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(Participation is anonymous!)

Policy Writers Workshop
February 27, 2018

What is the Policy Program?

• Within the Integrity and Compliance Office (ICO)

• Official resource for all university policy making

• Implemented in 2012 per BOV “policy on policies” (Creating and Maintaining Policies and Procedures)
  – Shared governance process
  – Policy approval authority
What does the Policy Program do?

• Oversees development, review, approval and retirement processes for university policies and procedures
  – Adherence to “policy on policies”
• Communicates approved policies, etc. to university members
  – Policy Points quarterly publication
• Administers and maintains Policy Library

What does the Policy Program do?

• Performs gap assessments
• Maintains policy archives
• Sends timely review notices
• Scans environment for trends/areas of importance
• Educates/guides university community

So . . .

What is a policy?

• A policy articulates requirements and expectations for behavior, actions and activities of the university community. A policy may require or prohibit an action, support compliance with applicable laws and regulations and/or mitigate risk.

What are procedures?

• Procedures are mandatory actions and processes necessary to comply with a policy.
• Policies may or may not include procedures.
Why do we need policies?

- Make expectations clear
  - What
  - Why
  - Who
  - How (procedures)
- Support compliance
- Mitigate 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
  - Universitywide operational expectations and/or compliance with applicable laws, regulations, policies and procedures
    - President’s Cabinet approves
- Local
  - Meets the unique needs of 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 fills 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
Submission of policy to ICO for review

- Policy owner...
  - Gains approval to develop from cabinet member (administrative policy) or president or designee (BOV policy)
  - Consults with subject matter experts
  - Uses current Policy Template
  - Uses Executive Summary of Proposed Policy template
  - Submits policy and summary to policy@vcu.edu

ICO...
- Follows Policy Review Checklist
  - Format (template use, etc.)
  - Clarity
  - Consistency
  - Recommendations
- Facilitates governance process

Policy Template
- Required
- Provides guidance
- Contributes to consistency

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
### Policy Type

- BOV
- Administrative
- Interim
- Local

### Responsible Office

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

### Initial Policy Approved

- The date first version was approved – its “birthday”

### 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
Policy Statement and Purpose

- States VCU’s stance on the topic and purpose of the policy
- States who must follow the policy
- States key requirement(s)
  - Does not include procedures on how to comply; these go in the Policy Specifics and Procedures section
- Includes separate exceptions section (if applicable)
- Consequences for noncompliance
  - Standard noncompliance/nonretaliation statement

Example of Policy Statement and Purpose

- 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 . . . . (VCU’s Stance)
- 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. In addition, compliance with this policy serves to minimize those risks associated with activities involving minors for everyone . . . . (Purpose of Policy)

Example of Policy Statement and Purpose (cont’d)

- 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 . . . . (Who Policy Applies To)

- 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 . . . . (Key Requirement(s))

Example of Policy Statement and Purpose (cont’d)

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. (Consequence for Noncompliance)

Source: Safety and Protection of Minors

Source: Policy Template
Table of Contents
• Outlines the sections of the document

<table>
<thead>
<tr>
<th>Table of Contents</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Who Should Know This Policy</td>
<td>25</td>
</tr>
<tr>
<td>Definitions</td>
<td>26</td>
</tr>
<tr>
<td>Policy Specifics and Procedures</td>
<td>27</td>
</tr>
<tr>
<td>FAQs</td>
<td>28</td>
</tr>
</tbody>
</table>

Source: Policy Template

Who Should Know This Policy
• The groups that need to be familiar with the policy
  – Employees (includes faculty and staff)
  – Students
  – Others who may be subject to the policy (vendors)

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.

Definitions
• Limited to new, uncommon or specialized terms that have unique or particular meaning to the policy or are industry-specific
• Alphabetical order – please!
• Do not contain requirements
• Aid in the reader’s understanding of the policy or procedure
• Not capitalized in body of policy unless they are proper nouns
Examples of Definitions

- **Honorarium**
  - An honorarium is a token payment to a non-employee or non-student granted in recognition of a special service which custom or propriety forbids any fixed business price to be set. The services involved vary but are generally associated with oral presentations made at university-sponsored functions. [Source: Honorarium]

- **Disability**
  - For an individual, a documented physical or mental impairment that substantially limits one or more major life activity, a record of such an impairment, or being regarded as having such an impairment. [Source: Accessibility and Reasonable Accommodation for Individuals with Disabilities]

Contacts

- Name of the unit(s) that is responsible for interpreting and revising the policy and answering questions about the policy. Also include the title/position of the individual whom to contact and general email account (if available and monitored).
- Do not use personal names, phone numbers or email addresses 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]
Policy Specifics and Procedures

• Draft procedures with the “every reader” in mind
  – Benefits the reader and policy owner
• Involve key stakeholders and subject matter experts
  – Avoids errors
  – Creates sense of ownership
• Must be able to monitor and enforce

Policy Specifics and Procedures

• 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 Procurement Services’ internal procedures to process the reimbursement submission

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 practices as established by state policy and the VCU Classified Salary Administration Plan as listed in the Related Documents section of this policy . . . .

2. 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. Advertisement: Human Resources is responsible for coordinating placement of all advertisements for vacant classified and hourly positions and will ensure that advertisements conform to university formatting, language and EEO guidelines . . . .

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
Forms

- List the forms that are referenced in, or related to, the policy
  - Internal forms
  - Federal and state forms
- Use current official form tiles
- 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

<table>
<thead>
<tr>
<th>Forms</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Request new website or website redesign: <a href="http://op.vcu.edu/webrequest">http://op.vcu.edu/webrequest</a></td>
</tr>
<tr>
<td>2. Request an exception to this policy (Exception Request Form): <a href="http://op.vcu.edu/webexception">http://op.vcu.edu/webexception</a></td>
</tr>
</tbody>
</table>

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

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

Related Documents:

2. VCU Policy: Reporting, Investigating, and Handling Incidents
3. Violence Against Women Act

Source: Timely Warning/Crime Alert

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

This policy supersedes the following archived policies:

- Revision: 9/30/2009  Information Security Policy
- Revision: 8/10/2015  Information Security Policy
- Revision: 1/19/2017  Information Security (minor revision to note that VCU’s
  Information Technology Policy Framework encompasses this policy)

Source: Information Security

FAQ (not “FAQs”)

- Anticipated or commonly asked questions and answers regarding this policy and procedures
- Offers further interpretation of policy and procedures
- Additional relevant information
- If no FAQ: “There are no FAQ associated with this policy and procedures.”
Example of FAQ

1. If observed a violation to this policy, to whom should I report the violation?
   In accordance with the VCU Due Process policy, an employee, affiliate or student can typically report the violation to his or her supervisor, unit administrator or Dean. Alternatively, the individual can also report the violation to the VCU chief information officer or the VCU police. The department
   or unit administrator must report the violation to the university chief information officer.

2. Can I report a violation anonymously?
   Yes, Questions or concerns may be submitted to the VCU hotline anonymously at
   hotline@vcu.edu or by calling 1-888-442-9222 from the United States or by leaving a collect call to
   804-684-5555 and giving the name "Virginia Commonwealth University" if calling from the Data
   campus.

3. I am a departmental supervisor and I suspect that an employee in my department is violating
   this policy. Can I initiate monitoring on this employee’s computer?
   No. You must contact the shelf information office to report your concerns and suggest initiation of
   monitoring or investigation. Unauthorized monitoring is prohibited and is considered a violation of this
   policy.

Source: Computer and Network Resources

Executive Summary Template

• Required for new policies and substantive revisions
• Must accompany draft throughout review and approval process
• All fields must be completed
  – Salient points

Policy writing tips

Insert Web Page

This app allows you to insert secure web pages starting with https:// into the slide deck. Non-secure web pages
are not supported for security reasons.

Please enter the URL below:
https://

Note: Many popular websites allow secure access. Please click on the previous button to ensure the web page
is accessible.
Policy Writing Tips

• Planning
  – Permission to develop
  – Consult with subject matter experts
  – Consult with stakeholders
  – Research
    • Other universities’ policies
    • Contact us!

Policy Writing Tips

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

Policy Writing Tips

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

Policy Writing Tips

• Example of plain language
  – Hypothetical “Before”: VCU is taking action to help ensure that all employees are able to perform their day-to-day activities and duties in a setting that does not encourage, condone or otherwise tolerate any form of mistreatment or misconduct.
  – Hypothetical “After”: VCU is committed to maintaining a civil working environment.
Policy Writing Tips

- Use consistent terminology
  - Terms
  - Abbreviations and acronyms
    - Use throughout after initial use
    - Example: "Integrity and Compliance Office" = "ICO" for remainder of policy

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

- Use generic product names
  - Microsoft Word → word processor

- Use position titles, not personal names

Policy Writing Tips

- Test reading ease

Facility Location

<table>
<thead>
<tr>
<th>Name</th>
<th>School Level</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>100.00-00.00</td>
<td>8th grade</td>
<td>Easiest to read, likely understood by an average 11-year-old student</td>
</tr>
<tr>
<td>90.00-99.99</td>
<td>9th grade</td>
<td>Easy to read; conversational language for consumers</td>
</tr>
<tr>
<td>75.00-89.99</td>
<td>10th grade</td>
<td>Fairly easy to read; potentially understanding by 12- to 15-year-old students</td>
</tr>
<tr>
<td>60.00-74.99</td>
<td>11th grade</td>
<td>More difficult to read; potentially understanding by 16- to 18-year-old students</td>
</tr>
<tr>
<td>50.00-59.99</td>
<td>12th grade</td>
<td>Difficult to read; more difficult to read; may be understood by some 16- to 18-year-old students</td>
</tr>
<tr>
<td>10.00-49.99</td>
<td>College Prep</td>
<td>Very difficult to read; may be understood by some 16- to 18-year-old students</td>
</tr>
<tr>
<td>0.00-09.99</td>
<td>College Ready</td>
<td>Very difficult to read; likely not understood by anyone</td>
</tr>
</tbody>
</table>

Policy Writing Tips

- VCU editorial style guidelines
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!!!

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

VCU editorial style guide

• Highlights
  – Do not use “(VCU)” callout after “Virginia Commonwealth University”; okay to use “VCU” in subsequent references
  – Do not use 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”

AP Stylebook online

Secure | http://www.apstylebook.com/vcu/library/
Policy review and governance
A revised Student Code of Conduct policy is now open for university comment through Thursday, Feb. 8. The draft policy can be found at https://policy.vcu.edu/policies-open-for-public-comment. For more information, contact Justin Moses, associate vice provost in the Division of Student Affairs at jmoses4@vcu.edu or visit https://policy.vcu.edu/policies-open-for-public-comment.
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

University Council (UC) review

- UCAAUP review
  - Meets two weeks prior to full UC meeting
  - Policy owner presents policy with executive summary
  - UCAAUP 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 every two weeks (generally)
  - Kevin Allison is contact to get on cabinet’s 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
  – Michele Schumacher is contact to get on BOV agenda
  – Send draft to Paula Gentius in president’s office for cursory review
• Respective cabinet member presents policy and executive summary to BOV Audit, Integrity and Compliance Committee
• BOV approves policy

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

• Options
  – No revision = no changes
  – Minor revision = does not alter the scope or application; changing process to align with current business practices
  – Substantive revision = alters the scope or application; adds or removes requirements or responsibilities for a unit or individual
  – Retirement
  – Consolidation with other policies
  – Retirement
Questions?

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828-3982