



## Communication Standards for University Policies

### OUCI Responsibilities

- Maintain policy feedback distribution list, which includes: senior leadership groups such as President’s Cabinet; Senior Management Council; President’s Council; Vice Provosts; Council of Deans; chairs; senior fiscal/business officers; senior human resource professionals; University Senate faculty leaders; University Staff Advisory Council; University Policy Review Committee; Responsible Office policy coordinators; college/VP unit policy points of contact; writing committee members.
- Maintain updated policy materials on the website.
- Maintain the policy database.
- Collaborate with OHR to maintain a list of policies for (a) onboarding, (b) annual reminder, (c) required training and/or signoff.
- Support Responsible Offices communication through onCampus Today, This Week, OneSource, WMC weekly email and student e-publications (Buckeye Net News and onCampus Weekly) *Policy News* announcement; monthly or as needed. Encourage Responsible Office policy coordinator to supply specific policy information for inclusion; general UPP information supplied by OUCI.

### Responsible Office (RO) Responsibilities

#### Minimum standards

- Strive to build in a month between approval and effective date for time to communicate with stakeholders before the policy is effective. In cases of substantial change, more time may be needed. Begin to work/communicate with stakeholders and people impacted as far in advance as possible.
- Develop a plan for communication to the university-at-large, with special attention to stakeholders and policy users/implementers; share plan with OUCI; include as a part of the Policy Proposal when feasible.
- Draft or update search terms and summary sentence and provide to OUCI for inclusion on website.
- Provide documentation of changes, which can vary depending on the extent of revision:
  - Write a bulleted summary of changes (see following as example) that can also be used for the signature form.
  - Compile a side-by-side comparison of current and revised policy (see following as example)
  - Compile and provide redline version to OUCI; retain in RO policy files as well.
  - Host the change documentation on the RO website and provide the URL to OUCI to put in the university policy database for the website; include the policy URL at the top of all change documentations
- Write and submit *Policy News* announcement for onCampus Today, This Week, OneSource, WMC weekly email and student e-publications.
  - Submit items for consideration to onCampus Today: [oncampus.osu.edu/osutoday/submitnews.php](http://oncampus.osu.edu/osutoday/submitnews.php)
  - Submit items for the faculty-staff page to: [oncampusfacstaff@osu.edu](mailto:oncampusfacstaff@osu.edu)
- Identify and email stakeholders with documentation about changes, link to policy, and effective date.
- As a part of the policy development/approval process, determine appropriateness, in consultation with OUCI and OHR, for (a) onboarding, (b) annual reminder, (c) required training and/or signoff.

#### Added approaches as needed

- Develop and implement a substantial vetting and communication plan (e.g., Tobacco Free, recent updates to the Sexual Misconduct policy, etc.) What kinds of policies merit such an approach?
- Provide email text for colleges/units to use to send announcement to relevant stakeholders. Have your Responsible Office communicator send email text to the OSU Communicators list serve (preferred) or ask OUCI to send it to the OSU Communicators list serve.
- Host Lunch and Learns, workshops, publish job aids, and provide on-line training.
- Discuss at college/unit leader, SBO, HR leader, faculty, staff, and student meetings.
- Discuss at Service Center leads meeting for policies that will impact HR, fiscal, procurement folks (Lisa Plaga.5 point of contact). The group meets in person on a quarterly basis and has monthly phone calls.
- Discuss at OAA leadership group meeting; quarterly all-chairs meeting.
- Attach training materials as supplemental materials (in the resources section) to policy.
- Collaborate with Student Life for student-intensive policy or rule issues. Engage social media (students don’t read email, they text and tweet).

**Additional Options**

- Email managers and supervisors monthly or as needed with policy updates. Pull list through HRITS monthly.

### Examples of Bulleted List Summaries of Changes

#### **Travel policy summary of major changes:**

- Changed travel estimate threshold approval from reimbursement to total travel expenditures
- Included clarifying definition to the Group Travel demographic to determine eligibility of use
- Added senior fiscal officer to the exception approval list
- Incorporated reasonable accommodation language to support ADA needs
- Reinforced exclusion of seating/boarding upgrades
- Included content to confirm criteria for eligible mileage (less daily commute)
- Established lodging threshold (2x the federal lodging rate)

#### **Privacy and Release of Student Education Records policy summary of major changes:**

- Adds policy statement: The university is committed to protecting education records of students to the extent required by law.
- Removes *home/local, physical, and dorm address* from “directory information.”
- Removes *dorm and cell phone* from “directory information.”
- Gives examples of *honors awarded* in “directory information.”
- Clarifies that post-enrollment records not pertaining to an individual’s previous attendance are not education records.
- Clarifies what the University Registrar sends out in the annual notice.
- Adds the Responsibilities section, as required by the university policy template.

**Example of Changes in Chart Format**  
**Summary of Changes**  
**Interim revision of the Sexual Harassment policy,**  
**Renamed Sexual Misconduct, Sexual Harassment, and Relationship Violence**  
 Effective 9/1/2015

The revised policy is expanded from addressing only sexual harassment to include all forms of sexual misconduct (Conduct of a sexual nature or conduct based on sex or gender that is nonconsensual or has the purpose or effect of threatening, intimidating, or coercing a person. Includes sexual harassment, sexual violence, and relationship violence. Sexual misconduct is a form of sex-and gender-based discrimination.). This revision incorporates relationship violence from the Workplace and Family and Relationship Violence policy, which is being concurrently revised and returned to and renamed Workplace Violence.

Below is a summary of changes to the policy. Individuals should also read the entire policy and FAQs. The policy will be effective and available on 9/1/2015 on the university policy website ([policies.osu.edu/](http://policies.osu.edu/)) and the Office of Human Resources website ([hr.osu.edu/public/documents/policy/policy115.pdf](http://hr.osu.edu/public/documents/policy/policy115.pdf)).

**Section: Policy**

**Subsection: Policy Statement**

Current Policy	Page	Revised Policy	Page
Addresses sexual harassment	1	Addresses sexual misconduct which includes sexual harassment, sexual violence, and relationship violence.	1

**Subsection: Definitions**

Current Policy	Page	Revised Policy	Page
Sexual harassment is defined	1	Adds definitions for: Sex-and gender-based discrimination Sexual misconduct Sexual harassment ( <i>substantially updated</i> ) Sexual violence Sexual assault, including non-consensual sexual contact and non-consensual sexual intercourse Sexual exploitation Relationship violence Domestic violence Dating violence Stalking Consent Title IX coordinator Deputy coordinator University community Appointees	1-4

**Subsection: Policy Details**

Current Policy	Page	Revised Policy	Page
I-Examples of Sexual Harassment	1	<b>I-Scope</b> – Does not list examples of harassment. – Addresses: Medium, location, jurisdiction, Title IX coordinator and deputy coordinator, academic freedom and legitimate first amendment rights, and policy maintenance.	4

<b>Current Policy</b>	<b>Page</b>	<b>Revised Policy</b>	<b>Page</b>
II-Romantic and/or Sexual Relations	2-3	<b>II-Romantic and/or Sexual Relations</b> – #F-7 was deleted. (bottom of page 3 of old policy)	4-6
III-Duty to Act	3-4	<b>III-Employee Duty to Report</b> – A-Adds that all university employees, except those exempted by legal privilege of confidentiality or expressly identified as a confidential reporter, have an obligation to report incidents of sexual assault. – C-Specifies how employees with a duty to report make such reports. – D-Specifies categories of employees that are exempt from the duty to report sexual assault and sexual harassment.	6-7
IV-A Confidentiality and non-retaliation	4	<b>IV-Confidentiality and V-Retaliation</b> – IV-A-States “the university recognizes the importance of confidentiality. To the extent possible, information received in connection with the filing, investigation, and resolution of allegations will be treated as confidential except when necessary to conduct an appropriate investigation, to provide assistance and resources to complainants, to perform other appropriate university functions, or when the university is compelled to provide information under the law.” – IV-B-States: “When requests for confidentiality arise, they will be evaluated by the Title IX coordinator to determine whether the university can honor the request while still providing a safe and nondiscriminatory environment. 1. When a complaint involves or impacts students, complainants will be advised that honoring a request for confidentiality may limit the university’s ability to respond fully to the incident, including pursuing disciplinary action against the accused. 2. In cases not involving or impacting students, the university may have a compelling responsibility to pursue an investigation regardless of the complainant’s request for confidentiality.” – V-A-States that the university will not tolerate retaliation in any form against any individual who makes an allegation, files a report, serves as a witness, assists a complainant, or participates in an investigation of discrimination or harassment. – V-B- States that retaliation is a serious violation that can subject the offender to discipline, up to and including termination of employment and/or student status, independent of the merits of the underlying allegation.	7
Not in policy; currently covered in “Guidelines for Investigating Complaints of Discrimination & Harassment		<b>VI-Investigation and Resolution Options</b> – A-Adds the “early resolution” approach. – B-Adds the “formal investigation and resolution” approach. – C-Specifies that investigators will be trained.	7-8
Current policy does not contain a “remedies” section.  Current policy contains a “corrective measures”	4	<b>VII-Remedies</b> – A-States that when the university makes a finding of a policy violation it will take steps, whether individual or systemic, to stop the alleged sexual misconduct, prevent its recurrence, eliminate any hostile environment, and remedy the	8-9

<b>Current Policy</b>	<b>Page</b>	<b>Revised Policy</b>	<b>Page</b>
section, addressed in new policy in the Remedies-Correction action/sanctions section (p 8-9)		<p>discriminatory effects on the complainant and others, as appropriate.</p> <ul style="list-style-type: none"> <li>- <b>B-Corrective action/sanctions</b> <ul style="list-style-type: none"> <li>- <b>1 &amp; 2</b>-Identify how sanctions may be taken with students.</li> <li>- <b>3</b>-Identifies how corrective actions may be taken with employees.</li> <li>- <b>4</b>-Identifies that student employees may be subject to both sanctions as a student and corrective action as an employee.</li> </ul> </li> <li>- <b>C-Interim measures</b>-Adds that the university may take interim measures before the final outcome of an investigation to ensure equal access to education and employment, gives examples of such measures, and specifies the coordination of the measures.</li> <li>- <b>D-Other remedial measures</b>-States that the university may take other remedial measures in a variety of instances and gives examples of such measures.</li> </ul>	
IV-B Corrective measures	4	Integrated into <b>VII-Remedies-B-Corrective actions/sanctions</b> , see above.	8-9
IV-C-False allegations	4	<b>VIII-False Allegations</b> <ul style="list-style-type: none"> <li>- No substantive changes, section is edited and separated into A and B.</li> </ul>	9
IV-D-Use of sexual harassment allegations in employment actions	4	<b>IX-Use of Sexual Misconduct Allegations in Employment or Academic Actions</b> <ul style="list-style-type: none"> <li>- Deleted “whenever such an allegation is discussed as a part of a determinant in the terms and conditions of an employment or academic status, the affected party should be given notice.”</li> </ul>	9
V-Policy and Procedure Administration	4	Section was deleted <ul style="list-style-type: none"> <li>- <b>I-F</b>-addresses policy maintenance (p. 4).</li> </ul>	n/a

## Section: Procedure

<b>Current Procedure</b>	<b>Page</b>	<b>Revised Procedure</b>	<b>Page</b>
I-Educational Program Goals and Objectives	5	Section was deleted.	n/a
II-Who Can Make Allegations	5	Section was deleted. Content is addressed in <b>Procedure-I-A-Reporting Allegations of Sexual Misconduct</b> , see below.	n/a
III-Confidentiality	5	Section was deleted. Content is addressed in <b>Policy-IV-Confidentiality</b> , see above.	n/a
IV-Retaliation	5	Section was deleted. Content is addressed in <b>Policy-V-Retaliation</b> , see above. Reporting retaliation is addressed in <b>Procedure-II-Reporting Retaliation</b> , see below.	n/a
V-Counseling and Support	5	Section was deleted. Content is addressed in the <b>Resources</b> section	n/a
VI-Receipt and Referral of Allegations	6	Section was deleted. Content is addressed in <b>Procedure-I-A-Reporting Allegations of Sexual Misconduct</b> , see below.	n/a
		<b>I-Reporting Allegations of Sexual Misconduct</b> <ul style="list-style-type: none"> <li>- <b>A</b>-Identifies who can make a report.</li> <li>- <b>B</b>-Identifies how and to whom reports can be made.</li> <li>- <b>C</b>-Specifies that filing a report with the university does not preclude the individual from filing a report with an external law enforcement or other agency nor does it extend time limits with those agencies. Individuals may request assistance from the Title IX coordinator or deputy coordinator to notify such authorities.</li> </ul>	10
		<b>II-Reporting Retaliation</b>	10

Current Procedure	Page	Revised Procedure	Page
		– Specifies that such reports should be directed to the Title IX coordinator or deputy coordinator.	
		<b>III-Conducting Investigations</b> <ul style="list-style-type: none"> <li>– <b>A</b>-States that all parties will be informed of the investigation procedures and all allegations being investigated.</li> <li>– <b>B</b>-States that parties have a right to a support person and that person’s role.</li> <li>– <b>C</b>-States that irrelevant prior sexual history of either party will not be allowed as evidence in any proceeding.</li> <li>– <b>D</b>-Specifies a preponderance of evidence standard to determine if a policy violation has occurred.</li> <li>– <b>E</b>-Specifies typical investigation steps and timeframes and factors that can affect the timeframes.</li> <li>– <b>F</b>-Addresses interviews with parties and witnesses as well as review of documents, written reports for allegations against employees, and hearings for students.</li> <li>– <b>G</b>-Addresses notification of findings.</li> <li>– <b>H</b>-States that parties retain all rights afforded under applicable federal, state or local laws (e.g. Title IX) in cases involving employees subject to collective bargaining agreements or university rules.</li> </ul>	10

**Subsection: Responsibilities**

Current Procedure	Page	Revised Procedure	Page
Current policy does not contain a “responsibilities” section.		The “ <b>responsibilities</b> ” section restates the content of the policy/procedure, reorganized according to the position or office that is responsible for required actions. Responsibilities are now specified for: <ul style="list-style-type: none"> <li>– Title IX coordinator</li> <li>– Deputy coordinators</li> <li>– Office of Human Resources</li> <li>– Office of Student Conduct</li> <li>– Human resource professionals</li> <li>– Supervisors (including faculty supervisor and volunteer supervisor), chair/director, and faculty member</li> <li>– All employees</li> </ul>	11-12

**Subsection: Resources**

Current Procedure	Page	Revised Procedure	Page
Resources – lists resources	6-7	<b>Resources</b> <ul style="list-style-type: none"> <li>– Updates resource list</li> </ul>	12-13

**Subsection: Contacts**

Current Procedure	Page	Revised Procedure	Page
Contacts – lists contacts for policy issues	7	<b>Contacts</b> <ul style="list-style-type: none"> <li>– Adds information on filing reports, including anonymous and criminal reports</li> </ul>	13