



SUBJECT: <b>Local Policies</b>	PAGE <u> 1 </u> OF <u> 5 </u>
	NUMBER: <b>01-COM-14</b>
RULE/CODE REFERENCE:	SUPERSEDES: 01-COM-14 dated 09/21/15
RELATED ACA STANDARDS:	EFFECTIVE DATE: November 7, 2016
	APPROVED: 

**I. AUTHORITY**

This policy is issued in compliance with Ohio Revised Code 5120.01 which delegates to the Director of the Department of Rehabilitation and Correction the authority to manage and direct the total operations of the Department and to establish such rules and regulations as the Director prescribes.

**II. PURPOSE**

The purpose of this policy is to establish a coordinated system for the drafting, review, and dissemination of written local policies. Guidelines shall be set for the development and revision process to ensure input from appropriate stakeholders.

**III. APPLICABILITY**

This policy applies to persons employed by the Ohio Department of Rehabilitation and Correction (DRC), independent contractors providing a service to the DRC, inmates, and volunteers.

**IV. DEFINITIONS**

**Department Policy** - A policy developed and reviewed through the Office of the Chief Inspector and approved by the Director/designee for dissemination. Policies shall define operational guidelines for DRC employees, volunteers, inmates, and the public.

**Drafter** - Any employee of the institution assigned to write a policy draft.

**Local Policy** - A policy specific to the facility that is developed and reviewed by the managing officer/designee. All final revisions of local policies must be approved by the managing officer. Policies shall define operational guidelines for institutional employees, volunteers, inmates and the public but cannot minimize requirements of related DRC policies or Administrative Regulations.

**Policy Administrator** - The staff person designated by the Operation Support Center Policy Review Team Chairperson responsible for administering and coordinating the DRC policy and operations manual review process.

**Subject Matter Experts (SME)** - A staff member within an area of responsibility that has been assigned reviewer authority for a local policy. The operational compliance manager (OCM), with approval by the managing officer, shall identify the SME's.

**Stakeholder** - Any person or group with a direct interest, involvement, or investment in the policy area.

## **V. POLICY**

It is the policy of the Ohio Department of Rehabilitation and Correction (DRC) to develop and maintain current and meaningful local policies. Local policies shall assist in ensuring compliance with agency directives, professional standards, legal requirements, settlement agreements or consent decrees, and/or any requirements or guidelines mandated by an external agency.

## **VI. PROCEDURES**

### **A. Responsibility**

1. A list of local policies required by DRC policy, ACA standards or other directives shall be developed and maintained on the Bureau of Operational Compliance intranet site. The policy administrator shall be responsible for updating the list as warranted.
2. The managing officer shall have the discretion for development of local policies in addition to the required policies based on facility need; however, all additional policies must follow the requirements for local policies depicted below. In addition to the list of required local policies posted on the BOC intranet site, it is the responsibility of the managing officer to ensure all plans, programs, and procedures required by other DRC policies, ACA standards, and Administrative Regulations are developed and maintained.
3. The OCM shall be responsible for administering the local policy process.

### **B. Local Policy Review and Revision**

1. All local policies shall be reviewed annually. It is recommended this review is completed during the ACA documentation collection period. However, at any time during the year, employees may provide input concerning local policies by contacting the OCM.
2. On or about the first business day of the ACA documentation collection period (or other review period as determined by the managing officer), the OCM shall distribute all local policies to the subject matter experts (SME) for review to determine if a revision is necessary. A Local Policy Review form (DRC1360) shall be attached to the policy.
3. The SME shall have approximately fourteen (14) calendar days following receipt of the policy to consider and take action on the policy. The OCM must be notified and grant approval for any extension to this deadline.

4. After review of the policy, if the SME determines no revision is necessary, the SME shall complete the Local Policy Review form (DRC1360) and the managing officer shall sign and date the last page of the policy documenting the annual review as complete.
5. In the event the SME determines revisions are needed, he/she shall prepare a draft revision of the policy by making notations on the policy and forwarding the draft to the OCM along with the Local Policy Review form (DRC1360).
6. The drafter is responsible for carefully proofreading the proposed draft policy prior to submission for conciseness, clarity, punctuation, and grammar. In addition, the drafter is responsible for reviewing the entire policy for accuracy; not just the revised sections. The Policy Writing Guidelines attached in Appendix B shall be used as a reference.
7. A Local Policy Review form (DRC1360) shall be completed for all policy revisions. The Local Policy Review form (DRC1360) shall be completed in its entirety showing the revision made to the policy, the factors supporting the revision, and the anticipated impact on institutional operations.
8. Local Policy Review
  - a. Upon receipt of a proposed policy and the corresponding Local Policy Review form (DRC1360), the OCM shall determine the appropriate stakeholders and coordinate a policy review meeting on the draft policy if warranted. The purpose of this meeting shall be to consider the proposed revision and its impact on overall institutional operations. Unless extenuating circumstances exist, attendance at the policy review meeting by the SME or a designee is required.
  - b. The managing officer/designee is responsible for ensuring all affected staff has the opportunity to provide feedback on the proposed policy draft before the policy is finalized.

### **C. Local Policy Format and Numbering**

1. Following the review and stakeholder input, the SME or OCM shall make the changes to the Word version of the policy. All policies shall be prepared on the approved Local Policy Template (DRC1356). If the previous policy was developed in an outdated format, the SME or OCM is responsible for transitioning the policy into the current, approved format.
2. All local policies must be numbered in the following manner and must be implemented during the annual review period following the effective date of this policy. Refer to Appendix A for specific details.
  - a. Local policies shall be numbered using references to the ACA Standards Manual and a sequential number representing the number of policies on this subject in this section. For example: 01A-01
    - i. The “01A” represents the Chapter/Section of the ACA Standards Manual.

- ii. The “01” designates the number of institutional policies on this subject in this section.
- b. It is the responsibility of the OCM to determine the most appropriate Chapter/Section of the ACA Standards Manual.
- c. Franklin Medical Center (FMC) local policies shall be numbered using references to the ACA Health Care Standards Manual.

**D. Approval and Implementation**

1. When a final version of the policy is complete, it shall be submitted to the managing officer for approval and signature.
2. Upon approval of the policy, the OCM shall assign an effective date.
3. The OCM shall facilitate posting the new or revised policy on the facility intranet, and shall disseminate notice of such to all institution staff, volunteers and inmates when appropriate.

**E. Rescinding Policies**

1. In the event a local policy is no longer needed or otherwise should be rescinded, the managing officer/designee shall complete a Local Policy Review form (DRC1360) providing a brief explanation as to the reason the policy should be rescinded. The managing officer shall then consider the request and the impact that rescinding the policy would have on the facility.
2. If it is determined appropriate to rescind the policy, the managing officer shall note such approval on the Local Policy Review form (DRC1360). If approved, the policy shall be rescinded and notice provided consistent with this policy.

**F. Policy Maintenance**

1. The OCM shall initiate and track the review of all local policies. The OCM shall be responsible for maintaining the hard copy of all local policies in a binder with a corresponding index. The index shall identify which local policies are required. A copy of all local policies shall also be maintained in the managing officer’s office.
2. Old and rescinded versions of policies must be kept in accordance with the Department Record Retention Schedule which can be found on the DRC intranet under the Legal Services section.

**G. Non-Routine Policy Revisions**

In the event of a non-routine situation, the OCM shall have the ability to coordinate an immediate policy revision outside of the annual review schedule using an abbreviated version of the policy process. This type of revision shall be extremely limited to only valid, urgent situations and only

after the OCM met with and received authorization from the managing officer to proceed with the revision.

**H. Security Policies and Policy Access**

Local policies are public information and shall be made available upon request. The only exception to public access is the security related policies which are not public information and shall be kept confidential. Local policies related to the DRC policy 310 series shall be developed, reviewed, and maintained at the discretion of the managing officer and are not required to follow the above procedures; however, they must be in compliance with their specific review requirements. The OCM is responsible for meeting with the appropriate deputy warden and/or the security chief to ensure all 310 related local policies are annually reviewed and approved by the managing officer.

**I. Adult Parole Authority, Corrections Training Academy, and Ohio Penal Industries Local Policies**

Local policies specific to the Adult Parole Authority (APA), Corrections Training Academy (CTA), and the Ohio Penal Industries (OPI) located on McKinley Avenue are exempt from the local policy review and revision process. The managing officer may develop their own policy review process; however, they must be converted to the Local Policy Template (DRC1356) during their next revision and must adhere to annual review, security policy access, and retention requirements.

**Attachments:**

Appendix A	Local Policy Numbering System
Appendix B	Policy Writing Guidelines

**Related Department Forms:**

Local Policy Template	DRC1356
Local Policy Review Form	DRC1360

# Local Policy Numbering System

A: The number which designates the Chapter and Section of the ACA manual.	B: Hyphen (-) followed by a number which designates the number of procedures on this subject in this section
<b>01- Part One: Administration &amp; Management</b>	
A - General Admin. / 4-4001 to 4-4024 B -Fiscal Management / 4-4025 to 4-4047 C - Personnel / 4-4048 to 4-4071 D - Training & Staff Devel / 4-4072 to 4-4094 E - Case Records / 4-4095 to 4-4113 F - Info. Sys. & Research / 4-4100 to 4-113 G - Citizen & Volunteer / 4-4114 to 4-4122	01, 02, 03 ...
<b>02- Part Two: Physical Plant</b>	
A - Building & Safety Codes / 4-4123 to 4-4124 B - Size, Organization, & Location / 4-4125 to 4-4128 C - Inmate Housing / 4-4129 to 4-4144 D - Environmental Conditions / 4-4145 to 4-4153 E - Programs & Service Areas / 4-4154 to 4-4166 F - Administrative & Staff Area / 4-4167 to 4-4170 G - Security / 4-4171 to 4-4-4173	01, 02, 03 ...
<b>03 - Part Three: Institutional Operations</b>	
A - Security & Control / 4-4174 to 4-4210 B - Safety & Emergency / 4-4211 to 4-4225 C - Rules & Discipline / 4-4226 to 4-4248 D - Special Management /4-4249 to 4-4273 E - Inmate Rights / 4-4274 to 4-4284	01, 02, 03 ...
<b>04 - Part Four: Institutional Services</b>	
A - Reception & Orient / 4-4285 to 4-4295 B - Classification / 4-4296 to 4-4312 C - Food Service / 4-4313 to 4-4328 D - Sanitation & Hygiene / 4-4329 to 4-4343 E - Health Care / 4-4344 to 4-4427 F -Social Services / 4-4428 to 4-4441 G - Release / 4-4442 to 4-4447	01, 02, 03 ...
<b>05 - Part Five: Inmate Programs</b>	
A -Work & Industries / 4-4448 to 4-4463 B - Academic/Education / 4-4464 to 4-4480 C - Recreation / 4-4481 to 4-4486 D - Mail, Telephone, Visit / 4-4487 to 4-4504 E - Library / 4-4505 to 4-4511 F - Religious Programs / 4-4512 to 4-4551 G - Security Threat / 4-4530	01, 02, 03 ...

## Writing or Revising DRC Policy Directives/Impact Analysis

### Policy

1. Review the entire policy for accuracy. As a policy owner, you are responsible for **all language** in the policy. Do not just focus on a specific section as there may be other language in the policy that needs updated as well. For example, all references to Central Office must be changed to Operation Support Center.
2. Pay attention to the deadline for policy revisions as it enables related policies to be scheduled together for Operation Support Center PRT eliminating the need for some staff to attend multiple PRT's.
3. Policy drafts must be developed using the most current, up-to-date, department policy format. The current format is (DRC1361/1362 rev. 04/08). If the previous policy was developed in an outdated format, the policy owner is responsible for transitioning the policy into the current, approved format.
4. Policy text shall be formatted in Microsoft Word, Times New Roman, font size 12. All paragraphs within the policy shall be formatted with a justified alignment.
5. When revising a policy, ~~strike out old language~~ and place new language in **bold**. Do not use all capital letters or the "Track Changes" function.
6. Review the use of the term "should" vs. the term "shall". Using the term "should" implies that you should do something but it is not always required, whereas "shall" implies that you must do it.
7. Review the use of the terms Warden and Deputy Warden of Special Services, Operations, and/or Administration. Instead of Warden, the term Managing Officer is more appropriate. Also, not all institutions have a DWSS, DWO, or DWA; therefore, it is more appropriate to use the language "responsible Deputy Warden".
8. Review the use of the terms Unit Management Administrator and/or Major. Those positions are now Unit Management Chief and/or Security Chief. Also, all references must be changed to Operation Support Center as opposed to Central Office.
9. Any related legislation or administrative rule must be properly cited in the header of the policy
10. Appropriate ACA Expected Practices (Standards) must be cited in the header of the policy. The ACA Expected Practices listed in the policy header must match the policies cited for that Expected Practice in the approved DRC Documentation Lists. When the revision to policy will impact the DRC Documentation Lists, the BAPOC Chief must be consulted prior to revising the policy.

11. Ensure the Applicability Statement is accurate and lists any facilities/entities that should be exempted from the policy requirements. The Applicability Statement must correspond to the response for Question Three on the Impact Analysis.
12. Definitions must be listed in alphabetical order with the term underlined. Also, we do not define positions or forms in policy; however, we may define roles. For example we may define Volunteer Coordinator because that is a role of a staff person and not their actual position. Do not define terms that are not specifically referenced within the policy language.
13. The policy statement must start with the phrase "It is the policy of the Ohio Department of Rehabilitation and Correction...." This phrase shall not be abbreviated or altered.
14. When using an acronym, the policy owner must first write out the entire title within the body of the policy, immediately followed by the acronym in parenthesis. Only then may an acronym be used throughout the remainder of the directive. Example: Rules Infraction Board (RIB)
15. When referring to another department policy within the body of a policy, the full name of the related policy and policy number must be cited in the following format: "The reception center shall ensure that all documents detailed in Department Policy 07-ORD-09, Inmate Education Records, are included."
16. Policies are not to contain a training component without the express approval of the CTA Superintendent or designee.
17. When referring to a DRC form within the body of a policy, the full name of the form and form number must be cited. For example: "The Managing Officer shall request a waiver by completing a DRC Policy Variance Request (DRC1887) and forwarding it to the CO PRT Chairperson."
18. All DRC forms cited within the policy must be listed at the end of the policy in the format below. Do not list forms at the end of the policy that are not referenced in the policy.

### **Impact Analysis**

1. A DRC Policy Impact Analysis (DRC1907) must be completed when creating or revising any DRC policy or operational manual. When creating a new directive, the impact analysis shall include a review of the impact that the new directive will have on the agency. When the owner is revising a directive, the impact analysis shall only include a review of the impact that the proposed revision will have on the agency.
2. Be thorough in your answers.
3. At times the practice is already in place and the policy is being revised to reflect the current practice. If that is the case, it should be stated in Question One.
4. If policy comments were received but not incorporated in the policy revision an explanation must be provided in the appropriate section on the first page.

5. The response in Question Three must match the Applicability Statement of the policy. Be sure that you consider all areas of our agency. For example, does the policy only apply to institutional staff? All DPCS staff? APA staff only? CTA? OPI? Does it apply to inmates, contractors and/or volunteers? You may need to revise the existing Applicability Statement in the policy if it is not accurate.
6. If the revision requires a change to DRC forms, ensure the response states whether the forms are electronic/paper and if the existing forms can be used until depleted.
7. If the proposed revision has an effect on any other areas of the agency, ensure that you document any discussion held with those other areas. Be specific as to who it was discussed with.
8. If the proposed revision will require staff training, ensure that CTA was contacted regarding the training? Who will provide the training, etc .