

UW–Madison
Policy Library Project

**Report and Recommendations
to the Executive Sponsors**

on behalf of the Policy Library Project Team

August 30, 2019
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Executive Summary

At the request of the Provost and the Vice Chancellor for Legal Affairs, the Office of Strategic Consulting is working with a cross-campus project team to establish a searchable, online policy library for all university-wide policies authored at UW-Madison. While the project team's work will continue through successful implementation of a policy library anticipated during the 2020-2021 academic year, this report represents an inflection point in the team's work and includes recommendations the team believes will best position the university for implementing a successful policy library.

Consensus among team members is that a policy library is needed and would be of great benefit to serving university constituents. An effective library empowers the campus community by ensuring transparency, providing easy access to documents, and enhancing the ability to quickly and confidently locate information. A successful library will respect institutional culture and honor the important roles a variety of stakeholders play in the policy development process through shared governance. The project team and campus partners completed a comprehensive policy inventory that counted 1,138 documents, about half of which are "library ready." The remaining documents have been flagged for attention from their originating units.

Implementing a policy library will require a thoughtful evolution that will likely take place in stages. At this time, the project team recommends:

1. Establish a framework for strong policy management.
 - 1.1. Establish the role of a policy coordinator as policy librarian, responsible for maintaining the searchable policy library, ensuring that changes to policy and new policies are reflected in the library, and helping stakeholders navigate policy development processes.
 - 1.2. Clarify and articulate the role of the library and policy coordinator within the process.
 - 1.3. Create a document that outlines guidelines for policy development and sets parameters for developing university-wide policies. Form a cross-campus working group to draft the guidelines.
2. Clarify and document authority delegations, which the team has not yet found explicitly documented and does not feel is within its purview to determine.
3. Establish standardized tools to be used consistently across the university.
 - 3.1. Establish common terms and definitions to be used consistently across the university.
 - 3.2. Create a template to be used for all university-wide policies.
 - 3.3. Establish a uniform numbering system for numbering university-wide policies, to be determined during the next phase of the project and informed by technical requirements.

The project team issues this report at the present time to facilitate decision-making that will ideally take place in parallel to our ongoing work. Specifically, decisions and action toward implementing recommendations under items 1 and 2 above are critical to the project's long-term success and are beyond this team's purview. The team believes the time is right for a searchable policy library and that implementing the recommendations in this report will make it possible for us to achieve this objective for the university.

Background

At the request of the Provost and the Vice Chancellor for Legal Affairs, the Office of Strategic Consulting (Strategic Consulting) is working with a cross-campus project team to establish a searchable, online policy library for all university-wide policies authored at UW-Madison. The project's primary goal is to create a single, reliable repository for easily finding all university-wide policies. The policy library will improve efficiency and accuracy in locating relevant policies and will reduce operational and legal risk to the institution.

While the project team's work will continue through successful implementation of a policy library anticipated during the 2020 – 2021 academic year, this report represents an inflection point in the team's work and includes recommendations the team believes will best position the university for implementing a successful policy library.

To better understand and inform the project, Strategic Consulting conducted extensive preliminary analysis that included:

- Researching previous policy management and curation efforts at UW-Madison.
- Identifying best practices for policy management.
- Benchmarking UW-Madison's practices against peer and Big Ten institutions.
- Conducting interviews with peer institutions within and outside the Big Ten to understand their experiences and obtain advice.
- Engaging a range of leadership groups, such as the Provost's Executive Group, Deans Council, Administrative Council, VCFA Directors, and others to solicit involvement and input.
- Engaging shared governance groups through conversations with their Secretaries and relevant committees to bring their expertise and perspective to the project.

Project structure and charges

In February 2019, the executive sponsors formally initiated the project, asked the Office of Strategic Consulting to provide project management, and established a steering committee to advise and guide the project on behalf of the sponsors. The steering committee includes representatives from Legal Affairs, Finance and Administration, Research and Graduate Education, and Academic Affairs. The steering committee is

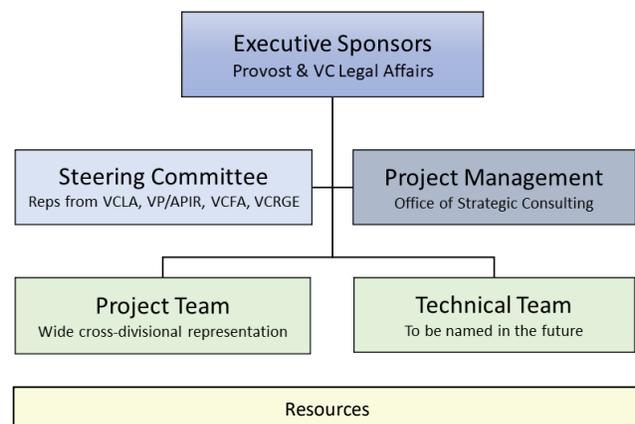


Exhibit 1: Project Structure

charged with overseeing the project's progress (Exhibit 2, attached).

In addition, the project relies on a project team comprised of cross-campus representatives charged with making recommendations and successfully implementing a functional policy library for UW-Madison. The team includes 21 members of the UW-Madison community, drawn from administrative offices across campus, including academic planning, business services, facilities, libraries, research, and others (Exhibits 3 and 4, attached). Though schools and colleges were deemed out of scope for this first phase of the project, at the request of the Deans Council, four individuals nominated by their Deans were included on the project team to represent the schools' and colleges' perspectives.

A technical sub-team that includes subject matter experts recently started working to define and document specific requirements for a policy management system, prioritize features for evaluating solutions, and vet requirements with broader users and stakeholders as needed.

The project also engages a variety of stakeholders, such as subject matter experts and governance groups, which are engaged through regular meetings with their respective secretaries and by welcoming their attendance and participation in project team meetings.

Past efforts

The project team recognizes that at least two prior attempts to establish a policy library paved the way for this effort. Though previous efforts did not create a library, they did lay important groundwork and generate worthwhile ideas that took root in some parts of the university. For example, a 2013 effort introduced ideas for standardizing the layout format and numbering for policies. Some administrative units, including the Office of Human Resources (OHR) and Transportation Services adopted or modified the draft policy template established during that effort. Variations of that template continue to be used to date. Perhaps most importantly, previous efforts and the teams that led them began important discussions that stimulated thinking across campus and created an appetite for better policy management. The project team is grateful to those teams for their preceding efforts and believes their work was foundational to creating conditions for further progress now.

Project Value and Context

Consensus among team members and beyond is that a policy library is needed and would be of great benefit to serving university constituents. A policy library is simply an online, searchable repository that helps users swiftly and accurately locate policies that may be relevant to a current situation or need. An organized and effective library empowers the campus community—faculty, staff, students, visitors, and others—by ensuring transparency and providing easy access to the documents that govern or constrain behavior. The institution has a responsibility to clarify and clearly communicate expectations, to promote compliance with federal and other applicable laws and regulations, and to provide convenient access to university-wide policies, that is, policies that apply generally to all members of the UW-Madison community, regardless of where the document originated.

Maintaining all university-wide policies in one place enhances the ability for anyone to quickly and confidently locate the information they need to navigate a given situation. A library improves productivity and efficiency in university operations and reduces the risk inherent when locating relevant policies is difficult or ambiguous.

A successful policy library is just one part of a policy management system that includes policy making, curating (organizing), and distributing (publishing and communicating), as illustrated in Exhibit 5 on page 6. Currently, policy making at UW-Madison reflects cultural norms: highly collaborative, and participatory. Rooted in historical practices and deep cultural commitments to robust conferral, consensus building, and shared governance, these norms are a significant part of UW-Madison's values, tradition, and identity, representing one of the unique strengths that make the institution great. Among other things, shared governance ensures that UW-Madison's policies reflect its multiplicity of voices, perspectives and needs. Building on that strength, a policy library will strengthen the institution's policy curation and distribution, ensuring all stakeholders can find policies in a reasonably efficient and trustworthy manner. After all, people have a right to be able to find and understand the policies that regulate their behavior.

To achieve that aspiration, an effective policy library will need a more uniform approach to policy curation and publishing than the institution has typically employed. To successfully achieve this level of alignment, it is paramount that any improvements to policy curation and publishing respect the culture and honor the important roles a variety of stakeholders play in the policy management process, particularly through shared governance. The team believes that by leveraging UW-Madison's cultural strengths in conjunction with stronger policy management practices, the institution will be far better positioned to continue responsibly and inclusively serving its diverse array of stakeholders.

Best Practices for Policy Management

As previously mentioned, a successful policy library requires strong and consistent policy management practices, such as clear, foundational tools and processes for policy making, curation, and distribution, as illustrated in Exhibit 5 (below and attached).

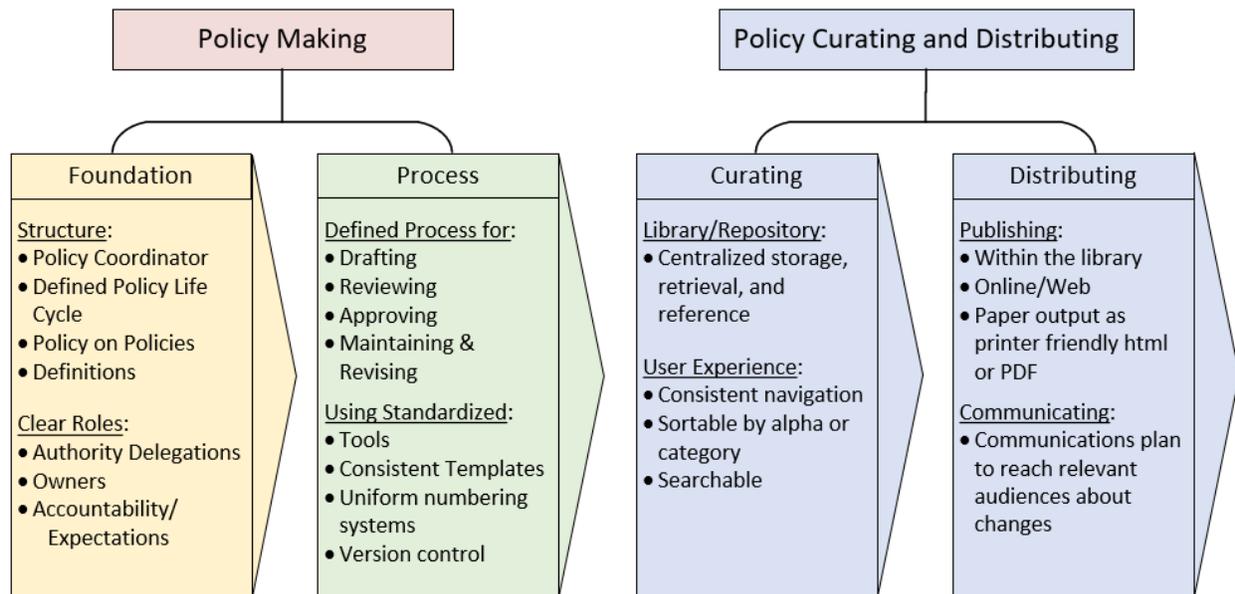


Exhibit 5: Best Practices for Policy Management

Within a policy management system, a library is the key tool for curating policies and making them findable in a user-friendly manner. Peer institutions emphasized that a successful policy library requires having in place the underpinnings of a strong policy-making framework and process. To be useful, a policy library must have consistent standards for organizing the information and determining how the policies are created and approved in the first place. Repeatedly, policy managers at peer institutions advised that a library cannot be effective without some standardization, such as a common vocabulary (terms and definitions), consistent templates, a uniform numbering system, some form of version control, and clear roles and responsibilities.

UW-Madison lags virtually all peer institutions in the Big Ten as illustrated in Exhibit 6 (next page and attached). Those peer institutions with the strongest policy management practices benefit from a policy coordinator that encourages good practices, facilitates the process, implements a set of standards across the institution, and serves as a resource. In short, for a policy library to be of value and trustworthy, there must be a person who facilitates discovery, understanding, and access to the library in a customer-service-oriented manner.

As of 9-27-18	Framework		Process		Library/Repository		
	Central Policy Office	Policy on Policies	Consistent Template	Uniform Numbering System	Library/Repository	Key Word Searchable	By Category
Indiana University	✓	✓	✓	✓	✓	✓	✓
Northwestern University	✓	✓	✓	✓	✓	✓	✓
Penn State University	✓	✓	✓	✓	✓	✓	✓
Purdue University	✓	✓	✓	✓	✓	✓	✓
Rutgers University	✓	✓	✓	✓	✓	✓	✓
University of Michigan	✓	✓	✓	✓	✓	✓	✓
University of Minnesota	✓	✓	✓	✓	✓	✓	✓
University of Illinois	✓	✗	✓	✓	✓	✓	✓
Ohio State University	✓	✗	✓	✗	✓	✓	✓
University of Maryland	✓	✗	✗	✓	✓	✗	✓
University of Iowa	✗	✓	✗	✓	✗	✗	✓
University of Nebraska	✗	✗	✗	✗	✓	✗	✓
Michigan State University	✗	✗	✗	✗	✗	✗	✗
UW-Madison	✗	✗	✗	✗	✗	✗	✗

Exhibit 6: Current State: Big 10 Benchmarks

Inventory of Current Policies

To understand the current policy situation at UW-Madison, the team initiated and deployed a far-reaching policy inventory that represents perhaps the most comprehensive effort of its kind in the university's history. The purpose of the inventory was to understand the number, breadth and depth of university-wide policies to inform requirements for an eventual library, identify items to go in the library, and document any issues that need to be resolved.

The team intentionally cast a wide net, guiding units to err on the side of inclusion in the inventory and with the goal of capturing all policy-related documents. Because the university has no common framework or understanding for what constitutes policy, many inventoried documents are ambiguous, blurring the lines among policy, guidance, procedures, standards and other documents that assert some degree of behavior regulation. For example, there are documents titled as *guidance* that claim in the text to be policy, and documents titled as *policy* that read more like guidance. There are even documents titled as both "guidelines" and "policy." Recognizing that the university will need to undertake a comprehensive clean-up effort to be completed over time, ambiguous documents have been flagged for resolution by the appropriate unit.

The inventory counted **1,129 documents** representing a range of policies and other related content.

For summary and discussion purposes, the analysis assigned inventoried documents to 13 temporary subject categories, as illustrated in Exhibit 7 (at right and attached). Categories were chosen based in part on the most commonly used categories at peer institutions. During the next phase of the project, the team will engage the UW-Madison campus community to more deeply understand user needs for the policy library. We'll conduct user focus groups to inform and determine a more precise taxonomy for the library's sortable subject index.

Temporary Subject Index	Documents Inventoried
Academic	135
Academic Staff	31
Administrative	149
Athletics	36
Communications & Mktg.	10
Facilities	124
Faculty	126
Graduate Education	82
Human Resources	83
Information Technology (IT)	27
Legal Affairs & Compliance	52
Research	141
Student Affairs	133
Total	1,129

Exhibit 7: Temporary Subject Index

To understand the state and nature of the documents inventoried, the analysis tagged each document across ten dimensions as illustrated in Exhibit 8 (below and attached). Documents tagged as anything other than "library ready" have been flagged for their corresponding unit to sort out prior to inclusion in the library.

Exhibit 8: Policy Inventory Analysis

Number of documents	Analysis term	Definition of analysis term
612	Library ready	Has enough information to be ready for the library. Minimum criteria: <ul style="list-style-type: none"> - Is a policy (as defined elsewhere) - Clear policy manager/"owner" - Clear approval authority/exec. sponsor listed - Properly titled "policy" - Uses policy language
22	Overlap	Covers something addressed in or related in another document. Link to the other document in the Analysis Notes.
240	Orphan	Has no clear policy manager/owner
8	Wrong address	Policy Manager/owner seems misplaced and document perhaps ought to be managed elsewhere.
177	No authority listed	Does not list a position (executive sponsor, responsible executive or authority), or person who approved the item.
14	Conflict	Is in direct conflict with another policy. Includes multiple versions of the same policy.
0	Gap	Reveals need for a policy but this document isn't one.
231	Ambiguous: Policy ramp	Is titled policy but needs to be more explicit e.g., remove "guidelines" reference OR is not labeled policy, but invokes policy language and probably should be policy.
66	Ambiguous: Clean-up path	Is not policy but needs some language clean-up to remove or change confusing language that implies mandatory behavior, or self-references as policy.

Note: Documents that are not "library ready" may be counted multiple times to reflect each of the issues that document faces. Therefore, the numbers will not add up to equal the total inventory number.

Policy Curation and Publishing

The inventory also demonstrated that policies are currently curated and organized at the local unit or divisional level. Numerous divisions and units organize and publish policies online, including Research and Graduate Education, OHR, Division of Information Technology (DoIT), and Business Services, to name a few. However, there is no consistent standard or approach for how such organization is to be done and there is no single online portal or “front door” to finding aggregated university-wide policies.

Instead, units or divisions adopt their own practices for organizing and publishing policies, primarily online. Some units, such as Business Services, publish policies as text or content embedded within web (html) pages. Other units, such as Academic Planning and Institutional Research (APIR) and DoIT use the Knowledge Base (KB) as a repository to organize policies. Still others, including Research and OHR, use both the KB and web pages. Current practices are sometimes locally effective, but they put the onus on the user to figure out where to look online to find relevant policies and require that a user hunt on multiple sites to find all relevant documents across departments. An unintended consequence of current publishing practices is a puzzling web of multiple postings, outdated versions and confusing listings. *The project team was unable to identify any explicitly defined standards for curating or publishing university-wide policies.*

Recommendations

Over the long term, implementing a successful policy library will require a thoughtful evolution. The university will need to carefully consider and implement a series of incremental steps over the next several years.

To successfully implement a policy library at UW-Madison, the project team recommends the following key activities, without which a library may not be effective over the long term.

1. Establish a framework for strong policy management.

As previously noted, a successful library relies on sturdy foundational underpinnings. To that end, the team recommends establishing a framework for strong policy management that includes the role of a policy coordinator, clarification and articulation of the library and policy coordinator within the process, and guidelines for policy development. Other than some procedures outlined in Faculty Policies and Procedures, the team could not find any existing foundational documents setting standards or governing the process for making university-wide policy.

1.1. Establish the role of a policy coordinator.

A policy coordinator would play the role of policy librarian, responsible for maintaining the library and for acting as a friendly collaborator to help shepherd a proposed policy through the appropriate processes. The coordinator would not be a policy-maker; rather it is important for this role to be perceived as a neutral party acting as an impartial facilitator of the process and responsible for implementing consistent standards. As such, the coordinator would need to build trust and influence as a diplomatic ambassador. The policy coordinator would:

- Maintain the policy library
- Notify policy managers about policies that will be up for review and facilitate the review process as appropriate
- Assist stakeholders in developing policy by helping them draft content consistent with plain language goals, navigate the process, and use the appropriate tools
- Consult with administrators, faculty, academic staff, university staff, students and other stakeholders on the policy development process
- Conduct needs assessments and impact analyses (when asked), to understand the potential risks and impact of a proposed policy and inform policy decisions; in doing so, apply an equity lens to ensure that no policy has unforeseen negative consequences for any stakeholder group
- Collaborate with policy managers or authors to choreograph appropriate steps in the process and work closely with the Secretaries of the governance groups to coordinate
- Implement and facilitate a possible public comment period on proposed and existing policies, including receiving and processing feedback from public comments
- Train or educate constituents about good policy management practices, the role of the policy coordinator, and the tools and process for developing policy

To inform this recommendation, the team reviewed benchmark information (Exhibit 9, attached) from peer institutions. Some universities house their policy coordinator within an office of compliance, others in administrative units or directly reporting to the chancellor or president. The team discussed and surfaced several considerations regarding the potential location for a policy coordinator.

- *The Provost's Office*: Being rooted in the academic unit would optimize the policy coordinator's credibility and legitimacy with faculty but risks that administrative units could perceive the policy coordinator as irrelevant to administrative matters.

- *Finance and Administration (VCFA)*: The policy coordinator and library purpose align well with administrative functions, but risks that the policy coordinator will be perceived as strictly administrative and not relevant to the academic side of the house.
- *Office of Compliance* brings benefits that include its reputation as a neutral office and its proximity to legal affairs. Further, many policies involve or relate to federal, state and other regulatory or compliance matters. However, as currently described, the policy coordinator role does not have any compliance, investigative, or enforcement authority. Without such a role, the coordinator may not be an appropriate fit for our compliance office.

The team also discussed merits of a potential dual reporting structure, in which the policy coordinator would report, for example, to the provost, with a “dotted” line report to the VCFA. Dual reporting is symbolically good and connotes a boundary-spanning commitment. Such a structure would maximize cross-campus benefits from perceived ownership and legitimacy across major functional areas. However, dual-reporting could also be a challenging position to navigate, particularly if there is insufficient alignment between the supervisors.

1.2. Clarify and articulate the role of the library and policy coordinator within the policy development process.

Implementing a successful policy library presents an opportunity – and a necessity – to be transparent by illustrating for constituents how the policy development process works at a high level and articulating the role a policy coordinator and a library will play in that process. One challenge to understanding the policy development process in general is that there are multiple policy development processes at work in specific areas (relative to subject matter). Some units, such as DoIT and Research have a defined process for developing policies, but there is no commonly understood process at the university-wide level. Not finding any documentation of the policy development process for university-wide policies, the team attempted to capture the current process at the highest level and reached consensus on a set of high level “typical steps” taken to develop policy at UW-Madison, as illustrated in Exhibit 13 (attached).

The team also attached to this report a draft map (Exhibit 14) illustrating an accessible future state that includes a policy library and a policy coordinator in the process. Those two elements represent the only recommended substantive changes to the policy development process at this time. The team recognizes that introducing the library and the policy

coordinator also introduces an inherent tension about roles and emphasizes that the policy coordinator is intended to be a shepherding role to assist in navigating our existing policy development process.

In addition to the aforementioned recommendations, the project team believes that those across campus who regularly craft, review, and manage policy would be well-served by convening as a community of practice (CoP). By regularly convening as a group, those involved in policy development and publishing will build a network of peer learners who can exchange information, share best practices, surface common challenges, and disseminate knowledge and information. Such a community of practice might be facilitated by a policy coordinator, though it would likely be most effective if it is self-organized to build competencies across the institution and facilitate alignment in policy management. If the various policy-making, policy-reviewing, and policy-managing stakeholders do find it useful to convene as a CoP, they may naturally provide an important resource for the policy coordinator, including a valuable conduit of information and a source of advice and input on policy-related issues. Given that such a body would need to arise naturally out of the community of policy makers, we do not include this as a recommendation per se.

1.3. Create a document that outlines guidelines for policy development.

UW-Madison would likely benefit from a document that offers guidelines and sets parameters for developing university-wide policies. While this approach is not as prescriptive as creating a “policy on policies,” the team feels it aligns better with UW-Madison’s culture and is more likely to be followed than a document called a “Policy on Policies.” The team feels it is beyond the scope of this team’s charge to draft such a document and recommends:

1.3.1. Form a cross-campus working group to draft the guidelines document. The working group would include faculty, academic staff, university staff, students, administrators and representatives from key functional areas that develop significant university-wide policies, such as academic planning, Business Services, Human Resources, Facilities Planning and Management (FP&M), and others. If a policy coordinator (recommendation 1.1) has been identified in time, that person would facilitate the working group’s activities.

1.3.2. Ensure the guidelines document:

- Acknowledges that federal and state law, federal rules, or Board of Regents or UW System (UWSA) policy may supersede UW-Madison policy, as well as noting that policies formulated at organizational levels below the University are superseded by UW-Madison policy.

- Clearly articulates authority delegations designating which roles have what authority for approving policy.
- Clearly describes what people are expected to do (such as the process to follow for developing policy, the tools to use, including template, etc.) and which points in the process are not optional, as well as where flexibility is afforded.
- Clearly articulates what level of delegated authority is needed to establish a university policy (i.e., does a policy need a “sponsor” with delegated authority).
- Describes how to create provisional, emergency and expedited policy and who has authority to approve such policies.
- Mentions that some policies benefit from a public comment period and describe a process for such a comment period on draft policies.

2. Clarify and document authority delegations.

The policy inventory revealed that policy documentation is sometimes lacking and needs to be clearer. Many current policies do not clearly note the institutional authority under which the policy was approved. In many cases, there is assumed implicit authority, wherein everyone “just knows” who has the authority to make something a policy. After several discussions about approval authority, the team noted that authority delegation is currently unclear and not well understood. The team has not yet found explicitly documented authority delegations indicating who, beyond the chancellor, has authority for approving which policies. The team will continue to pursue and investigate whether such authority delegations exist in charge letters or historical documents and the team also recognizes that it is not within its purview to make determinations about delegation of authority where needed. The team also wrestled with clearly understanding the ambiguous roles various committees play in approving or advising on policy, which presents an opportunity for clarification and education.

3. Establish standardized tools to be used consistently across the university.

The results of the policy inventory illustrate a wide range of formats, layouts and approaches to policy and related documents. A more user-friendly approach that provides continuity and enhances understanding would present policies in a consistent layout using standard tools and formats.

3.1. Establish commonly understood terms and definitions to be used consistently in policies across the university. To achieve that, the team attached a draft set of proposed terms and definitions (Exhibit 10, attached) informed by carefully examining terms used at peer institutions (Exhibit 11, attached) and further informed by robust conversation about different needs across the university’s wide array of functional areas and disciplines. The team intentionally stated the terms and definitions in plain language. The goal is to use a

set of commonly understood terms that consistently mean the same thing across campus. That goal is best achieved by using terms and definitions composed in clear, straight-forward language. As someone noted during a team discussion, if we want people to understand and use the terms, we must make the terms understandable. The team also recommends:

3.1.1. *Encourage the use of plain language in university-wide policies.* Too often, policies are over-written and difficult to follow. While some policies specific to areas of specialization and expertise may require technical language, the spirit of most policies ought to strive, wherever possible, to use clear, understandable language for a broad audience. Recognizing that university employees, students and stakeholders represent a wide variety of education levels and that for some English is a second language, striving for clarity encourages equity and accessibility.

3.2. Create a template to be used for all university-wide policies. The team engaged in thoughtful and detailed discussions to draft a policy template broad enough to be used across the university's wide array of needs, yet specific enough to be useful for a searchable library. The team reached consensus on the elements in the attached proposed template (Exhibit 12, attached), which uses the proposed terms and definitions described above (recommendation 3.1) and attached. The proposed template would be used for all university-wide policies.

3.3. Establish a uniform numbering system for numbering university-wide policies. To be effective, the policy library will need a uniform and unique numbering system. The team defers proposing a specific numbering system until the next phase of the project when technical requirements and the capabilities of potential vendor software may influence this decision. In general, the numbering system ought to align with a subject category index (e.g., academic, administrative, human resources, etc.) and, if possible, with UW System's policy numbering system.

As previously noted, a policy library at UW-Madison will be most successful if implemented in a series of manageable steps or phases. Most of the above recommendations represent a series of first steps that are accessible, meaning they are within the realm of manageable change and likely to be supported by most stakeholders as a step toward stronger policy management practices. The team believes there are likely opportunities for further improvement in subsequent phases after the library is implemented. Several of those opportunities have been mentioned in this report, including conducting needs assessments and impact analyses for proposed policies, and establishing a public comment period for proposed policies. Those ideas have merit and would likely be best folded into institutional practices when the library is up and running.

Conclusion

This report represents an inflection point in the project team's ongoing work toward implementing an online searchable policy library during the 2020 – 2021 academic year. The team believes executing these recommendations will best position the university for implementing a successful policy library. Moving forward, the next phase for this project will pivot toward acting on these recommendations if accepted and implementing the policy library. To achieve this:

- *The steering committee will continue to oversee the project* on behalf of the executive sponsors, advising the various teams and working groups through Office of Strategic Consulting.
- *Office of Strategic Consulting will continue managing the project through library implementation*, including facilitating the work of project teams and working groups, sharing important updates about project status with key stakeholder groups (e.g., leadership council, provost's executive group, administrative council, etc.), collaborating with the policy coordinator if named, and developing a robust communication and change management plan for ensuring the library is effective.
- *The project team, with representatives from key administrative areas, will continue its work toward implementing the library*, including participating in efforts to implement new tools (e.g., terms and definitions, template, process), identifying a standardized numbering system and subject index taxonomy, evaluating potential solution products, and establishing a process for eventually populating the library.
- *A technical sub-team will continue its work documenting and defining specific business and technical requirements of a policy management system*, prioritize specific features to be used to evaluate solutions, and vet requirements with broader units and other stakeholders to validate and improve as necessary (see Exhibit 15, attached).
- *A cross-campus working group will be formed to draft the guidelines for policy development*. As described in recommendation 1.3.1 on page 12, the working group will include faculty, academic staff, university staff, students, administrators and representatives from key functional areas that develop university-wide policies.

The project team issued this report at the present time to facilitate decision-making that will ideally take place in parallel to our ongoing work. Specifically, decisions and action toward implementing recommendations 1 and 2—to respectively establish a policy coordinator and a working group to develop the guidelines document, and to clarify and document authority delegations—are critical to the project's long-term success.

The team believes the time is right for a searchable policy library and that implementing the recommendations in this report will enhance the likelihood of the library's long-term success.

Exhibit 1

Policy Library Project Structure and Governance

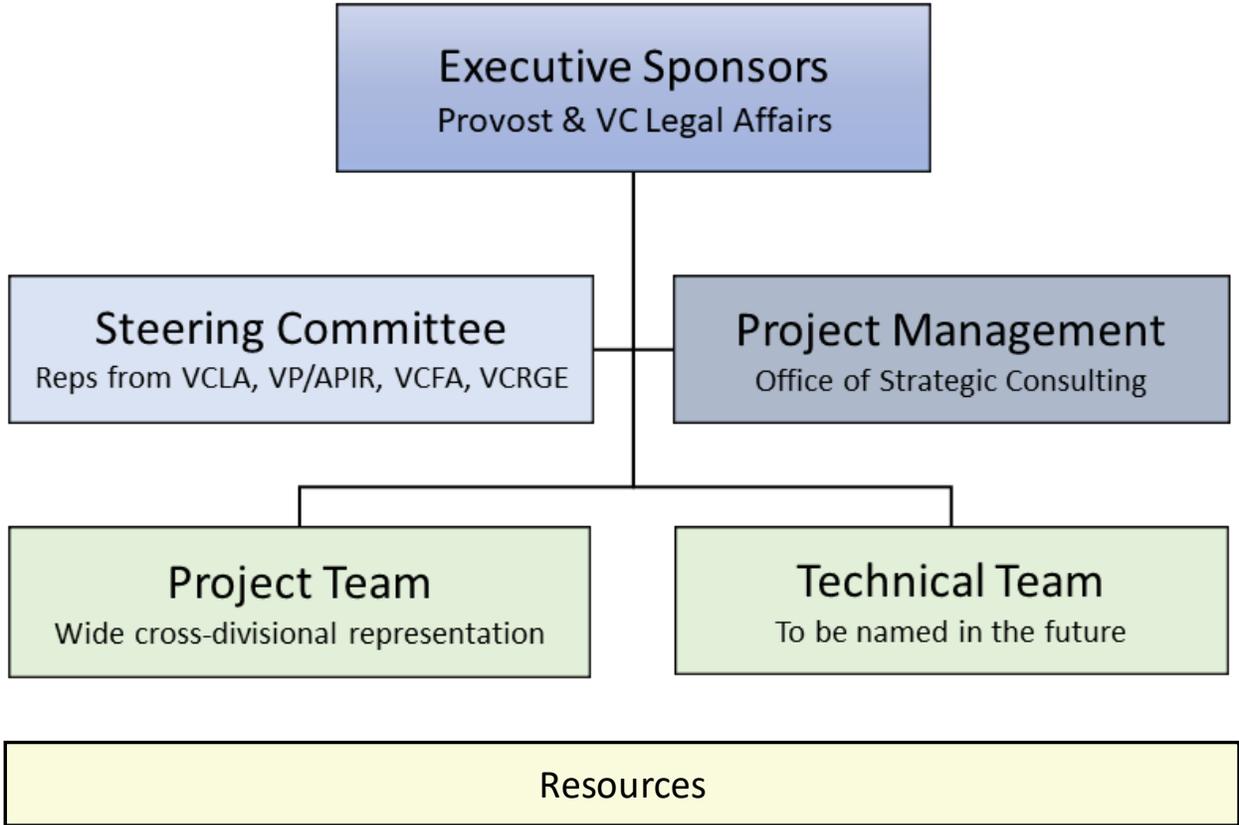


Exhibit 2

Policy Library Project

Steering Committee Charge

At the request of the Provost and the Vice Chancellor for Legal Affairs, the Office of Strategic Consulting is undertaking a long-term project to develop a searchable policy library for the university.

Project Goals

1. Make it easier to find university-wide policies by establishing a searchable, online policy library.
2. Ensure policy library is compatible with the policy development process.

Charge

The Steering Committee is charged with overseeing the project's progress:

1. Serve as day-to-day proxy for Executive Sponsors (e.g., make critical and timely decisions to keep the project on schedule and within scope).
2. Advise, inform, and offer guidance to the project manager, executive sponsors, and key stakeholders,
3. Assist with project communications (which will be provided) with Executive Sponsors, other university executives, and the campus community.
4. Serve as allies and ambassadors for the project with stakeholder groups in your sphere(s) of influence.

Membership

The attached addendum lists Steering Committee members, as well as the Project Team roster and Subject Matter Experts.

Deliverables

The Steering Committee does not have specific deliverables.

Responsibilities

Steering Committee Responsibilities include:

1. Consult with project managers and the project team as needed throughout the project.
2. Guide project development and outcomes.
3. Identify potential risks and barriers to success.
4. Monitor project quality and progress.
5. Communicate, as needed, with project executive sponsors and ensure that project management team understands concerns, needs, and directives of executive sponsors.

Scope

The following items and activities are considered **in scope** for this project:

1. University-wide policies, regardless of where they originate.
2. Documenting the university level policy-making and approval process, including tools and templates, numbering systems, version control.
3. Recommending and implementing a searchable, online policy library.
4. Establishing policy publishing standards, such as html, pdf, and other outputs.

The following activities are considered **out of scope** for this project:

- Revising the content of existing policies.

Exhibit 3

Policy Library Project

Project Team Charge

At the request of the Provost and the Vice Chancellor for Legal Affairs, the Office of Strategic Consulting is undertaking a long-term project to develop a searchable policy library for the university.

Executive Sponsors

Provost John Karl Scholz and Vice Chancellor for Legal Affairs Ray Taffora

Project Goals

1. Make it easier to find university-wide policies by establishing a searchable, online policy library.
2. Ensure policy library is compatible with the policy development process.

Charge

The Policy Library Project Team is charged with making recommendations and successfully implementing a functional policy library for UW-Madison. The project team will:

1. Assist in developing and delivering a searchable online campus policy library,
2. Consult with, advise, inform, and guide the project managers, steering committee, executive sponsors, and key stakeholders,
3. Assist with project communications (which will be provided), and
4. Serve as allies and ambassadors for the project with stakeholder groups in your sphere(s) of influence.

Membership

The attached addendum lists Steering Committee members, as well as the Project Team roster and Subject Matter Experts.

Deliverables

The Project Team's deliverables for phase 1 (due August 31, 2019) include:

- A. Summary analysis of current state for policy management (including an inventory of current policies and clarification of the current process for policy development, approval, curation and publishing).
- B. Recommended framework and process for policy making.
- C. Definition of requirements for a searchable policy library.
- D. Project plan for implementing the recommendations.
- E. Estimate of resources and timeline needed to implement.

Responsibilities

In fulfilling its charge, the Project Team is expected to:

1. Identify decision points and forward recommendations to the Steering Committee and/or Executive Sponsors for decisions as needed along the way.
2. Surface key questions and issues for referral to the Steering Committee for guidance or resolution.
3. Identify and flag problematic policy content that merits attention and refer it to the appropriate authority for consideration and resolution, such as:
 - a. Conflicts: UW-Madison policies that conflict with each other OR may conflict with higher order policy (UW System policies, State statute or administrative code, or federal regulations)
 - b. Overlaps: Multiple overlapping policies intended to address the same issue and may point to a need for a single university-wide policy.
 - c. Gaps: Situations or concerns where a policy may be needed but does not currently exist.
 - d. Questionable or unclear policy that seems outdated or otherwise in need of review,
 - e. Orphans: Existing policies that appear to have no clear owner or responsible authority.

Scope

The following items and activities are considered **in scope** for this project:

1. University-wide policies, regardless of where they originate.
2. Documenting the university level policy-making and approval process, including tools and templates, numbering systems, version control.
3. Recommending and implementing a searchable, online policy library.
4. Establishing policy publishing standards, such as html, pdf, and other outputs.

The following activities are considered **out of scope** for this project:

- Revising the content of existing policies.

Exhibit 4

Executive Sponsors: Provost John Karl Scholz and Vice Chancellor for Legal Affairs Ray Taffora

Steering Committee

Office	Person
Office of the Provost	Jocelyn Milner, Vice Provost of Academic Affairs, & Director, APIR
Office of Legal Affairs	Ben Griffiths, Senior University Legal Counsel
Office of the VC for Research & Grad. Ed.	Lynn Haynes, Director, Office of Research Compliance
Office of the VC for Finance & Admin.	Scott Hildebrand, Special Assistant

Project Team

Office	Person
Academic Planning & Instl. Research	Michelle Young, Academic Planner
Business Services	Amy Ferguson, Associate Director
College of Agri. & Life Sciences (CALs)	Sandy Fowler, Assistant Dean
Conference Centers & Mail Services	Josh Goldman, Associate Director
Div. of Diversity, Equity & Ed. Achievement	Tena Madison, Director of Data Management
Division of Student Affairs	Kipp Cox, Assistant Dean
DoIT	Gary Declute, Sr. Information Processing Consultant, Cybersecurity
Enrollment Management	Jeremy Traska, Director of Administration & CFO
Facilities Planning & Management	Margaret Tennesen, Deputy Associate Vice Chancellor
Graduate Education	Parmesh Ramanathan, Associate Dean
Housing	Faye Reber, Divisional Administrative Assistant
Human Resources	Patrick Sheehan, Director, Workforce Relations
Libraries	Bruce Barton, Dir., Library Application Dev. & Discovery Strategy
Nelson Institute for Env. Studies	Lynn West, Assistant Director of Administration
Office of Compliance	Jaimee Gilford, Director
Office of Research Compliance	Heather McFadden, Dir. of RCR Ed., Stem Cell Research Oversight
Research & Sponsored Programs (RSP)	Jennifer Rodis, Policy & Planning Analyst
School of Education	Anna Lewis, Co-CIO
School of Medicine & Public Health	Greg Zalesak, Administrator, Depts. of Neurology & Neurological Surgery
University Relations	Tricia Nolan, Assistant VC, University Marketing
UWPD	Brent Plisch, Assistant Chief of Operations

Resources

Office	Person
Faculty	Steve Smith, Secretary of the Faculty
Academic Staff	Heather Daniels, Secretary of the Academic Staff
University Staff	John Lease, Secretary of the University Staff
Associated Students of Madison	Laura Downer, Chair
Athletics	Katie Smith, Associate Athletic Director, Compliance
Data Mgmt. & Analytic Services	McKinney Austin, Ass. Director, Office of Data Mgmt. & Analytics
University Health Services	Arnie Jennerman, Director, Business Services
UW System	Stefan Fletcher, Dir., Administrative Policies & Special Projects

Exhibit 5

Best Practices for Policy Management

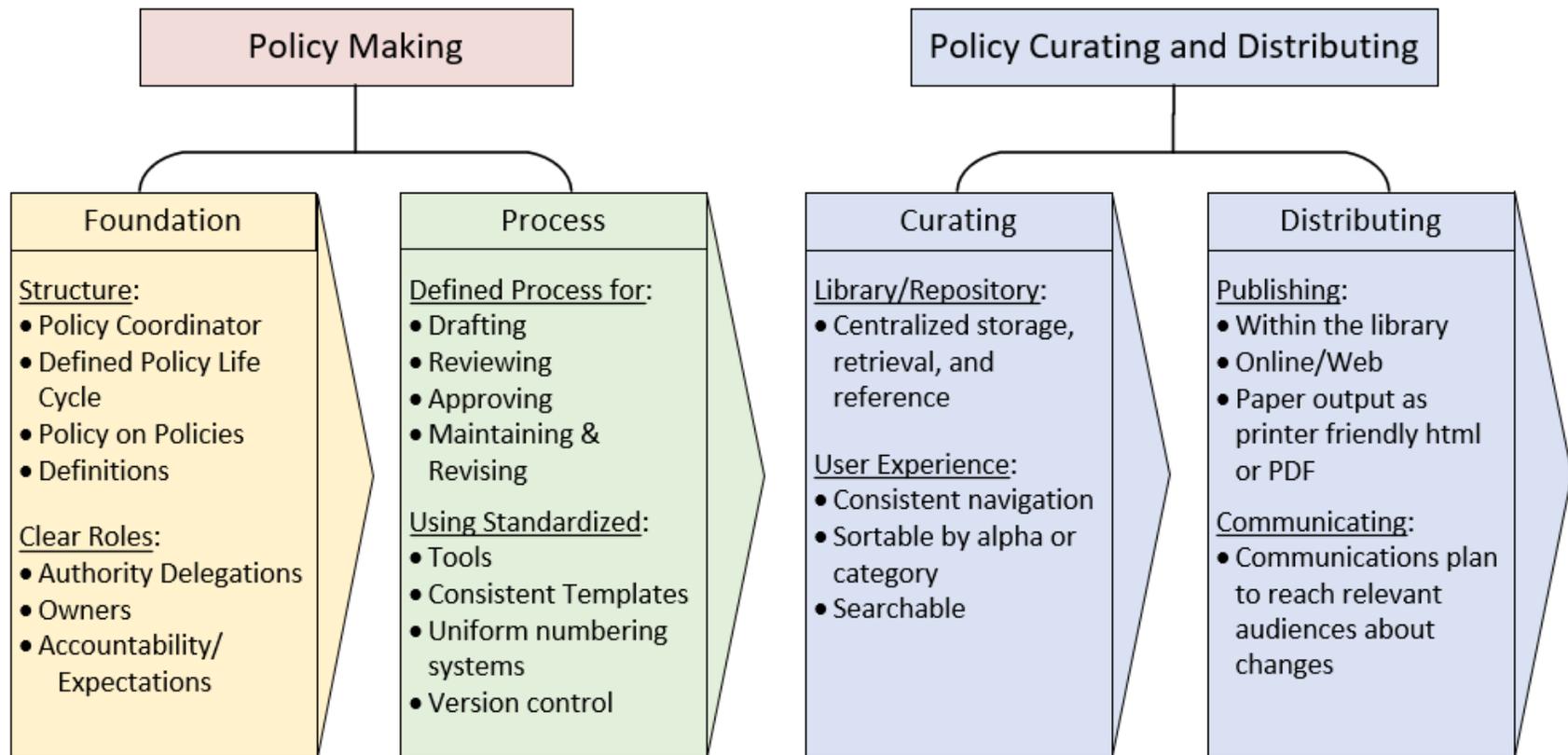


Exhibit 6

Current State: Big 10 Benchmarks

As of 9-27-18	<u>Framework</u>		<u>Process</u>		<u>Library/Repository</u>		
	Central Policy Office	Policy on Policies	Consistent Template	Uniform Numbering System	Library/Repository	Key Word Searchable	By Category
Indiana University	✓	✓	✓	✓	✓	✓	✓
Northwestern University	✓	✓	✓	✓	✓	✓	✓
Penn State University	✓	✓	✓	✓	✓	✓	✓
Purdue University	✓	✓	✓	✓	✓	✓	✓
Rutgers University	✓	✓	✓	✓	✓	✓	✓
University of Michigan	✓	✓	✓	✓	✓	✓	✓
University of Minnesota	✓	✓	✓	✓	✓	✓	✓
University of Illinois	✓	✗	✓	✓	✓	✓	✓
Ohio State University	✓	✗	✓	✗	✓	✓	✓
University of Maryland	✓	✗	✗	✓	✓	✗	✓
University of Iowa	✗	✓	✗	✓	✗	✗	✓
University of Nebraska	✗	✗	✗	✗	✓	✗	✓
Michigan State University	✗	✗	✗	✗	✗	✗	✗
UW-Madison	✗	✗	✗	✗	✗	✗	✗

Exhibit 7

Policy Inventory Temporary Subject Index

as of 8-5-19

Temporary Subject Index	Documents Inventoried
Academic	135
Academic Staff	31
Administrative	149
Athletics	36
Communications & Marketing	10
Facilities	124
Faculty	126
Graduate Education	82
Human Resources	83
Information Technology (IT)	27
Legal Affairs & Compliance	52
Research	141
Student Affairs	133
Total	1,129

Exhibit 8

Policy Inventory Analysis

as of 8-5-19

Number of documents	Analysis Term	Definition of analysis term
612	Library Ready	Has enough information to be ready for the library. Minimum criteria: <ul style="list-style-type: none"> - Is a policy (as defined elsewhere) - Clear policy manager/"owner" - clear approval authority/exec. sponsor listed - properly titled "policy" - uses policy language
22	Overlap	Covers something addressed in or related in another document. Link to the other document in the Analysis Notes.
240	Orphan	Has no clear policy manager/owner
8	Wrong Address	Policy Manager/owner seems misplaced and document perhaps ought to be managed elsewhere.
177	No Authority Listed	Does not list a position (exec sponsor, responsible executive or authority), or person who approved the item.
14	Conflict	Is in direct conflict with another policy. Includes multiple versions of the same policy.
0	Gap	Reveals need for a policy but this document isn't one.
231	Ambiguous: Policy Ramp	Is titled policy but needs to be more explicit e.g., remove "guidelines" reference OR is not labeled policy, but invokes policy language and probably should be policy.
66	Ambiguous: Clean-up path	Is not policy but needs some language clean-up to remove or change confusing language that implies mandatory behavior, or self-references as policy.

Note: Documents that are not "library ready" may be counted multiple times to reflect each of the issues that document faces. Therefore, the numbers will not add up to equal the total inventory number.

Exhibit 9

Peer Institution Policy Offices

Institution	Central Policy Office?	Policy on Policies? *	Coordinator Title	Reports/Rolls up to:	Reports to Functional Area	Policy Body?	Name of Body
Cornell	✓	✓	Director, University Policy Office	VP for Finance	Finance & Administration	✓	Executive Policy Review Group and a Policy Advisory Group
Indiana	✓	✓	Chief Policy Officer	VP for Univ. Academic Affairs	Provost	✓	Policy Advisory Council
Minnesota	✓	✓	Office of Institutional Compliance	Chief Compliance Officer	Compliance	✓	Policy Advisory Committee
Ohio State	✓	✓	Policy and Training Director	VP & Chief Compliance Officer	Compliance	✓	University Policy Review Committee
Penn State	✓	✓	Compliance Specialist (uncertain)	Corporate Controller's Office	Finance & Administration	None Found	None Found
UC Berkeley	✓	✓	Policy Coordinator	Office of the Chancellor	Chancellor/President	None found	None Found
UNC	✓	✓	Director, Office of Ethics Ed. & Policy Management	Chancellor	Chancellor/President	✓	Policy Review Committee
UT at Austin	✓	✓	Deputy Compliance Officer and Policy Prgm. Manager	University Compliance Services	President	✓	Policy Office Advisory Group
UVA	✓	✓	University Policy Manager	Exec VP & COO	Finance & Administration	✓	Policy Review Committee

* Titles vary for "Policy on Policies" documents. Some institutions have a document that includes the elements of a Policy on Policies, though the document may not include the phrase "Policy on Policies" in its title. For example, Minnesota calls theirs "Establishing Administrative Policies."

Exhibit 10

Proposed Terms and Definitions (aligns with Draft Template)

Approval Authority

Position or office with the right to issue, approve, or enforce policy. Typically, this authority is granted by WI state statute or other foundational document(s) and can be delegated to others by the relevant authority.

Definitions

Explanation of key terms or concepts specific to this policy

Effective Date

Date when policy enters into force. It may be a past, present or future date.

End Date

Date when the policy is no longer in effect.

External References

Any federal/state laws or regulations, other Board of Regents or UW System policies that mandate or otherwise affect this policy.

Issuance Date

Original date when the policy is released to the university as approved. Unless otherwise noted, this date is assumed to be identical to the Effective Date.

Next Review Date

Date of next scheduled review. This field should automatically change after any revision or completed review.

Policy

A general written rule by which the institution is guided in the management of its affairs. This written statement mandates, specifies, or prohibits behavior to express the values of the institution, enhance the institution's mission, ensure coordinated compliance with applicable laws and regulations, promote operational efficiency, and/or reduce institutional risk.

Policy Contact(s)

The policy contact is generally a position who is the subject matter expert designated by the Responsible Office to be the first point of contact to answer policy questions and assist in policy interpretation.

Policy History

Background Information on a policy's development, such as issuance date, approval date(s) for any prior revisions of the policy as well as the policy's initial approval date. Policy history will include any information about when a policy has been re-numbered, repealed or reviewed.

Policy Manager

Position (and by extension, the incumbent in a position) responsible for the development and administration of policies within a relevant domain; administration of policy includes policy interpretation and enforcement, as well as related procedures, processes, instructions, forms, and revisions. Depending on the scope of the subject matter, a policy may have more than one policy manager.

Rationale/Purpose

A brief summary of the policy's primary objectives; may include the need for the policy (e.g., federal or state statutory requirements, meet the goals and objectives of the University, critical needs, etc.)

Related UW-Madison Documents

Other UW-Madison related documents/websites that provide relevant information and may be necessary to ensure compliance with the policy. Could include links to procedures or forms, for example.

Related UW-Madison Policies

Other UW-Madison policies that are closely related to the policy itself and may need to be known to users of the policy.

Scope

Who and or what the Policy applies to: Lists groups who must know and adhere to the Policy. In the absence of a scope statement, the policy is assumed to apply to all members of the UW-Madison community (including, but not necessarily limited to faculty, staff, students, users, and visitors).

Other relevant terms:

Guidelines

General non-mandatory recommendations that provide readers with helpful information about how to achieve a particular aim; these might include recommendations, administrative instructions, best practices guidance, or frameworks in which to operate.

Institution-wide/University-wide

Refers to policy, procedures and guidelines that apply generally to all members of the UW-Madison community, including, but not necessarily limited to, faculty, staff, students, users, and visitors regardless of where the document originated.

Policy Making Process(es) [also: Policy Development]

Policy development and review through an established process to ensure that policies are developed, approved, and reviewed consistently. Documentation of policy development process(es) provides a single point of reference for information related to policy development and review.

Policy Management

A system for all of the elements and practices in the policy life cycle, including a framework and process for policy making or development, and the tools and techniques for policy curation and distribution.

Procedures

A description of the operational processes necessary to implement policy. Procedures include information on the offices and positions responsible for policy implementation, instructions to campus constituents regarding how to effect the policy, where to turn for information, and the like.

Unit Policy

College/School/Department/Division (unit) policy that has application only within the issuing unit (e.g., applies only to unit employees, staff, and students working for or studying within the unit). A unit policy can create additional specifications, requirements, or restrictions as compared to higher-order policy (e.g., University-wide or UW System-wide policy) but cannot contradict or be less restrictive than a higher-order policy.

Exhibit 11

Peer Institutions

Policy Template Elements

Policy Template includes:	UNC	Cornell Univ.	Univ. of Virginia	UC Berkeley	UT at Austin	Indiana Univ.	Univ. of Minn.
Title/Name	✓	✓	✓	✓	✓	✓	✓
Purpose	✓	✗	✗	✗	✗	✗	✗
Policy Statement	✓	✓	✓	✓	✓	✓	✓
Reason/Why for policy	✗	✓	✓	✓	✓	✓	✓
Procedures	✓	✓	✓	✓	✓	✓	✓
Scope/Who it applies to	✓	✓	✓	✓	✓	✓	✗
Related Documents/Information	✓	✓	✓	✓	✓	✓	✓
History: Effective dates; Revisions	✓	✓	✓	✓	✓	✓	✓
Definitions/Glossary	✓	✓	✓	✓	✓	✓	✓
Consequences/Sanctions	✓	✗	✗	✗	✗	✓	✗
Responsibilities	✗	✓	✗	✓	✓	✗	✓
Policy Contact	✓	✓	✓	✓	✓	✓	✓
Additional Contacts	✓	✗	✗	✗	✗	✓	✓
Responsible Office/Officer	Responsible University Officer(S)	Responsible Office		Responsible Office	Responsible Policy Owner	Responsible University Office	Responsible University Officer
Executive/Senior Leader	Issuing Officer	Responsible Executive	Oversight Executive	Responsible Executive	Responsible Executive Sponsor	Responsible University Administrator	Senior Leader
Policy Owner	✗	✗	✗	✗	✗	✗	✓
Issuing Office	✓	✗	✗	✗	✗	✗	✗
Appendices/Attachments	✗	✓	✗	✓	✗	✗	✓
FAQS	✗	✗	✗	✗	✓	✗	✓
External Regulations	✓	✗	✗	✗	✗	✗	✗
Link to current policy	✗	✗	✗	✓	✓	✗	✗
Principles	✗	✓	✗	✗	✗	✗	✗

Exhibit 12

Proposed UW-Madison Policy Template

Green text = Language the team reached consensus on.

Blue text = Language the team has indicated some preference for, but not yet reached consensus on.

See *Proposed Terms and Definitions* document for an explanation of each field's understood meaning.

Policy Title	
Policy Number	
Approval Authority	[The authority responsible for final approval of a new or revised policy.]
Policy Manager	[Position or office responsible for the development and administration of the policy.]
Policy Contact	[include Office Name, Telephone Number, Email/Web address [If multiple contacts for different aspects of policy, note area of expertise for each contact.]

1. Rationale/Purpose

[Brief summary of the policy's primary objectives; may include the need for the policy (e.g., federal or state statutory requirements, meet the goals and objectives of the University, critical needs, etc.)]

2. Definitions

[Explanation of key terms or concepts specific to this policy]

3. Scope

[Who and or what the Policy applies to: Lists groups who must know and adhere to the policy. In the absence of a scope statement, the policy is assumed to apply to all members of the UW-Madison community, including, but not necessarily limited to, faculty, staff, students, users, and visitors.]

4. Policy

[The actual language which constitutes the policy itself.]

5. Related UW-Madison Policies

[Other UW-Madison policies that are related and may need to be known by users.]

6. Related UW-Madison Documents

[Other UW-Madison related documents/websites that provide relevant information and may be necessary to ensure compliance with the policy. Could include links to procedures or forms, for example.]

7. External References

[Any federal/state laws or regulations, other Board of Regents or UW System-wide policies that mandate or otherwise affect this policy.]

8. Policy Administration

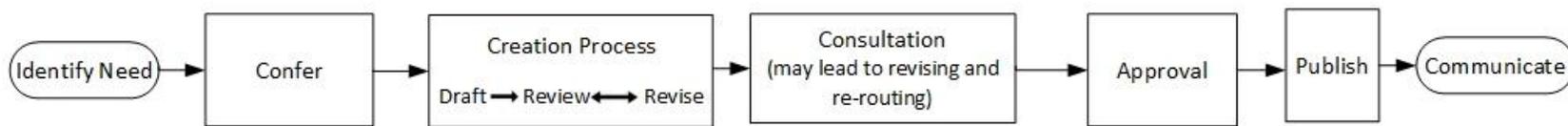
Effective Date	[Date when policy enters into force. It may be a past, present or future date.]
Policy History	<p>Issuance Date [List original date when the policy is released to the university as approved.]</p> <p>Revised Dates [List dates the policy was revised.]</p> <p>Reviewed Dates [List last reviewed date(s)]</p> <p>End Date [Date when the policy is no longer in effect.]</p>
Next Review Date	[Enter date of next scheduled review. This field should automatically change after any revision or review.]

For policy library administration:

Category/Subject Area (main)	Tabled labelling category until after inventory analyzed.
Keywords (list all)	

Exhibit 13

UW-Madison Policy Development Current State: Typical Steps



External:

- Federal
- State
- Association
- Accreditation
- UW System
- City/County
- Audit
- Trend or best practice
- Peer Institutions

Examples:

- +/- Peer institutions
- +/- Colleagues
- +/- Departmental staff
- +/- Subject Matter Experts
- +/- Administrators at all levels (AVC's etc.)
- +/- Sponsor Authority
- +/- Legal
- +/- Stakeholders, such as:

Internal:

- Compliance
- Audit
- Stakeholders:
 - Gov. body
 - Non-Gov Working Group or committee
 - Subject Matter Expert
 - Administrative Office
 - Persons directly affected
 - Benchmarking

- Faculty
- Ac. Staff
- Univ. Staff
- Univ. Committee
- Students
- Customers/ persons served
- Alumni
- City/County

May include a variety of appropriate stakeholders depending on the policy.

Consider appropriate stakeholder vetting with campus community, such as:

- +/- Shared governance bodies
- +/- Other relevant groups, e.g., advisory groups
- +/- Admin-istrators, senior leadership, mngmt. groups/teams
- +/- Users
- +/- Students
- +/- Affiliates
- +/- Legal
- +/- Peer Institutions

- Chancellor
- Provost
- VCFA
- VCLA
- VCRGE
- VCSA
- VCUR
- Or Other Delegated Authority or approval authority*
- UW System
- BOR

- Record date approved
- Add to Knowledge Base
- Publish on Web page
- Paper copies

Communicate to key stakeholders and campus community using appropriate vehicles, such as:

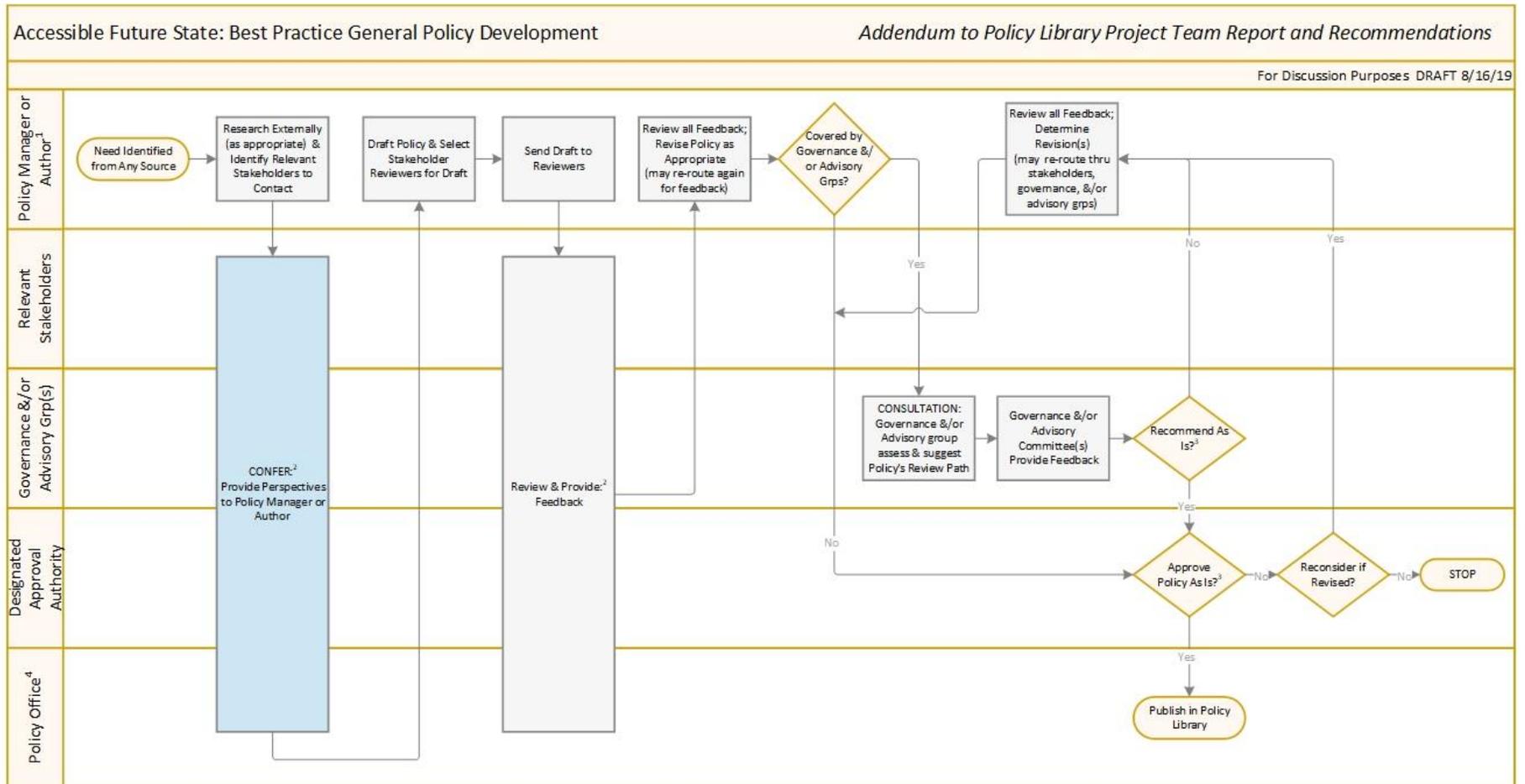
- Inside UW
- Working @UW
- Networks
- Training
- Change Mgmt.
- Communication may occur throughout the process.
- Includes periodic review

* Delegated authority or approval authority may include, but not be limited to, any of the following: an administrative office; a faculty, academic staff, university staff or student governance body (committee), task force, or advisory body, etc.

Exhibit 14

Accessible Future State: Best Practice General Policy Development

This document is also attached as a pdf file to this report.



- Notes:
- ¹An author may be any of the following (but not limited to): an administrative office; a faculty, academic staff or university staff governance body (committee), task force, or advisory body, etc.
 - ²The “CONFER” and “Review & Provide Feedback” steps are recommended to provide broad perspective to the policy author. This upfront investment should help the downstream activities go more smoothly and efficiently.
 - ³These steps need not be separate steps in all cases.
 - ⁴The Policy Office will be a neutral resource to facilitate the policy development process.

Exhibit 15

Policy Library Technical Team

The Policy Library Technical Team will assist the UW-Madison Policy Team as it evaluates systems to support the electronic management of policies. This system will establish a centralized way to store, access, search and retrieve approved university-wide policies. The team will participate in the development, review and prioritization of specific requirements to be included in the system.

Goals

To assist the sponsors and core Policy Team with recommendations for a product the team will:

- document and define specific requirements of a policy management system
- prioritize specific features that should be used to evaluate solutions
- provide access to the people and resources to review requirements
- vetting requirements with broader units and other stakeholders as necessary

Comprised of three project team members and five non-team members who bring valuable subject matter expertise, including:

- McKinney Austin, Assistant Director, Office of Data Management & Analytics
- Bruce Barton, Director, Library Applications Development & Discovery Strategy
- Kevin Cherek, Manager, Operations & Support Services, AIMS
- Heather Daniels, Secretary of the Academic Staff
- Adam Hills-Meyer, Content Strategist, Center for Digital Accessibility & User Experience
- Anna Lewis, Co-CIO, School of Education
- Gary DeClute, Senior Information Processing Consultant, DoIT
- Ed Jalinske, Cybersecurity Education and Policy Director

The technical team will produce:

- A framework to prioritize each requirement
- A list of specific features to be included for system selection
- A communications plan for vetting requirements with broader campus audiences
- Facilitated meetings with campus to gather feedback about requirements
- A brief report with findings and recommendations.