

Policy Team:

Krystyne Savarese, Director, savarese.6@osu.edu, 614-292-8728
Christie Frankart, Assistant Director, frankart.31@osu.edu, 614-292-6585
Office of University Compliance and Integrity
21 E. 11th Ave., Columbus, OH 43201

What needs to be a policy?

Issues that rise to a level needing to be addressed through the university policy process share a number of characteristics, that include and are not limited to:

- Apply across the institution.
- Establish the university's position across a range of matters.
- Manifest and operationalize the university's mission, vision, and values.
- Endure across time and administrations; change infrequently and set the course for the foreseeable future.
- Support equity, integrity, and simplicity in practices across the institution.
- Promote quality and operational efficiency, reduce bureaucracy, and provide guidance for managing the institution.
- Ensure compliance with and must be consistent with applicable laws, regulations, & university rules.
- Manage institutional risk.

Questions to consider when revising current or writing new policies:

- Are there new mandates (state or federal law, case law, rule changes) that require or suggest a policy change or a new policy be written?
- Have changes occurred in best practices, customer needs, university culture, or social trends to suggest policy changes or the need for a new policy?
- Can the issue be integrated with or addressed by other policies, rules, or documents?
- Are terminology, office names/numbers/websites/hotlinks, and cross references current and correct?
- Can this policy be eliminated? Is it needed any longer?

Revision means the policy will undergo substantive content changes. Substantial revisions must go through the entire process and require a signature and approval process. Minor revisions or those revisions mandated by federal or state law or regulation may go through an expedited process, as determined by the Responsible Office policy coordinator and the OUCI policy director.

Edits are non-substantive changes (i.e., style, format, grammar) and/or correction of error, and can be coordinated by the Responsible Office policy coordinator, who is responsible for updating the UPP database. Corrections of URLs is not an edit – these changes can be made without an edit date added to the policy document

Review means the policy was reviewed and confirmed that the content was found to be current; can contain edits; does not require signature approval. Review is expected to occur minimally every five years.

*All superseded policies (revised, reviewed), signature forms, and their supplemental documents must be archived.

University Policy Process

Predevelopment

1. **Identify issue.** Issues may emerge from trends within a VP unit, through legislation or regulation, changes in best practices, as a result of an incident on campus, or in a variety of other ways.
2. **Identify responsible executive.** This position is responsible for the content and accuracy of a policy. Different offices can own pieces of the policy or procedure, and one executive carries the overall responsibility. If disputes arise, this individual is the one who ultimately decides the outcome or the process that will be used for resolution.
3. **Notify policy director/assistant director.** When work is beginning on any policy, whether it is an edit, review, or revision of a current policy; or development of a new policy.
4. **Assemble a team.** Involve individuals with content and process expertise, policy users, those impacted by the policy, and others.
 - _____ Contact the policy director/assistant director and determine a plan of action and a timeline. Check out the resources on the university policy website.
 - _____ Benchmark best practices as necessary, using policies, practices, and programs from Ohio State's benchmark institutions and other organizations. The policy team can provide a list of benchmark institutions and/or can ask for example policies from the Association of College and University Policy Administrators (ACUPA).
 - _____ Form a policy writing group. Consider how to select the team members (content and process experts, users, those impacted, etc.). The writing group should include a Service Center lead (fiscal/purchasing/HR policies) and faculty when feasible. Get explicit about member roles, expectations, etc.
 - _____ Review applicable university bylaws, rules, regulations; university policies; state and federal laws/regulations; and industry standards. Policies must remain consistent with all. Consider whether the issue can be addressed in a current policy rather than creating a new policy.
 - _____ Familiarize yourself with the Policy Template and writing standards, available on the policy website.
5. **Identify designated Legal Affairs attorney.** Contact Alexandra Schimmer or the policy director/assistant director for assistance if needed.
6. **Submit policy proposal to Senior Management Council (SMC).** For a new policy, the responsible executive, often a member of SMC, submits a policy proposal to the SMC. The SMC decides if a governing document is needed on the issue, and if so, if it should be in the form of a policy or rule.
 - _____ Prepare a Policy Proposal, which includes a list of stakeholders from which you will solicit input/feedback and a timeline of the development/review process.
 - _____ Review the Policy Proposal with the policy director/assistant director and work with the policy director and your VP get on the SMC agenda when ready. This is the point at which SMC will decide if it should be a policy or a rule, or if we even want to address the issue with a governing document.
 - _____ Responsible executive, responsible office policy coordinator, and policy director must approve the proposal before submission.
 - _____ Get approval (or not) from SMC to proceed with policy development.

Development

7. **Solicit input from key stakeholders and draft policy.** The writing group drafts the policy, using benchmarking and best practice information as appropriate.
- _____ Discuss major policy changes with stakeholders prior to proposing them.
 - _____ Keep the policy as short and succinct as possible.
 - _____ Does the policy accurately state current practice?
 - _____ Are “terms of art” in the policy adequately defined?
 - _____ Is your terminology consistent across all your policies and through the draft?
 - _____ If two policies are interrelated, is it clear when each policy will apply?
 - _____ Is it clear to whom the policy applies?
 - _____ Check related policies to ensure your policy is not in conflict with, or if it interacts with any other university policies. Connect with the appropriate Responsible Office to resolve any issues.
 - _____ Ensure the draft policy is consistent with university bylaws, rules, regulations; university policies; industry requirements; and state and federal laws/regulations.
 - _____ Contact and solicit input/feedback from all units that have responsibilities as a result of the policy.
 - _____ Has the law in this area changed? Check with designated Legal Affairs attorney for questions on whether or not the law has changed.
 - _____ Internal administrative procedures of units that own or have responsibilities defined by the policy should generally not be part of the policy document. Consider pulling out very specific and detailed procedures and placing them in separate documents that can be linked to the policy.
 - _____ **University Senate.** For policies that apply to faculty, provide drafts and solicit input/feedback at points at which it can be meaningfully integrated. Contact: Secretary of the Senate 614-292-2423.
 - _____ **University Staff Advisory Committee.** For policies that apply to staff, provide drafts and solicit input/feedback at points at which it can be meaningfully integrated. Contact information can be found at: <http://usac.osu.edu/index.php>
8. **Solicit and integrate feedback.** The responsible office policy coordinator works with the policy director to solicit feedback from stakeholder groups identified on the policy proposal, the policy writing group evaluates and integrates the feedback into a refined policy draft.
- _____ Ensure draft policy is consistent with university bylaws, rules, regulations; university policies; and state and federal laws/regulations.
 - _____ Provide a draft to the policy director/assistant director for their editorial review/update.
 - _____ Review the draft policy with the responsible office leaders and your Legal Affairs designee before distributing broadly for feedback. The Responsible Office sets the direction of the policy; Legal Affairs stops the Responsible Office from making legal or other serious mistakes.
 - _____ Prior to sending the policy out for feedback, connect with the policy director to schedule a date to take draft to UPRC.
 - _____ Work with the policy director to put together the request for feedback to all stakeholders identified on the approved policy proposal (additional stakeholders can be added), in addition to the specific groups below, as needed. The policy director sends out the request for feedback.
 - _____ The policy team will collect and collate all the feedback and provide it to the writing group. The writing group is responsible to authentically examine and consider the feedback that is received.

The group integrates the feedback that will improve the policy from both content and understandability perspectives.

_____ Provide a draft to the policy director/assistant director for their editorial review/update.

9. Prepare implementation and communication plan.

_____ Develop an implementation plan to ensure that the policy and its requirements will be implemented and adhered to by the individuals and groups to whom it applies.

_____ Develop a communication plan for the policy roll-out, which should include communications to all stakeholders, individuals and groups impacted by the policy, administrators, etc. For advice and assistance, contact your VP unit communications person and/or University Communications.

10. Take draft to University Policy Review Committee (UPRC). The responsible office policy coordinator and policy expert(s) take the draft policy to the UPRC for feedback. *It is a good idea to review this draft with Legal Affairs before taking it to UPRC.*

_____ Provide policy (and associated documents if you want) to the policy director, in Microsoft word format, two weeks prior to the UPRC meeting. Use “track changes” so that proposed changes are apparent, if you are taking a policy revision to the group.

11. Consider, integrate feedback from UPRC; determine effective date; begin communicating to users. Feedback is solicited, considered, and integrated from UPRC.

_____ Refine the draft policy based on feedback from the UPRC.

_____ If substantive changes were made, consult with the policy director to determine if you should solicit further feedback.

_____ Provide a draft to the policy director/assistant director for their editorial review/update, prior to final legal review and signoff.

_____ Responsible Office policy coordinator reviews the policy and signs off on it.

_____ Designated Legal Affairs attorney reviews the policy and signs off on it.

_____ Responsible executive (usually a vice president and senior vice president/provost) signs off on it.

12. Submit to SMC. After the policy has been reviewed and signed off on, the responsible executive submits the final policy draft to the SMC for endorsement.

_____ Provide completed signature form final policy to the policy director in Microsoft Word format.

_____ Develop the SMC/Cabinet cover sheet in consultation with the policy director.

_____ Work with the policy director to schedule SMC endorsement and Cabinet approval agenda dates that are workable for Responsible Office SMC/Cabinet members.

_____ The policy director submits policy materials for SMC/Cabinet meetings.

13. SMC reviews and endorses (or not). The SMC may endorse the policy for President’s Cabinet’s approval immediately, ask for substantial revisions or for additional time to review the policy, or determine that a policy is not needed or desired on the subject.

_____ Get endorsement (or not) from SMC.

_____ If endorsed, the provost’s executive assistant will get the Policy Approval and Signature Form to the President’s Office for Cabinet approval.

_____ The responsible office policy coordinator needs to get a copy of the SMC agenda and provide it to the policy director and keep a copy for your files.



14. Cabinet reviews and approves (or not). After endorsement by SMC, President's Cabinet may approve the policy immediately, ask for substantial revisions or for additional time to review the policy, or determine that a policy is not needed or desired on the subject.

_____ All other signatures (except the policy director signature) on the Policy Approval and Signature Form must be obtained before it goes to Cabinet for final approval.

_____ Get approval (or not) from Cabinet.

_____ If approved, the President's Office will send the signature form to the policy director or responsible office. Provide a copy of the signature form and Cabinet agenda to the policy director and keep a copy for your files.

15. Provide final and redline version; summary of changes; and copy of signature form and SMC, Cabinet agendas to OUCI.

_____ Provide the final word version and PDF to OUCI.

_____ If there are complex tables, ensure they are in accessible format.

16. Communicate and disseminate.

_____ Implement your communication plan.

17. Post to website. Responsible office policy coordinator forwards policy data to OUCI policy team for inclusion in the database that feeds the university policy website. Policies are actually housed on the Responsible Office's server and website.

_____ Forward the policy data to OUCI policy team for inclusion in the database. Instructions as to what information must be forwarded can be provided by the policy team, who enters the policy data and posts it to the website.

Implementation

18. Implement policy and communication plan; train. The responsible executive/office communicates and trains according to their communication plan.

_____ Share information and tools needed to implement the policy with stakeholders and individuals who are expected to carry out or enforce the policy. We strongly encourage use of BuckeyeLearn for on-line and instructor-led (ILT) training or tools.

19. Archive superseded policy. The superseded policy, policy approval and signature form, SMC, Cabinet agendas, and all supplemental documents are archived upon approval of the new policy.

_____ Archive the superseded policy with the policy approval form. Keep a copy in your department for your records.

20. Monitor compliance; review audit and investigation findings; conduct training and education and implement accountability measures to address performance issues.

21. Encourage feedback. Responsible Offices should encourage and collect feedback about their policies for use in the next policy revision.

22. Review policy. Policies should be reviewed and updated or confirmed current on a 5 year cycle.

_____ Collect all feedback you receive on the policy as it is implemented, and on an ongoing basis. Retain for the next revision of the policy.

_____ Create a process, or make a note on your calendar that the policy needs to be reviewed and either updated or confirmed current every 5 years. If substantial changes need to be made, this process is followed.