



## SAINT VINCENT COLLEGE

### **Policy Drafting Guide**

This Policy Drafting Guide sets out the structure and provides a standard template to be used when drafting a college-wide policy. This guide describes the sections and information that need to be included in any policy. Below are descriptions of each required section, as well as tips, samples and more.

#### **Policy Title**

This section provides the official title of a policy. The title must identify the key purpose of the policy, in as few words as possible. The naming convention is the name of the policy (i.e., its subject), followed by the word "policy."

#### **Purpose**

The information in this section answers the question as to why the policy exists. Key areas that may be addressed include:

- legal or regulatory reasons
- description of conflict or problem the policy will resolve
- overall benefits
- reasons related to the College's Benedictine mission and College Strategic Plan

#### **Scope**

This section specifies to whom the policy applies. The scope answers the questions – who is the primary audience? Who needs to follow this policy? While college policies have college-wide applicability, they may apply more specifically to one or more groups. Examples: College staff, faculty, contractors, volunteers, undergraduate and/or graduate students, etc.

#### **Policy Record**

This section shows the background and history of the policy document and notes any actions taken, along with the date, with respect to the policy. It should include the effective date, the name of the person who approved the policy, the policy history, and the policy owner.

#### **Effective Date**

This is the date on which the earliest version of a substantially similar policy that provides a policy statement for a particular topic went into effect. The effective date of new policies or those that have substantially changed from previous versions should be the date that the current version was approved by the President, or when it is due to be implemented. (For example, certain new policies that may require significant cost expenditures for compliance may have a delayed effective date, where such delay is meant to allow for proper planning.)

## **Approval**

This section records the date on which the proposed version of the policy is most recently approved by the President.

## **Policy History**

This section tracks the history and amendments to a policy since its original date of approval. Whenever possible, each subsequent approval date should be accompanied by a list of what changes and updates were made to the policy.

If the proposed policy is the first document addressing a particular subject matter, the text should read: “Approved in its original form: [Approval]”

Additional text may be included to clarify that the University had procedures in place to ensure compliance in a particular area prior to enactment of a University Policy.

*Example: “The Saint Vincent College FERPA policy was first issued in 2006; however, Saint Vincent College has over the prior decades provided students their notification of rights by annually publishing those rights in the Student Handbook.”*

## **Policy Owner**

This section designates a College official (by position, not name) and office as being responsible for the general oversight of a policy that naturally falls within the official’s or office’s areas of responsibility. The responsible official may delegate operational responsibility to a policy owner. Depending on the scope of the subject matter, a policy may have more than one responsible officer, i.e., more than one policy owner.

## **Policy**

This is the most important section of the policy. The policy itself – or, in other words, the College’s policy statement -- is ultimately a statement from the Office of the President conveying an idea endorsed by the College, or an official Saint Vincent College position. It provides direction for the intended audience. Questions that are typically answered through the policy statement include: In what situation(s) does this policy apply? What are the major conditions or restrictions? What are the expectations of those affected? Are there exclusions or special situations?

Below are guidelines for the policy owner/drafter to keep in mind when drafting the policy statement:

- Sentences and paragraphs must be clear and understandable for the given audience.
- Acronyms may be used if spelled out completely the first time the phrase is used.

*Example: College Policy Coordinating Committee (CPCC)*

- Use strong action words (will, must, are responsible for, etc.). Avoid using “shall” in the policy statement.
- If the policy statement is lengthy or has different subsets, consider using numbering/lettering or some outline format to help guide the reader.
- Use inclusive, non-gendered language when possible.

## What Not to Include

- The policy statement should not include background details on the policy nor should it contain procedural steps. Procedures are a means of implementing policy and can be included, instead, in an appendix to the policy (with the intention that such appendix can be updated from time to time, as necessary); sometimes specific procedures may be left to the determination of a specific unit, department, or office.
- Avoid using a specific label, such as the name of a software product. Generic terms are more sustaining and require less maintenance (i.e., less updating of the policy).
- Similarly, avoid the use of individual names. Instead, use the more ambiguous or generic office or position title.
- Avoid using specific contact information in the policy statement itself, unless required by law or regulation, or considered best practice. Contact information should be included in an appendix instead (with the intention that such appendix can be updated from time to time, as necessary).

## Reference Documents

A list of resources that support the specific policy. These documents may be explicitly referred to in the policy or simply helpful to the readers' understanding of it. The documents may be internal or external, such as references to state or federal laws. Common examples are:

- Related procedures;
- Links to college-wide forms used/referenced in following the policy and associated procedure;
- Handbooks that may contain additional information;
- Related documents and sources of additional information, including final reports, meeting minutes, or other key background documents;
- Citations to specific federal or state law or regulations.

The list of related information will be displayed in an order defined by the policy owner, typically in order by importance or level of involvement in the policy. Please be sure that any linked sites remain live. Outside websites should only be linked if you have confirmed that they are accessible (i.e., meet web accessibility requirements).

## Definitions (as needed)

A list of unique terms that, by being defined, add to the reader's understanding of the basic policy or procedures. This is the appropriate section in which to define unfamiliar or technical terms, or terms with special meaning within a particular policy. The list of definitions should be posted in alphabetical order.

## Appendix/Appendices (as needed)

More than one appendix may be attached to a policy, to house information that need not be included in the policy statement itself (i.e., a high-level pronouncement of the College's philosophy on a matter) but rather is more procedural or informational in nature. For example, a

process for implementing the policy may be included in an appendix or contact information for those most involved in carrying out a policy or answering questions about it.

Appendices can be modified from time to time, as needed, to reflect updated processes, changed contact information, etc., without going through the formal policy approval process.

## Appendix B

### Policy Creation, Review and Approval Process

The following outlines the policy process beginning with a division/department assessment and ending with Presidential approval. These steps should be followed for both identification and drafting of new policies as well as amendments and updates to existing policies.

In limited situations, certain policies -- including those mandated by federal or state statute, or the College President or Board of Directors -- may be “fast-tracked.” A fast-tracked policy may not necessarily follow the above steps sequentially, but still requires adequate consultation with relevant College constituents and approval by the President.

#### **Step 1: Division/Department Assessment and Audit**

- Periodically review University-wide policies in your area of responsibility. Determine whether:
  - The policy is relevant, up to date, and currently in effect. If such is the determination, no additional steps are necessary.
  - The policy is relevant and necessary but needs to be updated or revised to better reflect actual Saint Vincent College policy or practice, or to comply with certain laws or regulations. If such is the determination, then:
    - In consultation with relevant campus constituents and the CPCC, make necessary revisions, being sure to use Word's tracking feature to track any changes to the policy as currently approved. (Keeping the changes in a tracking/redlined format enables CPCC and others to review them). Document reasons/justification for those changes.
    - Recommend that the policy be approved in its revised form.
  - The policy is no longer relevant or in effect. If such is the determination, then formally recommend that the policy be removed from the College Policy Library and be archived.
- Identify any gaps or problems areas within your department that you feel or know should have the support of a college policy.
  - In consultation with relevant campus constituents draft a new policy that addresses the gap. Put the policy into the policy template and briefly note reasons that the policy is necessary.
  - Recommend that the policy be approved and added to the College Policy Library.

#### **Step 2: Initial CPCC Review**

CPCC reviews the Division/Department's policy determinations and offers recommendations regarding campus stakeholders/constituents who should be consulted in reviewing an existing division/department policy or in development of a new policy.

### **Step 3: Division/Department Consultation**

Division/department consults with relevant campus stakeholders/constituents per Step 2 above.

### **Step 4: Present to CPCC**

Upon completion of consultation/review as set forth in Step 3, division/department presents those policies and corresponding recommendations to the UPCC for final review. (For simple updates to an existing policy, the multiple layers of CPCC review – i.e., Step 2 and Step 4, as presented here – may not be necessary.)

### **Step 5: Final CPCC Review**

The CPCC will consider the submitted policies and incorporated feedback and affirms that the review process has been satisfactorily followed. The CPCC will recommend that the Division/Department submit the policies to the President for final disposition or recommendation for further action.

### **Step 6: Presidential Approval**

The policy owner or VP for their unit under which the policy falls should present the CPCC-recommended policy to the President for approval. For the meeting with the President, the Office of Legal Counsel will provide a policy approval form for the President to sign. If the President so determines, the policy may also be shared with President's Cabinet.

Note that, for mere updates to the contact information in a policy, or non-substantive and technical updates to a policy, the President's approval is *not* required. However, the President should be notified of the update.

### **Step 7: Recording**

Upon approval, the Division/Department must report back to the UPCC with the final/official approval authority and date. This information will be incorporated into the final policy template and the policy will be published by the Office of Legal Affairs.