Policy Writers Workshop

June 19, 2015
8:45 – 11:45
VCU Student Commons
Commons Virginia B-C-D
Policy Writers Workshop Topics

1. What is the Policy Program?
2. What is a policy? What is not a policy? And why do we have them?
3. Policy Classification (Policy Types)
4. Submit a policy
5. Policy template (Group Exercise)
6. Policy writing tips

Remember, Compliance is Everyone's Job
What is the Policy Program?

- BOV approved *Creating and Maintaining Policies and Procedures* in May 2011
- A universitywide program that manages centralization and data normalization of all universitywide policies

Remember, Compliance is Everyone's Job
What is the policy program?

- Policy making & approval function approved by the Board of Visitors Policy. Details outlined in *Creating and Maintaining Policies and Procedures*.
- Provides guidance in the policy needs assessment; creation; and approval process.
- Ultimate goal: A centralized policy library.
What is a policy and why do we have them?

- Makes expectations clear
- Mitigates risks
- Explains regulations and laws in plain language
- Supports compliance
- Mandates required actions and processes governed by the university
Why do we have policies?

- It is important to have policies because well-written policies can prevent chaos, confusion, and maybe even legal problems.

- Policies articulate what is done, who is served, and what services and resources are needed.
Acronym BAIL (knowing which policies to refer to will BAIL you out of confusion):

- Board of Visitors (BOV) policies
- Administrative policies
- Interim policies
- Local policies
Local policies are considered departmental (i.e., only affect one unit or area)
What is not a policy?

- **Guidelines are not policies:** Guidelines are considered additional information about a policy and are best addressed in the FAQ section.

- Guidelines are typically not binding and are not enforced like policies and are not recommended to use in policy library.

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Submission of a policy for review

- Once policy has been discussed with your committee or subject matter experts; approval from VP, SVP, etc.
- Policy has been drafted and placed in the policy template
- Ready for review by ICO
- Electronically submit your policy to: policy@vcu.edu

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Policy Template

- A required tool for the policy writer/policy owner
- Provides consistency and guidance of information within the numerous sections of the policy
The policy title gives the reader an idea as to what they are preparing to read.

Indicates what content is basically, or reasonably, included in the document.
Responsible Office

- Which office will be responsible for this policy?
- Which office interprets the policy?
Think of this as the birthday of the policy

Example:

Initial Approval Date: 1/20/2013
Current revision or last revision date for this policy is the last date that you reviewed the policy.

Example:

Current Revision Date: 5/9/2014
Policy Statement & Purpose

- A description of the policy
- May be brief or lengthy depending on the topic
- Statements of purpose and intent (VCU’s stance on a topic)
- Statements of why
In accordance with the federal Drug Free Workplace Act of 1988, the federal Drug Free Schools and Communities Act of 1989, and the Commonwealth of Virginia’s Policy on Alcohol and Other Drugs (AOD), it is the policy of Virginia Commonwealth University that the unlawful or unauthorized manufacture, distribution, dispensation, possession or use of alcohol and illicit drugs by employees and students on university property or as part of any activity is prohibited. The purpose of this policy is to protect the health, safety and welfare of members of the university community and the public being served by the university.

VCU supports an environment free from retaliation. Noncompliance with this policy may result in disciplinary action up to and including termination. Retaliation against any employee for bringing forth a good faith concern, asks a clarifying question, or participates in an investigation is prohibited.
Table of Contents

Outlines the sections of the document for the reader

Table of Contents

Who Should Know This Policy ....................................................... 2
Definitions ................................................................................. 2
Contacts .................................................................................. 3
I. Procedures for Policy Education and Enforcement ............. 3
II. Procedures for AOD Counseling, Treatment and Accessing Services at VCU 5
III. Procedures for University Sponsored Events Associated with Alcohol .... 5
Forms .......................................................................................... 6
Related Documents .................................................................... 6
Revision History ........................................................................ 7
Who should know this policy?

Individuals responsible for knowing and understanding the policy

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Examples of who should know this policy?

**Clinical Trials**
- Policies on research, research individuals need to know the policy on research or those responsible for clinical trials registration

**University Business Travel**
- Travelers and individuals who work in procurement need to know policies about reimbursement of travel

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Definitions aid in the reader’s understanding of the policy or procedure

- Define new, uncommon or specialized terms
- Define terms that can have different meanings in a different context
- Alphabetize defined terms in the definition section of the policy

Remember, Compliance is Everyone's Job
Defining Integrity & Compliance:

**Misconduct** – unacceptable or improper behavior, especially by an employee or professional person.

**Integrity** - the quality of being honest and having strong moral principles; moral uprightness.

*Remember, Compliance is Everyone’s Job*
Contacts

- Use position names and titles rather than individual names
- Check contact information and office/job titles, to ensure they are current and accurate

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The Office of the Provost officially interprets this policy. The Office of the Provost is responsible for obtaining approval for any revisions as required by the policy *Creating and Maintaining Policies and Procedures* through the appropriate governance structures. Please direct policy questions to Office of the Vice Provost for Academic and Faculty Affairs.
Policy Specifics and Procedures

- Procedures are mandatory actions, or required actions and processes, to comply with a policy; they support compliance with applicable laws and regulations to mitigate risk.
- Accurately state current practices.
- Use numbering.
- Use bullets.
- Use subheadings to define steps and processes.

Remember, Compliance is Everyone's Job.
Example of procedures

C. Procedures

1. Department Chair or Director submits a completed Recommendation for Off-Cycle Faculty Bonus Award form to the Dean or respective Unit Head. The form is located on the Human Resources’ website at www.hr.vcu.edu/about/forms.html#faculty

2. Dean or Unit Head reviews and, if approves, submits to appropriate Vice President. (If unit reports directly to the President, Vice President, approval is not required.)

3. Vice President reviews and, if approves, submits to President for approval. Note: If the faculty member is at the level of the Dean or higher, the off-cycle bonus also requires approval by the Board of Visitors before it can be processed.

4. If the off-cycle bonus request is approved by the President, the Dean/Unit Head prepares a notification letter to the faculty member. (A notification template is available from the Office of the Provost and the Office of the Vice President for Health Sciences.) The Dean/Unit Head also determines if the faculty member is selecting a cash distribution or the option to tax-defer the bonus award. Tax-deferring the bonus depends on the faculty member’s previous Tax-Deferred Annuity (TDA) contributions or the timing of the off-cycle bonus. If the deferred option is selected, faculty must complete a Salary Reduction Agreement (SRA) available at www.hr.vcu.edu/about/forms.html#benefits. Questions about the tax-deferred options can be directed to the VCU Human Resource Generalist for your department, which you can locate at www.hr.vcu.edu/about/generalists.html#list.
This section of the policy is where the policy writer/owner can reference forms that are included in the policy

✓ Correct URLs are important

✓ Be sure to list in order of appearance in the policy
Example of forms listed in forms section of policy

1. www.scheduling.vcu.edu

2. Request for Change of Faculty Appointment Status - Term (Non-Tenure) Track to Probationary (Tenure-Eligible) Track

3. Request for Change of Faculty Appointment Status - Probationary (Tenure-Eligible) Track to Term (Non-Tenure) Track
Related Documents

- Provide citations for objective sources driving policy content
- Include Documents critical to the development of corresponding policies and procedures
- Include federal regulations, state regulations, state policies and VCU policies, and procedures
- If providing web address links, check to ensure they are current and are in alpha order

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Examples of related documents

1. Commonwealth of Virginia Policy on Alcohol and Other Drugs
2. Employee Standards of Conduct
   http://www.dhrm.virginia.gov/hrpolicy/web/pol1_60.pdf
3. Policy for Residence Hall Students
   http://www.housing.vcu.edu/docs/residence_hall_policies.pdf
Revision History

- Provides an historical overview of when this policy changed
- Include former names of the policy if applicable
- Include dates of prior revisions
This policy supersedes the following archived policies:

<table>
<thead>
<tr>
<th>Revision/Approval Date</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial Approval: 9/1991</td>
<td>VCU Alcohol and Drug Policy</td>
</tr>
<tr>
<td>Revised and Approved, 11/10/1999</td>
<td>VCU Alcohol and Drug Policy</td>
</tr>
<tr>
<td>Revised and Approved, 5/17/2002</td>
<td>VCU Alcohol and Drug Policy</td>
</tr>
<tr>
<td>Revised and Approved, 11/16/2006</td>
<td>VCU Alcohol and Drug Policy</td>
</tr>
<tr>
<td>Revised and Approved, 5/09/2014</td>
<td>VCU Alcohol and Other Drug Policy (Formerly VCU Alcohol and Drug Policy)</td>
</tr>
</tbody>
</table>
FAQs

- Information in this section offers further interpretation of policy statements and procedural steps if need
- Most common questions and answers go here
- Additional relevant information on the policy
- Consider minor revisions if need to add or change

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FAQ Examples

Example A: There are no FAQs associated with this policy and procedures

Example B: (From the policy on Outgoing Sponsorships, Advertising and Endorsement)

1. Question: Does this policy prohibit university units from participating in civic, community or charitable events, such as purchasing tickets for seats at a table for an organization’s fundraising event or an annual dinner?

Answer: This policy does not preclude university units or individuals representing the university from participating in these events. However, a sponsorship of the event must comply with this policy.

3. Question: Does a VCU unit’s paid membership in a professional organization constitute an “official” university relationship?

Answer: Some memberships are considered to be contractual. Per the policy, the appropriate university cabinet official will determine if a relationship is official.

Remember, Compliance is Everyone’s Job
Questions?
BREAK TIME

10 Minutes
Creating a Policy

Start here, start early!

Call!

Remember, Compliance is Everyone's Job
Creating a New Policy

- Can this policy be combined with an existing policy covering the same topic?
- Consider relationship to existing policies that may have similar purpose
- Numerous policies on one topic may cause confusion for the every reader

Alcohol Policy

Drug Policy

Alcohol & Drug Policy
Creating a new policy

- Discuss with stakeholders prior to proposing a new policy and get the approval from your VP
- Use terms consistently throughout the policy
- Keep in mind what will help your reader better understand expectations
- Consider legal or regulatory requirements (not a good idea to copy and paste legal info in a policy; citations are best practices in the related documents section)
Policy Writing Tips

- What is plain language?
- Why does plain language matter?
- Why should you care?
- Make it easier for the intended audience:
  
  Consolidate → Combine  
  Expeditiously → Quickly

The 3 C’s: Clear, Concise and Credible

Remember, Compliance is Everyone's Job
Policy Writing Tips

- Write for your intended audience
- Organize your information
- Use active voice
  - Passive: It was demonstrated that high stress can cause heart attacks.
  - Active: Research shows that high stress can cause heart attacks.
- Avoid jargon and slang
- Be succinct (briefly and clearly expressed)
- Keep paragraphs short

Remember, Compliance is Everyone's Job
Policy Writing Tips

- Use headings and subheadings
- Define unique & industry specific terms
- Include a table of contents
- Write shorter sentences (15-18 words)
- Test the readability of your policy

MS Word Readability Statistics:

Counts
- Words: 68
- Characters: 375
- Paragraphs: 1
- Sentences: 3

Averages
- Sentences per Paragraph: 3.0
- Words per Sentence: 22.6
- Characters per Word: 5.3

Readability
- Passive Sentences: 0%
- Flesch Reading Ease: 52.4
- Flesch-Kincaid Grade Level: 9.3

Remember, Compliance is Everyone's Job
Policy Writing Tips

- Choose words wisely:
  - Must
  - Will
  - Prohibited
  - Should / Should Not
  - Recommend
  - Encouraged

- Be consistent
- Spell out acronyms the first time they are used
- Do not use contractions
- Do not use idioms ('touch base' or 'across the board')
- Double check your policy language for accuracy and up to date information
The BOV are the only group that creates and approves polices.
Policy Writer’s Workshop

BREAK TIME

30 Minutes
Revising a policy

- Consider legal or regulatory changes since the last approval date
- Use the policy template
- Minor revisions
- Major revisions
- Discuss major changes with stakeholders prior to proposing major changes
Formal Approval Review Process

Review by ICO

Review by University Counsel

Review through public comment for 30 days

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Formal Approval
Final Steps

Contact appropriate VP or Cabinet member to contact the scheduler to schedule the policy on the agenda to be approved.

University Council/or BOV approval (Administrative policies go to University Council and Board of Visitors policies go to the BOV for final approval).

Once approved, policy owner will forward final copy to ICO for inclusion into the Policy Library to policy@vcu.edu.

Remember, Compliance is Everyone's Job.
Triennial Review

- Every three years (at a minimum)
- You will receive an email notification 6 months prior to due date
Triennial Review

Minor or no changes = Update revision date and submit to the ICO

Major or substantive changes = Approval process

Remember, Compliance is Everyone's Job
Policy Owner’s Responsibilities

✓ Assess the need for policy (w/VP approval)
✓ Initiate and implement the policy process
✓ Communicate with the ICO (Start Here, Start Early!)
✓ Edit, review and revise policies in a timely manner
✓ Interpret the policy when questions arise
Policy Owner’s Responsibilities

- Primary responsibility for drafting (identify key stakeholders for input)
- Follow the formal approval process
- Educate key stakeholders (brief appropriate university governance bodies)
- Maintain the policy document
- Respond to triennial review notifications
- Provide status of policy

Remember, Compliance is Everyone’s Job
Policy Library Website

www.policy.vcu.edu
Common Questions

How do I know if something should be a policy?

Why are there so many steps in the process?

What is the responsibility of the policy owner?

Can a policy have more than one owner?
Policy Feud Game
Questions?
Thank you for your time!