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## Internal Audit Report

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# Campus Administrative Policies, Procedures and Guidance (PPG) Governance

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June 2016

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**Approved**  
Barry Long, Director  
Internal Audit & Advisory Services

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## I. EXECUTIVE SUMMARY

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Audit & Management Advisory Services (AMAS) has completed an audit to evaluate the effectiveness of campus Policies, Procedures and Guidance (PPG) governance in addressing risk and providing assurances that management's goals would be met to accomplish the campus mission of teaching, research and public service.

In general, except for relevancy and timeliness, campus administrative PPG provided a reasonable level of assurance that management's goals would be met to accomplish the campus mission of teaching, research and public service. Additional assurances and efficiencies were evident for those Campus-wide administrative policies coordinated by the campus Policy Coordination Office (PCO) as the PCO assisted principal officers and policyholders in the development and revision of campus-wide administrative policies. PCO also coordinated efforts to ensure that new campus-wide administrative policies adhered to standards.

However, responsibility for maintaining overall campus administrative PPG has been delegated to campus principal officers without committing to formalized requirement<sup>1</sup> governing policy development, review and update, and with no oversight or requirement for periodic review to ensure campus administrative PPG stayed relevant. Without a campus commitment to formalize, direct, and enforce per formalized policy, there is less assurance that campus PPG content is relevant and timely.

Given the campus preference for not formalizing policy requirements or establishing oversight of all campus administrative PPG, we believe that as a minimum, steps be taken through executive level messaging to campus principal officers, the need for keeping relevant and timely, policies for those activities presenting the greatest non-compliance risk to the campus, and charging the PCO with providing a level of monitoring of PCO coordinated campus-wide administrative policies.

The following observation requiring management corrective action was identified:

### A. Aged Campus-wide Administrative Policies

The Policy Coordination Office records indicated that 15 of the 28 numbered campus-wide administrative policies had not been reviewed within the last five years. These 15 policies were older than five years with a range of 6-19 years.

Observations and related management corrective actions are described in greater detail in section III. of this report.

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<sup>1</sup> A 1994 report by the Policies and Procedures Team made recommendations in their report entitled "University Policy and Procedure Formulation, Approval, and Dissemination" elements of which the PCO has incorporated in their operations and published as draft policies, "Campus Policy on Policies" v7 dated 12/2/2014 and "Campus Wide Administrative Policies" v10 dated 6/1/2016, followed by currently published "Guidance on Campus Wide Administrative Policy". The scope of the two draft policies, current guidance, and PCO activity is limited to a subset of all campus PPG.

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## II. INTRODUCTION

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### Purpose

The purpose of the audit was to evaluate the effectiveness of campus Policies, Procedures and Guidance (PPG) governance in addressing risk and providing assurances that management's goals would be met to accomplish the campus mission of teaching, research and public service.

### Background

Campus policies and procedures are fundamental tools to control risk and provide reasonable assurance that management's goals will be met to accomplish the campus mission of teaching, research and public service. Generally speaking, policy refers to rules that guide action while procedures are activities that implement policy. Both of these are requirements that help ensure that operations are performed as management planned to achieve its goals. Policies and procedures are often published in the same document, but not always.

There is a campus policy approval process that involves the Policy Coordination Office, a department of the Campus Provost/Executive Vice Chancellor (CP/EVC) Office. As policies have legal ramifications, Campus Counsel is also involved, as are other offices, including UCOP, depending on the nature of the policy. The EVC provides the final approval for policies that complete the process. This process is significant as it helps ensure that policies are in support of the university's mission, in compliance with federal and state regulations and university policies, safeguard individuals, and protect university assets. This is especially applicable to campus-wide administrative policies, as these affect a broad range of the campus community.

The Policy Coordination Office, on behalf of the Campus Provost/Executive Vice Chancellor and Chancellor's Offices, is responsible for coordinating campus delegations of authority and policy development. This includes assisting policy owners with the approval process; ensuring consistency and providing technical support in the writing of policies and procedures; analyzing policies in the systemwide context; acting as quality control agent on behalf of the CP/EVC; and advising leadership when objectives are not being met. The Office of the Campus Provost and Executive Vice Chancellor is the office of record for the official version of all campus delegations of authority and of all campus administrative policies.

Principal Officers, also known as responsible officers, are individuals delegated authority and responsibility for developing policies, procedures and guidance, or in the absence of formal delegation, have this authority and responsibility implicit in their job descriptions. Policy owners are designated by the responsible officer to develop policy and procedures; execute the consultation plan, approval process and dissemination; and promulgate new and revised policies.

There are 28 numbered (indicating fully processed) campus-wide administrative policies published on the Policy Coordination Office (PCO) website. There are additional new draft campus-wide policies in process and approximately 99 departmental policies. There are systemwide policies that the campus is responsible to comply with. There are systemwide policies that may be sufficient for campus management and therefore do not require additional campus policies. However, these may require campuses to develop their own procedures to ensure the systemwide policies are implemented.

There is a third tool called guidelines (aka guidance, guides, etc.) that assists with policies and procedures. Guidelines are generally not requirements that must be complied with and do not have the same degree of formality as policies and procedures do, and do not have to go through the approval process mentioned

above. They have been compared to the answers provided to frequently asked questions and represent an expedient method to provide advice on how to get things done.

### Scope

In our review of campus PPG, we:

- Conducted an online survey of campus administrative unit supervisors and directors
- Interviewed a cross section of campus administrative personnel with responsibilities and subject matter expertise for PPG
- Reviewed documentation pertaining to governance of PPG formulation, review and dissemination available on UCSC and UCOP websites
- Reviewed activities of the PCO
- Reviewed campus-wide policies coordinated by the PCO including policy status (age, revised date, contact information)

Due to the large number of campus administrative PPG content and the distribution of project owners across the campus we did not attempt to evaluate the effectiveness of each PPG document.

**III. OBSERVATIONS REQUIRING MANAGEMENT CORRECTIVE ACTION**

<b>A. Aged Campus-Wide Administrative Policies</b>		
<p>The Policy Coordination Office records indicated that 15 of the 28 numbered campus-wide administrative policies had not been reviewed within the last five years. These 15 policies were older than five years with a range of 6-19 years.</p>		
<b>Risk Statement/Effect</b>		
<p>When policies are not reviewed timely there is the risk that they become obsolete and no longer relevant to campus management’s requirements.</p>		
<b>Agreements</b>		
<b>A.1</b>	<p>CP/EVC will issue an administrative memorandum or other form of messaging to campus principal officers communicating the importance and expectation for identifying and maintaining relevant and timely policies, procedures and guidance; particularly over those activities representing the greatest compliance risk or having the greatest impact to the campus if not followed.</p>	Implementation Date
		3/30/2017
		Responsible Manager
		Campus Provost/ Executive Vice Chancellor
<b>A.2</b>	<p>PCO shall maintain updated contacts and dates associated with formal campus-wide policies and periodically remind principal officers of those policies that have not been reviewed and are past their recommended review period.</p>	Implementation Date
		8/30/2017
		Responsible Manager
		Principal Analyst, PCO

**A. Aged Campus-wide Administrative Policies. – Detailed Discussion**

According to the Campus Policy on Policies (Policy MSC-001), draft version 7, 12/2/2014, “Policy owners are accountable for the timely review, updating and dissemination of policies within their functional area.”

According to the Policy on Campus Wide Administrative Policies (Policy EVC-003), draft version 10, 6/1/2016, “Policy owners are accountable for identifying the need for new or revised policies, the timely review and updating of existing policies, and identifying the best method of dissemination...” Further, “The PCO will determine if the proposed revisions meet the criteria of a technical review.”

According to Guidance on Campus Wide Administrative Policy (file name EVC0003 V11) dated 7/15/16, published on the PCO website, “Policy Owners are responsible for ongoing review and revision of policies within areas they have been formally delegated (or for which they have been assigned) operational responsibility and must assess whether the policy is effective in meeting its intended purpose. A review should be undertaken at least once every five years or when relevant new laws, regulations, or systemwide policies emerge.”

There was no definition of “timely” provided by either draft policy. UCOP’s policy for its own policy owners’ timely reviews states five years. In the current guidance issued “...on behalf of the Chancellor and CP/EVC...”, a “review should be undertaken at least once every five years...”. Without any other guideline, we chose five years as a reasonable timeline to test if policies had been reviewed timely, and if not to regard them as “aged.” We assumed that the Policy Coordination Office (PCO) would be informed by policy holders when a review takes place in order to determine if proposed revisions meet the criteria of a technical review. Therefore, we based our finding of aged policies on the PCO’s records.

We believe there is an opportunity to improve the quality of campus-wide administrative policies through executive level messaging to campus principal officers, the need for keeping relevant and timely, policies for those activities presenting the greatest non-compliance risk to the campus, and charging the PCO with providing a level of monitoring of PCO coordinated campus-wide administrative policies.

**APPENDIX A – Work Performed and Results**

Governance of Policies and Procedures	
Work Performed	Results
Conducted an online survey of campus personnel with directors and managers.	Feedback identified issues and opportunities related to policy, procedures or guidance (PPG).
Interviewed a cross section of campus personnel with responsibilities and subject matter expertise related to policy, procedures or guidance.	Feedback identified issues and opportunities related to campus policy, procedures or guidance.
Searched for and reviewed source documentation on UCOP and UCSC websites.	<p>Read the UCOP the documentation available on the UC Policy Development Resources site, including the Policy Toolkit. Many of the elements of the UCOP policy resources are similar to what is offered by UCSC PCO to policy writers. One section of the UCOP Toolkit advises to take care in policy word selection in order to differentiate between a requirement and advice.</p> <p>UCOP has a policy project ongoing to standardize, update and review policies, procedures and guidance.</p> <p>UCOP has a draft Policy on Policies that has yet to be released.</p>
<p>Reviewed all published UCSC campus administrative policy documents and select divisional policy, procedure and guidance documents.</p> <p>Reviewed the policy websites of UC campuses and 3 major research institutions.</p>	<p>Generally, it appears that UCSC PPG adequately addresses implementation of UC policies. While its approach is more decentralized than other institutions.</p> <p>The age of some UCSC policies and lack of evidence of updates and current contact information detracts from their utility and credibility.</p> <p>In reviewing Principle Officers subsets of PPG there was no evidence of consistent notification of last reviewed date or person to contact for interpretation or advice.</p>
<p>Compared selected UCSC policies, procedures and guidance to UCOP policies and to other UC campuses to test for alignment of PPG within the UC system.</p> <p>Selected UCSC ITS, SHR and Financial Affairs to compare PPG to UC policies.</p>	<p>UCSC Campus Wide Administrative policies appear to address regulatory requirements and local needs not covered by UCOP policies and align generally with other UC campuses.</p> <p>Selected UCSC PPG appeared adequate in implementing UC policies, however, it was observed that SHR has published policies that are currently in process with PCO for formalization.</p> <p>Document comparisons with other UC campuses did not allow for sufficient understanding on how other campus’ PPG is implemented due to non-comparable organizational structures and not having access to subject matter experts involved at each institution to fully understand how PPG is applied to processes.</p> <p>Two early examples were UCOP Business and Finance Bulletin policies BUS 63: Insurance Requirements and Certificates of Insurance and BUS 49: Policy for Cash and Cash Equivalentents Received. In both instances, each policy has elements that are regularly waived for subsets of participant groups. The process of waiving is not apparent in comparing PPG documents across campuses.</p>

## APPENDIX B – Guidance on Campus Wide Administrative Policy (EVC-003 V11)

### GUIDANCE ON CAMPUS WIDE ADMINISTRATIVE POLICIES

Effective Date: 12/1/1994

Last Revision Date: 7/15/16

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## Guidance on Campus Wide Administrative Policy

### I. Purpose/Scope

Campus wide administrative policies affect a broad range of the campus community, either because they are of general interest or applicability, or because one division/unit establishes a set of principles that others must abide by. To ensure these policies are in support of the university's mission, in compliance with federal and state regulations and university policies, safeguard individuals, and protect university assets, all campus wide administrative policies must be reviewed. This vetting process assures a consistent and inclusive approach to policy development.

Academic Senate policies, as well as policies that divisions/units (or subdivisions thereof) establish for their own operations, are not governed by this policy. Where conflicts exist between this policy and UC policies, UC policies shall take precedence.

### II. Definitions

**Campus Wide Administrative Policy:** A written statement that meets all of the criteria set forth in section III. A. of this document.

**Delegation of Authority:** The assignment of authority and responsibility for actions and/or activities to specified campus administrators.

**Interim Policy:** A provisional policy issued when a campus wide policy is needed within a time frame too short to complete the campus wide administrative policy approval process.

**Responsible Office:** The office(s) responsible for functional oversight of the area of operations addressed within a particular policy.

**Responsible Officer:** The Principal Officer(s) who sponsors the policy, heads the Responsible Office, and has high-level oversight of the area of operations addressed within a particular policy.

**Policy Dissemination:** Dissemination of an approved policy involves two steps: (i) posting the approved policy on the campus policies and procedures website and (ii) formal communication of new or revised policy and/or operational procedures, a summary of changes, effective date, and related guidance to affected parties.

**Procedure:** A process or description of a set of steps for implementing a specific policy.

**Policy Owner:** Policy Owners are designated by the Responsible Officer to develop policy and procedures; execute the consultation plan, approval process, and dissemination; and promulgate new and revised policies. The Policy Owner serves as the subject matter expert and is responsible for interpretation and responding to questions on policies under their purview.

**Policy Promulgation:** Promulgation of an approved policy involves two steps: (i) policy dissemination and (ii) monitoring policy effectiveness and enforcement.

**Procedure Owner:** The university official responsible for the overall implementation of a particular administrative procedure within their area of functional responsibility.

**Technical Review:** Revisions to a policy which are technical in nature, such as updating a link to a website or a contact name, that do not change the substance or principles of the policy.

**Template:** A predesigned, fixed format structure used to provide guidance and facilitate easy, consistent capture of all required policy components.

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UC Santa Cruz Policy

Policy Coordination Office

pco@ucsc.edu; (831) 459-3411

**GUIDANCE ON CAMPUS WIDE ADMINISTRATIVE POLICIES**

Effective Date: 12/1/1994

Last Revision Date: 7/15/16

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**III. Detailed Statement**

UC Santa Cruz formally approves, issues, and maintains a consistent format for campus wide administrative policies. The process is supported by a formal framework designed to guide Policy Owners in the timely dissemination of important governance and administrative information, and to make the information readily accessible to internal and external audiences.

The guidance in this document sets forth a formal framework for the review, formulation, documentation, approval, dissemination, monitoring of effectiveness, and enforcement of campus wide administrative policies. The framework demonstrates accountability in support of the university's mission in accordance with the public trust.

Individuals engaged in campus wide administrative policy processes must follow the framework outlined in this policy and the *Campus Wide Administrative Policy and Procedure Approval Process*.

**A. The Framework**

A campus wide policy is a written statement that meets all of the following conditions:

- a. has general applicability to members of the UC Santa Cruz campus community and is not specific to a particular division, unit/department, or office;
- b. utilizes the standard policy and/or procedure template and formatting, available on the Policy Coordination Office (PCO) website (see *Getting Help*). Longer more complex policies that cannot conform to the template may simply include the following required sections: *Purpose of the Policy*, *Definitions*, *Detailed Policy Statement*, *Getting Help*, *Applicability and Authority*, *Related Policies/References*;
- c. is consistent, more restrictive, or supplemental, but is not contrary to Regental or UC Office of the President (UCOP) policies, including personnel policies and collective bargaining agreements. Where policies intersect or overlap, text should be cross-referenced rather than repeated in the body of the policy;
- d. is distinct from a procedure. Whenever possible, the Policy Owner should make a distinction between policy and procedure. As a general rule, policies and procedures appear as separate documents. Campus policies state a set of directives and provide general parameters for fulfilling the intended campus objective. Campus procedures represent an implementation of policy by providing the steps and detailed guidance related to the successful and efficient performance of a particular administrative process; and
- e. has received approval by the Campus Provost/Executive Vice Chancellor (CP/EVC).

**1. Responsibilities of Policy Owner**

- a. **Policy Development**
  - i. **Establishing need:** Policy Owners are accountable for identifying the need for new or revised policies, the timely review and updating of existing policies, and identifying the best method of dissemination (i.e. training, outreach, and reference materials). Policy Owners must determine whether the UCOP policies require further interpretation or procedures at the campus level.
  - ii. **Plain language:** All policies should be written in [plain language](#). Plain language is defined as clear, succinct writing designed to ensure the reader understands as quickly and completely as possible.
  - iii. **Assigning authorities:** The authority and responsibility for actions that implement policy are assigned through formal delegations of authority documents. Policy Owners must also explicitly and formally delegate authority for exceptions to policy when allowable unless the policy specifies no exceptions. A process for resolution of conflicts must be identified, including the responsibility for final determination based on Delegation of Authority. In the absence of a formal delegation, the authorities, including exceptions, will rest with the Responsible Officer unless otherwise specified in the relevant policy.
  - iv. **Ensuring compliance with existing laws and policies:** All policies should consider applicable federal, state and local laws and regulations, and system wide policies. Campus wide policies should be developed to manage risk where policy has been determined to be required, yet UCOP Policy remains unestablished.

**GUIDANCE ON CAMPUS WIDE ADMINISTRATIVE POLICIES**

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**b. Consultation Plan**

- i. **Stakeholders/leadership:** Policy Owners must coordinate with professionals who have related expertise and/or substantive interest in the policy and/or its implementation and incorporate their comments into the policy draft.
- ii. **Required reviewing offices:** All policies are to be reviewed by the following offices:
  - a. Academic Senate
  - b. Campus Controller
  - c. Campus Counsel
  - d. Internal Audit
  - e. Labor Relations
  - f. Policy Coordination Office (PCO)
- iii. **Affected parties:** The Policy Owner must identify and consider the views of those who will be directly affected by changes in policy. Early communication with high-interest stakeholders is encouraged.
- iv. **Campus community review and comment period:** A one month review period is required for all new policies. Revised policies require a two week review period. More time may be provided as needed.

**c. Approval**

Final documentation must be provided to the PCO at least one week prior to seeking approval from the CP/EVC. The Policy Owner and the PCO will present the final documentation to the CP/EVC for approval. The CP/EVC may approve, deny, or return campus policies for further consideration and/or revision.

**d. Dissemination**

- i. **Dissemination;** Approved policies shall be formally communicated to the campus community by the Public Information Office.
- ii. **Training:** Guidance materials or classes that effectively support the components of the policy must be made readily accessible to all affected parties.
- iii. **Resources:** Supplemental resources that aid in the context or interpretation of the components of the policy must be made available to all affected parties. This includes, at a minimum, the designation of whom the user may consult with for guidance or problem resolution. These support options should be documented within the policy under the *Getting Help* section.

**e. Implementation, Promulgation**

- i. **Ongoing review and revision:** Policy Owners are responsible for ongoing review and revision of policies within areas they have been formally delegated (or for which they have been assigned) operational responsibility and must assess whether the policy is effective in meeting its intended purpose. A review should be undertaken at least once every five years or when relevant new laws, regulations, or systemwide policies emerge. Procedure Owners are responsible for communicating changes in law and/or system wide policy that may affect implementation processes.
- ii. **Interpretation:** Policy Owners and those listed in the *Getting Help* section of the policy are responsible for interpretation of the intent and implementation of the policy for both internal and external audiences.

**2. Role of the Policy Coordination Office**

The PCO assists Policy Owners in navigating campus wide administrative policy and procedure approval processes, ensures consistency and provides technical support in the writing of policies and procedures, analyzes policies in the system wide context, acts as quality control agent on behalf of the CP/EVC, and advises leadership when objectives are not being met.

The PCO is the office of record for the campus wide administrative policy and delegation of authority documents (active and inactive); and provides access to active documents on the Policy Coordination website.

**3. Technical Review**

**GUIDANCE ON CAMPUS WIDE ADMINISTRATIVE POLICIES**

Effective Date: 12/1/1994

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Updates that do not change the substance or principles of the policy may be approved by the Responsible Officer. The PCO will determine if the proposed revisions meet the criteria of a technical review. If technical updates trigger substantial changes, such as the direction or scope of the policy, a full CP/EVC approval process is required.

**4. Interim Policy**

An interim policy may be approved on a case by case basis. Policy Owners seeking to develop an interim policy should meet with the PCO to identify the existing policy gap and associated risks. PCO will work with the Policy Owner to streamline the consultation plan and approval process. An interim policy is effective for six months from the approval date and renewable in six-month increments while the Policy Owner completes the campus wide administrative policy approval process, preferably within one year of the approval date of the interim policy. All interim policies must be clearly marked "INTERIM POLICY:" preceding the policy name.

**5. Rescinding a Policy**

A policy that has been determined by the Policy Owner to no longer be necessary may be rescinded. Examples include when two or more policies are consolidated, when a policy has been superseded by another policy under a new Policy Owner, or when the need to administer the activity ceases. The Policy Owner must contact the PCO to develop a consultation plan and timeline to establish stakeholder concurrence.

Note: There are some policies that predate this framework, and have not completed each step of the campus wide administrative policy approval process. These policies remain official UCSC policies and in time, are expected to complete the process in order to fall into compliance.

**IV. Getting Help**

The campus PCO provides training and assistance to campus units (including help with completing forms, carrying out procedures, or interpreting guidance within this document).

If you need help with ...	contact ...
questions about guidance within this document,	the PCO, 459-3411, <a href="mailto:pco@ucsc.edu">pco@ucsc.edu</a> .
obtaining templates for policies and procedures,	the PCO, 459-3411, <a href="mailto:pco@ucsc.edu">pco@ucsc.edu</a> or see the Policy Coordination website for downloadable templates <a href="http://policy.ucsc.edu/resources/index.html">http://policy.ucsc.edu/resources/index.html</a> .
additional guidance and resources,	the PCO, 459-3411, <a href="mailto:pco@ucsc.edu">pco@ucsc.edu</a> or see the Resources for Policy Writers website <a href="http://policy.ucsc.edu/resources/index.html">http://policy.ucsc.edu/resources/index.html</a> .
navigation of the policy approval process,	the PCO, 459-3411.

**V. Applicability and Authority**

*Guidance on Campus Wide Administrative Policies* applies to all campus wide administrative policies and procedures and the individuals engaged in the processes leading to approval and dissemination of administrative policy.

The PCO has issued this guidance on behalf of the Office of the Chancellor and CP/EVC who are the campus authorities on campus wide administrative policies.

The CP/EVC is designated authority for resolution of conflicts and approval of exceptions to guidance outlines herein.

**VI. Related Policies/References for More Information**

Related Policies and Procedures

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Policy Coordination Office	UC Santa Cruz Policy	<a href="mailto:pco@ucsc.edu">pco@ucsc.edu</a> ; (831) 459-3411
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Bylaws and Standing Orders of the Regents, Standing Order 100.6, *Duties of the Chancellors*.

**References**

Draft *Establishing and Maintaining Presidential Policies*, Office of the President, March 4, 2015.

*Presidential Policies Frequently Asked Questions*, <http://policy.ucop.edu/policy-resources/faq.html>

*University of California Policy Toolkit Policy Development Guidelines*,  
<http://ucop.edu/ethics-compliance-audit-services/files/policy-toolkit/pol-guidelines.pdf>

**Delegation of Authority**

UC Santa Cruz Delegation of Authority number SCDA-EVC0001 *Authority to Approve Campus Administrative Policies* from Chancellor to Campus Provost/Executive Vice Chancellor dated June 29, 2007,  
<http://delegations.ucsc.edu/sites/delegations.ucsc.edu/files/delegations/SCDA-EVC0001.pdf>

**Implementation Procedures**

[\*Campus Wide Administrative Policy and Procedure Approval Process\*](#)

*Guide to Writing Policy and Procedure Documents*,  
<http://policy.ucsc.edu/resources/images/GuidetoWritingPolicy.pdf>

*University of California Policy Stylebook*,  
<http://www.ucop.edu/ethics-compliance-audit-services/files/policy-toolkit/pol-stylebook.pdf>

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Policy Coordination Office

UC Santa Cruz Policy

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<http://policy.ucsc.edu/resources/images/EVC003V11.pdf>

## APPENDIX C – Campus-wide Administrative Policies – Aging Report

The following is a listing of numbered Campus Wide Administrative policies, with the number issued by the PCO indicating the policy has been processed by that office. Based on the data published on the PCO website it is not clear when the policy was last reviewed or revised. The 15 highlighted policies are those with effective dates or last revised date greater than five years. As policies cycle through the PCO the revised policy will utilize the current policy template that specifically records last reviewed date.

Title	Last Update	Age in years
ACG0006: Advanced Payment for Vendors	5/7/97	19
ACG0012: Campus Cashiering, Check Cashing, and Returned Checks	7/1/97	19
ACG0024: Employee Emergency Loan Policy	3/17/04	12
ACG0025: Credit Card Merchant Policy (Mar 17, 2004, revised Apr 19, 2011)	4/19/11	5
ACG0026: Authority to Suspend or Revoke Access to Financial Information System	3/17/04	12
ACG0027: UCSC Bank Account Policy	8/23/07	9
ACG0028: Departmental Billing and Receivables Policy	11/1/09	7
BAS0001: Service/Support Animal Policy and Procedures	4/9/14	2
BAS0002: Non-research Animal Policy	7/24/15	1
EHS0015: UCSC Campus Water Protection Policy	7/1/10	6
EHS0016: Smoke and Tobacco-Free Policy	1/1/16	0
EHS0020: Fire Protection (Oct 13, 1997) This policy is under revision. For more information, please contact the Associate Vice Chancellor of Risk and Safety Services.	10/13/97	19
EVC001: Campus Alcoholic Beverage Policy for UCSC Sponsored Events (Dec 1, 2010; latest revision Aug 21, 2011)	8/21/11	5
IT0001: HIPAA Security Rule Compliance Policy (Dec 20, 2006; revised Dec 5, 2013)	5/12/13	3
IT0002: UCSC Password Policy (Feb 11, 2007; latest revision Jan 27, 2015)	1/27/15	1
IT0003: Policy for Acceptable Use of UCSC Electronic Information Resources (Acceptable Use Policy) (Nov 19, 2008; revised May 22, 2015)	5/22/15	1
IT0004: UCSC Minimum Network Connectivity Requirements Policy (Mar 4, 2009; revised May 22, 2015)	5/22/15	1
IT0005: UCSC Information Security Log Policy	8/2/11	5
IT0006: UCSC Digital Certificate Policy	3/16/15	1
MM0001: Purchasing Common Goods and Services	5/7/97	19
MM0002: Purchasing Conduct and Ethics	5/7/97	19
MM0003: Employee-Vendor Relationships and Conflict of Interest (Jun 12, 1997) (undergoing revision)	6/12/97	19
SA-0002: Child Care Access Policy (Dec 12, 2006) This policy is under revision. For more information, please contact the Associate Vice Chancellor of Colleges, Housing, and Educational Services.	12/12/06	10
SPS0001: Key Control and Access	5/6/97	19
SPS0003: Installation and Use Of Security Alarms (May 7, 1997, revised Jan 16, 2002)	1/16/02	14
SS001: UCSC Policy and Procedures Governing Campus Elections (Sept 1, 2012 revised Jul 1, 2012)	7/1/12	4
UR0001: Policy on the Administrative Fee on Gifts Made to the University of California, Santa Cruz (Regents) and the UC Santa Cruz Foundation (Jan 1, 1983, revised Jul 1, 2010)	7/1/10	6
UR0002: UCSC Policy and Guidelines for Support Groups (Jul 1, 1994, revised Jul 1, 2012)	7/1/12	4

 > 5 years

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## APPENDIX D – Discussion on Campus Policy on Policies

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UC systemwide has been in the process of updating a policy on policies document that would establish the requirements for creating and maintaining UC polices. At UCSC, despite recommendations over the years to formalize, a policy on policies document has never been formalized into campus policy. The campus has chosen to maintain documentation as draft policy and currently as guidance rather than a policy, which has limited its effectiveness.

We were told that the campus would consider formalizing the current guidance into policy, but not until or unless the UC system-wide policy on policies was finalized and issued.

The campus PPG governance model places responsibility for managing campus PPG on campus principal officers. The EVC PCO office is only resourced and directed to manage campus-wide policies, (and not the entire system of campus PPG) and be a conduit and resource for assisting principal officers develop and finalize campus-wide policies. The PCO also coordinates system-wide policies required for adoption by campus.

UCSC Principal officers have established PPG at the local level, following a variety of formats, styles, frequencies of the update, and maintenance of contacts. Some principal officers have adopted robust PPG, while other campus principal officers have been less engaged in maintaining related PPG. One common thread in UCSC's policy governance is the EVC PCO in its role of coordinating campus-wide policies.

We met with the EVC's office to share observations identified and to discuss steps that could be taken to improve PPG governance and how best for the EVC's office to demonstrate a commitment to having relevant and timely PPG within the boundaries of severe resource constraints. Currently, the PCO Office reporting to the EVC consists of .1 FTE, and we were told that there are no resources available to increase the level of effort over campus policy development and oversight.

EVC's Office has estimated the cost of updating all campus policies at \$3.4 M. We were told that this estimate was derived at by estimating the time required to finalize a single policy at 450 hours and updating 20 policies per year, taking five years to complete. It is clear that this level of resource commitment is not available and we do not suggest all campus policies be reviewed and updated at one time. However, the identification of key campus policies, some of which is already taking place, and a phased approach to reviewing the more critical policies for relevancy would be more practical and readily achievable.

Other steps discussed with the EVC's Office and the PCO that could be taken by the PCO to enhance campus PPG effectiveness, include:

- Defining the term "timely review" to be associated with a specific number of years and included within policies requiring policy holders to conduct a timely review of policies.
- Notifying campus-wide administrative policy holders when their period for timely review has reached its limit.
- With support from CP/EVC, directing campus-wide administrative policy holders to notify the policy coordination office of their policy review and its results, even if no change was the conclusion.
- Completing the review process for the policy, "campus-wide administrative policies", and related procedure "campus-wide administrative policies and procedures approval process" to incorporate the above requirements into formalized policy and procedure.