Policy Style and Development Guide

Office of Ethics Education and Policy Management

THE UNIVERSITY
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at CHAPEL HILL

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Introduction

The Office of Ethics Education and Policy Management (OEEPM) at UNC-Chapel Hill is dedicated to guiding and supporting the work of various administrative and academic units striving to improve the consistency, accessibility, and effectiveness of University policies and their supporting standards and procedures.

The OEEPM policy management efforts are guided by the UNC-Chapel Hill Policy on Policies (POP). The POP replaced the previous Policy Development, Approval and Publication (PDAP) policy and became effective on January 7, 2017. The POP creates a structure for consistency and clarity in University policy documents.

Both style (how a document is displayed or formatted) and content (what a document actually says) are important. The OEEPM has compiled some tips on policy style and formatting to assist you in developing University Policies, Procedures and Standards that are consistent and easy to understand. Standardized templates for writing University Policies, Procedures, and Standards are available for download on policies.edu.edu. Each template provides italicized instructions under each section header for guidance regarding content that should be included.

University Policies, Procedures, and Standards must adhere to the University templates supplied by the OEEPM and contain all required sections. Units are encouraged to follow similar templates for Unit Policies, Procedures, and Standards, taking care to distinguish them from University-level documents. For definitions of Policies, Procedures, and Standards, as well as a table distinguishing University policy documents from Unit policy documents, please see the "Important Definitions" and "University Policy vs. Unit Policy" sections of this style guide.

Please note: this style guide is not intended to be comprehensive. For any specific issues not addressed by this guide, please refer to the most recent version of the *Chicago Manual of Style* (currently 16th edition). This guide also highlights additional resources that may be of assistance as you progress through the policy development process. A member of the OEEPM team can also meet with you to discuss drafts of new policies or existing policies in need of revisions. The OEEPM was created to be a resource for questions or concerns, so please contact us anytime!

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Important Definitions

Issuing Officer: Those authorized to issue University Policy. As outlined in the University of North Carolina Standard on Policies, Issuing Officers include Vice Chancellors, Director of Athletics, Director of Internal Audit, Deans, and others.

Policy: A Policy at UNC-Chapel Hill is a written statement that mandates, specifies, or prohibits behavior in order to express basic values of the University, enhance the University's mission, ensure coordinated compliance with applicable laws and regulations, promote operational efficiency, and/or reduce institutional risk. It includes criteria as mandated by the UNC-Chapel Hill Policy template. Clear ownership of the Policy is required—the owner should be a specific role within the Policy issuing unit.

Policy Officer: The Director of Ethics Education and Policy Management, head of the University Office of Ethics Education and Policy Management ("Policy Office"), the Policy Officer coordinates Policy organization, coordination, review, approval, and publication.

Policy Liaison: Representatives appointed by heads of administrative units designated by the Policy Officer to perform Policy administration functions both internally for the unit and collaboratively with the University Policy Office.

Procedure: The specific operational steps required to accomplish an action that necessitates specific instructions. Procedures often pertain to implementing Policy. Procedures may also provide guidance for behavior on issues that are not dictated by Policy. Procedures are created at the unit level and changes do not go through the same review or approval process as Policies, but Procedures that impact multiple units may need additional review or feedback before being implemented.
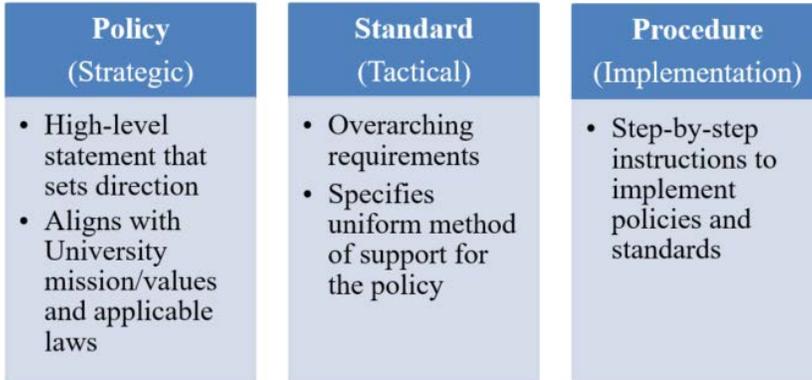
Standard: The minimum acceptable limits or rules that may be used to achieve Policy implementation. While Procedures provide specific instructions for units (e.g. how to use specific applications to encrypt data in the HR department), Standards set overarching minimum requirements that must be met by all (e.g., minimum encryption strength for use with sensitive information throughout the university). Standards are created at the unit level and changes are not required to go through the same review or approval process as Policies, but Standards that impact multiple units may need additional review or feedback before being implemented.

University Policy: Has application throughout the University, informs someone outside the issuing unit of rights and responsibilities, or regulates the actions of the unit as it interacts with other units on campus.
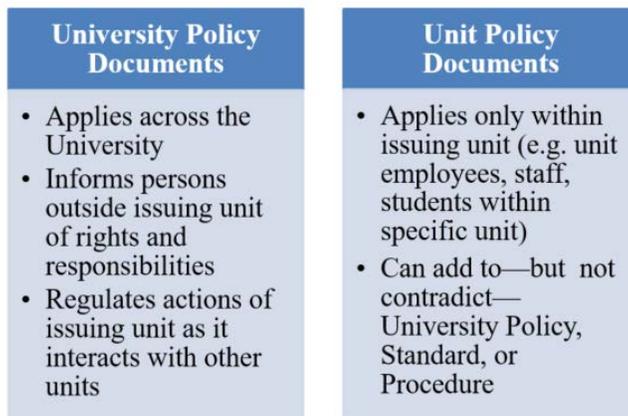
Unit Policy: Has application only within the issuing unit (e.g. applies only to unit employees, staff, students and others working for or studying at the unit). A Unit Policy can create additional specifications, requirements, or restrictions but cannot contradict a University Policy, Procedure, or Standard.

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Policy vs. Standard vs. Procedure

Policy (Strategic)	Standard (Tactical)	Procedure (Implementation)
• High-level statement that sets direction • Aligns with University mission/values and applicable laws	• Overarching requirements • Specifies uniform method of support for the policy	• Step-by-step instructions to implement policies and standards

University Policy vs. Unit Policy

University Policy Documents	Unit Policy Documents
• Applies across the University • Informs persons outside issuing unit of rights and responsibilities • Regulates actions of issuing unit as it interacts with other units	• Applies only within issuing unit (e.g. unit employees, staff, students within specific unit) • Can add to—but not contradict—University Policy, Standard, or Procedure

Policy Type Decision Tree:

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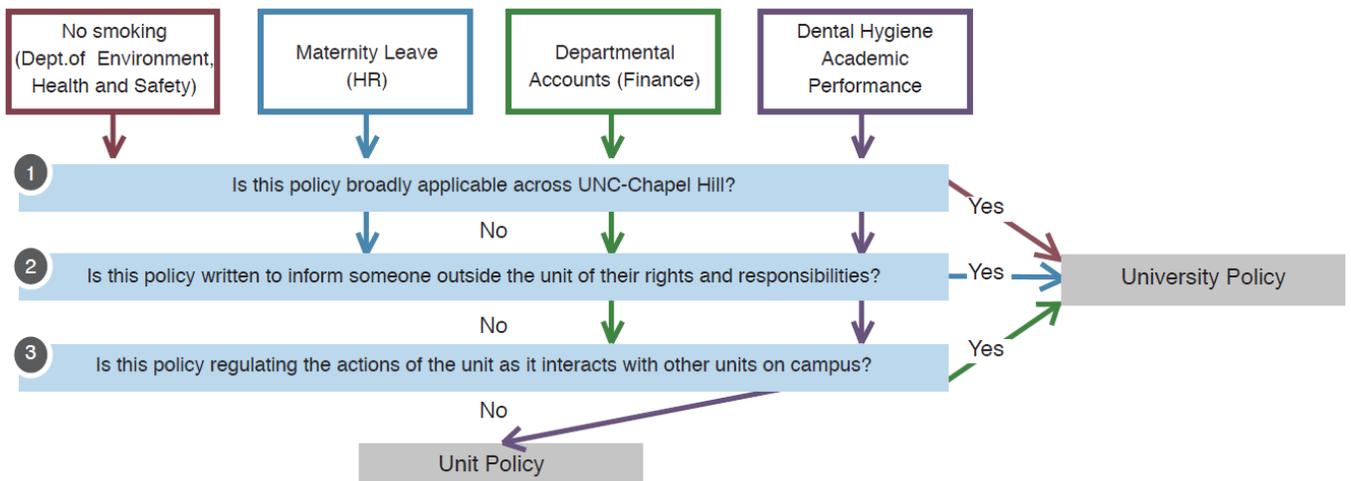
General University Policy Writing Tips and Best Practices

✓ **Style Consistency**

The OEEPM Policy Style Guide follows the *Chicago Manual of Style* writing standards, with some exceptions:

- Capitalize all terms defined in the policy, as well as those defined in the central Policy Glossary, each time they are used.
- Capitalize titles of individuals at UNC-CH when the title is referring to a specific person (e.g., "Executive Vice President for Academic Affairs and Provost"). Leave titles that refer to a group of people in lowercase (e.g., "vice provosts")
- Do not abbreviate months, even when used with a specific date.

✓ **Readability**

The best-written policies are written with the reader in mind. A University policy must be understood by everyone in the community, including non-subject matter experts. Keep policies simple and easy to read to enhance accessibility by a diverse audience. Use simple and precise terminology, and avoid using jargon when possible.

✓ **Use Active Voice**

Use active rather than passive voice. Active voice clearly specifies who performs the actions (e.g., instead of "candidates who are barred from employment should be notified…" use "the unit head must notify candidates who are barred from employment…").

✓ **Third Person Narrative**

All policy documents are written in the third person (e.g. "If the request is approved, the Office of the Treasurer will work with the unit to determine a bank and work directly with the chosen bank to establish the bank account.")

✓ **Use of Lists**

Use lists whenever possible and logical, but always after an introductory sentence or paragraph. Lists may be numbered or bulleted as appropriate.

✓ **Titles**

Select a title that is concise and clearly reflects what the content is about. All policies should contain the word "Policy." Similarly, all Standards should contain the word "Standard" and all Procedures, the word "Procedure." How the title starts will impact how it is indexed for searching, thus if several documents with similar names fall under one policy, please standardize the name for easy reference (e.g. Policy on Tree Management, Standard on Tree Management, Procedure for Tree Management).

✓ **Required vs. Encouraged Actions**

If someone does not really have to do anything, why is the Policy, Standard, or Procedure in existence? If an action is required, use the terms "must" or "will" rather than "should." The use of "should" implies the action is optional.

✓ **Be Wary of Using "Ensure"**

Having a policy that cannot be enforced is worse than not having a policy at all. Therefore, do not use the word "ensure," because the University generally cannot ensure actions of its community members. Focus on the activity you are attempting to regulate, not on the individuals engaged in the activity. The words "to achieve" or "to accomplish" are useful in these instances.

✔ **Vet Policies Widely**

Ask various stakeholders for feedback to consider all aspects of the policy and its impact. Ask individuals who are not intimately involved to read the draft policy to see if it makes sense to them.

✔ **Referring to Specific University Units, Job Functions, and Policy Contacts**

Use an office, department, unit or job title instead of an individual's name (e.g. "The Office of University Counsel is responsible for…" or "Contact the Vice Chancellor for…"). Contact information should include general department phone number, email address (if applicable). If you choose to include an individual employee's email address, be sure to update the policy document when personnel changes occur.

✔ **Emphasizing Specific Words**

Please refrain from the use of all caps or underlining words that need to be stressed in a sentence. Underlined words can be mistaken for hyperlinks when the policy document is posted online. Other words that require emphasis may be put in **Bold** or *italics*. Terms that are included in the Definition section of the University Policy Template should be capitalized throughout the document.

✔ **Contact the Office of Ethics Education and Policy Management**

When writing a University Policy, Procedure, or Standard, involve the OEEPM as soon as possible to decrease potential duplication or overlap of policy development efforts. Our team is available to provide assistance at any stage of the policy development process. The OEEPM was created to be a resource for questions or concerns, so please contact us anytime!

Style Tips

✔ Use the same word to refer to the same concept throughout all documents.

✔ Use lists whenever possible and logical, but always after an introductory sentence or paragraph. Lists help promote readability by breaking up policy content. Lists may be numbered or bulleted as appropriate.

✔ Do not capitalize "university" except when referring to the "University of North Carolina at Chapel Hill."

✔ Capitalize titles of individuals at the University when the title is referring to a specific person (e.g., "Vice Chancellor for Research" or "Dean of Students"). Leave titles that refer to a group of people in lowercase (e.g., "vice provosts").

✔ Capitalize all terms defined in the policy, as well as those defined in the central Policy Glossary, each time they are used.

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✓ Spell out an acronym the first time, following with the acronym in parentheses (e.g., The Office of Ethics Education and Policy Management (OEEPM) supports various units across campus striving to improve the consistency, accessibility, and effectiveness of university policies). The acronym may be used throughout the remainder of the policy document.

✓ Do not use "UNC"—use "University of North Carolina at Chapel Hill," "UNC-Chapel Hill," "UNC-CH," or "the University."

✓ After the initial formal reference to the "University of North Carolina at Chapel Hill," be consistent in referring to the University throughout the Policy, Standard, or Procedure (e.g. use "UNC-Chapel Hill," "UNC-CH," or "the University" throughout the remainder of the document).

✓ Do not use "institution" and "university" interchangeably; use one term consistently.

Grammar Tips

✓ Use simple rather than compound sentences.

✓ Use the Oxford comma. Place a comma after the second-to-last item before the conjunction (and, or, or nor) and use a semicolon to separate items in a series when any of the items itself uses a comma. For example:

  ▪ "Units must apply, authorize, and report."

  ▪ "The process consists of benchmarking; testing, remedying, and monitoring; and reporting findings."

✓ Use an internal comma after the date and year when a specific date is given. Do not use internal commas when a specific date is not given (e.g. "Effective October 21, 2015, all students must…" or "In October 2015, the Office of Student Conduct established…").

✓ Use parallel construction. Start sentences or sentence fragments using words in similar format (e.g. instead of "built a team, raises money" say "builds a team, raises money"; instead of "running, swimming, and exercised" say "running, swimming, and exercising" or "ran, swam, and exercised").

Other Considerations

✓ **Be Mindful of the Audience**
Because the audience for a policy is generally the entire university community, the language used must be accessible and understandable to all, not just technical experts.

  ▪ You should assume that readers have basic knowledge of the campus and University community and no knowledge of specific policies or procedures.

  ▪ Use clear and precise words, short sentences, and common terminology. If industry terminology or words with specialized meaning must be used, define them in the policy. Be consistent when using technical terms. When multiple words have the same meaning, select one and use it throughout the document.

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- The policy document should be written on a 7th grade reading level.

✓ **Use Plain Language**

Plain language makes documents more clear, concise, and user-friendly. General plain language guidance:

1) **Keep it simple.** Policies are not law and should be written in plain language—not legal jargon. They should be easily understood by the entire University community. Use simple, direct language and strong sentence structure.

2) **Keep it general.** Policies cannot anticipate all possible situations. Thus, policies should be relatively general and clear enough to apply to various unforeseen circumstances.

3) **Make it helpful.** The policy should tell the reader why it exists, who it affects, its major conditions and restrictions, when and under what circumstances it applies, and how specifically it is to be carried out.

Additional plain language guidance:

- Use short words (one or two syllables, e.g., "use" not "utilize") and write in short sentences.

- Avoid using jargon and qualifiers (e.g., totally, completely, definitely, etc.).

- Avoid using unnecessary words (e.g., say "Faculty and staff must…" instead of "All faculty and staff must…"). See the table below for additional examples.

Excess Words/Phrases	Plain Alternatives
constitutes	forms, makes up
as a means of	to
for the purpose of	for, to
in order to	to
pertaining to	of, about
related to	of
with regard to	about
at the present time	now, currently
accordingly	so
in the event that	if
during that time period	during that time
will plan in the future	will plan
in an effort to	to
on a monthly basis	monthly
at a later time	later
on the grounds that	because

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- Use proper grammar and punctuation.

- Use active rather than passive voice. Active voice clearly specifies who performs the actions (e.g., instead of "candidates who are barred from employment should be notified…" use "the unit head must notify candidates who are barred from employment…").

- Use pronouns to help the reader relate to the document (e.g., instead of "Receipts must be provided…" say "University employees must provide receipts…"). This is also an example of switching from passive to active voice.

- Additional advice can be found at the Center for Plain Language website.

✓ **Use Gender Inclusive Language**
Policies must be written using gender-neutral and gender-sensitive language.

- Do not use masculine or feminine pronouns as the default (e.g. "he" or "she"); use "they" or "the individual" instead.

- Avoid using gendered-nouns such as chairman, man, mankind, man-made, etc. Instead use gender-neutral nouns such as chair, coordinator, humanity, individual, machine-made, people, person, synthetic, etc.

- Additional advice can be found at the UNC-Chapel Hill Writing Center: Gender-Inclusive Language

✓ **Follow Capitalization Standards**

- **Always capitalized:**
Terms such as 'Unclassified Professional Staff,' 'University Support Staff,' etc.

- **Always lower-case:**
'non-exempt' and 'exempt' as they are used to refer to employee classifications are always lowercase

- **Dependent on context:**
Certain titles ('dean,' 'provost,' etc.) should only be capitalized when referring to a specific individual

✓ **Use Standard Notations**
- **Times:**
Correct: 'a.m.' and 'p.m.'
Incorrect: 'am' and 'pm'

- **Numbers:**
Spell out single-digit numbers (including zero) and use numerals for all others. This is especially important when a policy is discussing something such as hours in a work week, as readers will likely be expecting the numeric form, not written out (Correct: '40' hours. Incorrect: 'forty' hours).

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*See the *Chicago Manual of Style* (items 9.3 – 9.7) for exceptions.

- **Hyphenated:**
  'Non-reappointment'

✓ **Referring to Academic Degrees**
  Abbreviations should be formatted as follows (without periods): BA, BS, MA, MS, PhD
  - **Correct:** Bachelor of Science, bachelor's degree, BS;
    Master of Arts, master's degree, MA;
    Doctor of Philosophy, doctorate, PhD

  - **Incorrect**: Bachelor's of Science, Bachelors Degree

Policy Contact Information

University Policies, Standards, and Procedures should provide current contact information so individuals with unique/unaddressed situations can seek timely advice on policy interpretation and application. Responsible offices must ensure that those whose contact information is listed in the policy are content experts prepared to answer questions or know who the content expert is and how to put the user in contact with that individual.

Ideally, contact information should be single spaced. The recommended format for providing contact information is:

Name: Name of Appropriate Department Official (optional)
Title: Position Title (required)
Unit: Policy Contact's Department/Office Name
Phone: phone number in ###-###-#### format (best to list main department number, not individual's extension)
E-mail: general department email is best, but including the individual's email address is okay. **Please do not hyperlink email addresses to prevent phishing attacks**.

Example:

Name: Kim Strom-Gottfried, PhD
Title: Director
Unit: Office of Ethics Education and Policy Management
Phone: 919-445-8362
Email: ethicsandintegrity@unc.edu

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Writing Procedures

Procedures are the specific operational steps required to accomplish an action that necessitates specific instructions. Procedures often pertain to implementing Policy. Procedures may also provide guidance for behavior on issues that are not dictated by Policy. Procedures are created at the unit level and changes do not go through the same review or approval process as Policies, but Procedures that impact multiple units may need additional review or feedback before being implemented.

Some guidance on writing procedures:

- Write Procedures in sequential order (i.e., the order that steps must be undertaken by the person to whom the policy applies). See the [Template for University Procedure or Standard](#) and follow the italicized instructions provided in each section.
- Focus on describing, in a concise and objective way, precisely what is to be done to ensure that an activity is carried out as required by the policy.
- Write procedures in a style that is easy to read and comprehend. Use plain English. Choose precise and unpretentious terms. The more complex the subject matter, the greater the need for a simple direct writing style.
- Use a uniform outline format for sequential steps of a Procedure (e.g. I., A., 1., a, (1), (a), (i), (aa)).

Procedures are stated in a format where:

- each action or process is clearly described;
- the inputs and outputs of each action are identified;
- the responsible party for each action is identified;
- an auditor can use the procedure to determine whether the procedure is being followed.

List each step separately and in a logical order, and:

- Write each step as a complete sentence, assuming the reader is performing the action, beginning with a command or action verb - such as: *prepares, approves, files, sends, delivers.*
- If the action is not performed by the reader, begin the sentence with the responsible area and followed with a command or action verb (e.g. "The department supervisor reviews, approves, and forwards the form to the appropriate vice president for approval.").
- Specify the area responsible to carry out instructions. Do not use people's names.
- Use the present tense.
- Use bulleted lists for items that do not require sequential processing.

Writing Standards

Standards are the minimum acceptable limits or rules that may be used to achieve Policy implementation. While Procedures provide specific instructions for units (e.g., how to use specific applications to encrypt data in the HR department), Standards set overarching minimum requirements that must be met by all (e.g., minimum encryption strength for use with sensitive information throughout the university). Standards are created at the unit level and changes are not required to go through the same review or approval process as Policies, but Standards that impact multiple units may need additional review or feedback before being implemented.

Standards may describe requirements such as minimum frequency for a compliance activity, required sets of information to be collected or provided, minimum technical specifications, or other specific obligations. Standards are used for information that is expected to change over time, that is too detailed to include in a Policy, or that is best issued by an expert other than the Issuing Officer for a unit.

Similar to writing policies and procedures, you should write standards in a style that is easy to read and comprehend. You may use bulleted lists to organize standards.

Frequently Asked Question (FAQ) Documents

FAQs should address questions that are frequently raised or that are not addressed in the policy itself. There are two options for directing readers' attention to FAQs:

- You may refer to the FAQ document at the end of the "Policy," "Standard," or "Procedure" section of the template and provide guidance for the reader to access it.
- You may incorporate FAQs directly at the end of the "Policy," "Standard," or "Procedure" section.

Additional Resources

If you are having trouble with any aspect of your policy development, ask for help. There are resources to assist you; there is knowledge of the area you are working on; and there are others who have been through, or are going through, the same process.

The OEEPM is available at any stage of the process. Other sources of assistance include:

- Your unit's Policy Liaison. Find your Policy Liaison here: http://policies.unc.edu/prc/
- Subject matter expert(s)
- Policy Liaisons/development leads in other areas throughout campus

Tools Available on policies.unc.edu:
- Template for University Policy
- Template for University Procedures and Standards

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- University Policy Glossary
- Policy Development Checklist
- Policy Development Thought Web
- Policy Development Training Module PowerPoint Slides
- Policy Life Cycle Diagrams

Other Tools Available:
- The Center for Plain Language's Five Steps to Plain Language
- The UNC-CH Writing Center's Gender-Inclusive Language guidance

Acknowledgement:

This Policy Style and Development Guide draws from policy development resources available from other universities, particularly: Cornell University, Georgia State University, Michigan Technological University, Ohio State University, University of Kansas, and University of Pittsburgh.