

Policy on the Development, Issuance and Maintenance of Policies

I. Purpose

Pursuant to the Bylaws of New York Medical College, the College's President and Chief Executive Officer has general control and supervision over all matters pertaining to the College and its activities, subject to the advice and approval of the Board of Trustees. The purpose of this policy is to provide for a uniform standardized approval process and procedure for the development, issuance and maintenance of all policies of New York Medical College to assure consistency, compliance with law, communication with the College community and effective updating.

II. Policy

It is the policy of New York Medical College that all policies be developed, issued and maintained in accordance with the uniform standardized approval process and procedures provided herein for drafting, revising, approving, withdrawing, and promulgating policies. It is also the policy of New York Medical College to maintain policies electronically in a central policy database on its policies website and to disseminate such policies as applicable within the College to ensure wide circulation. Furthermore, it is the policy of New York Medical College that all policies are subject to change at any time, with or without notice, since policies constitute evolving and dynamic documents.

III. Scope

This policy applies to all administrators, faculty, employees, students, visitors and others who come in contact with the College.

IV. Definitions

Policy: A policy is a written plan or set of principles that is officially and formally established and required to be followed in conducting College business. A policy may have general broad applicability or it may apply only within a school, a center or institute. Departmental or divisional procedures and guidelines, although useful and important, do not meet these criteria and therefore are not considered policies nor can they be in conflict with a policy. A policy may ensure compliance with applicable laws, regulations or standards, relate to furtherance of the College's mission, establish governance, operational, administrative or financial policies, or set limits within which people are required to operate.

Responsible Office: The College office responsible for initiating, drafting, implementing, maintaining, revising or withdrawing a specific College policy under the direction of the Responsible Officer.

Responsible Officer: The individual working under the direction of the appropriate Responsible Executive responsible for developing, coordinating, and maintaining the College Policy involved.

Responsible Executive: The President, a Dean or a Vice President of the College with principal responsibility for the substantive area covered by a particular College policy, the Responsible Office and the Responsible Officer.

Effective Date: The date specified in the College policy stating that the policy is in effect.

V. Policy Principles

The following principles shall be followed:

1. All policies of the College must be approved by either the Board of Trustees or by the President.
2. The process for the formulation and maintenance of College policies under this policy is administered by the Office of the General Counsel.
3. All College policies shall be developed or revised in the standard format set forth in the Appendix and consistent with the procedural requirements contained in this policy.
4. All College policies shall be electronically posted on-line on the College's policies website and such electronic on-line policies shall be the official policies of the College.
5. All College policies shall be reviewed at least biannually by the Responsible Executive with the Office of General Counsel unless amendments or updates are required sooner.
6. All College policies shall supersede and prevail in the event of a conflict between a College policy and a department/ division level procedure and/or guideline.
7. All school, department or division procedures, practices and guidelines shall be consistent with and not expand the obligations of the College under College policies without the express written approval of the President and Chief Executive Officer or the Board of Trustees of the College.

VI. Development and Management of College Policies

College policies (including modifications to existing policies) are reviewed by and approved by the President and Chief Executive Officer, after review by the Office of General Counsel. The principal responsibility for proposing new College policies,

proposing amendments or modifications of existing College policies and updating existing College policies rests with the applicable Responsible Executive. For instance, College policies relating to research and academic matters in the School of Medicine, including faculty matters, resides with the Dean of the School of Medicine, who consults with the Faculty Senate as appropriate in accordance with Faculty Bylaws. College policies relating to budgetary, financial and accounting matters (including research accounting) primarily reside with the Vice President for Finance and Chief Financial Officer. College policies relating to facilities, human resources, housekeeping, cafeteria and food services, information technology, security and other general areas of College administrative operations primarily reside with the Vice President for Administration. College policies relating to service of process of legal document, signing of contracts, leases and other legal documents, indemnification, record retention, copyright compliance, insurance claim processing and coverage, institutional compliance and compliance with laws, regulations and requirements resides with the Vice President and General Counsel.

Should the Responsible Executive wish to propose a new College Policy or a substantive amendment of an existing College policy, the Responsible Executive shall discuss and review the matter with relevant and appropriate campus constituencies, especially those offices which would have significant involvement in implementing the policy or creating or modifying procedures to effectuate the policy. Following such discussion and review, the Responsible Executive shall prepare and submit to the Vice President and General Counsel, with a copy to the President, a written memorandum describing with sufficient particularity the new policy or the revisions to an existing College policy and identifying the Responsible Office and Responsible Officer. Based on such memorandum and after review of any issues or concerns, the Office of General Counsel shall prepare a draft policy, which shall be circulated for the review and comment of the Responsible Executive, the Responsible Officer and other appropriate constituencies of the College affected by the draft policy. A final draft shall be prepared by the Office of General Counsel after consideration of any comments submitted, which final draft shall constitute the legal approval of the draft policy. Copies of the final draft policy shall be forwarded to the Responsible Executive. Thereafter, the final draft shall be submitted by the Office of General Counsel to the President and Chief Executive Officer for review and approval. The President and Chief Executive Officer may approve and take final action on the policy or, in his discretion, submit the proposed policy to the Board of Trustees of New York Medical College for its review and final action. In the event of a final approval by the President and Chief Executive Officer or by the Board of Trustees, it shall be the responsibility of the Office of General Counsel to promulgate the policy and to ensure its posting electronically on the College's policies website.

VII. Effective Date

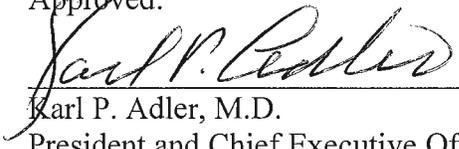
This policy is effective as of May 1, 2011.

VIII. Policy Management and Responsibilities

The Responsible Office under this policy is the Office of the Vice President and General Counsel. The Responsible Executive and the Responsible Officer under this policy are respectively, the College's President and the Vice President and General Counsel.

Questions relating to the implementation of this policy are to be directed to the President's Office or the Office of the General Counsel.

Approved:



Karl P. Adler, M.D.
President and Chief Executive Officer

5/12/11
Date

Appendix

[Policy Format]

[Name of Policy]

Purpose

[State the reason for the policy. May also include background information to place the policy in the broader context.]

Policy

[Set forth the actual policy and how it will work. Any procedures related to the policy should be identified, developed and either linked to the policy or included within the policy, if brief.]

Scope

[Identify those subject to and affected by the policy.]

Definitions (if needed)

Effective Date

[Insert the date on which the policy will first apply.]

Policy Management and Responsibilities

[Identify the Responsible Executive, Responsible Officer, Responsible Office for administering, implementing and enforcing the policy.]

Approved (or Revised)

Signature by the President

Date