# Guide to Writing and Maintaining Campuswide Administrative Policy

This guide is designed to assist UC Davis policy developers with researching, writing, and maintaining their policies per the four-year update cycle or more frequently as required. It details the review and approval process for campuswide administrative policies, and should be used as a resource by anyone who develops or updates campuswide administrative policies for their unit.

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## Questions and Comments

Questions, and comments may be sent to the Administrative Policy Office; policy@ucdavis.edu.

## Characteristics of a Good Policy Document

The Administrative Policy Manuals are intended to be practical, administrative standards, with both style and content determined by user needs. Each policy and procedure document must be developed, written, and updated with the user in mind. Good policy and procedure documents:

- Are reviewed regularly (per the update cycle) and updated as needed to provide appropriate direction to the campus community.
- Are written so that they are easy to understand, using simple, clear, concise language (plain language following the UC Policy Stylebook).
- Are written with the application of an equity lens with considerations on the potential disparate impact on under-served marginalized groups.
- Avoid jargon, overly technical descriptions, and fancy vocabulary.
- Are written assuming basic knowledge of the campus, but novice knowledge of the specific policy and procedure being described.
- Clearly differentiate between "policy," "procedure," and other appropriate headings within the section to align with the template structure.
- Consider why the user will need the information and what the user will likely be doing when looking for information.
- Provide accurate contact information for users who have questions or situations that fall outside of the normal situation.
- Are in alignment with related policies, missions, and goals.
- Are evaluated to address risk of non-compliance (e.g., health & safety, legal, financial, operational, and reputational).

Policy documents are not marketing documents or creative writing pieces and need to be well written to clearly explain how to accomplish a specific procedure at UC Davis with minimal problem, aggravation, or risk of non-compliance.

## Preparation and Research

Before drafting a policy, it is important to gather information needed to develop an accurate document. Focus your preparation and be sure you are clear on the point of the policy you plan to develop. Is the policy being developed in response to a problem encountered on campus, to a new systemwide policy issued by the Office of the President (OP), State, or Federal regulation, or for some other reason? Determine what you are trying to accomplish, and make sure the point of the policy will be clear to the campus community.

- First look for information on the Administrative Policy website. Check the PPM (and other UC Davis administrative policy manuals when applicable) for related policies and information. When developing a new policy document, make sure you are not duplicating existing information. There may be a PPM section that could be expanded to include the information you are developing, or there may be related policy documents that will help inform the policy you are developing. By gathering this information in advance, you will know where you can cross-reference rather than repeat information, and you can be sure the policy document you develop corresponds/complies with existing policies and procedures.
- It is also beneficial to conduct benchmarking by looking at policies issued by other UC campuses or other universities regarding the topic you plan to address. Other campuses may have found new or creative ways of addressing issues with which your unit has been struggling. Since we often deal with similar issues, reviewing other universities policies can often help focus your policy development and give you a good starting point for your PPM section.
- Check the OP website to see if there is a systemwide policy related to the policy you are developing. Keep in mind that all campuswide policies must comply with and not repeat systemwide policy but link to appropriate information for ease of maintenance, and continued compliance. The campus may implement more restrictive policies and procedures, but cannot ever be more permissive than systemwide.

- It is important to consult with cross-functional primary stakeholders in the policy to determine existing processes, roles and responsibilities, problem areas, related policies, and to ensure that the policy document you develop will not impede the ability of other units to conduct business. It is not necessary for you to conduct a broad review at this point, but you should consult with those units/departments who play a role in or most affected by the policy you are developing.
- Finally, consult with the Administrative Policy Office regularly during policy development. A New Policy Development Plan must be submitted prior to developing and drafting a new policy. The Administrative Policy Office provides guidance and oversight for campus policy development and should be included early in all policy development activity.

Consult the Administrative Policy Office for additional guidance on the initial consultation process.

### Application of an Equity Lens

Application of an equity lens is important to conduct a fair and impartial analysis on the impact of the design and implementation of your policy on under-served and marginalized individuals and groups, and to identify and potentially eliminate barriers.  Under-served individuals and group include ethnicity, race, religious expression, veteran status, people of color, including under-served groups and new immigrant populations, people who identify as women, age, socio-economic people with both apparent and non-apparent disabilities, people of various gender and sexual identities and expressions, American Indians and other indigenous populations.

A well-written policy document establishes direction and defines the intended audience. Consider disproportionate or undesirable impacts on those who need to understand, apply, or follow its requirements. Below are some questions to assist you:

- Who does the policy impact?
- What forces are driving the policy?
- Are there individuals and/or communities that will be disproportionately impacted (e.g., students who receive financial aid, staff who are visually impaired, staff position classification)?
- Are historical, legal, or other barriers set in the past being perpetuated or dismantled?
- Are assumptions made that everyone has the same understanding of the procedures and implications (e.g., tax implications)?
- Does it allow individuals to affect how it is applied and used?
- Has gender-neutral language (avoiding the use of gendered pronouns), lived or preferred names been incorporated?
- If disparities are identified, how can they be mitigated or eliminated?
- Below are some of the many benefits of applying an equity lens to the policy:
- Provide a positive impact on diverse individuals and groups.
- Identity and potentially reduce or eliminate barriers.
- Enhance policy effectiveness, broaden engagement, and understanding.
- Strengthen and broaden the policy impact.
- Increase accountability and capacity as an organization to identify root causes of inequities.

It is important to recognize that we all are subject to the influence of bias and assumptions. Spend sufficient time and attention evaluating your policy for disparate impacts. Consider the individuals/groups you consulted while creating/revising your policies to ensure that you have been inclusive rather than exclusive. Periodically focus on the evaluation of your policy and its implementation.

Contact the Administrative Policy Office, which leads the Policy Equity Review Workgroup (standard policy reviewer) to help evaluate your policy.

Additional considerations for application of an equity lens have been incorporated below.

## The Standard Template

The Administrative Policy Office has developed standard templates for the two administrative policy manuals (PPM, PPSM). The templates are available on the website at https://manuals.ucdavis.edu/templates. Each template uses standard styles that allow for clean transition from the Word document to the Web. It is important to use the templates properly and the styles to help streamline the review and approval process. When the templates are not used properly, the document will be returned to the department for corrections, thus slowing the process.

## Structure of the Policy Document

PPM sections are structured using standard outline format, which helps keep the section organized and easy for the reader to find the needed information. A standard PPM document is divided into the following parts for consistency:

### Header

Each policy section header includes the chapter number and name, section number and name (policy title), approval date (will be entered after the PPM section is approved), superseded date, responsible department, and source document (e.g., systemwide policy or regulation).

When developing a new PPM section, contact the Administrative Policy Office to determine the chapter number/name and the assigned section number.

Section names should be as simple and clear as possible, and identify the key purpose to aid users finding appropriate policy sections. The source document listed should be the document that provides primary guidance for the policy and procedures that follow. When considering section names, identify language that could help with preventing barriers when understanding or interpreting its meaning from a variety of intended audience.

### I. Purpose

Briefly summarize the information covered in the section. A concise summary of the objectives may also be given if it helps to clarify the subject matter. The purpose statement should inform readers why the section was issued, and what information they will find there. If applicable, include the intended audience, and provide reference to the related UC Davis Health policy section or other policy manual section for specific procedures addressed elsewhere.

### II. Definitions

Subject matter that requires a precise understanding of terms can be included here in alphabetical order. This allows a reader to approach the content in a more knowledgeable manner, and to easily refer back to the definition as needed when the term is used frequently throughout the policy section. When a term has more limited use, it can be defined in the body of the section and Definitions may be omitted. Review or add definitions that would increase to the user's understanding of the basic policy and procedures.

### III. Policy

The policy statement is the governing principle, plan, or understanding that guides the action. It states what we do, but not how. The policy statement(s) should be brief, and is supplemented by the information within the rest of the section.

### IV. Role and Responsibilities

This section is organized by the position, department, or committee that has certain required responsibilities in maintaining compliance with the policy. It often describes the membership of committees, the positions that hold any approval authorities (and the potential delegated authority), and the responsibilities employees have to provide information, complete reports, or otherwise act to maintain compliance.

Because this section may include the intended audience, again applying the equity lens will help to consider whether disproportionate or undesirable impact is potentially occurring on those who need to understand their role and responsibility. The same equity lens key question applies: Are there individuals and/or communities that will be disproportionately (and negatively) affected by serving in this role and fulfilling the responsibilities identified?

### V. Procedures

Procedures describe how the policy is implemented at UC Davis locations. The action steps included here should clearly and accurately describe the process and responsibilities for accomplishing tasks governed by the policy. Procedures are the *required* process for the specific situation. In addition to supplying procedures, you may want to include links to guidelines. Guidelines provide suggested methods for accomplishing tasks governed by the policy, but are not mandatory procedures and should be maintained on the department’s website rather than in the policy.

The procedures should be organized for ease of use with a series of consecutive action steps. Some policy sections may require multiple procedure headings for the different tasks addressed. Other policy sections may not require a procedure section.

Here again is an opportunity to apply the equity lens. Are there individuals and/or communities that will be disproportionately and negatively affected the procedures, instructions, or forms? Are required actions accessible (e.g., use of systems, trainings, forms, websites, and buildings)? If disparities are identified, how can they be mitigated or eliminated?

### VI. Further Information

Provide the responsible office name, telephone number, email address, or web address for individuals who may need assistance or additional information regarding topics covered in the policy section. Include any contact information provided in the policy in this section for ease of use. Consider the contacts listed within the context of the needs of the intended audience.

### VII. References and Related Policies

List the sources upon which the policy section is based, including Federal and State laws, Systemwide policies, and other UC Davis policies or Delegations of Authority. In addition, list other UC Davis policies that are related to or referenced in the section.

## Exhibits

Certain supplemental information may be included as Exhibits if desired, such as flow charts, or other guidelines as exhibits related to the section. It is important, however, to remember that exhibits are meant as supplemental information, and they should not be relied upon to convey significant policy information.

As a standard, forms and other supplemental information are maintained on the department's own website rather than as an exhibit to the policy. By maintaining it separately, the department can more easily maintain the information when it needs to be changed or updated.

## Modifying the Standard Structure

It is best to stay as close to the standard structure as possible. The closer you are to the standard, the easier it will be for users to find the information they need in your PPM section. However, there are occasions where you may need to add different parts/headings to the policy to increase ease of use.

Whenever you add a part/heading to the policy, it should be something that identifies a significant aspect of the policy. Any headings should be descriptive of the information to follow. All of your part headings should be of equal importance within the PPM section as a whole.

No matter how many headings you determine you need to clearly communicate your policy, you should retain the outline structure for all documents developed for the PPM. Documents submitted in narrative structure will need to be rewritten and re-reviewed before starting the formal review process.

Contact the Administrative Policy Office for assistance with the structure of your PPM section.

## Writing Tips

When writing your PPM section, keep in mind that you are an expert in the area on which you are writing, but that the users of your section will not be. Many people referring to your section may be new to their current position, or new to the campus altogether. This means you need to keep your procedures as simple and straightforward as possible. Provide enough information for users to understand the section, but not so much that they become confused. Keep your language straightforward (active voice, omit unnecessary words, use common words and avoid legalese) and write with attention to what the general campus population needs to know, not what a specialist in your own unit needs to know. Remember that you can always provide supplemental information on your department website, and provide a cross-reference in the PPM section for those users who may need more assistance with the procedure.

Do not confuse "policy" with "procedures" or "guidelines." The term "policy" refers to a very specific aspect of the PPM section. It should include only the governing principles that explain the reason why the remainder of the PPM section exists. It explains why we have certain procedures or guidelines, but not how to accomplish tasks. Procedures and guidelines are similar, but procedures are the required steps a user must take to comply with policy, while guidelines are recommended best practices for departments to accomplish tasks but are not required to be in compliance. Procedures are included in the document while guidelines are not.

Procedures should be presented in a step-by-step manner and should include locations of electronic systems or forms that are part of the procedure, and links to that information. Word choice in this section can also make a big difference in how easily your procedures can be used. For example, using the word "must" indicates that something is required, while the term "should" implies that there might be other options, or that a department could bypass the task associated with that step.

If you are unsure of any campus or grammatical standards, refer to either the Campus Editorial Style Guide maintained by Strategic Communications or The Chicago Manual of Style. The Campus Style Guide addresses common editorial issues on campus (e.g., capitalization of position titles, capitalization of quarter designations), and common grammatical issues.

Avoid including the type of information that is likely to change frequently. Instead of using an individual's name, use the position title. Instead of including a building name, refer just to the department name. By carefully considering the type of information you include in the document, you can help ensure better accuracy for a longer period.

Finally, remember that when it comes to writing policy, less is more. Don't use ten words to say what could be said in four. Keep your statements clear and to the point. If you are able to develop a user-friendly policy, you increase the likelihood that users will refer to the policy rather than call you, will work to stay in compliance, and will contribute to increasing efficiency across campus.

## Formal Review Process

When you have completed a draft of a new policy, checked all of your facts, and consulted with the appropriate individuals, follow the steps as established by your vice chancellor's/vice provost's/dean's office. Generally, you will submit your draft to the unit policy coordinator to conduct additional fact checking, resolve any editorial or structural problems, obtain vice chancellor's/vice provost's/dean's buy in before submission to the Administrative Policy Office. If your unit policy coordinator does not conduct this review, it is your responsibility to do so before submission. With your draft, you also need to submit a list of individuals who have been consulted during development, a list of individuals you believe should be included in the formal review, and a summary statement of the changes or purpose of the policy.

Note: Updates to an existing policy are accomplished using the Policy Management System inline editor. Contact your unit policy coordinator and the Administrative Policy Office to gain access to the policy draft.

Once submitted, the Administrative Policy Office will review the draft for compliance with applicable policies and regulations, compliance with other campus administrative policies, and delegations of authority. If there are any discrepancies between the draft and other regulatory documents, you will be contacted to find resolution.

In addition, the Administrative Policy Office will review the draft for structure, style, and usability; and will make any necessary editorial or structural changes to bring the draft in line with the standards for the manual. If the draft requires significant changes, you will be contacted to request or discuss the changes, or to review a revised draft. By following the guidelines regarding structure and style provided in this document and regularly consulting with the Administrative Policy Office during development, the policy development and submission process will be much more efficient.

Once the final preparations of the draft have taken place, the Administrative Policy Office will distribute the draft policy to the appropriate campus stakeholders for review and comments. The review period is typically 30 days, but may be extended by request when the draft requires review by larger committees, requires review by the Academic Senate, collective bargaining units, or during periods of unusually heavy workload (e.g., during fiscal close).

When the review period closes, the Administrative Policy Office will take care of any comments that can be resolved without consultation (e.g., issues resolved by systemwide policy or other regulation), but will contact you or the unit policy coordinator regarding anything that requires input from the policy developer.

Many drafts can move to final approval relatively quickly following the review, but others may require more work. If there are a significant number of comments, or if the comments question substantive portions of the policy, some negotiation may be required to resolve the issues. The Administrative Policy Office acts as a moderator in these situations, leading the negotiations, and can meet with the parties involved to discuss the disputed issues and facilitate resolution. The Associate Chancellor holds the final authority to resolve disputes regarding campus administrative policy if agreement cannot be reached.

### Final Approval Procedures

Following the resolution of issues, the Administrative Policy Office will distribute the draft for final approval. Every PPM section must be approved by the policy developer; the appropriate department head (as required); and the appropriate vice chancellor, vice provost, or dean. The policy is not considered official until all of the approvals have been received.

Upon final approval, the Administrative Policy Office will post the new policy on the official website, and a description of the new or revised policy on the appropriate revision page. The approval date is the date of the final approving authority's signature on the approval.

The Policy Management System sends an automated message to UC Davis affiliates who have registered to receive notification the day after any policy approval.

### Technical Updates

Technical updates are updates that occur between review cycles to provide clarification or minor procedural changes (e.g., changing a department name in procedures to reflect an organizational change), or correct topographical information (e.g., website links, references, contact info, editorial changes) Technical changes can be requested and made without going through the formal review process or final approval process.

- Technical updates cannot be used to make significant changes to policy or procedures.
- The number of technical updates to a single policy document must be minimal. When a policy requires multiple technical updates, it indicates that the policy needs a more thorough review and it should be fully updated.
- Technical updates will not be made to policies that are due for update and already require a full review, but can be made on policies that would otherwise be reissued.

### Revision Dates

When a technical update is made to a policy document, a revision date is appended to the approval date. The revision date does not modify the normal review cycle for the policy. The policy will still require a full review and update four years following the approval date.

### Responsibilities of Policy Developers and Departments

The policy developer primary responsibility is to ensure the continued accuracy of the policies they have been assigned by their units. Users across campus rely on the policy manuals to provide accurate guidance, and regularly make important business decisions based on the information contained within the manual. Whenever the source document or related information for the policy section is updated, the policy developer is responsible for reviewing the local policy manual section for compliance.

## Administrative Policy

All policy sections must be reviewed and updated at least every 4 years. The vast majority of policies do require some type of update, even if only a minor update, within this time span. If, after reviewing the policy you determine that it remains accurate as published (but may also need technical changes), contact the Administrative Policy Office to request that the policy be reissued. The policy will not go through a formal review process, but will require formal approval verifying its continued accuracy. If the policy has been reissued during the last review cycle, it will need to undergo the formal review process. By regularly reviewing, updating, and reissuing policies as needed, a clear message is sent to campus users that they can rely on the accuracy of the policy sections owned by your department.

Another important responsibility of departments that own policy sections is to monitor ease of use and compliance. When there is a high level of non-compliance across campus or when there is a large number of questions regarding a procedure, the department should review the policy section to identify problem areas that may be introducing confusion. It is important to recognize that systems, processes, and the campus culture are constantly changing and evolving, and the policy manuals must keep pace with those changes. A policy section that was adequate for campus needs 10 years ago may not be today. Departments and policy developers need to recognize when it is time to reorganize or restructure the information in an existing policy, in an effort to keep the policy manuals the practical guides they were meant to be.

### Development Process Overview

The below graphic provides an overview of the policy development process.

| | Policy Developer | Administrative Policy Office |
|---|---|---|
| Preliminary | Conducts initial preparation and research<br>Completes and submits New Policy Development Plan to Administrative Policy Office and Unit Policy Coordinator<br>Outlines need assessment and plan<br>Identifies policy developer information<br>Potential key stakeholders and units impacted<br>Obtains approval and sponsorship of vice chancellor/vice provost/dean of Responsible Department | Reviews submitted plan and confirms the policy is appropriate for inclusion in the campuswide policy manual<br>Confirms approval from vice chancellor/vice provost/dean of Responsible Department<br>Determines chapter and section number in which the policy will reside if appropriate for inclusion in the campuswide policy manual |
| Draft Policy | Continues to prepare and research<br>Consults with subject matter experts and key stakeholders to draft and vet content<br>Incorporates content in the standard policy template format<br>Checks all the facts, links, resources provided in the draft<br>Submits draft with stakeholders consulted, suggested reviewers, summary of statement of changes or purpose of policy to Administrative Policy Office<br>Collaborates with Administrative Policy Office to finalize the draft based on recommendations. | Provides guidance and assists with researching, formulating, and developing the draft (examples, templates, benchmarking, etc.)<br>Reviews draft for structure, style, usability, compliance, clarity, alignment with related policies, missions and goals, and provides feedback<br>Determines the official review cycle<br>Determines formal reviewers and if necessary consults with appropriate offices (e.g., Campus Counsel, Audit & Management Advisory Services, or other affected departments)<br>Requests discussion as needed to finalize draft |
| Formal Review Process | Request expanded stakeholder and legal review, as appropriate | Manages the formal review<br>Distributes and coordinates the official review request to appropriate campus stakeholders and |

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|---|---|---|
| | Conducts a review of the policy draft distributed | standard reviewers (including the Policy Equity Review Workgroup) for review and comments<br><br>Communicates comment period, purpose, instructions to reviewers<br><br>Compiles reviewer comments, resolves comments as needed, and returns comments to policy developer to resolve |
| Finalize Draft | Addresses or resolves reviewer comments<br><br>Provides all comments and resolutions to Administrative Policy Office<br><br>Communicates clarifications or justifications to reviewers as necessary | Collaborates with policy developer to finalize draft<br><br>Moderates situations, leads negotiations on issues raised to facilitate resolution if needed |
| Final Approval Process | Provides final approval of policy following resolution of reviewer feedback | Distributes final approval requests to the Policy Developer, Department Head, vice chancellor/vice provost/dean<br><br>Archives all correspondence, drafts, and policy history as the office of record |
| Implementation | Execute communication plan and facilitate training as appropriate | Publishes policy upon final approval by the vice chancellor/vice povost/dean<br><br>Ensures users registered to receive policy updates are notified |

## Additional Resources

Assistance and guidance with all stages of policy development is available from your unit policy coordinator, or from the Administrative Policy Office, Office of Compliance and Policy; policy@ucdavis.edu.

Additional information regarding procedures and policy structure is available in Development and Management of Campus Administrative Policies (policy on policies).

Other resources for policy developers are available on the Administrative Policy website for example:

- Understanding UC Davis Administrative Policies
- Register to Receive Policy Updates
- New Policy Development Plan
- Policy Writers Checklist
- Administrative Policy Development Process Flow Chart
- Policy Management System Training
- List of Unit Policy Coordinators
- Templates
- FAQs