# UC Policy Owner Guidebook

**Contact:** Ian Harazduk Email:

**Title:** Systemwide Policy Manager ian.harazduk@ucop.edu

(510) 987-9263 Phone:

# **Table of Contents**

Introduction	2
Presidential Policy Process	2
Chapter 1: Policy Initiation	2
How to Get Started	2
Policy Action Types	3
Policy Action Form	4
Chapter 2: Policy Drafting and Development	5
Policy Template	5
Characteristics of a Well-Written Policy Document	8
Policy Impacts	8
Chapter 3: Consultation Process	10
Stakeholders	10
Required Reviewers	10
Systemwide Comment Period	11
Chapter 4: Final Approval Process	12
Policy Advisory Committee (PAC)	12
Technical/Compliance with Law Revisions	13
Final Approval	13
Chapter 5: Dissemination and Training	14
Publication and Dissemination	14
Training	15
Chapter 6: Additional Resources	15
Accessibility	15
Policy Toolkit	15

## Introduction

This guide is designed to assist University of California Office of the President (UCOP) Policy Owners with developing, drafting, and maintaining their policies in accordance with the UC Policy on Developing and Maintaining Presidential Policies ("Policy on Policies"). The guide details the process for reviewing and approving Presidential Policies and serves as a resource by anyone who develops or revises Presidential Policies for their office/division. It is also beneficial for individuals, including Policy Advisory Committee (PAC) members, who are responsible for reviewing and approving Presidential Policies.

### **Presidential Policy Process**

The Presidential Policy Process is used for developing and maintaining policies that are under the administration of the UC President. There are also policies maintained by the Regents (i.e., Regents Policies) and by Systemwide Academic Personnel (i.e., Academic Personnel Manual [APM]), each with separate processes from the Presidential Policy process.

Several policy actions can occur under the Presidential Policy process, including issuance of new policies, policy revisions, policy rescissions, and interim policies. This guide will provide an overview of the steps involved, policy initiation, policy drafting and development, consultation process, the systemwide comment period, approval process, and dissemination and training.

# Chapter 1: Policy Initiation

### How to Get Started

Before drafting a policy, it is important to do thorough research and gather necessary information. Focus your preparation on the necessary policy statements and directives for the Presidential Policy. Is the policy being developed or revised in response to a changing systemwide risk, new operational circumstance, or state or federal regulations? Determine the purpose of the policy and ensure that it will be clear to Stakeholders and locations.

It is important to differentiate between information that will need to be in the Presidential Policy and information that might be more appropriately included in a supplemental document, such as a procedure or guideline. Presidential Policies are governing directives that mandate or constrain actions. While a Policy may include a Procedure section, there may be a need for a detailed description of how to conduct activities related to a Policy, which may be more suitable in a separate procedural document. In addition, locations may develop location-specific procedures that provide additional information about implementing a Presidential Policy at that location. Related best practices or supplemental materials may be better maintained in a guideline or guidebook (such as this one).

When initiating a policy action, it is important to think through the following items:

- Review the <u>UC Policy on Policies</u> and associated <u>Policy Development Resources</u>.
- Determine the correct policy action—new policy, policy revision (substantive, technical, or compliance with law), policy rescission, or interim policy.
- If the policy is developed or revised because of state or federal law, ensure that you have that language available for your review.

- Review any related policy content within UC, including Regents Policies, Academic Personnel Manual (APM) or UC locations. Benchmark against other higher education institutions/systems or industry policies.
- Plan your consultation process in advance, including which subject matter experts will need to advise in the drafting process and when to engage with Required Reviewers.
- Reach out to the University Policy Office for any assistance with completing the Policy Action
  Form, including determining the appropriate Stakeholders for the Policy, the policy process, and
  timeframes of completing the action.

### Policy Action Types

There are several types of actions to initiate, revise, or rescind a Policy in the Presidential Policy process. This section provides an overview of the policy action types. The process for completing these actions will be detailed throughout this guidebook.

### New Policy

A new Presidential Policy is one that has not previously been issued by the UC President. It may be necessary for a new policy topic, a subject that was previously included in guidance or other documents, or when a new Policy is needed to consolidate or replace language within other Presidential Policies. A new Presidential Policy must complete the entire Presidential Policy process.

#### Substantive Revision

A Substantive Revision policy action occurs when an existing Presidential Policy requires significant changes to its content, mandates, or principles that materially changes the intent, directive, scope, impacts, or substance of the Policy. To determine whether changes to a policy constitute a Substantive Revision, the Policy Owner must consult with the University Policy Office (UPO). A Substantive Revision to a Presidential Policy must complete the entire Presidential Policy process.

#### Technical Revision

A Technical Revision policy action occurs when an existing Presidential Policy requires changes that do not materially alter the intent or directive of the policy. These include changes due to University Presidential reorganization, updating contact information, correcting links, typographical amendments, clarifying language, changes to legal code numbering, or a change of the Responsible Office. The Policy Owner must consult with the UPO to determine that the changes are technical. A Technical Revision to a Presidential Policy does not require the completion of the entire Presidential Policy process, but rather Responsible Officer approval, and PAC notification.

### Compliance with Law Revision

A Compliance with Law Revision policy action occurs when an existing Presidential Policy requires changes to its content, mandates, or principles to ensure adherence to legal requirements, rules, or regulations. The Policy Owner must consult with the UPO to determine that the changes constitute a Compliance with Law Revision. A Compliance with Law Revision to a Presidential Policy does not require the completion of the entire Presidential Policy process, but rather UC Legal consultation, Responsible Officer approval, and PAC notification.

### Rescission

A Rescission policy action is the decommissioning of a Presidential Policy (either in whole or in part) that is no longer needed or where content has been incorporated into another policy or document. When a Presidential Policy becomes unnecessary or the subject matter no longer requires the structure of a formal policy, a Rescission policy action may be needed. The Rescission of a Presidential Policy requires the completion of the entire Presidential Policy process.

### Interim Policy

In rare circumstances, a new or substantively revised policy action may be unable to complete the Presidential Policy process due to extenuating circumstances, such as an imminent deadline for issuance. In these cases, an Interim Policy may be issued in an expedited manner. The expedited process requires the Policy Owner to consult with Required Reviewers, receive PAC final approval, and the final Approval Process (see Chapter 4). Following issuance of the Interim Policy, the Presidential Policy process must be completed, ideally within two years of the issuance.

### Policy Action Form

The <u>Policy Action Form</u> is a required document that must be completed by the Policy Owner throughout the Presidential Policy process for each policy action. The Policy Action Form has three sections, which need to be completed at specific points during the Presidential Policy process, as necessary.

### **Section I: Policy Review**

The Policy Review section is completed upon initiation of any policy action. Before the policy development begins, the Policy Owner consults with the UPO to discuss the policy action, and the consultation required. The Policy Owner must have approval from their Division Leadership to move forward with the next steps of the process. <a href="Note">Note</a>: This step is necessary to ensure that senior leadership is both aware and supportive of the policy actions in their divisions/units to prevent unnecessary time spent on actions that lack leadership support.

This section of the Policy Action Form can be completed by either the Policy Owner or the UPO. After the type of policy action is determined, the Policy Owner plans the consultation process which involves engaging with Required Reviewers, UC Legal (as necessary), and Stakeholders (such as subject matter experts, high-interest constituents, and any other members of the UC community). The consultation plan is documented in Appendix A of the form).

### **Section II: Policy Development/Revision Process**

The Policy Owner completes the next section of the Policy Action Form once they have completed their drafting and consultation of the proposed Policy.

If the policy action is a New Policy, Substantive Revision, Interim Policy, or Rescission, then this section of the form should include any major discussion topics or areas of disagreement that arose during the Policy Development Process. The Policy Owner should also include the potential policy action impacts (see Chapter 2). The Policy Owner completes the chart in Appendix A with the specific individuals/groups consulted, and the dates consultations were completed.

If the policy action is a Compliance with Law Revision, Technical Revision, or policy-related procedure or guideline, then the Policy Owner summarizes the draft preparation process and completes Appendix A to include consultation that occurred with these policy actions.

Following completion of Section II, the Policy Action Form is sent to PAC to review the form and the accompanying proposed policy documents.

### **Section III: Systemwide Comment Period Feedback**

The Policy Owner must complete Section III of the form upon completion of the Systemwide Comment Period, if required for the policy action. The Policy Owner summarizes the feedback received during the Systemwide Comment Period on the form and indicates any changes to the proposed policy action due to feedback or other factors. The Policy Owner must receive approval from the Responsible Officer and the Division Leader of the proposed policy action (who may be the same individual) at this point in the process.

Following completion of Section III, the Policy Action Form is sent again to the PAC to review the form and the accompanying proposed policy documents. This is the final approval stage for the PAC. The completed form will be transmitted by the UPO to UC Legal, senior leadership, and the President Executive's Office (PEO) for the policy action to receive final approval before issuance by the President.

# Chapter 2: Policy Drafting and Development

Upon receiving Division Leadership approval of the initiation of a policy action, the Policy Owner begins the drafting and development of the proposed Policy. The Presidential Policy is drafted using the standard Policy Template as described below. This chapter also discusses the characteristics of a well-written policy document. Throughout the development process, the Policy Owner considers the potential Policy impacts on the UC community.

The drafting and development process for any Policy needs to be tailored to meet the specific requirements of that policy action. It is important to engage interested parties as early as possible. In certain circumstances the consultation process (see Chapter 3) may need to be in conjunction with the drafting and development process. Another approach would be to have an iterative Policy drafting process where the Policy Owner collaborates with key Stakeholders and/or Required Reviewers to resolve any concerns raised as the Policy is developed. For complex new or revised Presidential Policies, a working and/or writing group may be formed with a diverse set of individuals. The group may include some Stakeholders or Required Reviewers to help with the development of the Policy by addressing various aspects such as legal and compliance requirements, location implementation issues, equity concerns, and operational limitations, among others.

### Policy Template

The UPO has developed a standard template for Presidential Policies. The template is available within the <u>Policy Toolkit</u> on the UPO website. The template uses standardized formatting for easy transition from a Word document to publishing on the web. The template streamlines the review and approval process and ensures accessibility of the Policy.

### Structure of the Policy Document

The Presidential Policy template is structured to assist the reader to find the relevant information. The policy template is divided into the following sections for consistency:

#### Header

Many Policies include a policy number, and each Policy includes a title. The policy title should be as concise as possible and identify the main purpose of the Policy.

Policies may include an alphanumerical title, which indicates that they are part of a particular manual (e.g., Accounting Manual (AM); Personnel Policies for Staff Members (PPSM); Policies Applying to Campus Activities, Organizations and Students (PACAOS); Business and Finance Bulletins (BFB)).

The header includes the Responsible Office, which is the office/division designated by the President to be responsible for the Policy. The Responsible Officer is the senior-level position within the Responsible Office with responsibility for the Policy.

The header also includes the Issuance Date and Effective Date. The Issuance Date is the date of the Issuance Letter for the new or revised Policy and the Effective Date is the date that version of the Policy is first enforceable. Note: Some Policies may still include the Last Review Date. As of the issuance of the revised Policy on Policies (ver. July 2023), this date is no longer needed as the Revision History section now provides details regarding the Policy's review history.

The header should also include the scope, which defines the intended audience to which the Presidential Policy applies and may include both individuals and locations.

Each Policy includes a Policy Owner and their contact information. The Policy Owner is the individual (by position) or office designated by the Responsible Officer to serve as the subject matter expert for the Presidential Policy and is responsible for interpreting and responding to questions about the Policy.

### I. Policy Summary

Briefly summarize the information covered in the policy and its purpose. Inform readers why the policy was issued, and the information that will be included. If applicable, the summary should include the legal, regulatory, financial, operation, accreditation, technological, and/or social requirements that the policy addresses.

#### II. Definitions

Terms used frequently throughout the Policy that would increase the reader's understanding (e.g., technical, uncommon, or specific to the policy) should be in alphabetical order. Defined terms should be capitalized in the body of the Policy to highlight that the term is defined. If a term is used only once or in a limited manner, then the term can be defined in the body of the Policy.

### III. Policy Text

The policy text is the main text of the Policy that states the governing directives that guide actions. It should be clear and concise and supplemented by information within the rest of the Policy. Procedures should be included in a separate section.

### IV. Compliance/Responsibilities

This section is organized by position, unit, or committee that has required responsibilities in maintaining compliance with a portion of or all of the Policy. It may describe the membership of committees, position(s) that hold approval authorities (and potential delegated authority), and the

responsibilities that employees may have to provide information, complete reports, or otherwise act to maintain compliance. It may provide the position(s) responsible for implementing and enforcing the Policy and those responsible for providing interpretation and clarification about the Policy.

### V. Procedures

Procedures describe the high-level required action steps that must be followed by all applicable locations to ensure compliance. Procedures outline the required process for implementing the Policy. They should be organized for ease of use with a series of consecutive action steps. The actions steps included in this section should clearly and accurately describe the process and responsibilities for accomplishing tasks governed by the Policy. Some Policies may require multiple procedure headings for different tasks.

Detailed process steps that frequently change or are specific to a particular location should not be included in the Policy. Guidelines or best practices not required should also not be included in the Policy (though they may be included in local procedures). Supplemental procedures or guidelines should be provided in separate documents and can be linked to the Policy for ease of reference. If there are no procedures, this section will be labeled "Not applicable."

### VI. Related Information

This section includes links to any sources referenced in the Policy, such as other Presidential Policies, Delegations of Authority, federal or state laws, or other organizational documents. These organizational documents may be detailed procedures, guidelines, memos, or other supplemental materials that provide useful information to the reader. References should be in order of relevance and importance to the policy topic.

### VII. Frequently Asked Questions

This section is for instances where it is important to provide interpretations of the Presidential Policy that cannot be articulated in the Policy Text. It is intended to facilitate the reader to better understand a new or revised Presidential Policy. In some cases, there may be extensive questions or guidance needed, which may be better to link to a separate document. FAQs often provide examples of how the Policy may be applied in specific circumstances.

If there are no Frequently Asked Questions, this section will be labeled "Not Applicable."

### VIII. Revision History

The language "This Policy is also reformatted to meet Web Content Accessibility Guidelines (WCAG) 2.0" should be included in this section.

The Revision History section is a record of changes, by date, for the Presidential Policy. For a new policy, indicate on the first line that this is a new policy as of the date issued. If it is a revision to the Policy, the revision history briefly describes the changes from the previous version.

Revisions are listed in reverse chronological order, with the most recent change at the top and the initial issuance at the bottom.

### IX. Appendix

This section is optional. Supplemental information may be attached to the Policy to ensure that there is clear implementation of the Policy. These appendices may be forms, flow charts, processes, lists, or other pertinent information.

However, if these documents may change more frequently than the Policy, it is better to link to them in the Related Information section and maintain them outside of the Policy.

### Characteristics of a Well-Written Policy Document

Presidential Policies are intended to be practical, administrative documents that clearly indicate governing directives that mandate or constrain actions of members of the UC community. Each Presidential Policy should be developed, written, and updated with the location and the end-user in mind. Presidential Policies should be:

- Written so that they are easy to understand, using simple, clear, concise language (i.e., Plain Language following the <u>UC Style Guide</u>).
- Written with the application of an equity lens with considerations on the potential disparate impact on under-served marginalized groups.
- Written assuming basic knowledge of the University, but novice knowledge of the specific policy topic 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 be doing when looking for information.
- Provide accurate contact information for users who may have questions or situations that fall outside of the normal situation.
- Aligned with related policies, missions, and goals.
- Reviewed regularly (per the required revision cycle) and updated as needed to provide appropriate direction to the University community.

### **Policy Impacts**

The Policy Action Form requires that the Policy Owner include the potential impacts of the Presidential Policy on the UC community, such as the financial, operational, and other impacts. When drafting the Policy, the Policy Owner should consider the potential impacts that the Policy may have on the community. On the Policy Action Form, the Policy Owner includes sufficient information to ensure that the UPO, PAC, senior-level executives, and the President have a clear understanding of how the Policy may impact the finances and operations of the system and University locations. There is no need to provide a separate detailed financial or operational impact analysis unless requested by leadership.

### Operational Impact

New or revised Presidential Policies often require operational changes to functions of the University or a location. In certain instances, a new unit or significant changes to a unit or function may be required to implement the Policy. There also may be new training requirements for employees or affiliates to successfully implement the Policy. During the consultation process, Stakeholders or Required Reviewers may indicate that a certain policy action has operational impacts.

### Financial Impact

Policy actions often have financial impacts on the University system or locations. It is important for the Policy Owner to identify and indicate these impacts in the Policy Action Form. The financial impacts may affect the budget, require additional resources, (previously described in the Operational Impact Section) or place a strain on existing resources. The Policy Owner consults with appropriate Stakeholders and Required Reviewers to determine the potential fiscal impact of the Policy. If there are already pledged or budgeted federal, state, or university funds associated with the implementation of the Policy, that information is described in this section.

### Other Impacts

There may be other potential impacts that the new or revised Policy has on the UC community. Some examples are equity, employee and labor relations, and regulatory impacts, which are described below. If there are other types of impacts, they are included in this section of the form.

### **Equity Impacts**

The Policy Owner should evaluate the Policy for disparate impacts. Consider the individuals and groups consulted with while developing or revising the Policy to ensure that process has been inclusive rather than exclusive.

In policy development, it is important to conduct a fair and impartial analysis on the impact of the design and implementation of a Presidential Policy on the diverse set of individuals and groups to whom the Policy applies, and to identify and eliminate barriers. A well-written policy document establishes direction and defines the intended audience. The Policy Owner should consider disproportionate or undesirable impacts on those who need to understand, apply, or follow its requirements and spell out how those impacts were addressed, if necessary. Below are questions to assist with this process:

- Who does the policy impact?
- Are there individuals/groups that are significantly affected by the policy action? If so, they should be included in the development process.
- 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)?
- Have gender-neutral language and lived or preferred names been incorporated?
- If disparities are identified, how can they be mitigated or eliminated?

It is important to design Policies with an equitable lens. Thinking through these questions can help ensure that the policy development process was completed equitably.

### **Employee and Labor Relations Impacts**

Employees are often the end users of Policies. The UC employs hundreds of thousands of employees in various categories, such as staff, students, and academic employees. Within each of these categories are various other sub-categories, such as full- or part-time employees, unionized employees, as well as an array of different appointments for staff and academic personnel. The Policy may also be applicable to volunteers, vendors, third parties, and other affiliates. Presidential Policies may apply to these various types of employees but may apply differently or have different processes for different groups.

The consultation process with Stakeholders and particularly Required Reviewers strives to ensure that each of these constituents is considered through the development process of a policy action. If the policy action will have important or varying impacts to these employment categories, then the Policy Owner clearly identifies these impacts in this section of the form.

### **Legal or Regulatory Impacts**

There are often legal or regulatory purposes for taking a policy action. There may be changes to local, state, or federal laws, rules, or regulations, which require changes in the UC policy landscape. This section should include how a particular policy action addresses a legal or regulatory change.

It is important to indicate when policy actions are occurring for the purposes of limiting a legal or regulatory risk. This may occur when regulators change interpretation of certain laws or rules and Policies must change to align with that new interpretation. Court rulings or audit findings may alter the University's interpretation of certain areas; and therefore, revisions are necessary.

# Chapter 3: Consultation Process

An essential part of the Presidential Policy process is the required consultation with Stakeholders, Required Reviewers, and the broader UC community through the Systemwide Comment Period. Consultation may occur before, during, or after the drafting and development of the policy action. A best practice is to ensure that interested parties who may have a major stake in the Policy are consulted early in the drafting and development process (see Chapter 2). Consultation may be required with these groups or individuals when only an outline or rough draft of the policy action has been developed. At the initiation of the policy action, the Policy Owner is required to plan their consultation process. The plan may change due to internal and external circumstances, but it is important that the necessary individuals be consulted on the policy action and that their feedback is considered in the development process.

### Stakeholders

Stakeholders are defined in the UC Policy on Policies as an individual or group within the UC system with subject matter expertise and/or substantive interest in a particular Presidential Policy or its implementation. These individuals and groups will change from Policy to Policy. Therefore, it is important that the Policy Owner identify Stakeholders during the Policy Review (Section I of the Policy Action Form). The plan to meet with and gather feedback from Stakeholders can occur in a strategic and efficient manner. There may be high interest constituents or subject matter experts who may be integral to the development process and will need to be consulted through the process. In other cases, there may be more peripheral constituents who only need to provide feedback when the policy draft is almost finalized.

Furthermore, there are certain units or entities in which it may be important to consult with during the Stakeholder consultation process. Please consider how the policy action will affect different UC locations, such as campuses, Academic Medical Centers, Agriculture and Natural Resources (ANR), and UC National Laboratories. There will likely be subject matter experts on campuses to consult with regarding a policy action. You may also reach out to the University Policy Office on how to connect with UC Health, ANR, and lab stakeholders.

### Required Reviewers

The UC Policy on Policies indicates four units/five offices that are required to be consulted for every new and substantively revised Presidential Policy. The plan for consulting with these constituents is best determined for each Presidential Policy. There may be challenges that affect academic personnel; and therefore, engaging with Systemwide Academic Personnel and the Academic Senate during the drafting stage may be necessary to gather their feedback and insights in the development stages. Alternatively,

there may be a policy that impacts unionized staff and may need engagement with Labor Relations early in the process. In some cases, policy actions may have minimal to no impact on a particular Required Reviewer unit/division, and the outreach may be as simple as asking whether they have any input on an almost finalized draft of the proposed Policy.

The UPO has compiled contacts for each of the Required Reviewers. These individuals are aware of their role in the Presidential Policy process and can assist with the required review for their unit/division:

Required Reviewer Units	Contacts	Email
Academic Senate	Monica Lin, Executive Director	Monica.Lin@ucop.edu
	Michael LaBriola, Assistant Director	Michael.LaBriola@ucop.edu
Systemwide Academic	Kelly Anders, Director	Kelly.Anders@ucop.edu
Personnel	Rebecca Woolston, Assistant Director	Rebecca.Woolston@ucop.edu
Systemwide Human	Abby Norris, Policy Specialist	Abigail.Norris@ucop.edu
Resources	Olga Zundel, Policy Specialist	Olga.Zundel@ucop.edu
	Aafia Ali Khan, Policy Specialist	aafia.alikhan@ucop.edu
Labor Relations	Matt Teaford, Labor Relations Director	Matthew.Teaford@ucop.edu
Graduate, Undergraduate	Tuanh Do, Executive Director	Tuanh.Do@ucop.edu
and Equity Affairs	Kimberly Peterson, Chief Policy Advisor	Kimberly.Peterson@ucop.edu

### **UC Legal – Office of General Counsel**

Many policy actions will require legal expertise to determine the specific language required for compliance with relevant laws and regulations. If a policy action involves legal requirements, it is important to consult the necessary expertise within UC Legal (or an external law firm if advised by UC Legal) during the consultation process.

### Systemwide Comment Period

The last step in the consultation process is the Systemwide Comment Period. The Policy Owner engages in this process when they have completed the consultation process with Stakeholders and Required Reviewers. The Policy Owner considers all feedback from the previous consultation processes and incorporates it, as necessary, into the proposed draft, and updates their Division Leadership if there have been major changes to the policy action during the consultation process.

For a proposed Presidential Policy to be distributed for Systemwide Comment, the policy action must be presented to PAC and receive formal approval by the committee before moving forward to the Systemwide Comment Period. The Policy Owner should now have completed Section II of the Policy Action Form. The Policy Owner must also have a final proposed draft of the Policy. If it is a revision from an existing Policy, the Policy Owner must also have the draft with tracked changes from the currently published version of the Policy. The Policy Owner should be prepared to provide a presentation to PAC that details the purpose of the policy action, the drafting and development process, the consultation process, and the potential policy impacts. This may be presented through a slide deck or a walk-through of the Policy Action Form.

Required Items for Submission to PAC:

1. Policy Action Form (completed through Section II)

- 2. Draft Proposed Policy (Clean version)
- 3. Draft Proposed Policy (Tracked Changes version), if applicable

Following PAC approval, the UPO works with the Policy Owner to connect with Systemwide Academic Personnel. The Systemwide Comment Period is managed by that office to ensure that the proposed policy is submitted to the Academic Senate as well as the broader UC Community. They will provide a template to the Policy Owner for a Systemwide Comment cover letter and a Model Communication document.

Required Items for Systemwide Comment:

- 1. Systemwide Comment Cover Letter
- 2. Draft Proposed Policy (Clean version)
- 3. Draft Proposed Policy (Tracked Changes version), if applicable
- 4. Model Communication

The Systemwide Comment Period is typically 90 days, with the majority of the comment period intended to take place during the academic year to allow sufficient time for the Academic Senate and other constituents to review the proposed Policy. In certain circumstances, the PAC may vote for an expedited Systemwide Comment Period (such as 30 or 60 days).

# Chapter 4: Final Approval Process

When the proposed Presidential Policy has completed the Systemwide Comment Period and any appropriate revisions have been made, the proposed draft will then require final approvals which includes a secondary PAC review, UC Legal approval, senior leadership notification for awareness, and submission to the President's Executive Office (PEO) for final signature by the President.

### Policy Advisory Committee (PAC)

#### **Systemwide Comment Feedback**

Following the Systemwide Comment Period, the Policy Owner compiles all feedback received. The Policy Owner reviews each comment and determines if any revisions to the proposed Policy need to be made. In some instances, and if feasible, it may be valuable to list each comment and specify its disposition. In other cases, comments may be grouped in major areas and described how or whether they will be addressed in policy language, supplemental documents, or other ways. For major Stakeholders, such as Student Organizations, Labor Relations, the Academic Senate, and other interested groups, it may be necessary to formally acknowledge comments received from these groups and indicate how these comments will be addressed.

The Policy Owner will need to make any necessary revisions to the proposed Policy and supplemental documents. Section III of the Policy Action Form needs to be completed to summarize the feedback received and changes to the policy action. When the proposed policy action is ready for final approval, the Policy Owner must receive approval from the Responsible Office and their Division Leader (if this is a different individual) and indicate that approval has been received on the Policy Action Form.

#### **PAC Final Approval**

Once, the proposed Policy has been approved by Division Leadership, the Policy Owner contacts the UPO to be added to the PAC agenda for final PAC approval.

Required Items for Submission to PAC:

- 1. Policy Action Form (completed through Section III)
- 2. Draft Proposed Policy (Clean version)
- 3. Draft Proposed Policy (Tracked Changes version), if applicable

PAC should receive these materials ten business days prior to the meeting, for sufficient time to review the materials. In preparation for the PAC meeting, the Policy Owner or designee should be prepared to discuss the policy development process and specifically the feedback received during the Systemwide Comment Period. This presentation is typically best achieved through a slide deck to the PAC. The Policy Owner or designee should also be prepared to answer any questions from the committee.

### Technical/Compliance with Law Revisions

Compliance with Law and Technical Revisions do not require PAC approval. After the Responsible Officer approves the revisions, they are submitted to the UPO for issuance. The Policy Owner must complete the Policy Action Form (Section I and applicable portions of Section II).

Required Items for Submission to UPO:

- 1. Policy Action Form (completed through Section II)
- 2. Draft Proposed Policy (Clean version)
- 3. Draft Proposed Policy (Tracked Changes version)

At the subsequent PAC meeting, the Policy Owner or a designee will notify the committee of the Technical or Compliance with Law Revision. If timing allows, the Policy Owner can take the revision to the committee to receive their feedback and provide awareness of the upcoming Policy revision.

### Final Approval

Following PAC final approval, the proposed policy action will move through final approval including UC Legal Approval, Senior Leadership awareness, and Presidential signature coordinated by the UPO.

PAC may require revisions to the proposed Policy. If so, the Policy Owner makes the necessary changes and sends the final clean Policy draft without tracked changes to the UPO to guide through the final approval process.

#### **UC Legal Approval**

The UPO coordinates submission of the Policy Action Form, Policy draft (clean and/or tracked changes), and any necessary supplemental documents to UC Legal for final review and approval. This review typically takes at least five business days. If comprehensive legal consultation occurred throughout the policy development process, this information should be documented on the Policy Action Form. This ensures that the UC Legal policy contact is aware about the prior consultation.

### **Senior Leadership Awareness**

Once UC Legal approves the proposed policy action, the Policy is sent for awareness to UCOP senior leadership. Specifically, the UPO submits the Policy Action Form, clean version of the Policy, and any

supplemental document(s) to the Executive President's Advisory Group (EPAG). This group is notified that the policy action will be issued (if signed by the President) imminently. The EPAG is not required to approve since the Division Leader of the Responsible Office approves the policy prior to final PAC approval.

#### **President's Executive Office Submission**

The UPO prepares the policy action for formal submission to the President's Executive Office (PEO). The UPO will reach out the Policy Owner to ensure that the following items are the final and correct items to submit for approval. The Policy Owner will need to provide language for the Issuance Letter to be signed by the President. In some cases, if the President is approving multiple Policies at the same time, the UPO may combine the language for those policies into one Issuance Letter.

Required Items for Submission to PEO:

- 1. PEO Cover Memo
- 2. Issuance Letter
- 3. Policy Action Form
- 4. Draft Proposed Policy (Clean version)

The PEO completes the document with Presidential signature typically in 3-5 business days at a minimum. If the PEO has questions, they will communicate with the UPO, who will coordinate with the Policy Owner, if necessary. The PEO returns the signed Issuance Letter to the UPO, to finalize, publish, and disseminate the policy (see Chapter 5).

# Chapter 5: Dissemination and Training

This Chapter focuses on the finalization, publication, dissemination, and any necessary training following approval of a Presidential Policy.

### Publication and Dissemination

The UPO finalizes and publishes all Presidential Policies. Once the UPO receives the signed Issuance Letter from the PEO, the UPO conducts a final accessibility review of the Presidential Policy document. The final version of the Policy is published on the Presidential Policy website: <a href="https://policy.ucop.edu/">https://policy.ucop.edu/</a>. The Issuance Letter and Presidential Policy (and any accompanying supplemental document, such as FAQs) are distributed via email to the Chancellors, Berkeley National Laboratory Director, Vice President of ANR, UCOP Division Leaders, Systemwide Academic Senate Chair, the Campus Policy Managers, the Policy Owner, and any other named parties in the Issuance Letter.

The Responsible Office and Policy Owner further distribute the Policy to all necessary Stakeholders. The Policy Owner ensures that any groups or individuals consulted during the development process receive the Policy issuance communication.

There are other methods to disseminate a Presidential Policy to necessary UC community members. Campus Policy Managers may have a local process for distributing Presidential Policies to their location. Any systemwide work groups or committees established may communicate updates regarding a particular policy topic to its members or location. In other cases, for particularly important or noteworthy issuances of Policy, the Policy Owner may work with External Relations & Communications

to create a communication plan to ensure that the UC community and other interested parties are made aware of the issuance. This may involve the drafting of articles in UC or UCOP newsletters, targeted email communication to key Stakeholders, notification to the UC Regents or UC Senior Leadership, or distribution to external media sources.

### **Training**

An important part of implementing a Presidential Policy is to ensure that individuals responsible for enforcing and complying with the Policies are informed of the new or revised Policy and its implications. First, the Policy must be communicated to the individuals described above. There is often a need to provide additional training and guidance on policy topics. The Policy Owner, in addition to disseminating the Policy and developing a communication plan, should also assess whether it is necessary to create training materials to effectively implement the Policy across the UC system. In some cases, systemwide training is required for the UC community (e.g., Sexual Violence and Sexual Harassment Policy).

Trainings may be in different forms or approaches, such as FAQs, form templates, guidance documents, in-person or virtual presentations, job aids, just-in-time training aids, self-paced assessments, or professionally produced slides or videos, etc. Locations may create location-based trainings to fit the needs of their community.

There are resources within the UC system to assist with creating training materials on policy topics such as the University of California Risk & Safety Training Center of Excellence.

# Chapter 6: Additional Resources

There are additional resources that can assist a Policy Owner in drafting, developing, and moving their policy actions through the process.

### Accessibility

The Policy Template is structed to ensure that all Presidential Policies meet web accessibility requirements. However, when electronic documents are edited by numerous individuals and if the policy document contains tables, charts, and subheadings, the document can often become inaccessible. The Policy Owner must review the document prior to final submission to verify that it meets the standards of web accessibility. For guidance and tips regarding web accessibility, please visit the ITS Electronic Accessibility Standards & Best Practices page.

### Policy Toolkit

Additional resources to assist Policy Owners and other interested parties on developing, reviewing, and approving Presidential Policies are available on the UPO <u>Policy Toolkit</u> page. The toolkit includes the following documents:

- Policy Template
- Policy Action Form
- Frequently Asked Questions
- Policy Process Overview and Policy Action Approval Processes
- Policy Comparison Matrix
- Policy Style Guide
- Policy URL Guide

Many of these resources, such as the Policy Template and Policy Action Form are described in detail above. If you have any questions regarding the Presidential Policy process, please contact the <u>University Policy Office (UPO)</u>.