UC Merced Guide to Writing and Maintaining Administrative Policy

This guide offers a clear, practical framework for crafting effective policies that are consistent, actionable, and easy to comprehend. It includes best practices for structure, language, formatting, and stakeholder engagement to support policies that align with organizational goals and legal standards. It outlines the review and approval process for administrative policies and should be used as a resource by anyone developing or updating administrative policies for their unit.

Policy documents are not marketing documents or creative writing pieces. Policy materials must be carefully crafted to clearly explain how to operate within the requirements, minimizing confusion, errors, and the risk of non-compliance. Policy documents should enable the reader to identify the directives, understand the requirements, and implement practices that support the University's mission of teaching, research, and public service within the constraints of the law, external obligations, and University policy.

Questions or comments may be sent to the Policy Office policy@ucmerced.edu.

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- Policies are guiding principles that express the institutional culture, goals, and philosophy.
- Policies promote consistency and operational efficiency, enhance the university's mission and mitigate significant institutional risk.
- Policies allow for some discretion by guiding decision making and limiting or setting parameters or choices.
- Policies help achieve compliance with applicable laws and regulations.
- Policies mandate actions or constraints and may contain procedures for compliance.

Qualities of a Procedure

Procedures are the operational processes necessary to implement institutional policy. They define the specific instructions necessary to perform the task. They detail:

- "Who" performs the procedure
- "What" steps should be taken
- "When" steps should be taken
- "How" steps should be performed

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 Presidential Policy, 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. Before you begin writing a policy:

- **Check the UC Merced Policies website for related policies and information.** When developing a new policy document, make sure you are not duplicating existing information. There may be a policy that could be expanded to include the information you are developing, or there may be related policy 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.

- **Check the OP Policy website to see if there is a related systemwide policy.** Keep in mind that all campus 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.

- **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. It may be helpful to consult your system-wide counterparts to learn of their policies and practices related to your topic.

- **Consult with cross-functional primary stakeholders and subject matter experts** 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. Rather than providing an early draft, prepare an outline to illustrate the fundamental rules of the policy during these early conversations.

- **Consult with the Divisional Policy Contact for your division** to ensure they and your Responsible Official are aware and approve of the development of your policy. The DPC will help guide you through the Policy Process so that you can focus on development.
- **Consult with the Policy Office regularly during policy development.** The Policy Office provides guidance and oversight for campus policy development and should be included early in all policy development activity. A Policy Office review helps provide perspective within your document and consistency with other UC Merced policies.

Drafting the Policy

Characteristics of a Good Policy Document

Policies and procedures 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 members of the UC Merced community.
- Are written so that they are easy to understand, using simple, clear, concise language.
- 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.
- 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).

Writing Tips

A well-written and user-friendly policy increases the likelihood that users will refer to the policy rather than call you, will work to stay in compliance, and will contribute to increased efficiency across campus.

- **Expertise.** When writing a policy, keep in mind that you are an expert in the area on which you are writing, but that the users of your policy will not be. Many people referring to your policy 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 policy and procedures, but not so much that they become confused.
    - Use straightforward language (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 provide supplemental information on your department's website and include a link in the policy for users who may need more assistance.
- **Policy vs Procedure.** Do not confuse "policy" with "procedures" or "guidelines."
    - "Policy" refers to the governing principles of the document, which explain the reason why the remainder of the policy 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. Procedures may be included in a policy document, whereas guidelines are typically presented in a separate document.
- **Policy sections.** Each section of the policy serves a specific purpose. Ensure information is reflected in the appropriate section, even if you refer to it in another section. For instance, the procedure section may mention a responsibility; it is essential that this responsibility is also listed in the Roles & Responsibilities section.

- **Style Guide.** If you are unsure of any campus or grammatical standards, refer to:
    - UC Merced's Campus Style Guide, which provides answers to campus-related style questions. For more information, visit the Public Relations website.
    - University of California Presidential Policy Style Guide for additional guidance.
    - The Associated Press style guide, which is used by most news agencies.
    - The Chicago Manual of Style for questions not addressed in the other guidance.
- **Evergreen.** Avoid including information that is likely to change frequently. Instead of using an individual's name, use their 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. This does not apply to the Policy Contact, who should be listed by name and kept current.
- **Clarity and Conciseness.** When it comes to writing policy, less is more. Do not use ten words to say what could be said in four. Keep your statements clear and to the point.

The Standard Structure (also known as the Policy Template)

Policy templates are used to ensure consistency, efficiency, and accuracy when creating organizational policies. They provide a standardized structure, making it easier to write, understand, and implement policies across different departments or areas. This helps in maintaining clarity, promoting fairness, and ensuring compliance with regulations.

The Policy Office has developed a standard template for policy documents. The template uses standard formatting styles that support accessibility. When the template or formatting is not adhered to, the document will be returned to the Policy Writer for corrections.

Header / Metadata

The Policy Office will complete the header/metadata based on the information provided in the Policy Initiation Form and the policy text. The front page of every policy document includes the following elements:

- **Type of document** (i.e., policy, procedure, guideline or other)
- **Document title:** Titles should be as simple and clear as possible, identifying the key purpose to help users find the appropriate documents. When considering the title, identify language that could help prevent barriers to understanding or interpreting its meaning. Titles should not contain "UC Merced" or "Policy".
- Indication of "Draft" or "Interim" status of the document (if applicable).

- **Responsible Official (RO):** The position/title of the senior-level executive sponsoring the policy. This is typically an Assistant, Associate, or Vice Chancellor, but in some situations can be an Assistant/Associate Vice Chancellor. There can be multiple Responsible Officials, but this is rare.
- **Responsible Office:** The office charged with administering the policy and accountable for the policy's accuracy, interpretation, and updating. There can be multiple Responsible Offices, but this is rare.
- **Issuance Date:** The date the Responsible Official issues the policy.
- **Effective Date:** The date the policy is first enforceable.
- **Summary:** One sentence summary of the policy.
- **Scope:** Defines the boundaries and applicability of a policy, clarifying who and/or what the policy covers. It outlines the specific situations, individuals, buildings, or programs to which the policy applies, as well as any exceptions or limitations. Essentially, it answers the question of "what" the policy addresses and "who" it affects.

Policy Owner or Contact

The Policy Owner is the individual employee designated by the Responsible Official as responsible for interpreting and responding to questions about the policy and acting as the point of contact when revisions are necessary. Consider the contacts listed within the context of the intended audience's needs. If different sections are best addressed by different contacts, list the various contacts and the types of questions they should be called about.

Summary (can be called Overview or Purpose)

Briefly describe the reason the policy was issued, what information it contains, and which populations are affected by it. Include the legal, regulatory, financial, operational, accreditation, technological, or social requirements that this policy addresses. Do not restate policy. Instead, reference the source of authority and/or existing policy briefly, ideally in three or fewer sentences. A concise summary of the objectives of the policy may be included if it helps to clarify the subject matter. Do not describe *how* the policy is carried out.

Definitions

Include definitions of terms used frequently throughout the policy that would increase the reader's understanding (e.g., technical, uncommon, specific to this policy) in alphabetical order.

- Avoid defining common terms unless the common term has a specific and/or non-conventional use within the policy.

- Terms appearing only once in the document should be omitted from the definitions section and defined where the term appears.
- Capitalizing defined terms throughout the body of the text is a legal writing style that ensures the reader will refer to the specific meaning within the context of policy, and not the reader’s own convention.
- If there are no Definitions, the section may be deleted.

Policy Text

Describe the core purpose or governing principle of the policy. The policy statement(s) should be brief and supplemented by the information within the rest of the document. The policy text should be a high-level overview stating ***what*** we do.

Details related to ***how*** the policy is carried out should be included in the Procedures section.

Details related to ***who*** carries out the policy should be included in the Responsibilities section.

This section only applies if you are writing a policy; otherwise, the section may be deleted.

Procedures

Procedures describe ***how*** the policy is implemented, organized for ease of use with a series of consecutive action steps. The action steps should clearly and accurately describe the process and responsibilities required to accomplish tasks governed by the policy.

- Clearly describe, in logical order, the high-level required action steps that must be followed to ensure compliance.
- Use plain language and active voice. For example, rather than saying “the letter is sent to the employee,” say “the manager sends the letter to the employee.”
- Present complex procedures in outline format, as provided in the template.
- Provide links to applicable resources, processes, guidelines, electronic systems, or forms that are related to the procedure.
- If there is a procedure for requesting exceptions to the policy, include it here.
- If there is a procedure for the resolution of conflicts related to the policy, include it here.
- If there are no procedures, “Not Applicable” may be noted.

- Word choice in this section can significantly impact 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.

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.

Roles and Responsibilities

This section is organized by the position, department, or committee that has specific responsibilities for maintaining compliance with the policy. It often describes positions that hold approval authorities, and the responsibilities employees have to provide information, complete reports, or otherwise act to maintain compliance. Ensure all roles and responsibilities mentioned in other sections of the policy are also referenced here, preferably in general terms.

References and Resources

- List the sources upon which the policy is based, including Federal and State laws, systemwide policies, and other UC Merced policies or Delegations of Authority.

- List other policies that are related to or referenced within the policy.

- List relevant resources, considering the needs of the intended audience, such as related websites, guidance documents, and forms.

- When applicable, include links to Frequently Asked Questions (FAQ) for the policy. FAQ can be added as a section to the policy but may be better maintained on a website where they can be updated more frequently than a policy.

Appendix

Certain supplemental information may be included in the appendix if desired, such as flow charts. Appendices are intended as supplemental information and should not be relied upon to convey significant policy information.

As a standard, forms, guidelines, and other supplemental information are maintained on the Responsible Office’s website and linked to from the reference section, rather than as an appendix item. By maintaining this information separately, the department can more easily update it when necessary.

Modifying the Standard Structure

The closer you are to the standard structure, the easier it will be for users to find the information they need. However, there are occasions where you may need to add different sections/headings to the policy to increase ease of use.

- Whenever adding a section to the policy, it should be something that identifies a significant aspect of the policy. Headings should describe the information that follows.
- All section headings should be of equal importance within the policy as a whole.
- No matter how many sections you determine you need to clearly communicate your policy, you should retain the outline structure. 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 policy.

Application of an Equity Lens

It is essential to conduct a thorough and impartial analysis of the policy's design and implementation, focusing on its impact on underserved and marginalized individuals and groups, to identify and potentially eliminate barriers. 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) 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 are all 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.

Role and Responsibilities: 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?

Procedures: Are there individuals and/or communities that will be disproportionately and negatively affected by 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?

Policy Checklist

Policy Owners and Writers should review this checklist before writing a policy, as some of the best practices mentioned here are not covered elsewhere in this guidance. They should also review the policy against this checklist before initiating the Review and Consultation process and again before proceeding to Finalization and Approval.

- Adherence to the standard structure and the policy template.
- Title is concise and updated in the footer and document information. In Word, you can find the document information under File>Info.
- Policy Owner or other contact information is accurate and complete.
- Consistent use of styles – no rogue or mismatched formatting.
- Information is included in appropriate sections. For example (but not limited to):
    - Procedural information and responsibilities should not be articulated in the Summary.
    - Responsibilities may be mentioned in the Procedure section but should also be clearly articulated in the Responsibilities section.
- Abbreviations should be spelled out at least once, with their abbreviations in parentheses: For example: “Chief Ethics and Compliance Officer (CECO)” – and then the abbreviation “CECO” should be used throughout, as appropriate.
- Defined terms should:
    - align with other University policies and procedures.
    - be defined inline if they are used only once in the document.
    - be capitalized throughout the document.
    - be used throughout the document without repeating the definition.
      For example: When “Employees” is the defined term; don’t say “Employees including staff and faculty” every time the term is used.
    - not be defined if they are not used within the document.
- Use of capitalization
    - Defined terms should be capitalized throughout
    - When referencing the University of California, “University” should be capitalized. When referencing our campus, “university” should be lower-case.
    - When referencing itself, “Policy” should be capitalized. When referencing other policies, “policy” should not be capitalized.

- Correct and consistent spelling of titles and referenced documents. Check the directory to be sure of a person's title. Use a consistent format.
    - For example: VC or AVC for the Basket Office and Chief Basket Weaver
    - We recommend spelling out regulatory agencies and codes, except when it is a commonly used UC reference.
        - California Vehicle Code rather than CVC
        - "PPSM-XX: Title of Policy" without needing to spell out PPSM (but note the placement of the dash and colon and keep it consistent).
- Delegated vs designated. Always use "designated" unless the source of authority is based on a Presidential Delegation of Authority.
- Readability and Consistency
    - Is the policy using active voice, or might it be unnecessarily vague?
    - Is there missing information, such as references to forms or other processes?
    - Is there contradictory information or other clarification needed?
    - Are there unanswered questions that can be clarified?

Review and Consultation

The consultation process is crucial in policy development because it provides a mechanism for incorporating diverse perspectives, enhancing transparency, and enhancing the effectiveness and legitimacy of policies. Policy owners and writers should work closely with their DPC throughout the consultation process, and both should feel free to seek further guidance from the Policy Office. The consultation process involves three groups:

1. **Stakeholder Review (2-4 weeks).** Consult professionals who have related expertise and/or substantive interest in the policy or its implementation (e.g., impacted units).

   While it is essential to discuss proposed policies with potentially impacted stakeholders early in the drafting process, these stakeholders should be among the first to view and react to the more developed draft. The policy owner or writer coordinates this review. Feel free to use the sample Request for Review below and please copy policy@ucmerced.edu.

2. **Standard Reviewers (2-4 weeks).** Consult Campus Counsel, CPAC, Employee/Labor Relations, Ethics & Compliance, and Internal Audit. These reviewers will review through a lens related to their areas of expertise. The Policy Office will coordinate this period and will provide feedback to you.

3. **Campus Comment Period and Academic Senate Review (30-60-day).** This period allows all employees to weigh in on the policy, providing broad perspective for consideration. The Policy Office will coordinate this period and will provide feedback to you.

Sample Request for Review (for Stakeholders and Standard Reviewers)

Always provide a clean copy of the draft for each review stage. Expand on the reviewers below as appropriate – it is normal to have 3-10 reviewers listed for stakeholder review.

Dear Colleagues,

In preparation for campus-wide review, the proposed UC Merced policy on ***<policy title>*** needs to be vetted by your department or functional area.

<Policy Summary and Scope>

Your review of this policy is requested no later than **<date 2-4 weeks from your send date, adjust as needed>.** Please provide feedback using the comment feature within Word or by replying to this email (please do not reply all). Due to the time-sensitivity of this request, your lack of response will be acknowledged as your acceptance of the policy with no further feedback. Below, I have listed the individuals asked to participate in this review. Please feel free to share with other interested parties within your organization.

- **<department>** <Individual Name(s)>
- **<department>** <Individual Name(s)>
- <name of committee> (All Members)
- Assistant Vice Chancellor for <highly impacted group> <Name>

Your support in this process is appreciated. If you have any questions or concerns, please do not hesitate to contact me.

<signed and sent by policy owner/writer or DPC>

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Addressing Comments

Between each set of review steps, consider comments and update the draft policy appropriately, using track changes. Then save a clean version for the next review step. Keep track of the types of feedback you receive and the types of updates you make in response, as well as a brief explanation for why changes will not be made in response to certain feedback. This will advise the Summary of Feedback you'll prepare during Finalization and Approval.

Campus feedback won't change the substance of policies, especially when there are higher sources of authority such as laws, regulations, and systemwide policies. We can be stricter than these higher sources of authority, but not more permissive. The consultation period is meant to provide the policy writer with feedback on areas of confusion and concern. We want to make a good faith effort to enable constituents to provide feedback and, where appropriate, incorporate revisions to address relevant concerns.

You are not required to adopt non-technical suggestions, but you are required to consider them. Requests for clarification should be accommodated.

Review the guidance above, particularly the Review Checklist, to ensure your policy is complete and ready. Share your final draft with your DPC for a final review before sending it to the Policy Office.

Finalization and Approval

The policy owner or writer should prepare the following documents in coordination with their DPC, who will share the documents with the Responsible Official and seek approval to issue.

- **Draft Proposed Policy.** Clean copy, ready to post online and issue.
- **Summary of Feedback.** A high-level summary of changes made to the proposed policy in response to feedback from the review periods. This will be used within the issuance letter. In some cases, you may want to share this information with Academic Senate.
- **Draft Issuance Letter.** Template below. Feel free to edit, but be sure to include elements such as effective date, summary, scope, and if revised, a high-level list of revisions.

> Dear Colleagues:
>
> I am issuing the UC Merced policy on ***<title of policy>***.
>
> <description and scope of policy. If issuing a revised policy include description of revisions>

The policy is effective as of <effective date>, and can be found at <link to policies webpage or the policy itself>.

<for interim policies: Employees who wish to provide feedback on the interim policy can do so through this anonymous survey by <feedback deadline>.>

Sincerely,

<Name of Responsible Official>

<Title of Responsible Official>

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Issuance and Implementation

Once the Responsible Official has approved the policy for issuance, the DPC will forward the approval to the Policy Office. The Policy Office will make final updates to the policy (update issuance/effective dates, perform a final review for formatting/best practices, remove draft marks, etc.), post the policy on the policies website, and notify the DPC to proceed with issuance.

The DPC then ensures the Responsible Official sends the issuance letter to Cabinet to officially announce the issuance of a UC Merced Policy, copying policy@ucmerced.edu, the DPC, and the policy owner or writer.

The policy owner or writer can now execute their communications and/or training plans at their own discretion. Examples of methods of communication, including but not limited to:

- Create a message outlining the policy’s purpose, its impact, and how it benefits the target audiences. Use the message to share the issuance letter with all who provided feedback during drafting and stakeholder reviews, as well as individuals, departments, or committees with an interest in the policy, or who can help implement the policy, or amplify the messaging.

- Provide training on how to comply with the policy. Customize the training to each disparate audience, if appropriate.

Reviewing and Updating the Policy

The policy review process is crucial for effective policy development because it ensures policies remain relevant, effective, and aligned with organizational goals and legal requirements. Regular reviews help identify outdated or ineffective policies, leading to necessary updates and improvements, ultimately minimizing risks and maximizing policy effectiveness. Outdated policies can expose organizations to legal penalties, data breaches, and reputational damage.

The Policy Office recommends reviewing policies every 2-5 years and when there is a change to the source of authority (for policies based on policy or laws).

Please notify your Divisional Policy Contact if you are considering updating a policy.

If you do not have a Word version of the policy, check with the Policy Office, as they may have a copy available. If you are unable to find a Word version, you'll need to adapt or export from PDF to Word. This should be done with care as the formatting and text may be corrupted during the process. Use styles to correct formatting issues and spellcheck to find corrupted text.

When updating a policy, especially older policies, be sure to apply the guidance provided in this document to ensure the policy complies with current expectations. Don't hesitate to dig deeply into a policy written by a colleague, someone who preceded you, or your younger self. Our campus is still young but quickly evolving and what worked for us before may not work as well for us in the future.

Technical Changes vs Substantive Changes

Technical changes will not typically require review and consultation; however, they still require approval by the Responsible Official. Technical changes are typically minor adjustments, corrections, or improvements that don't alter the core meaning or substance. This may include updates to names, titles, and contact information, as well as corrections for typos, grammatical mistakes, and other adjustments that enhance clarity without altering the core meaning or intent of the policy. Updating rule or statutory references due to external changes, or changing agency names in a document to reflect a new name established by law, may also be considered technical changes.

Substantive changes typically require a full review and consultation process, as well as approval and issuance by the Responsible Official. Substantive changes are significant modifications that alter the core meaning, intent, application, or results of the policy.

Questions or comments may be sent to the Policy Office policy@ucmerced.edu.