details of administrative or academic decision-making, including decisions on most policies. The FIT Board of Trustees will assure the college's property and resources are used solely to support the mission of the college. They will safeguard the college's assets, both financial and physical, and ensure the mission of the college is carried out in an ethical, professional, socially responsible, and legal manner. Four factors are considered in determining when a proposed policy requires Board approval:

- fiduciary responsibility;
- requirements of federal, state, or local law or SUNY mandates;
- changes to Board-approved policy; and
- Impacts on the college, as a whole, including matters of the college's discretion.

### **Responsibilities**

#### • Office of Policy and Compliance

The Office of Policy and Compliance is responsible for:

- sending regular announcements to the FIT college community on new or revised policies posted in FIT's College Policy Library;
- policy management and maintenance of the policy document library: FIT's College Policy Library;
- maintenance of copies of approved policies in accordance with NYS Archives, schedule LGS-1;
- notification to responsible parties when particular policies are scheduled for review or revision;

- guiding and collaborating with responsible parties during any phase of the policy development process, including implementing the policy; and
- o assessing policy implementations to gauge effectiveness.

#### • Policy Advisory Group

Each PAG member is responsible for reviewing policy drafts through the lens of their respective division in order to comprehensively assess a policy's impact on the entire institution. PAG offers feedback to facilitate the development of a policy before advancing it for executive level review and approval, and reviews the final policy draft to see that all concerns have been addressed.

#### • Responsible Administrator

The Responsible Administrator is responsible for:

- Creation and/or revision of a college policy that falls under their purview;
- o Implementation of policy principles in all affected areas; and
- Oversight of policy enforcement in Responsible Office(s).

### **Procedures**

#### • Policy Development

The Policy Initiator may identify a college-level policy issue and develop it into an Impact Statement. See Procedures for Policy Development document for detailed process.

#### • Policy Format

A standard policy format ensures clarity and consistency. Although not all policies will contain all of the format elements, college policies will be written and maintained following the format described in the Guide to Preparing Policy. For all FIT policies that predate this policy, the format described above is not applicable. If it is feasible, revised policies will be written in the approved policy format.

#### • Policy Revisions and Deletions

New laws, SUNY system-wide mandates or redundancies may warrant the revision of a college policy. When a policy is no longer relevant or if it is consolidated with another policy, the college may deem it appropriate to withdraw the policy. See Procedures for Policy Development document (section: Revising and Deleting an Existing Policy) for detailed process.

#### • Exceptions

The college may expedite the policy-development and approval process in situations that require time-sensitive policy changes to protect the college and its operations, and for compliance requirements.

#### • Policy Implementation

Implementation is facilitated by the Responsible Administrator(s), in collaboration with Responsible Office(s), and is ongoing. The Office of Policy and Compliance will assess implementations each term to determine progress and help the Responsible Administrator identify any additional items required for successful implementation and enforcement.

#### • Posting

Once all approvals have been obtained as noted in the Procedures for Policy Development, the Office of Policy and Compliance posts the policy on the College Policy Library.

#### • Communication

Policies posted on the College Policy Library will be communicated in the following methods:

- announcement on Newsroom Direct;
- monthly email update from the Director of Policy and Compliance; and
- if the policy affects students, a monthly email is sent from the office of Enrollment Management and Student Success.

Other methods of communication may also be developed depending on the implementation needs for each specific policy

#### • Training

When required for compliance with the policy, training may be developed and administered to those that are required to complete the training as identified in the policy. This compliance-related training is coordinated by the Office of Policy and Compliance in consultation with the Policy Administrator(s).

#### Enforcement

Those identified in the policies under "Who is Responsible for This Policy" are responsible for ensuring that the policy is followed as it pertains to their area. For continuous compliance requirements, the Office of Policy and Compliance may monitor aspects of the policy (i.e., reporting/training requirements). Internal Audit may audit policies and procedures periodically to ensure compliance.

#### • Periodic Review

Policies shall be regularly reviewed and shall be updated as necessary to ensure alignment with FIT's compliance program as well as federal, state, and local laws, and SUNY Guidance.

### Violations

Violations of college policy will be handled in accordance with the following, unless a specific policy explicitly states otherwise:

• Employees:

Employees covered by the Collective Bargaining Unit will be disciplined according to the Collective Bargaining Agreement, as well as relevant law and college policy. For non-bargaining employees, the Vice President for Human Resource Management and Labor Relations, or their designee(s), will review the violation and make a recommendation to the President for appropriate counseling and/or disciplinary action based upon relevant law and college policy.

#### • Students:

The Dean of Students will review the violation and implement appropriate counseling and/or disciplinary action in accordance with the Code of Student Conduct.

#### • Third Party or Contractor

Violations of FIT policies by third parties will be addressed by FIT senior leadership at its sole discretion and in accordance with the relevant policy, laws, and circumstances.

## **Related Policies**

• Records Retention and Disposition

# **Related Documents**

(Contact the Director of Policy and Compliance for access to these documents.)

- Guide to Preparing Policies
- Impact Statement
- Procedures for Policy Development

# Contacts

• Director of Policy and Compliance Office of Policy and Compliance 212-217-3360 compliance@fitnyc.edu