DirectPoll Online Polling Link:

http://etc.ch/xrjZ

(Participation is anonymous!)

Policy Writers Workshop
August 9, 2017

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”

I am ____ with the policy development and approval process at VCU.

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“Policy on policies”
- Revised December 2016
- Significant changes
  - Review and approval process
  - Comment period abbreviated
  - Executive summary required

Why does the Policy Program exist?
- Clarifies and facilitates shared governance process
  - “Policy on policies”
- Centralizes VCU’s expectations (Policy Library)
  - Policy normalization and version control
  - Policy centralization and accessibility
- Contributes to a culture of ethics and compliance

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
  - Policy Points quarterly publication
- Guides responsible offices, president, and cabinet members
- 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 university community and the public
**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.

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**What are procedures?**

- Procedures are **mandatory actions** and **processes** necessary to comply with a policy.
- Policies may or may not include procedures.

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**Why do we need policies?**

- Make expectations **clear**
  - What
  - Why
  - Who
  - How (procedures)
- Support compliance
- Mitigate risk

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**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
  – Univeristywide 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!)

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

Submission of policy to ICO for review

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

Submission of policy to ICO for review

• 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 reviewed and 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)
• Concludes with 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 . . . .

Source: Safety and Protection of Minors
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))

Source: Safety and Protection of Minors

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.

Source: Policy Template

Table of Contents

• Outlines the sections of the document

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 (consider vendors, third parties, etc.)
Examples of Who Should Know This Policy

• University Business-Related Travel
  – 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
  – 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

- 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

- 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
Policy Specifics and Procedures

- Use direct language conveying mandatory or prohibited action (e.g., must, required, will and prohibited) rather than language that may be viewed as optional (e.g., should, shall, 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 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 . . .

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

1. Request new website or website redesign: http://bp.vcu.edu/webrequest
2. Request an exception to this policy (Exception Request Form) http://bp.vcu.edu/webexception
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

Example of Related Documents

1. Federal Fair Labor Standards Act (FLSA)
2. Federal Family and Medical Leave Act (FFMLA)
3. VCU: Family and Medical Leave
   - http://policy.vcu.edu/Policy/FamilyAndMedicalLeave.html
4. State Policy 3301 Family and Medical Leave
   - http://policy.vcu.edu/Policy/StatePolicy3301FamilyAndMedicalLeave.pdf
5. VCU Leave Reporting
   - http://policy.vcu.edu/Policy/StatePolicy3301FamilyAndMedicalLeave.pdf
6. VCU Leave Status Reporting
   - http://policy.vcu.edu/Policy/StatePolicy3301FamilyAndMedicalLeave.pdf
7. VCU: Family and Medical Leave
   - http://policy.vcu.edu/Policy/StatePolicy3301FamilyAndMedicalLeave.pdf
8. VCU: Sick Leave
   - http://policy.vcu.edu/Policy/StatePolicy3301FamilyAndMedicalLeave.pdf
9. VCU: Use of the Paid Leave Program
   - http://policy.vcu.edu/Policy/StatePolicy3301FamilyAndMedicalLeave.pdf
10. VCU: Leave Time and Guidelines
    - http://policy.vcu.edu/Policy/StatePolicy3301FamilyAndMedicalLeave.pdf

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:

- Revisions: 8/10/2015, Information Security Policy
- Revisions: 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 someone violates this policy, to whom should I report the violation?
   - In accordance with the VCU Code of Student Policy, an employee, faculty or student can typically report the violation to their department or administration. Alternatively, an individual can also report the violation to the VCU Chief Information Officer or the VCU’s Policy Office. The department or unit administrator must report the violation to the university’s chief Information Officer.

2. Can I report a violation anonymously?
   - Yes. Questions or requests may be submitted in the VCU’s hotline anonymously at [919-734-6495](tel:919-734-6495) (from the United States) or by sending a collect call to [919-734-6495](tel:919-734-6495) and giving the name “Virginia Commonwealth University” calling from the United States.

3. I am a department 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 chief Information Officer 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

• 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

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

• 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 a civil professional 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, theirs, etc.

• Use generic product names
  - Microsoft Word → word processor

• Use position titles, not personal names

Policy Writing Tips

• Test reading ease

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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, theirs, etc.

• Use generic product names
  - Microsoft Word → word processor

• Use position titles, not personal names
Policy Writing Tips
- VCU editorial style guidelines

What’s being covered today
- Introduction
- What is AP style?
- AP Stylebook online
- What’s inside
- What you may not find, but need to know
- Examples
- When in doubt
- Questions and answers
- Contact information

Introduction
- VCU’s official editorial guide
- Communicators’ responsibility to uphold the standards
What is AP style?

- Definitive resource for writers
- Outlines basic rules on grammar, punctuation, usage and journalistic style
- Reflects changes in common language
- Helps to navigate changing world of social media
- Goal is to be clear, concise and understandable around the globe
- “The bible for journalists and anyone who cares about good writing”
What’s inside

- Grammar and usage guidelines
- Search function
- Ask the Editor
- Pronunciation guide
- University exceptions
- User guide
- Technical support
- Shop

What you may not find, but need to know

- Grammar rules
- Active vs. passive voice
- Audience and goals
- Misused words
- Jargon
- University exceptions not communicated to UR
- Additional resources (dictionaries)

Examples of AP style

Capitalization

- Titles are capped before a name and lowercased after ... but not necessarily.

Examples of AP style

- Lowercase generic terms, including informal department and office names
  - biology department vs. Department of Biology
  - nursing school vs. School of Nursing
  - university vs. Virginia Commonwealth University
- When generic term is capped as part of official name, plural used with another name is lowercased
  - the schools of Medicine and Dentistry
  - the corner of Franklin and Shafer streets
### Examples of AP style

**Bulleted lists**
- Initial caps
- No end punctuation*
- Keep bullets consistent

*However, use end punctuation with bullets that are complete sentences but not continuations of the intro text.

### Examples of AP style

These conclusions led the alumni association to:
- Create an incentive for membership
- Plan a fall event for recent graduates
- Start a local chapter

**If someone tries to harm you**
- Stay calm and think rationally.
- Remember what the attacker looks like.
- Consider what you can do to defend yourself.

### Examples of AP style

**Serial comma**
- Oxford comma = not AP style
- No comma before last conjunction, except for clarity

My night classes were in biology, marketing, and health and human services.

### Examples of AP style

**Acronyms**
- No acronym in parens after first reference
- Acronym in subsequent references okay

Virginia Commonwealth University is located in Richmond, Virginia. VCU has more than 31,000 students.
When in doubt

Reach out!
• University editors are your friends.
• Email, call or Gchat us if you have a question.

Questions and answers

Bring 'em on!

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Policy review and approval
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 weekly (generally)
  - Kevin Allison (cc: Mandy Moffett and Brian Shaw) 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
  - Michelle Schumacher is contact to get on BOV agenda
- 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
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
  - Consolidation with other policies
  - Retirement

Policy Owner Responsibilities

- Assess the need for the policy and obtain approval to draft
- Primary responsibility for drafting (w/ key stakeholders’ input)
- Follow the policy review and approval governance processes
- Educate key stakeholders
- Interpret policy when questions arise

Policy Owner Responsibilities

- Maintain the policy document (e.g., hyperlinks, conformance with template, brand standards, etc.)
- Timely review
  - Communicate with ICO!!!