



29 British American Boulevard, 2<sup>nd</sup> Floor  
Latham, NY 12110  
518-439-8311  
thearcny.org

## [Policy Number]: Policy Development

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Category: Corporate Compliance      Effective Date: XXXXXXXX  
Department: XXXXXXXXXXXXXXXXXXXXXXXX      Last Revision Date(s): 5/27/2020

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### POLICY STATEMENT

The [Chapter] wishes to establish a standardized process for policy development, approval, revision and implementation.

This policy applies to all policies developed by the [Chapter].

### PROCEDURE

#### A. Development of Policies

Policies shall be developed and/or revised to meet regulatory requirements and to comply with other [Chapter] policies.

The Compliance Officer will be responsible for the overall coordination and implementation of any new or revised policy. The [Executive Director] and other members of senior management will be consulted as needed throughout the process of developing or revising any policy, and must review all policies prior to approval to assure compliance with regulatory and other [Chapter] policies.

Administrative and managerial staff in [Chapter] departments shall be responsible to recommend the timely development, review, revision, and implementation of new and existing policies relating to his or her area of accountability. Administrative and managerial staff should consult with the Compliance Officer prior to developing any new policy to ensure that the policy is necessary and consistent with overall [Chapter] operations.



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### B. Review of Policies

The Compliance Officer shall conduct a review of all policies on an annual basis and shall recommend the development of new policies or revision of existing policies on an as-needed basis. When the Compliance Officer determines that a policy needs to be created or revised, the Compliance Officer shall either (a) draft the policy or revise the existing policy; (b) request that leadership from all affected departments collaborate on the drafting process; or (c) shall request that Inside Counsel or Outside Counsel prepare the policy on behalf of the [Chapter]. The Compliance Officer shall utilize the resources of the Arc New York as appropriate.

### C. Approval of Policies

All policies shall be approved by the Board of Directors prior to implementation. The date of approval of each policy shall be included on the policy.

### D. Maintenance of Policies

The Compliance Officer shall assign a number to each policy.

The Compliance Officer shall maintain an ongoing file of revised policies, substitute policies and current policies, including an index.

Policies, as they are revised or replaced, shall not be discarded.



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### E. Distribution of Policies & Training

The Compliance Officer shall distribute new and revised policies to a standard distribution list which shall include the Board, the [Executive Director] and all department heads and, if applicable to their scope of responsibilities, independent contractors, agents and employees.

The Compliance Officer shall develop a plan for informing and educating the independent contractors and staff of the [Chapter] of new and revised policies, which may include obtaining a written certification that each Affected Individual has read and understands each new or revised policy. Copies of these certifications shall be maintained in an individual's personnel file or in the independent contractor's contract file.