

## Creating and Updating RF Policies

**Effective Date:** April 26, 2023  
**Function:** The Office of Compliance Services  
**Contact:** RFCompliance@rfsuny.org

### Basis for Procedure

This Procedure implements the Research Foundation’s (RF) [Establishing Policies and Procedures Policy](#).

### Procedure Summary

This Procedure outlines the steps to create, revise, review, and publish a new or updated Policy, or to obsolete a Policy, to ensure stakeholder input is received and proper approvals are obtained.

### Procedure Steps

Step	Role or Responsibility	References or Tips
Seek stakeholder input prior to drafting, revising, or obsoleting the Policy.	Policy Owner or Designee	Stakeholders include campus focus group(s): e.g., Human Resource Officers, Operations Managers, Technology Transfer Officers, Finance Advisory Group. Best practice is to include the Office of General Counsel in the drafting process.
Draft a new Policy within the approved <a href="#">Policy Template</a> . Any updates to existing Policies must be recorded on the current Policy document using the “Track Changes” function in Microsoft Word or an equivalent feature or function in a word processing program that ‘redlines’ changes. Policy review must include a review and update (or obsoleting) as necessary of all related Procedures, Guidelines and forms.	Policy Owner or Designee	Policy Owner must review all linked Procedures, Guidelines and forms, and must consider any other related Procedures, Guidelines and forms that are not linked and should be, or that should be created. This also includes any internal controls related to the underlying Policy.

Develop a communication and training plan.	Policy Owner or Designee	Consult with External Relations, Training Unit or Office of Compliance Services.
Submit to the Office of Compliance Services: (1) Draft Policy or Policy revisions*; and (2) Completed <a href="#">New or Updated Policy form</a> . * For a request to obsolete, include the current Policy document. Skip review by the Office of General Counsel and Enterprise Compliance Team and legal sign-off below.	Policy Owner or Designee	Send to the Office of Compliance Services (OCS) via <a href="mailto:RFCompliance@rfsuny.org">RFCompliance@rfsuny.org</a> .
Submit draft Policy or Policy revisions to the Office of General Counsel for legal review.	Policy Owner or Designee	Contact the Office of General Counsel via <a href="mailto:RFLegal@rfsuny.org">RFLegal@rfsuny.org</a> or 518.434.7045.
Review RF Policies for accuracy and consistency with Board resolutions, relevant laws, rules, or regulations, and RF standards for professional conduct, consider relevant legal risks to the organization, and make recommendations.	Office of General Counsel	
Send to Enterprise Compliance Team for review and feedback: (1) Draft Policy; and (2) Completed <a href="#">New or Updated Policy form</a> .  Also send (1) and (2) above to Operations Managers and Deputy Operations Managers (OMs/DOMs).	Office of Compliance Services	OCS facilitates this step once they receive notification that legal review is complete.
Review new or updated RF Policies to provide an institutional perspective and provide input on the impact to the organization.	Enterprise Compliance Team (ECT)	
Incorporate feedback from ECT and OMs/DOMs as necessary.	Policy Owner or Designee	
Send draft Policy and form to the Office of General Counsel for legal sign-off.	Policy Owner or Designee	Contact the Office of General Counsel via <a href="mailto:RFLegal@rfsuny.org">RFLegal@rfsuny.org</a> or 518.434.7045.
Obtain approval from Policy Owner on form.	Policy Owner	
Send draft Policy and form to Leadership Team for review.	Policy Owner or Designee	Policy Owner or Designee must contact the <a href="#">Assistant to the President</a> to put the draft Policy on the Leadership Team meeting agenda for review.

		Policy Owner or Designee should be present at this meeting.
Advise RF President regarding approval of new or updated RF Policy.	Leadership Team	
Submit to the RF President for approval.	Policy Owner or Designee	This can occur at the conclusion of the Leadership Team meeting if there are no additional edits requested.
Submit to the Chief Compliance Officer for final approval.	Policy Owner or Designee	This can occur at the conclusion of the Leadership Team meeting if there are no additional edits requested.
Submit to the Office of Compliance Services: (1) Draft Policy; and (2) Completed form.	Policy Owner or Designee	Send to the Office of Compliance Services via <a href="mailto:RFCompliance@rfsuny.org">RFCompliance@rfsuny.org</a> . Ensure that all necessary parties have reviewed and the form has all necessary signatures prior to sending to the OCS.
Post Policy on RF website (or remove if obsoleted) and notify the Policy Owner or Designee once posted (or removed).	Office of Compliance Services	OCS updates Policy Administration Checklist.
Notify stakeholders of the posted (or obsoleted) Policy. Communicate as necessary according to communication plan.	Policy Owner or Designee	It is important to keep stakeholders informed of any new information or changes to existing policies.
Maintain: (1) Word version of approved Policy; (2) Completed New or Updated Policy form; and (3) Completed Policy Administration Checklist.	Office of Compliance Services	The OCS is the office of record for final drafts of Policies and the corresponding forms.

## Definitions

*Policy:* Governing rule or principle that requires or prohibits conduct.

*Policy Owner:* The Vice President responsible for the operational administration of functions subject to his or her routine oversight.

*Procedure:* Required steps to implement or comply with a related Policy.

*Guideline:* Optional steps outlining suggested ways to perform a function or adhere to a Policy or procedure.

*ECT:* Enterprise Compliance Team, composed of cross functional members of campus and central office.

## Related Information

[Establishing Policies and Procedures Policy](#)

Procedure for [Creating and Updating RF Procedures and Guidelines](#)

## Forms

[New or Updated Policy](#)

[Policy Template](#)

## Change History

Date	Summary of Change
April 26, 2023	ECT step updated to include sending materials to Operations Managers and Deputy Operations Managers.
August 6, 2020	Revised procedure steps to more accurately reflect the process and to provide clarity for who is responsible for each step and to clearly differentiate between steps for input versus steps for approval/sign-off. Added approval step from Policy Owner.
08/25/15	Rearranged the procedure to make document more efficient and easy to follow.
11/6/12	New Document

## Feedback

Was this document clear and easy to follow? Please send your feedback to [webfeedback@rfsuny.org](mailto:webfeedback@rfsuny.org).

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