What is the Policy Program?

- Within the Integrity and Compliance Office (ICO)
  - Provides independent oversight of university operations
  - Reports to BOV
- Official resource and for all university policy making
- Goal = maintain current and comprehensive policies and procedures conveying the expectations of VCU

What does the Policy Program do?

- Oversees development, review, approval and retirement processes for university policies and procedures
- Communicates approved policies, etc. to university members
- Administers and maintains Policy Library

What is a policy?

- Articulates requirements and expectations for behavior, actions and activities of the university community
- Requires or prohibits an action, support compliance with applicable laws and regulations and/or mitigate risk

What are procedures?

- Mandatory actions and processes necessary to comply with a policy
- Policies may or may not include procedures.
Why do we need policies?

- Convey the organization’s mission and enables the execution of its strategy
- Ensure employees clearly understand expectations and consequences for misconduct
- Influence employee behavior and support ethical, compliant decision-making
- Create a positive and respectful workplace and organizational culture
- Foster credibility and trust with internal and external stakeholders

Why do we need policies?

- Improve productivity and performance
- Prevent, detects and responds to misconduct
- Protect the university’s people, reputation and bottom line
- Meet all legal standards required to operate
- Avoid litigation and mitigates risk

What is not a policy?

- Guidelines are not policies!
- Guidelines are suggestions or recommendations for a preferred course of action or behavior; they are not requirements or mandates
- Guidelines are not enforced like policies, but may be relevant to implementing a policy (e.g., Related Documents, FAQ, etc.)

Types of policies at VCU

- Board of Visitors (BOV)
  - University governance and/or requires the BOV to take an action item (such as a vote to approve something)
    - BOV approves
- Administrative
  - Operational expectations and/or compliance with applicable laws, regulations, policies and procedures; applies to or affects more than one unit, department, division or school/college
    - President’s Cabinet approves

Types of policies at VCU

- Local
  - Meets the unique needs of, and generally applies to or affects, one unit, division, department or school
    - Not governed by Policy Program (but always happy to help!)
    - Cannot conflict with an administrative or BOV policy

Interim policies

- Applies to BOV and administrative policies
  - Provisional policy that fulfills an emergent need and requires implementation pending the full approval process
    - Accreditation, legal, regulatory or remedial action
  - President’s Cabinet approves
  - Limited in term to one year or less
Policy Template

- Required for administrative and BOV policies
- Provides guidance
- Contributes to consistency
- Accessible!

Template: Policy Title
- Expresses the purpose and describes the policy
- Should not include “Virginia Commonwealth University” or “VCU”
- Should not include “Policy”
- Preceded by “[DRAFT]” for draft policies
- Followed by “- Interim” for interim policies

Template: Policy Type
- BOV
- Administrative
- Interim
- Local

Template: Responsible Office
- Unit primarily responsible for developing and implementing the policy – the “owner”
  - Ensures accuracy of subject matter
  - Trains appropriate audiences
  - Enforces and monitors compliance
  - Interprets policy
  - Timely review
- Also include name of cabinet-level office
  - Example: Office of Sponsored Programs, Office of Research and Innovation

Template: Initial Policy Approved
- Date first version was approved

Template: Current Revision Approved
- New policy
  - “None – New Policy”
- Revised policy
  - Date current version was approved
  - Minor “out of cycle” revisions do not change the current approval date
Example of Policy Statement and Purpose

• VCU’s Stance
Virginia Commonwealth University is committed to maintaining a safe and supportive environment for all individuals in the university community, particularly minors who participate in VCU sponsored or hosted programs . . . .

• Purpose of Policy
The purpose of this policy is to bring awareness to the presence of minors on campus, and to prescribe minimum requirements for the screening, supervision and training of individuals working with minors – to ensure their protection, to fulfill our obligations as mandated by law, and to provide the best possible experience for any minors participating in activities sponsored or hosted by the university.

Example of Policy Statement and Purpose (cont’d)

• Who Policy Applies To
This policy applies to all programs and activities that involve non-enrolled minors and are sponsored by the university or conducted by other organizations on VCU’s campus, including camps, clinics, workshops, conferences, research lab mentorships, and other educational activities . . . .

• Key Requirement(s)
Minors participating in VCU sponsored or VCU hosted programs and activities must be conducted in a manner that is appropriate and intended to keep everyone healthy and safe . . . .

Example of Policy Statement and Purpose (cont’d)

• Exceptions
Exceptions to this policy include: (1) events on campus which are open to the general public and which minors attend at the sole discretion of their parents or guardians; (2) campus visits; (3) minors serving as participants in Institutional Review Board approved research studies, when the minor is accompanied by a parent or legal guardian . . . .

Example of Policy Statement and Purpose (cont’d)

• Consequence for Noncompliance & Non-Retaliation
Noncompliance with this policy may result in disciplinary action up to and including termination. VCU supports an environment free from retaliation. Retaliation against any employee who brings forth a good faith concern, asks a clarifying question, or participates in an investigation is prohibited.

Template: Table of Contents

• Outlines the sections of the document

Table of Contents
- More Should Know the Policy . . . .
- Definitions .
- Contents .
- Policy Specifics and Procedures .
- Forms .
- Related Documents .
- Executive Notes .
- FAQ .
Template: Who Should Know This Policy

- The groups that need to be familiar with the policy
  - Employees (includes faculty)
  - Students
  - Others who may be subject to the policy (e.g., affiliates)

Examples of Who Should Know This Policy

- **University Business-Related Travel policy**
  - University employees, non-employees and students seeking reimbursement from any VCU funding source are responsible for knowing this policy and familiarizing themselves with its contents and provisions.

- **Classified Employment, Promotion and Transfer policy**
  - Classified employees, and anyone who hires classified employees, are responsible for knowing this policy and familiarizing themselves with its contents and provisions.

Template: Definitions

- Limited to new, uncommon or specialized terms that have unique or particular meaning to the policy or are industry-specific
- Aid in the reader’s understanding of the policy or procedure
- Do not contain requirements
- Alphabetical order
- Not capitalized in body of policy

Consult the new Policy Glossary!!!

- All defined terms used in VCU’s policies
- Assists with clarity, consistency and comprehension
- Resource for drafting (not mandatory)

Template: Contacts

- Unit that is responsible for interpreting and revising the policy and answering questions about the policy
- Include the title/position of the individual whom to contact and general email account (if available and monitored)
- Do not use individual/personal names, personal phone numbers or an individual’s email address as contacts
- Use current official name of unit and position contact
Example of Contacts

- The Office of Procurement Services officially interprets this policy. Procurement services 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 procurement services, travel and corporate card manager.

Source: University Business-Related Travel

Template: Policy Specifics and Procedures (cont’d)

Mandatory actions/operational processes/steps required to comply with the policy
- List in order they should occur
- Who performs the procedure
- What steps are required
- How the steps are to be performed
- Use numbering and bullets
- Use subheadings to define steps and processes
- Consistent with Policy Statement and Purpose and other policies

Policy Specifics and Procedures (cont’d)

- Include procedures that apply to more than one unit/area of the university community
  - Omit strictly “internal” or “local” processes and procedures
  - Example: Include requirements and procedures for university travelers to get reimbursed, but exclude Office of Procurement Services’ strictly internal procedures to process the reimbursement submission

Policy Specifics and Procedures (cont’d)

- Use direct language conveying mandatory or prohibited action (e.g., must, required, will and prohibited) rather than language that could be viewed as optional (e.g., should, may or should not)
- Do not include guidelines/recommendations
  - But refer to them and list as Related Documents or FAQ

Example of Policy Specifics and Procedures

- Draft procedures with the “every reader” in mind
  - Benefits the reader and policy owner
- Include requirements and procedures for university travelers to get reimbursed, but exclude Office of Procurement Services’ strictly internal procedures to process the reimbursement submission

Policy Specifics and Procedures (cont’d)

- Include procedures that apply to more than one unit/area of the university community
  - Omit strictly “internal” or “local” processes and procedures
- Example: Include requirements and procedures for university travelers to get reimbursed, but exclude Office of Procurement Services’ strictly internal procedures to process the reimbursement submission

Policy Specifics and Procedures (cont’d)

- Use direct language conveying mandatory or prohibited action (e.g., must, required, will and prohibited) rather than language that could be viewed as optional (e.g., should, may or should not)
- Do not include guidelines/recommendations
  - But refer to them and list as Related Documents or FAQ

Example of Policy Specifics and Procedures

1. Human Resources Role: Human Resources will post and advertise vacancies, recruit, screen, assist with selection, consult with managers on salary determinations and authorize a salary offer to be made by the hiring department according to applicable pay policies as outlined in state policy and the VCU Classified Salary Administration Plan as listed in the Related Documents section of this policy . . . . . .

3. Posting of Vacancies: Subject to the exceptions listed below, Human Resources must post, for a minimum of five working days, all classified positions that become vacant and are to be filled . . . . . .

3. Posting of Vacancies: Subject to the exceptions listed below, Human Resources must post, for a minimum of five working days, all classified positions that become vacant and are to be filled . . . . . .

4. Interviews: Interviews are a required step in the selection process. No person is to be hired without having been interviewed for the posted position . . . . . .

Source: Classified Employment, Promotion and Transfer
**Template: Forms**

- List the forms that are referenced in, or related to, the policy
  - Internal forms
  - Federal and state forms
- Use current official form titles
- Use current hyperlink for VCU materials
- List URL (but no hyperlink) to external materials
- List in this order: (1) referenced, (2) VCU forms in alphabetical order, and (3) the rest in alphabetical order

**Example of Forms**

1. Campus Accountability Guest Form
2. Employee Request for Accommodation Form
3. Medical Certification for Employee Accommodation Form
4. Race/Deer Closeness Incident Reporting Form

**Template: Related Documents**

- List documents and resources critical to policy development and compliance
  - Other university policies and procedures
  - Local policies, procedures, guidelines, standards, etc.
  - Federal and state regulations, laws and policies
- List in this order: (1) referenced, (2) VCU policies in alphabetical order, and (3) the rest in alphabetical order

**Related Documents (cont’d)**

- Use current official document titles
- Use current hyperlink to VCU materials
- List URL (but no hyperlink) to external materials

**Example of Related Documents**

   https://www.cdc.gov/niosh/topics/crimstds/epi/crime.html
2. VCU Policy: Emergency Notification, Response, and Evacuation
   https://www.vcu.edu/campus-safety/campus-security-codes-of-conduct/
3. Violence Against Women Act
   https://www.federalregister.gov/documents/2014/03/01/d14908/violence-against-women-act

**Template: Revision History**

- Indicates when changes were made to the policy
- Includes former names of the policy (if applicable)
- Includes approval dates of prior versions
  - Minor “out-of-cycle” revision dates and reason for revision are included
Example of Revision History

Anticipated or commonly asked questions and answers regarding this policy and procedures

Additional relevant information

If no FAQ: “There are no FAQ associated with this policy and procedures.”

Example of FAQ

FAQ

1. Can an employee of VCU, does this policy still apply to me?

Yes. VCU promotes an integrated Data Classification Program that can be used by individuals to understand the security of sensitive data. VCU's Data Classification Standard is designed to provide VCU personnel with guidance on the handling, transmission, and disposal of sensitive data, including specific requirements related to the handling of various types of information. It is important to consider that an employee may be subject to handling sensitive data and specific procedures should be in place to handle sensitive types of information. Unless specifically instructed otherwise, all VCU personnel are subject to the VCU Information Security Program.

Example of FAQ

FAQ

1. Can an employee of VCU, does this policy still apply to me?

Yes. VCU promotes an integrated Data Classification Program that can be used by individuals to understand the security of sensitive data. VCU's Data Classification Standard is designed to provide VCU personnel with guidance on the handling, transmission, and disposal of sensitive data, including specific requirements related to the handling of various types of information. It is important to consider that an employee may be subject to handling sensitive data and specific procedures should be in place to handle sensitive types of information. Unless specifically instructed otherwise, all VCU personnel are subject to the VCU Information Security Program.

Executive Summary Template

Required for new policies and substantive revisions

Must accompany draft throughout review and approval process

All fields must be completed

Submitting a policy to ICO for review

Policy owner . . .

Has gained approval to develop a new policy from cabinet member (administrative policy) or president or designee (BOV policy)

Has consulted with stakeholders/subject matter experts

Uses current Policy Template

Completed Executive Summary of Proposed Policy

Submits draft policy and summary to policy@vcu.edu

Submitting policy to ICO for review

ICO . . .

Follows Policy Review Checklist

Format (template use, etc.)

Clarity

Consistency

Recommendations

Facilitates governance process
Policy Writing Tips

• Planning
  – Consult with subject matter experts
  – Consult with stakeholders
  – Research
    • Other universities’ policies
      – Official SCHEV Peer and Virginia Institutions (https://opds.vcu.edu/eaar/facts-and-figures/schev-peer--virginia-institutions/)
    • Contact us!

• Drafting
  – You are writing for the general university audience – the “every reader,” not subject matter experts
  – Consult the Policy & Procedures Writing Guide
  – Use plain language
    • easy to READ
    • easy to UNDERSTAND
    • easy to USE

• Plain language (plainlanguage.gov)
  – Short sentences
  – Active voice
    • Active: Subject performs the act stated by the verb
      – An employee must prepare the report
    • Passive: Subject is acted upon by the verb
      – The report must be prepared by an employee
  – Logical organization (headings and sub-headings)

Policy Writing Tips

• Use simple words and phrases

<table>
<thead>
<tr>
<th>Don’t use</th>
<th>Say</th>
</tr>
</thead>
<tbody>
<tr>
<td>should be</td>
<td>is to be</td>
</tr>
<tr>
<td>necessary</td>
<td>need to</td>
</tr>
<tr>
<td>unacceptable</td>
<td>can’t, not be</td>
</tr>
<tr>
<td>incorrect</td>
<td>wrong</td>
</tr>
<tr>
<td>unprocessed</td>
<td>unprocessed</td>
</tr>
<tr>
<td>meaningful</td>
<td>meaningful</td>
</tr>
<tr>
<td>advance</td>
<td>in advance</td>
</tr>
<tr>
<td>submit</td>
<td>submit, start at right</td>
</tr>
<tr>
<td>automatic</td>
<td>automatic, more, other</td>
</tr>
</tbody>
</table>

Policy Writing Tips

• Consistency
  – Terms
  – Abbreviations and acronyms
    • Use throughout after initial use
    • Example: “Integrity and Compliance Office” = “ICO” for remainder of policy

Policy Writing Tips

• Use gender-neutral pronouns/language
  – They, them, their, etc.

• Use generic product names
  – “Microsoft Word” → “word processing program”

• Use position titles, not personal names
VCU editorial style guide

- University Relations developed
- VCU’s nomenclature, capitalization, punctuation, etc. standards
  - Adopts AP style
  - VCU enhancements
- Communicator’s responsibility to uphold the standards!!!

Policy Writing Tips

- VCU editorial style (brand.vcu.edu)

VCU editorial style guide

- Highlights
  - Capitalize a formal title immediately preceding a name, but lowercase title if it follows the name or stands by itself
  - Do not capitalize “university” when it stands alone or refers to VCU
  - In the absence of rule, use lowercase rather than capital letters
    - Defined terms in policies should be lowercase in body of policy
  - Do not use any punctuation at the end of bulleted items that are not sentences (unless it compromises clarity)

AP Stylebook online (apstylebook.com/vcu_library)

VCU editorial style

Carla Davis
Editor, UP Operations
daviscl2@vcu.edu
(804) 827-5707

Camille Coy
Senior copyeditor, UR Operations
cscoy@vcu.edu
(804) 828-1864

VCU editorial style guide

- Highlights
  - Do not use “VCU” callout after “Virginia Commonwealth University”; okay to use “VCU” in subsequent references
  - Do not use Oxford serial comma (the comma following the second-to-last item in a series) unless its absence compromises clarity
  - Spell out numbers one through nine; use numerals for 10 or more
  - Use numerals for percentages; spell out “percent” and “percentage”
Word Document Accessibility
(saeo.vcu.edu/resources/accessible-word-documents/)

Please make sure your document is accessible prior to submitting it for review!

Policy Writing Tips

- Test reading ease using Word

<table>
<thead>
<tr>
<th>Grade</th>
<th>Text Complexity</th>
</tr>
</thead>
<tbody>
<tr>
<td>20 10-14 13</td>
<td>Very difficult to read</td>
</tr>
<tr>
<td>20 15-18 16</td>
<td>Difficult to read</td>
</tr>
<tr>
<td>20 19-21 18</td>
<td>Not difficult to read</td>
</tr>
<tr>
<td>20 22-25 20</td>
<td>Very easy to read</td>
</tr>
</tbody>
</table>

Policy review and governance
University Council (UC) review
• UC meets monthly: September - May
• Two phases of UC review
  1. UC Committee on Academic Affairs and University Policies (UCAAUP) review*
     - Melody Harris is contact to get on UCAAUP agenda
  2. Full UC review
     - Jamie Stillman is contact to get on full UC agenda
• Policy owner is responsible for getting on agendas

* UC-implemented process

University Council (UC) review
• UCAAUP review
  - Meets two weeks prior to full UC meeting
  - Policy owner presents policy with executive summary
  - UCAAUP reviews and recommends that policy proceed to full UC for review
    - Policy becomes a consent item on full UC agenda

University Council (UC) review
• Full UC review
  - Representative from UCAAUP briefs UC on the policy
  - Policy owner is present for any questions, etc.
  - UC recommends that policy proceed to cabinet for review and approval

President's Cabinet review (and approval)
• Cabinet meets monthly
  - Policy owner is responsible for getting on agenda
  - Paula Gentius is contact to get on agenda
• Respective cabinet member presents policy and executive summary
• Cabinet approves administrative policies; reviews BOV policies
Board of Visitors review and approval
• BOV meets quarterly
  – Policy owner is responsible for getting on agenda
  – Michele Schumacher is contact to get on agenda
• Send draft to Paula Gentius in president's office for cursory review
• Respective cabinet member presents policy and executive summary to BOV Governance and Compensation Committee
• BOV approves policy

When your policy is approved...

LET US KNOW!!

Monitoring effectiveness
• Develop controls to measure policy effectiveness and enforcement
• Monitor those controls
• Track and remediate violations
• Consider if any policy improvements/changes should be made

Monitoring effectiveness
• Survey template to determine if policies are easy to find and understandable

Triennial (“timely”) review
• At least every three years
• ICO sends reminders approx. six months prior
• Policy review schedule is located on policy site

Triennial ("timely") review

- Are revisions necessary?
  - Regulatory/legal changes?
  - Changes to the "higher education/business" climate?
  - Policy clearly written for the intended audience?
  - Policy questions or ambiguities addressed?
  - Numerous violations?
  - High number of exceptions?

- Options for policy owner
  - No revision = no changes; BUT MUST USE CURRENT POLICY TEMPLATE!
    - Minor revision = does not alter the scope or application (e.g., fix typos; update office names and position titles; repair broken hyperlinks, etc.)
    - Substantive revision = alters the scope or application; adds or removes requirements or responsibilities for a unit or individual
    - Consolidation with other policies
    - Retirement

- Policy Retirement
  - Numerical violations?
  - Cabinet member must authorize
    - Administrative policy = cabinet approves retirement
    - BOV policy = cabinet and BOV approve retirement

Policy Retirement Template

- Required to retire a policy
- Must accompany policy through retirement process
- All fields must be completed

Exercise: Identify the Issues
Questions?

policy@vcu.edu
828-2336

atrapchick@vcu.edu
828-3982