



VCU

Integrity and Compliance

Policy Review Checklist

Policy Template

All policies should be in the current [Policy Template](#).

- Yes, in the current Policy Template
- No, needs to be put into current Policy Template
- Check footer for policy title and approval date

Policy Title

- Expresses the purpose and description of the policy
- Should not include "Virginia Commonwealth University" or "VCU" since this is in the header of the Policy Template
- Should not include "Policy"

Policy Type

- Board of Visitors – addresses matters of university governance and/or requires BOV to take an action item (such as a vote to approve something)
- Administrative – addresses universitywide operational expectations and/or compliance with applicable laws, regulations, policies and procedures
- Interim – provisional administrative or BOV policy that fulfills an urgent need such as such as when required by accreditation, legal, regulatory, or remedial actions
- Local – meets the unique needs of, and generally applies to or affects, one unit, division, department or school

Responsible Office

- The office that is responsible for developing and implementing the policy, including ensuring accuracy of the subject matter, training appropriate audiences, enforcing and monitoring compliance with the policy, and timely review. Includes the name of the unit and the name of the office in which the unit is located (e.g., Procurement Services, Office of the Vice President for Finance and Budget).

Initial Policy Approved

- Revised policy - verify the initial approval date with the ICO policy tracker and Revision History section of policy.
- New policy - there will not be an initial approval date entered on the draft. Once approved, the approval date must be entered on the policy and should not change with any subsequent revisions.

Current Revision Approved

- Revised policy - for policies being revised as a result of triennial review, enter the date that the revised policy receives final approval. For all other revisions (not resulting from triennial review), do not change the revision date since the triennial review period is still in effect, but include date of revision in the Revision History (e.g., date and policy title with brief description of minor revision).
- New policy - there will not be a revision date entered until the policy is approved – the initial approval date and revision date should match.

Policy Statement and Purpose

- Describes the purpose, key requirements and expectations of the policy
- Move procedural steps to Policy Specifics and Procedures section
- Concludes with the noncompliance/non-retaliation policy statement:

Noncompliance with this policy may result in disciplinary action up to and including termination. VCU supports an environment free from retaliation. Retaliation against any employee who brings forth a good faith concern, asks a clarifying question, or participates in an investigation is prohibited.

Table of Contents

- Ensure page numbers are correct

Who Should Know This Policy

- Evaluate the primary groups that need to know and/or follow this policy
- Does not use “faculty and staff” as separate entities; instead uses “employees (including faculty)”

Definitions

- Should be limited to key words/terms that are unique/have specialized meaning to this policy
- Place definitions in alphabetical order
- Should not include any “hidden” requirements or procedures

- Policy Glossary - Determine if definitions are consistent with Policy Glossary. If not, ask why and advise that glossary definition should be used unless there's a compelling reason not to.
- If there are no definitions, it states "There are no definitions associated with this policy and procedures."

Contacts

Include the name of the unit and the name of the office in which the unit is located (e.g., Procurement Services, Office of the Vice President for Finance and Budget) that is responsible for interpreting and revising the policy and answering questions about the policy. Also include the title/position of the individual whom to contact (but does not include individual's name or individual's contact information).

- Evaluate the unit/office for appropriate responsibility regarding this policy

Policy Specifics and Procedures

Mandatory actions that establish required actions and processes to comply with the policy, support compliance with applicable laws and regulations, and mitigate risk

- Listed in reasonable/logical order
- Consistent with the **Policy Statement and Purpose**
- Consistent with other university policies
- Uses direct language conveying mandatory or prohibited action (e.g., *must, required, will* and *prohibited*) rather than language that may be viewed as optional (e.g., *should, shall, may* or *should not*); includes requirements (mandatory) but not guidelines (recommendations, but not mandates)
 - Guidelines provide additional detail and direction on university policy and suggest a recommended or preferred course of action or behavior; they are generally relevant to implementing university policy and do not supplant the requirements of established policy. Guidelines are distinct from policies and procedures which mandate actions by university members. Guidelines should not be used in lieu of policy when certain behaviors and actions are required of university members.
- If there are no policy specifics or procedures, it states "There are no procedures associated with this policy and procedures."

Forms

All forms applicable to this policy

- Priority of listing: (1) the order in which the forms are referenced in the policy; (2) if not referenced in the policy, list VCU forms in alphabetical order; and (3) the rest of the forms in alphabetical order
- Does not include hyperlinks to external forms; instead list include URL
- If there are no forms, states "There are no forms associated with this policy and procedures."

Related Documents

Documents critical to the policy including related VCU policies and federal and state regulations

- Verify titles and hyperlinks
- Priority of listing: (1) the order in which the documents are referenced in the policy; (2) if not referenced in the policy, list VCU policies in alphabetical order; and (3) the rest of the documents in alphabetical order.
- Does not include hyperlinks to external sources; instead list include URL
- Evaluate for relatedness
- If there are no related documents, it states “There are no related documents associated with this policy and procedures.”

FAQ

Anticipated or commonly asked questions and answers regarding this policy and its procedures

- Listed in reasonable order
- If there are no FAQ, it states “There are no FAQ associated with this policy and procedures.”

Reader Ease and Compliance with [VCU Brand Standards Guide and its editorial style guidelines](#)

- Evaluate the policy for consistency and appropriateness
- Uses gender-neutral pronouns
- Uses direct language conveying mandatory or prohibited action (e.g., *must*, *required*, *will* and *prohibited*) rather than language that may be viewed as optional (e.g., *should*, *shall*, *may* or *should not*)
- Language is concise, consistent and easy to read
 - Provide Word’s “Readability Statistics” report for the draft to policy owner along with resources to aid in making policy easier to understand. Communicate that the target “Score” and “School Level” for university policies is between 60.0 and 50.0, which is the 10th to 12th grade level.
- Follows VCU editorial style guidelines, including:
 - Capitalization (Do not capitalize defined terms; do not capitalize position title unless it precedes person’s name; do not capitalize “university” even when referring to VCU)
 - Bulleted lists (Capitalize first word of each bullet; no punctuation at end of each bullet unless it is a complete sentence, then use a period)
 - “FAQ” not “FAQs”

- Document is accessible [<https://saeo.vcu.edu/resources/accessible-word-documents/>]

Executive Summary of Proposed Policy:

- Accompanies new and substantially revised policies
- Uses current [executive summary template](#)
- Includes Governance Process Tracking dates
- Responses to questions are completed (reason for creation or revision; general requirements of new policy or substantive differences; stakeholders providing input; other resources considered; general assessment of policy's impact)

Return ICO-reviewed Draft to Policy Owner:

- Communicate general observations and recommendations
 - Identify any additional stakeholders and recommend collaboration with other units, as appropriate
 - Recommend consolidation with other policies, as appropriate
- Communicate next steps in governance process
- Provide Word's "Readability Statistics" report for the draft to policy owner along with resources to aid in making policy easier to understand. Communicate that the target "Score" and "School Level" for university policies is between 60.0 and 50.0, which is the 10th to 12th grade level.
- Ask if policy is intended to fill a gap(s) identified during ICO gap assessment work with responsible unit/policy owner

Associated Processes:

- Update internal ICO policy tracker