Policy Memorandum 2020-02

Policy Development and Review – Effective September 1, 2019

INTENDED AUDIENCE: This policy is intended for all staff and board members who develop, approve, and review policy for AAWDC and the Anne Arundel County Local Workforce Development Board

SUBJECT: Development of Policies, Standard Operating Procedures, and Forms, including Responsibilities, Timelines, and Requirements for Review

RESPONSIBLE OFFICE: Anne Arundel Workforce Development Corporation
Office of Compliance

POLICY CONTACT: Compliance Manager

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CANCELLATIONS

N/A

STANDARD OPERATING PROCEDURES

Policy Development
Standard Operating Procedure Development

FORMS

Policy Memorandum Template

Approvals

President and CEO, AAWDC

Chairman, Local Workforce Development Board
Introduction

The purpose of this policy is to provide a uniform set of guidelines for policy development in the following organizations and facilities:

- Anne Arundel Workforce Development Corporation (AAWDC)
- Anne Arundel County Local Workforce Development Board – AAWDC is the fiscal and administrative entity of workforce development funds in Anne Arundel County. As such, AAWDC provides staff support (including policy development) to the Local Board
- Anne Arundel County Career Center – AAWDC is the leaseholder and lead partner in the Career Center. As such, it is AAWDC’s responsibility to develop policies pertaining to the Career Center.

AAWDC reserves the right to prescribe policies and procedures for subgrantees and regional initiatives in which AAWDC is the lead partner. From time to time, AAWDC executives and management may choose to issue interim guidance through other means. Nothing in this policy should be read as forbidding that practice.

AAWDC's Office of Compliance is responsible for the development, approval, and dissemination of all policy guidance at the local level. In addition to policy development, the Office of Compliance will manage the process for developing standard operating procedures (SOPs) and forms. From time to time, the Office of Compliance may work with Office of Communications and Outreach, the Fiscal Office, and/or the Office of Human Resources to develop policy.

Policy Statement

Development of Initial Policy Guidance

AAWDC will develop a local policy interpretation in three situations:

- Guidance from a higher level requires a local policy interpretation.
- An initiative/functional department requests a local policy interpretation.
- Basic business functions, such as Human Resources or Accounting, require a local policy interpretation.

As a rule, the Office of Compliance will develop a Policy Memorandum for distribution to staff. However, there are situations where policy may be communicated in other ways. These methods include, but are not limited to, handbooks, manuals, program guidance letters, or technical assistance trainings.

When a Policy Memorandum is issued, the current template must be utilized. The template contains all the information that is necessary to transmit a local policy interpretation to staff as well as general guidance on how to write a successful policy.

Policy Dissemination

Once policy guidance is finalized and approved for distribution, the following will occur:

- A PDF version will be disseminated to staff using a methodology that allows the Office of Compliance to track active acknowledgement of receipt by staff. Active acknowledgement is defined as a feedback mechanism that requires intervention by a staff member (such as a signed acknowledgement form).
- In-person training may be provided, as determined by AAWDC management. When in-person training is provided, the training is mandatory for responsible staff. Supervisors will be responsible for staff attendance.
- Policies are public documents subject to the Maryland Public Information Act, and will be placed on the website of the relevant entity (AAWDC website, Local Board website, etc.)

Policy Review

Policy guidance is reviewed:

- Every two years on a quarterly schedule. In other words, if a policy’s effective date is October 1, 2019, then the policy will be reviewed during the calendar quarter ending December 31, 2021 (October – December 2021).
- Higher-level guidance (i.e., federal regulation change) necessitates a change to local policy guidance.
• Upon request by an initiative/functional department.

Any changes to policy guidance will be disseminated as detailed above.

**Standard Operating Procedures (SOPs) and Forms**

Each AAWDC initiative/functional department is responsible for the development of its own SOPs under the general guidance of the Office of Compliance. Whenever possible, subject-matter experts (SMEs) will create, develop, and finalize SOPs and forms. Once finalized, the SOP/form will be submitted to the Office of Compliance, which will disseminate the document and maintain version control. SOPs will be reviewed at the same time as any associated policy is reviewed or on a bi-annual basis (whichever is sooner). Forms will be reviewed annually.

**Definitions**

*Policy Memorandum* — A policy memorandum is the standard method to provide the local policy interpretation of higher-level rule or regulation. Policy Memorandums may be issued by AAWDC and/or the Anne Arundel County Local Workforce Development Board.

*Standard Operating Procedure* — A standard operating procedure is developed to provide staff with established or proscribed methods for conducting routine operations. SOPs are shown as a process flowchart. Checklists may be included as part of an SOP.

*Program Guidance Letter* — The Office of Compliance will compile a program guidance letter when staff require specific guidelines for implementing corporate policies. The guidance letter will communicate any allowable exceptions to previously communicated policy guidance, specific guidance related to AAWDC’s case management standards, and expected performance outcomes.

**Related Policies and Other Resources**

The following job aids are available to staff:

• Order of Precedence — A chart showing how policy flows from the funder to the AAWDC.