

## Policy Structure and Administration

Palmer College of Chiropractic (College) is committed to ensuring the College's policies are legally sound, current, meet the highest fiduciary standards, and wisely provide for the future intellectual and financial health of the College and the furtherance of its missions.

It seeks to develop, institute and enforce a comprehensive structured body of College policy that provides a rational and consistent context for decisions and actions by College administrators and individuals.

### *Scope*

This Policy Structure and Administration policy (Policy) applies to the entire College community, which is defined as including the Davenport campus (Palmer College Foundation, d/b/a Palmer College of Chiropractic) and Florida campus (Palmer College Foundation, Inc., d/b/a Palmer College of Chiropractic Florida) and any other person(s), groups, or organizations affiliated with any Palmer campus

### *Policy Categories*

This document classifies policies into three categories. These categories are Board of Trustees' Policies, Institution-Wide Policies and Non-Institution-Wide Policies.

### **Board of Trustees' Policies**

Board of Trustees' policies include:

1. Policies by which the Board operates and governs itself; and
2. Policies which serve as umbrella policies to provide high-level guiding principles and direction under which the College administration is responsible for implementation and compliance with the intent of the Board policy.

Board of Trustees' policies, which serve as umbrella policies, concern the way in which the Board intends the College to operate. They are broad, philosophical statements and/or positions of the Institution that affirm general Institution operating standards as adopted by the Board. They have the effect of internal governing law. Such policies are structured in accordance with the Mission and Purpose Statements of the College and are consistent with the following framework:

1. Board policies are consistent and applicable to local, state and federal laws and accrediting bodies.
2. Board policies are limited to fundamentally important and broadly applicable issues.
3. Board policies provide a rational and consistent context for decisions and actions by College administrators.
4. Board policies provide guidance and direction to administrative procedures established to implement policy.

5. Board policies provide a foundation of understanding and trust between the College and the individual members of the College community.
6. Board policies are designed to enable the Board to perform its appropriate functions.
7. Board policies are designed to enable the Administration to perform its appropriate functions.
8. Board policies are adopted in good faith and in the public interest.

Board of Trustees' policies logically lead to a series of Institutional policies that link back to Board of Trustees' policies.

## **Institution-Wide Policies**

The Board recognizes the need for the College to develop, institute and enforce Institutional policies to fully comply with Board policies, applicable laws, accreditation requirements and govern the operations of the College.

Such Institutional policies provide specific rules and provisions for implementing Board of Trustees' policies, aligning operations, communicating policy roles and responsibilities and setting expectations for operation across the College system. Institutional policies are consistent with the following framework:

1. Institutional policies derive from the authority of Board of Trustees' policies, including specific delegated authority to manage the Institution, or comply with federal or state laws, rules, or regulations;
2. Institutional policies apply Institution-wide;
3. Institutional policies provide detailed provisions, requirements, prohibitions and sufficient guidance and direction to ensure Board policy is properly implemented;
4. Institutional policies communicate requirements of or provisions for members of the College community;
5. Institutional policies and administrative rules provide the College's Administration the necessary flexibility to make timely changes to effectively implement policy;
6. Institutional policies provide for uniform compliance with fiscal, academic, research, human resources, and other management standards and requirements imposed by applicable laws or external agencies;
7. Institutional policies impact a substantial number of the College population;
8. Institutional policies promote consistency, efficiency, and effectiveness and/or mitigate or manage significant Institutional risk;
9. Institutional policies may satisfy a state or federal requirement or serve as a compliance indicator; and
10. Institutional policies are adopted in good faith to inform employees, students and the general public.

All members of the College community are responsible for complying with Institutional policies and related procedures.

## **Non-Institution-Wide Policies**

The Board recognizes the need for the College to develop, institute and enforce Division-, Department- and/or Campus-Specific policies for the efficient day-to-day operations of the College.

Non-Institution-Wide policies include Division-Specific, Department-Specific and Campus-Specific policies. Divisions, departments and campuses may develop policies to govern their unique needs

provided they do not conflict with Board and/or Institutional policies. Further, no division, department or campus may adopt a policy, procedure or practice that expands the obligations of the College under Institutional policies. In the event of a conflict between an Institutional policy and Division-, Department- or Campus-Specific policy, the Institutional policy will supersede.

### *Division-Specific Policies*

Division-Specific policies are policies that concern the terms or conditions affecting a specific division under the operational guidelines of the College.

Division-Specific policies are consistent with the following framework:

1. Division-Specific policies support the College's mission and strategic positioning goals;
2. Division-Specific policies apply division-wide only;
3. Division-Specific policies are consistent with Board and/or Institutional policies and applicable laws and accreditation requirements;
4. Division-Specific policies may be more restrictive than Institutional policies, but not more permissive; and
5. Division-Specific policies are adopted in good faith to inform employees, students and the general public.

### **Department-Specific Policies**

Department-Specific policies are policies that concern the terms or conditions affecting a specific department under the operational guidelines of the College.

Department-Specific policies are consistent with the following framework:

1. Department-Specific policies support the College's mission and strategic positioning goals;
2. Department-Specific policies apply department-wide only;
3. Department-Specific policies are consistent with Board and/or Institutional policies, Division-Specific policies and applicable laws and accreditation requirements;
4. Department-Specific policies may be more restrictive than Institutional policies, but not more permissive; and
5. Department-Specific policies are adopted in good faith to inform employees, students and the general public.

### **Campus-Specific Policies**

Campus-Specific policies are policies that concern the terms or conditions affecting individual Campus operations.

Campus-Specific policies are consistent with the following framework:

1. Campus-Specific policies support the College's mission and strategic positioning goals;
2. Campus-Specific policies apply to a specific campus;
3. Campus-Specific policies are consistent with Board and/or Institutional policies, Division-Specific policies and applicable laws and accreditation requirements;
4. Campus-Specific policies may be more restrictive than Institutional policies, but not more permissive; and

5. Campus-Specific policies are adopted in good faith to inform employees, students and the general public.

## *Delegation of Authority*

### **Delegation of Authority to the Office of the Chancellor/CEO**

In approving this Policy Structure, the Board delegates to the Office of the Chancellor/CEO the responsibility to develop, institute and enforce Institutional policies necessary to fully comply with Board policies, applicable laws and govern the operations of the College. Institutional policies shall not limit the authority of the Chancellor/CEO to enact policy or make exceptions to policy regarding safety, health, and property protection measures.

### **Delegation of Authority to the Chief Compliance Officer**

The Chief Compliance Officer appointed by the Board is responsible for oversight of the compliance functions of the College and shall be responsible for the administration of Institutional policies and associated processes and procedures. Under the direction of the Board and with the advice of the Chancellor/CEO and Executive Administrative Team, the Chief Compliance Officer's responsibilities shall include, but are not limited to:

1. Ensure that the College's Institutional policies and associated processes and procedures are fully compliant with relevant Board of Trustees' policies and applicable laws;
2. Develop, oversee and maintain the College's Institutional policy development process;
3. Draft Institutional Policy Proposals for Chancellor/CEO and Executive Administration Team review;
4. Facilitate the development, approval and maintenance of Institutional policies including monitoring for necessary modifications and updates;
5. Communicate the promulgation or, where appropriate, revision or withdrawal of Institutional policies;
6. Facilitate the establishment of any new support systems needed to achieve the College's compliance with new or substantially revised policies;
7. Initiate review of policies whose requirements and/or provisions have been in effect for five years or longer.
8. Determine when revisions to an existing policy should be presented to legal counsel for review; and
9. Provide final interpretations regarding Institutional policies, subject to approval by the Chancellor/CEO.

### **Delegation Of Authority To Policy Owners**

The Chief Compliance Officer may sub-delegate operational responsibility of the policy owner to an appropriate College Official. Depending on the scope of the subject matter, an Institutional policy may have more than one policy owner.

### **Delegation Of Authority To The Office Of Institutional Compliance**

The Office of Compliance which was established to reaffirm the College's commitment to conduct all of its operations and activities in a lawful manner; to increase awareness of such objectives; and to foster a culture of compliance and accountability shall serve as the official repository and point of contact for all Institutional policies, processes and procedures providing a single location for Institutional policies for the College Community.

Divisions, departments and/or campuses may not have separate websites or documents with duplicate versions of Institutional policies. All division, department and/or campus websites and paper documents should reference the policies available on the website of the Office of Compliance.

### **Delegation of Authority to the Executive Administration**

In approving this Policy Structure, the Board further delegates the administration to develop, institute and enforce Division-, Department- and Campus-Specific policies for the efficient day-to-day operations of the College.

#### **Division-Specific Policies**

Each Vice-Chancellor is responsible for the oversight, development, substance, authorization, implementation and final interpretation of Division-Specific policies under his or her specific division.

Division-Specific policies are maintained by the respective Vice Chancellor's and are available on the College website as appropriate.

#### **Department-Specific Policies**

Each Department Head under the direction and in consultation with the respective Vice-Chancellor is responsible for the oversight, development, substance, authorization, implementation and final interpretation of Department-Specific policies under his or her specific department subject to approval by the relevant Vice-Chancellor.

Department-Specific policies are maintained by the respective Department Heads and are available on the College website as appropriate.

#### **Campus-Specific Policies**

Each President is responsible for oversight, development, substance, authorization, implementation and final interpretation of Campus-Specific policies under his or her jurisdiction.

Campus-Specific policies are maintained by the respective Presidents and are available on the College website as appropriate.

### *Limitations*

The Policy Structure specified in this Policy does not limit the authority of the Board of Trustees to enact policy in the best interest of the Institution independent of this Policy should the need arise.

Nothing in this Policy shall be deemed to override the authority granted by the Articles of Incorporation to the Board of Trustees and its established committees or to specific Officers of the College.

### *Policy Reviews*

#### **Board Policies**

As a Policy of the Trustees, Board policies are subject to periodic review and revision by the Board of Trustees when deemed appropriate by the Board.

#### **Institutional Policies**

Institutional Policies that are required by law are reviewed by Legal Counsel to ensure they are consistent with applicable laws; they are in the best interests of the College; whether other Institutional reviews are necessary prior to promulgation; and risk management concerns have been reasonably addressed.

## Non-Institution Wide Policies

Each Vice-Chancellor shall conduct reviews of existing Division-Specific policies under his/her jurisdiction at least every five years.

Each Department Head shall conduct reviews of existing Department-Specific policies under his/her jurisdiction at least every five years.

Each President shall conduct reviews of existing Campus-Specific policies under his/her jurisdiction at least every five years.

Non-Institution-Wide policies are subject to review by Legal Counsel if deemed appropriate by the respective Vice-Chancellor, President or Department Head at the direction of the respective Vice-Chancellor.

## *Standard Institutional Policy Provisions*

Institutional policies are supplemented by provisions that are applicable to all institutional policies. It is the responsibility of all employees and students to know and comply with these standards.

- [Standard Provisions Applicable to All Institutional Policies](#)

## *Additional Information*

### *Associated Policies, Processes, and/or Procedures*

This Policy is supplemented below. It is the responsibility of all employees to know and comply with additional associated policies and procedures as supplemented.

### *Policies*

- [Board of Trustees BT103 Delegation of Authority to the Institution to Create Institution-Wide Divisional and Campus -Specific Policy](#)

### *Processes and/or Procedures*

- N/A

### *Forms/Instructions*

- N/A

### *Other Related Information*

- N/A

### *Contacts*

- Earlye Julien, PHR, M.S.Ed., CQIA  
Senior Director for Compliance  
1000 Brady Street  
Davenport, IA 52803  
563-884-5476  
[earlye.julien@palmer.edu](mailto:earlye.julien@palmer.edu)

## Related Information

- Policy Hierarchy

## History

Last Revised: ..... September 1, 2016

Adopted: ..... February 13, 2010

Last Administration Review: ..... September 1, 2016

Responsible Officer..... Dennis Marchiori, D.C., Ph.D.  
Chancellor and CEO  
Palmer College of Chiropractic  
1000 Brady Street  
Davenport, Iowa  
Phone: 563-884-5466  
[dennis.marchiori@palmer.edu](mailto:dennis.marchiori@palmer.edu)

Issuing Office ..... Office of Compliance  
Earlye Julien, PHR, M.S. Ed., CQIA  
Senior Director for Compliance  
& Chief Compliance Officer  
Palmer College of Chiropractic  
1000 Brady Street  
Davenport, Iowa  
Phone: 563-884-5476  
Fax: 563-884-5883  
[earlye.julien@palmer.edu](mailto:earlye.julien@palmer.edu)