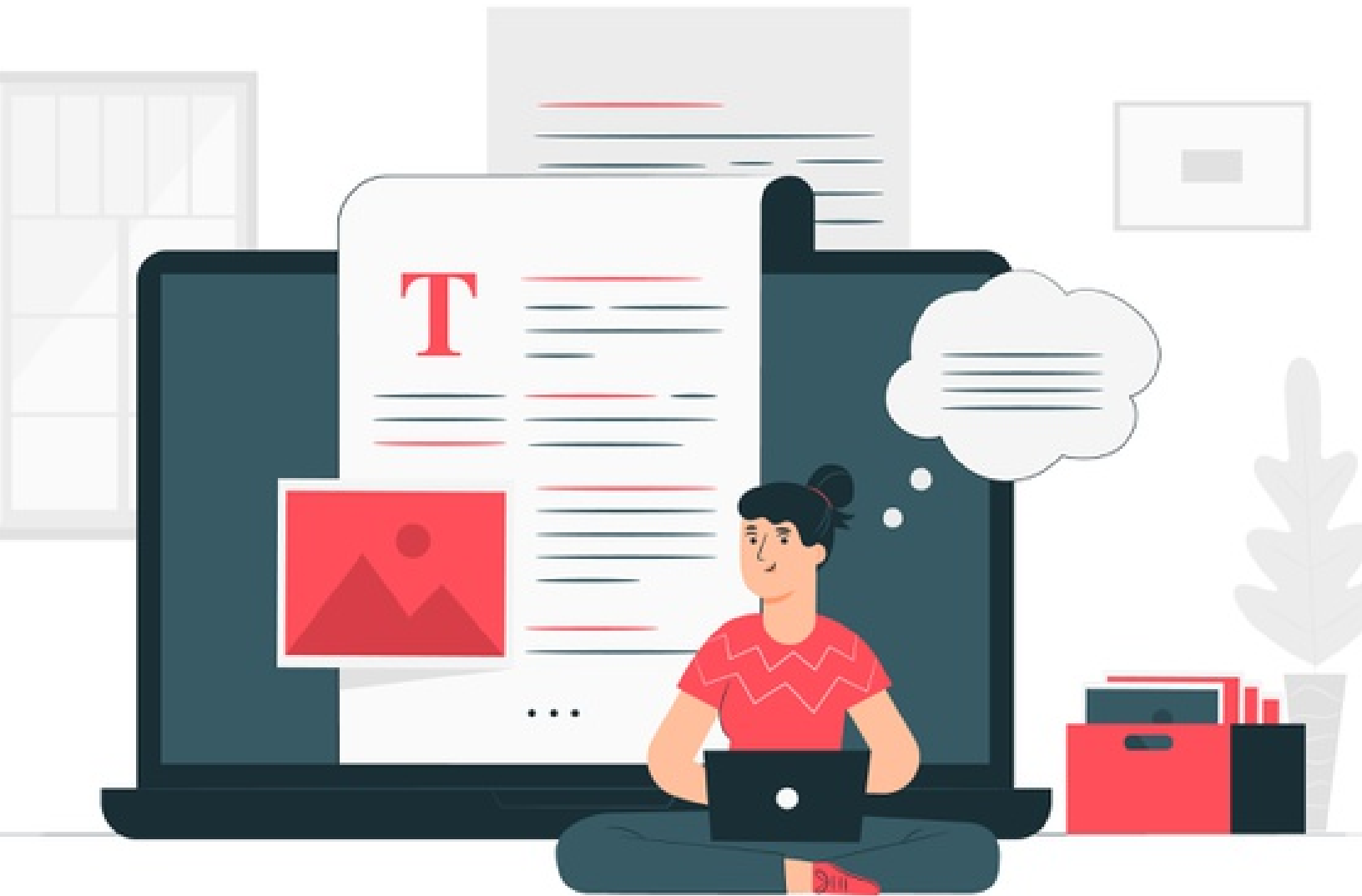


Guide to Writing Effective Policies and Procedures

HSC Office of Institutional Compliance and Integrity



Introduction

Guide to Writing and Maintaining Policies & Procedures

Policies and Procedures are intended to be practical, administrative guides with both style and content determined by user needs. The only way this can be the case is if each and every policy and procedure document is developed, written, and updated with the user in mind.

This guide is designed to help policy owners and policy subject matter specialist (SMS) at UNT Health Science Center with the process of researching, writing, and maintaining their policies. It also explains the review and approval process for campus wide administrative policies. This guide should be used as a resource by anyone who develops or updates campus wide administrative policies for their department.

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The Importance of Policy Effectiveness

A crucial element of an effective compliance program is that employer's clearly state the prohibition of conduct that violates the 3 P's- policies, procedures and processes. Robust policies and procedures are imperative, but almost worthless if they are not read and effectively understood. Policies and procedures must be comprehensively and effectively communicated.

Effective policy management enables compliance and ethical business. This ensures good governance, best practices and compliance.



How Policies & Procedures Work

It's important to note that Policies and Procedures are not the same thing

Policies

Policies serve as a functional framework for HSC, which states the intentions to guide decision-making. Policies and procedures must be written so that people can get the information they need in order to do the job they are assigned to do. Policies without procedures result in inconsistent practices.

Procedures

Procedures are a combination of one or more business processes and are outlined steps to take, and the order in which they need to be taken. Well-written procedures are typically precise, factual, short and to the point. It provides a series of routine steps to accomplish an action.

Benefits	
Policy Benefits	Procedure Benefits
Defined boundaries	Reduced learning curve/training time
Eliminates "Trial and Error" approach	Consistent and Effective Outcome
Provides guidance on how to handle issues properly	Standardized processes

Is a Policy or Procedure Necessary?

Here's How to Erase Uncertainty

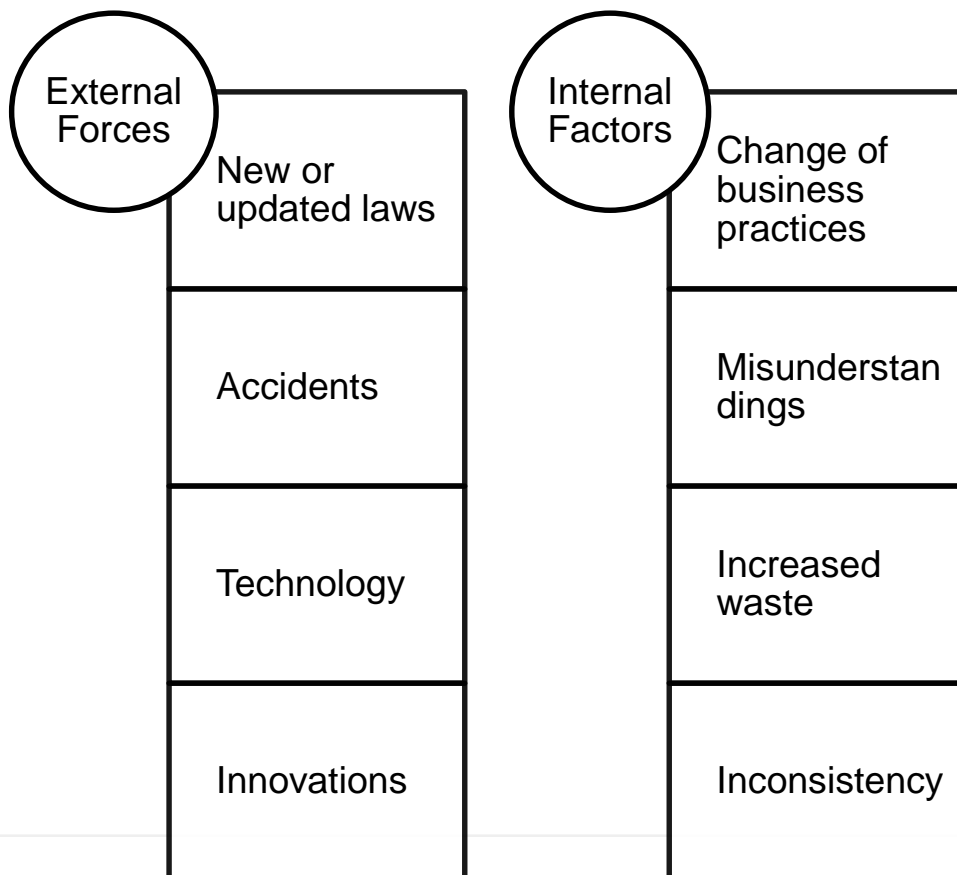
It is wasted effort to write a policy or procedure “just because”. Before you decide that you need a policy or procedure, be sure you can express the problem you need to solve and that a solution exists

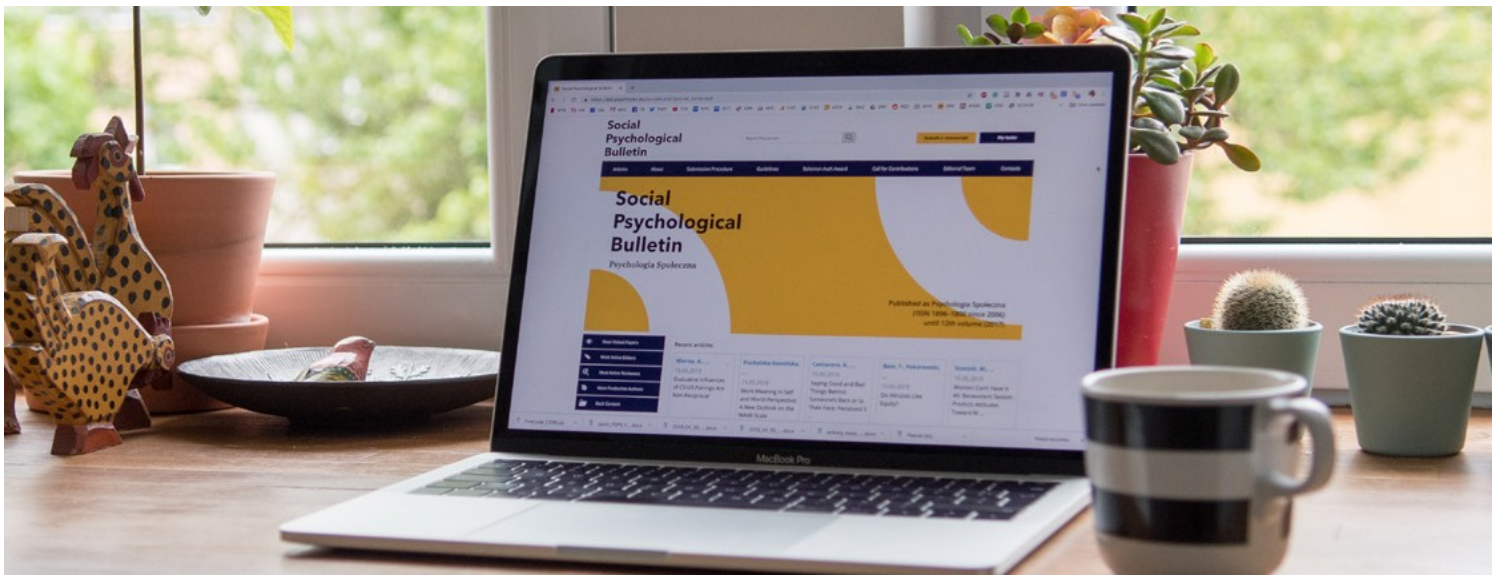
Policies and procedures are usually needed for personnel, safety and health issues, or when you need to control, inform, educate or direct.

If considering a policy in response to an event, ask yourself:

- Has this happened before?
- What are the chances it might happen again?
- Do potential consequences involve financial or legal issues?

Signs that an informal rule or unwritten rule is not working





Modifying the Standard Structure

In general, it is best to stay close to the standard template. The closer you are to the standard template, the easier it will be for users to find the information they need. However, there may be 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.

No matter how many headings you determine you need to clearly communicate your policy, you should retain the outline structure for all documents developed in PolicyTech.

Policy & Procedure Development

Policies need to be concise, consistent and easy to read. Using clear and simple language increases the probability that the policy will be understood and followed. Use short, everyday words when possible. Simple words are easier and faster to read for all levels of readers, and will aid in understanding. Keep sentences brief. Longer sentences demand greater concentration from the reader and may make the meaning difficult to follow.

Effective policies are easy to read. “Plain language” is a writing style that helps readers:

- Find what they need,
- Understand what they find; and
- Use what they find to meet their needs.

Follow the guidelines below for plain language writing:

Write in the “active voice”. In an active-voice sentence, the person or department taking the action is the subject of the sentence. Passive-voice sentences often do not identify who is performing the action:

Passive Voice	Active Voice
The Lake was polluted by the company	The company polluted the lake
New regulations were proposed.	We proposed new regulations
The following information must be included in the application for it to be consider complete	You must include the following information in your application.

Choose words wisely. Use direct language like must, will and prohibited rather than should, should not, shall and may as these words may imply an action is not mandatory.

Wordy, dense documents are confusing to the reader. Edit your policy to reduce unnecessary or redundant information. This task can be difficult for the writer him/herself or for a subject matter expert, so have a fellow colleague read your document and provide feedback

Be consistent. Make sure that examples and clarifying statements do not convey different meanings or interpretations. Double check that policy language does not conflict with already existing policies and procedures and all your information is factual and up-to-date.

Review & Implementation Process

When you have completed a draft of the policy, checked all of your facts, and consulted with the appropriate individuals, follow the steps as established by your department head. If your unit policy coordinator does not conduct this review; it is your responsibility to do so before submission to Policy r. With your draft, you also need to submit a list of individuals who have been consulted during development.

Establishing a Communication Strategy

The Pros and Cons of Notifying Users in Person, In Writing and by Email

Whether you should notify user in person, in writing or by email will depend on the following:

- Length of Document
- Number of people being notified
- Material's complexity
- Need for speed

Notify in Writing	Notify in Person	Notify via Email
<ul style="list-style-type: none"> • If users are external • If the content is complex or long • If the subject is not controversial • If face-to-face contact is not important 	<ul style="list-style-type: none"> • If the content is controversial or sensitive • If there the audience group is small • If you want to give the content importance • If you need to explain all or part of the policy 	<ul style="list-style-type: none"> • If face-to-face contact is not important • If subject is not controversial

Resistance

Guidelines for Navigating Resistance

For most people, change is hard and unwelcome. Fear of the unknown of being taken advantage of are common reactions. You will likely hear, “But we’ve always done it this way” or “This policy is really dumb.” No matter what you do or how well you prepare, you will probably meet with resistance from some employees.

Five Trusted Guidelines

1. Anticipate Objection
2. Listen effectively
3. Provide background, facts and reasoning
4. Clarify what is said
5. Enforcement is crucial


Responsibilities of Policy Developers

The primary responsibility of policy developers is to ensure the continued accuracy of the policies they have been assigned by their department. The HSC Community relies on policies to provide accurate guidance and regularly make important business decisions based on the information contained within the policies. Wherever a policy is updated, the policy developer is responsible for uploading the policy into Policy Tech

All policies must be reviewed, revised and or updated at least every 2 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 exactly as published, extend the next review date listed in PolicyTech so that the policy reflects that it is still effective. By regularly reviewing, updating, and reissuing polices as needed, you send a clear message to the HSC Community that they can rely on the accuracy of the policies owned by your department.

Sample Policy

See Policy Tech for Policy & Procedure Template

 <p>Policies of the University of North Texas Health Science Center</p>	<p>Chapter XX <i>(to be assigned by the Office of Institutional Compliance)</i></p>
<p>Name of Policy- <i>policy owners must ensure the policy is named in a way that is intuitive, so that the intended reader knows generally what the policy covers, and it is easy to find when searching.</i></p>	

Policy Statement.

Give a brief description (one or two paragraphs) of the policy. This section should be a summary or overview, and should not include any substantive aspects of the policy.

Application and Purpose of Policy.

This section should lay out the intended goal of the policy, and why it this particular policy is necessary at UNTHSC. It also should detail to whom the policy applies.

Definitions.

Include a glossary section to define terms that the average person might not know or understand in the context of the policy. If a glossary of terms exists outside of the policy, reference that glossary here with a hyperlink, if applicable.

Policy and Responsibilities.

The body of the policy itself. All substantive aspects of the policy should be explained, as well as any exceptions to the policy (if applicable) and consequences for not following the policy.

Reference.

Include a reference to any applicable laws, regulations, or Regents Rules in this section. Likewise, if this policy is required for accreditation, this section should state that explicitly, including what the accrediting body requires to be included in the policy to meet the accreditation criteria.

Related Policies and Procedures:

Any related policy and procedures

Reviewed by Office of the General Counsel: Date and Name of Attorney

Approved: Date

Effective: Date

Revised: Date

Next review due on or before: Date

Contact Information/Policy Owner: Name of Subject Matter Specialist (SMS) or Department Head



OFFICIAL INSTITUTIONAL PROCEDURE

PROCEDURE NAME (R*) Title (avoid using procedure in the name)	EFFECTIVE DATE (R*) Original date of implementation (adoption date)	PROCEDURE NUMBER (R*) alpha-numeric format (e.g. ICO-1.01A)
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PROCEDURE STATEMENT (R*)

An institutional procedure is strictly operational. Procedures contain a series of consecutive action steps related to a policy that specifies how a particular policy should be carried out. Procedures may have detailed instructions, definitions, and/or forms that facilitate policy compliance. Generally procedures change more frequently than policy and have a separate approval process.

REASON FOR PROCEDURE (O*)

Background information explaining the need and purpose for the procedure. Reference external requirements (law, regulations) and university decisions that support why we have the procedure.

AREAS OF RESPONSIBILITY (R*)

Lists departments, units, offices, and individual job titles for those who have responsibility for aspects of daily control and coordination of the procedure, authority to approve exceptions to the procedure (if applicable), and procedural implementation (including responsibility for any required electronic or written forms). Sets forth the scope of such department's, unit's, office's, or individual's responsibilities under the procedure, the procedural areas subject to discretionary modification (if any), and the responsibility for implementation.

PROCEDURE DETAILS (R*)

Using an approach which is customized to the subject (i.e., can be a statement in outline format of each step required, a checklist of what needs to be done, an explanation of how to complete the necessary forms or screens—including copies of the forms or screens, or an appropriate combination of techniques), provide the reader with the necessary procedural and “how to” information. Included in this section should be definitions of unique terms or terms subject to different interpretation and copies of all forms needed to complete the procedure. A transaction flow chart might also be included in this section.

RELATED INFORMATION (O*)

Links to associated policies, standards, guidelines, and regulations that support the procedure statement. Standards are mandatory controls and guidelines are non-mandatory recommendations or best practices that support the procedure.

DEFINITIONS (O*)

Include defined terms that have particular meaning or need for interpretation relative to the procedure or provide links to a central glossary.

FORMS/ONLINE PROCESSES (O*)

Include links to related forms or online processes

HISTORY (R*)

Revision Date(s): Include date last revised (this date should not be the same as the effective date) and previous revised dates.

Reviewed Date(s): Include date of last review.

ADMINISTRATIVE AUTHORITY (R*)

Title of Highest Level Department Authority

RESPONSIBLE UNIVERSITY DEPARTMENT/DIVISION (R*)

Title of Administrative Oversight Department/Office/Program

Address, City, State

General Telephone Number

General Email

PolicyTech, the institutional policy repository, is updated regularly. In order to ensure a printed copy of this document is current, please access it online at <https://www.unthsc.edu/administrative/institutional-compliance-office/unt-health-science-center-policies/>

***R = Required *O = Optional**