

STUDY OF VDOT'S POLICY FORMAT AND FORMULATION

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EXECUTIVE SUMMARY

In May 1987, VDOT's Deputy Commissioner established a task force, led by the Office of Policy Analysis, to examine the overall configuration of agency policy instructions, as well as processes for their formulation and communication. In conducting this analysis, the task force:

- o reviewed the Code of Virginia and other secondary resources to develop definitions and criteria for the various levels of policy instruction;
- o inventoried all known policy instructions used by the Department;
- o surveyed several levels of VDOT management regarding the existence of any problems related to the framework and format of VDOT's policy instructions, as well as to procedures and roles associated with their formulation and communication;
- o surveyed other government agencies about their policies and formulation procedures; and
- o conducted a content analysis of the Department Policy Memoranda (DPM).

Findings and Conclusions:

Major findings and conclusions of the task force are located on pages 4-11 of this report. They are summarized as follows:

- (1) The Code of Virginia, through Sections 33.1-8, 33.1-12, and 1-17.2, grants policy-making authority to the Commonwealth Transportation Board, Commissioner, Deputy Commissioner, Chief Engineer, as well as to any other personnel to whom the Commissioner officially delegates that task.
- (2) Procedures are generally non-discretionary and should therefore be issued by those to whom the Code delegates policy-making authority.
- (3) Guidelines enable more latitude in their interpretation, but should still provide for reasonable consistency.
- (4) The Department has 122 known sets of manuals and unbound instructions, although only ten are widely used throughout the Department.

- (5) The major problems noted by VDOT's managers with respect to policy instructions are obsolete manuals, verbal policy instructions, and inability to locate instructions.
- (6) The most frequently-mentioned suggestions for improvement in the format area were updated instructions, a better content layout, a cross-index or referencing system, reduced duplication, and more clearly written instructions.
- (7) The major problem noted by managers about the formulation process is insufficient input into the development of policy instructions.
- (8) Survey respondents most frequently identified the following improvements for policy formulation and communication: greater input for all affected parties; more use of committees or task forces to develop policy instructions; and more timely interpretation and updating of instructions.
- (9) VDOT managers generally express a consistent understanding, and one with which the task force essentially agrees, about the roles of district engineers, division administrators and others relating to the policy process. However, few survey respondents indicated any recognition of a role for anyone to monitor or enforce these instructions.
- (10) Other agencies surveyed generally have a controlled process for promulgating policy instructions, with policy-making authority set by statute and operating procedures promulgated by high-ranking officials.

Recommendations

The task force offers the following recommendations for the consideration of the Executive Committee. Further details relating to these recommendations, as well as an action plan, are located on pages 11-17 of this report.

- (1) The Commissioner should issue a DPM relating to policy format and formulation, including definitions of the various levels of policy instructions, the latitude they afford, and the general roles of Department administrators, managers and others in their formulation, communication, and review.
- (2) All administrators designated to issue policy, procedures or standards on their own authority should

have that authority delegated by the Commissioner if it is not already available through Section 33.1-8 of the Code of Virginia.

- (3) The central office and each district, respectively, should maintain a library of all policy instructions used by VDOT and the district and its residencies.
- (4) The Management Services Division (MSD) should develop and circulate a cross-index or index of all policy instructions used by VDOT.
- (5) The MSD should also finalize a plan to update, revamp, and maintain the DPM.
- (6) Eighteen manuals now used by the Department should be consolidated or eliminated. They are listed on page 13 of the report.
- (7) An action plan should be developed by each division administrator to update any manual not revised during the past 12 months. Provisions to be included in the action plan are located on pages 13 and 14 of this report.
- (8) Each division administrator should also establish a procedure for ongoing manual maintenance, including provisions for the assignment of responsibility; continuous updating of instructions; incorporation of external policies and procedures; distribution of manuals; and a system for follow-up, interpretation, and evaluation of manual changes.
- (9) Documents that promulgate written instructions should include a table of contents, index, numbered and dated pages, and subject and section identification. These documents should also include statements regarding the instructions' purpose, authority, contact person, effective date, and, as needed, definitions.
- (10) The Office of Policy Analysis and the Management Services Division, respectively, should develop procedures for facilitating the incorporation into division manuals of the Code of Virginia and policy changes of the Commonwealth Transportation Board.
- (11) To the extent not already being done, those within and outside VDOT who are affected by particular policies, procedures, and other instructions should have meaningful opportunities for input into their development as well as any substantive revisions.

TASK FORCE

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Introduction

The Virginia Department of Transportation (VDOT) maintains a large number of policies, procedures, and other written instructions to guide all functional components of its operations. These instructions are promulgated by VDOT, the Commonwealth Transportation Board, other state agencies, the federal government, and even outside organizations.

In May 1987, the Deputy Commissioner appointed an agency task force to examine the overall configuration of agency instructions, as well as the process of their formulation and communication. This request supported a recommendation made in Senate Document #18 for such an analysis.

The objectives established by the task force were to:

1. Develop definitions and criteria to distinguish among VDOT's written instructions (regulations, policies, procedures, guidelines, standards and specifications);
2. Inventory policies, procedures and other written instructions used by VDOT;
3. Assess any problems related to the framework and format of written instructions, including accessibility, clarity, timeliness, and completeness;
4. Assess any problems associated with procedures and roles regarding formulation, review, revision, and communication of policy instructions;
5. Determine policy formats and formulation procedures of other transportation and non-transportation agencies; and
6. Develop recommendations and an action plan to improve VDOT's existing policy format and its procedures for formulating and communicating policy instructions.

To carry out study objectives, a number of activities were undertaken. These included:

- o A review of the Code of Virginia and other secondary resources;
- o An inventory, examination, and analysis of VDOT's policy instructions;
- o A mail survey of VDOT administrators and managers, including:

Top Management
 Division Administrators
 Assistant Division Administrators
 District Engineers
 Assistant District Engineers
 District Section Heads
 Resident Engineers;

- o A telephone survey of other agencies; and
- o A content analysis of the Department Policy Memoranda.

The remainder of the report is a summary of the results of the study, as well as a set of recommendations and an action plan to implement those recommendations.

VDOT'S WRITTEN INSTRUCTIONS: DEFINITION AND CRITERIA

Characteristics of the various levels of policy instructions have a bearing on who may promulgate those instructions and the flexibility with which they may be interpreted. Therefore, it is important that these characteristics be identified and incorporated into definitions and criteria.

As a result of research and analysis of the Code of Virginia, Black's Law Dictionary, and a number of management references, the task force established definitions, criteria, and examples for the various levels of written instructions. They are listed in Figure I.

Major points related to some of these definitions should be emphasized:

- o The following are granted explicit and implicit policy-making authority by Sections 33.1-8 and 33.1-12 of the Code of Virginia: The Commonwealth Transportation Board, Commissioner, Deputy Commissioner, and Chief Engineer;
- o In addition, Section 1-17.2 of the Code, as amended, explicitly grants the authority to make policy to any other VDOT personnel to whom the Commissioner officially delegates that task;

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FIGURE I

DEFINITIONS/CRITERIA FOR WRITTEN INSTRUCTIONS

RULE/REGULATION: Any statement of general application promulgated by VDOT in accordance with the authority conferred on the Department by applicable laws. Within VDCT, regulations are promulgated by the Commonwealth Transportation Board. VDOT is also subject to rules and regulations of outside agencies, such as the Federal Highway Administration and Virginia Marine Resources Commission (VMRC). In either instance, rules and regulations are specific and inflexible, allowing no discretion unless explicitly stated.

Examples:

Internal -- Rules and Regulations Governing the Prequalification of Prospective Bidders
(Commonwealth Transportation Board)

External -- Wetlands Regulations (Virginia Marine Resources Commission)

POLICY: A broad, value-oriented statement or approach which outlines, explains or justifies a certain course of action and establishes the framework for administrative action and decisions by VDOT staff.

Policy-making authority is implicitly or explicitly limited by the Code of Virginia to: The Commonwealth Transportation Board, Commissioner, Deputy Commissioner, Chief Engineer and others to whom the Commissioner officially delegates such authority.

Examples:

Internal --- DPM 3-1 Control of Traffic; Classifying and Marking Highways

External -- Executive Order #1 (Equal Employment Opportunity)

PROCEDURE: A ministerial discussion or set of instructions about "how to" carry out a policy. Procedures are intended to provide a consistent approach to a policy, and should explicitly state the range for latitude, if any. In view of their legal implications, the authority to promulgate procedures should be officially delegated.

Examples:

Internal -- Purchasing Procedures DPM 6-8

External -- State Grievance Procedure

GUIDELINE: An informational statement or discussion of "how to" carry out policies or procedures that generally provides more flexibility or discretion than do procedures. Guidelines are often typified by the words "may", "can", or "should". While there is more room for latitude in interpreting guidelines than interpreting policies, general consistency is still needed.

Examples:

Internal -- Guide to Holding Public Hearings

External -- Wetlands Delineation Guidelines (FHWA)

STANDARD: A statement or depiction of what is considered acceptable or desirable. Standards are intended to represent minimum levels of acceptability for performance. Many of VDOT's standards are imposed by external organizations.

Examples:

Internal -- (1) performance standards for VDOT employees. (2) the geometric standards that are part of the Subdivision Street Requirements.

External -- AASHTO Standard Specifications for Highway Bridges

SPECIFICATIONS: Directions, provisions and requirements associated with contracts for the construction of roads and bridges. The only manual of specifications used by VDCT is the Road and Bridge Specifications and attached special provisions.

Source: Policy Task Force

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- o Rules and regulations, whether promulgated by VDOT, state government, or federal agencies, allow no discretion unless explicitly provided;
- o Procedures are generally ministerial (non-discretionary) in nature. Therefore, they should be issued by the Transportation Board, Commissioner, Deputy Commissioner, Chief Engineer (as appropriate) or by other VDOT administrators to whom the Commissioner has officially delegated that duty;
- o Procedures are intended to provide consistency and should therefore state the option and range for latitude, if any; and
- o Guidelines enable more latitude in their interpretation than do procedures, but should still provide for reasonable consistency.

INVENTORY OF VDOT'S INSTRUCTIONS

At present, there is no index or list of the numerous written instructions used throughout VDOT. Without such an index, there is the increased likelihood that needed policies, procedures, or other instructions will not be located and that obsolete instructions are perpetuated.

To develop a complete inventory of the policies, procedures, and other instructions used by VDOT, those repoding to the mail survey (see page seven for additional details) were asked to examine a list of known policy instructions, and identify any additional manuals and unbound instructions not on the list.

As a result, 122 manuals and unbound instructions were identified. These documents are promulgated by VDOT, other state and federal agencies, and professional organizations. They can be sorted as follows:

coding or use instructions	8
training and other guides	13
regulations, policies, procedures, standards, specifications	101

The inventory of written instructions is located in Appendix A of this report.

Following analysis and discussions with affected divisions, the Task Force has identified eighteen manuals or other instructions in this inventory as immediate candidates for consolidation with other documents, or as candidates for elimination. They are identified in the right hand column of Appendix A. After further analysis within and across divisions, additional policy documents might also be consolidated or eliminated.

As shown by Table I, just ten of the 122 manuals maintained by VDOT receive widespread use throughout the Department. However, remaining manuals, though less widely used, often constitute the major policy instructions for specific functional units within the Department.

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TABLE I
MOST WIDELY USED MANUALS

<u>Name of Document</u>	<u>Department</u> <u>Wide</u>	<u>Central</u> <u>Office</u>	<u>Field</u>	<u>Section</u> <u>Heads</u>	<u>Resident</u> <u>Engineers</u>	<u>DE &</u> <u>ADE</u>
1. Road/Bridge Specs.	96	21	75	21	34	20
2. DPM	84	25	59	9	30	20
3. Highway Laws of VA	74	33	41	9	21	11
4. Road Designs/Standards	68	14	54	22	22	10
5. Human Resources P&P	49	18	31	17	11	3
6. Maintenance Policy Man.	43	--	41	--	23	14
7. MUTCD	25	6	19	8	--	6
8. Subdivision Street Stds.	24	--	23	--	11	9
9. Fiscal Div. Manual	21	12	--	8	--	--
10. Commercial Entrances Man.	20	--	20	10	--	5
11. Purchasing Manual	--	8	--	10	--	--
12. Leg. Coord. Process	--	6	--	--	--	--
13. CD/CDO Numbered Memo.	--	5	--	10	--	3
14. Info. Sys. Div. Memo.	--	5	--	--	--	--
15. Va. Supplement/MUTCD	--	5	--	--	--	--
16. Work Area Protection Man.	--	--	16	--	9	--
17. Land Use Policy Manual	--	--	--	--	8	--

Source: Task Force Survey

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The inventory of policy instructions developed as part of this study could form the basis for a policy index to be circulated throughout VDOT. Based on the definitions and criteria developed for the Department's written instructions, some VDOT manuals within the inventory may need to be retitled or redefined according to their intended function and the degree of flexibility they afford.

ASSESSMENT OF POLICY INSTRUCTIONS AND THE FORMULATION PROCESS

Users of Department policy instructions are in a very good position to evaluate them and make suggestions for their improvement. Accordingly, a survey that requested information about VDOT's policy instructions and their formulation was mailed to approximately 260 managers and administrators in the central office and field. The survey was completed and returned by 217 of these personnel, for a response rate of 83 percent.

Responses to the survey are summarized and incorporated as Appendix B of the report. Key findings from the survey follow:

POLICY INSTRUCTIONS:

1. The most prevalent weakness identified about VDOT's policy instructions is out-of-date or obsolete policies. Nearly 57 percent of the respondents see this as a frequent or fairly common occurrence. However, it should be noted that some divisions are now in the process of revising manuals.
2. Another weakness noted by a high percentage of respondents is the existence of verbal policies that have not been placed in writing. This potential problem may be related to the lack of timeliness in updating manuals, or to the inability to locate a written instruction that does, in fact, exist.
3. About one-third of the survey respondents felt the system for location of written instructions is very or somewhat ineffective. The most frequent solution proposed to address this problem is to index or cross-index written instructions, rather than consolidate manuals.
4. While nearly one-half of all respondents believe that written instructions are somewhat or very ineffective in their clarification of latitude, about the same number feel that they understand the degree of flexibility that is appropriate in implementing policies or procedures. This is an area that is difficult to assess, since managers vary significantly in their degree of comfort about applying judgment in the interpretation of policies.
5. For many questions relating to policy/procedure format, there were notable differences in responses among different levels of agency management, although no clear pattern emerged. In addition, field managers as a whole reported more duplication of instructions within and across manuals than did central office managers. The latter may be due to the wide variety of manuals used by many field managers.
6. The most frequently mentioned suggestions for improvement in the format area were an improved or uniform policy/procedure layout; a cross-index or referencing system both within and across manuals; less duplication or overlap; and more clearly written instructions.

FORMULATION AND COMMUNICATION PROCESS:

1. The most predominant "negative" associated with the formulation process is the limited amount of input many managers perceive they are allowed in the development or revision of policy instructions. Overall, over 40 percent of survey respondents scored this area as very or somewhat ineffective. However, responses suggest that field managers are more dissatisfied with input processes than are central office managers. Forty to 60 percent of field managers rated this area low, compared with 26-33 percent of central office managers.

It should be noted that some Divisions have recently implemented steps that enable more input during the formulation process. However, this finding has serious implications, in view of the fact that the major users of VDOT's written instructions are field personnel.

2. While the major sources of information about VDOT's policies and other instructions are policy manuals and memos, about one-half of the respondents also rely on verbal instructions as a major information source. While this finding may support the value of policy interpretation, it also suggests that policies could be written more clearly.
3. The most prevalent suggestions for improvement in the formulation/communication area are: greater input from all affected parties; greater use of committees or task forces to develop policy; more timely updating of instructions; and more uniform interpretation of policy instructions through meetings, training, or systematic follow-up.
4. Most managers appear to share a common understanding, and one that the task force believes is essentially correct, about the roles of district engineers, division administrators, and others relating to policy, procedures, and other written instructions. There seems to be a consistent perception that division administrators should develop, communicate and interpret policies and procedures; and that district engineers should review, provide input for, implement, and interpret them, while having a less prominent role in their development.

However, few respondents indicated any recognition of a role for anyone to monitor or enforce policies and procedures. Accountability by the divisions and, to some extent, the district offices for oversight of policies and other instructions is a basic element of good management. In addition, it is critical to the success of VDOT's current decentralization policy. The monitoring role should be stressed in future communications to VDOT's managers.

POLICY FRAMEWORK AND FORMULATION PROCEDURES OF OTHER AGENCIES

Sometimes good ideas can be obtained from other organizations that have confronted the same issues and opportunities as VDOT. To determine how other agencies are dealing with the management of their policies, a structured telephone survey was conducted with officials of the Pennsylvania, Texas and North Carolina transportation agencies, as well as the Virginia Department of Mental Health, Mental Retardation and Substance Abuse Services and the Virginia Department of Corrections. The survey inquired about both the configuration of policy instructions and the procedures for their formulation and communication. Key findings were:

1. All agencies surveyed indicate they have a controlled process for promulgating policies and procedures. Policy-making authority is set by law, and operating procedures are promulgated by a high-ranking official within the agency (e.g., deputy agency head or director).
2. All agencies have a department-wide policy manual. In addition, the surveyed transportation agencies issue 25 to 50 or more division or functional manuals.
3. Most agencies have a system for the layout or formatting of policy instructions, although the format is not always standard across all instructions or agency manuals. Components of most formats include (1) identification of policy versus procedure; (2) authority; (3) purpose; and (4) effective date. In addition, other formatting features sometimes include: review date, definitions, and source of official interpretation.
4. All agencies have a system for review of manual material, with continuous, annual, or a combination of both types of review.
5. Agencies afford participation in the development or revision of instructions, with the extent of input typically based on the potential impact of a policy or procedural change.
6. Some agencies have spent considerable time and effort in revising their policy instructions and formulation processes. For example, Texas now writes and formats policies based on an information mapping process developed by a consultant. Included in this process is attention to writing style and clarity. Pennsylvania develops policy instructions through the use of a strategic management committee and has clearly defined roles for central office and field staff for all aspects of promulgation and management of policy instructions.

FORMAT AND FORMULATION OF THE DEPARTMENT POLICY MANUAL

The Departmental Policy Memoranda (DPM) book contains 118 policies, most of which cover the construction and maintenance of roads. A recent analysis of the DPM by the Management Services Division and responses to the survey developed by the Task Force show that:

- No clear guidance or criteria have been established regarding the kinds of policies that should be included in the DPM. As a consequence, cross-cutting, as well as division-specific instructions are presently included in this manual.
- The DPM should be reserved for instructions that cross divisional lines. At present, a number of the DPM's policies should be moved to division manuals or elsewhere. At the same time, there are some cross-cutting policies contained in division manuals that may be good candidates for the DPM.
- The DPM is in serious need of updating. Some of its policies are as much as 20 years old. In addition, responses to the policy survey frequently alluded to the obsolescence of DPM policies.
- A process should be established for keeping the DPM up-to-date. This process should include the assignment of responsibility for determining needed policy revisions, as well as the notification of the Management Services Division about these changes.

RECOMMENDATIONS

The following recommendations address major issues discussed on preceding pages. An action plan beginning on page 16 is designed to implement these recommendations.

1. A DPM relating to policy format and formulation should be issued by the Commissioner. This instruction should:
 - a) distinguish among or define the various levels or kinds of written policy guidance used by VDOT;
 - b) clarify the appropriate use of each form of instruction, including the general amount of latitude that may be appropriate; and
 - c) clarify the general roles of directors, division administrators, district engineers, and others in the

formulation, promulgation, execution, monitoring and evaluation of the various written instructions.

The DPM should cover policy, procedures, standards, regulations, and guidelines, and should utilize the materials produced by the task force and incorporated into this report.

2. All administrators designated to issue policies, procedures, or standards outside the aegis of the Commonwealth Transportation Board should have this authority officially delegated to them by the Commissioner if authority is not already available through Sections 33.1-8 of the Code of Virginia.
3. A central library of all instructional manuals should be maintained by the Management Services Division. In addition, each district should maintain a set of all written instructions used within the district office and its residencies.
4. The Management Services Division should investigate the feasibility of establishing and maintaining a cross-index of all VDOT instructions, perhaps utilizing a software package designed for that purpose. Depending on the outcome of that investigation, a cross-index or, at a minimum, an index of all written instructions should be placed in the DPM. The index should be kept current by the Management Services Division.

In addition, VDOT should consider automating the index, once on-line systems are widely available in the C.O. & field; or, as an alternative, the index could be loaded onto a disk for access by stand-alone microcomputers.

5. The Management Services Division should finalize a plan to update, revamp, and maintain the DPM. The plan should be submitted to the Executive Committee for review. Once the plan has been approved, the Management Services Division should coordinate with division administrators regarding 1) policies being removed from the DPM book that may be appropriate for division manuals, or perhaps for elimination, and 2) policies in division manuals that should be moved to the DPM.
6. Following consultation with affected division administrators, 18 manuals or free standing instructions are recommended for consolidation or elimination. The elimination or consolidation of some of these instructions is already underway in the divisions. They are:

1. Internal Procedures for Establishing Rules and Regulations
2. Level of Service Manual
3. Post Construction Manual
4. Rules/Regulations for Big Walker Mtn./Eliz. River Tunnels
5. R/W Instructional Memos
6. Pass-By Trips Policy
7. Jamestown-Scotland Ferry Policy and Procedures
8. T.E.D. Instructional Memoranda
9. CD/CDO Memoranda
10. Guidelines for Revenue Sharing
11. DBE Program Compliance Procedures/Certification Procedures
12. Additions, Abandonments, and Discontinuances
13. Title VI Manual and EEO/AA Plan
14. Vegetation Management Manual
15. Erosion and Sediment Control Manual
16. Equipment Division Instr. Memoranda
17. Maintenance Division Instr. Memoranda
18. Hazard Communication Policy

Appendix A should be consulted for additional details.

Affected division administrators should take the appropriate steps to consolidate or eliminate these instructions, including the notification of manual/policy holders, as well as the Management Services Division for index updating. Consolidation or elimination of identified instructions should be built into the plan outlined in Recommendation 7.

7. Each division administrator should develop an action plan with assigned responsibilities and time frames to update each manual within his/her purview that has not been revised during the past 12 months. This plan should include provisions for:
 - a) identifying and then revising or eliminating instructions that are:
 - unnecessarily duplicative;
 - obsolete, inappropriate or not needed; or
 - contradictory;
 - b) incorporating into relevant manuals any substantive instructions that have been issued verbally or through separate letters and memos; and
 - c) consolidating or eliminating instructions identified in Recommendation 6; and
 - d) meeting with functionally-related divisions to assess the feasibility of:
 - merging duplicative or closely-related materials;
 - eliminating contradictory material; or
 - consolidating any division manuals.

Action plans should incorporate a strategy for obtaining input from appropriate district and residency personnel. The strategy should incorporate the points covered in Recommendation 11.

These action plans should be approved by the appropriate Directors, who should ensure that plans provide timely and realistic strategies for manual/instructional updating. Time frames for the completion of updates should be reported to the Commissioner.

8. Each division administrator should also establish a procedure for ongoing manual maintenance, placing particular emphasis on:

- the overall assignment of responsibility;
- the continuous updating of instructions as changes occur, with formal review at least annually;
- timely incorporation of policy and procedural changes from external agencies;
- the distribution of manuals or policies to those who need them; and
- a system for follow-up, interpretation, and evaluation of manual changes.

This procedure should be approved, and monitored by the respective Director, and then submitted to the Assistant Commissioner for distribution as appropriate.

Written instructions, to every extent possible, should be updated by preparing and distributing replacement pages or amending existing instructions by reference, as opposed to writing and separately filing a new instruction. New material should be underscored. In addition, a cover memo should explain what material has been deleted, replaced, or superceded.

9. Documents that promulgate policy, procedures, guidelines, and other written instructions should

a) at a minimum, include the following features:

- a table of contents
- an index of subject matter
- numbered pages
- dated pages for loose leaf manuals
- subject and section identification; and

b) also specify, through either an introductory section or internal formatting:

- the purpose (objective)
- the authority or reference for the instructions;

- the contact person for questions, interpretation or assistance
- the effective date; and
- (if needed) definitions.

Those who draft instructions should label them appropriately according to their purpose and the definitions stated in Figure I. If the instruction is a procedure or guideline, the underlying policy should also be articulated.

Appendix C provides a guide to assist in the implementation of this recommendation.

10. A procedure for facilitating the incorporation of amendments of the Code of Virginia and policy changes of the Commonwealth Transportation Board into division manuals should be developed by the Office of Policy Analysis and the Management Services Division, respectively.
11. Those within and outside VDOT who are affected by particular policies, procedures, and other instructions should have meaningful opportunities for input into their development and revision. Input promotes sound, balanced policies, as well as compliance after they are implemented.

Therefore, to the extent not already being done:

- a) Division personnel, as well as district engineers and others in district and residency offices should be given the opportunity to submit ideas or recommendations for new policies, procedures, and guidelines or those that are scheduled for substantive revisions. This initial input might be achieved through participation on task forces, individual polling, meetings, or other techniques.
- b) Drafts of all proposed new or substantially revised instructions over which VDOT has some control should also be submitted to those personnel that will be affected by the changes. A reasonable period of time (at least two weeks) should be allowed for review and comment.
- c) To the extent that policies and other written instructions affect contractors, developers, suppliers, or others outside VDOT, the same opportunities should be afforded.

ACTION PLAN TO IMPLEMENT
RECOMMENDATIONS OF POLICY TASK FORCE

<u>ACTION</u>	<u>RESPONSIBILITY</u>	<u>TARGET DATE</u>
1. Approval of task force recommendations	Executive Committee	12/87
2. Draft, issue DPM instruction relating to policy format and formulation	Staff as Designated; Commissioner	1/88
3. Delegate authority to issue policy, procedures, etc. - determine who should issue - delegate authority as necessary, either through Section 1.17-2 or through internal mechanism	Commissioner	2/88
4. Establish policy libraries in Central Office and Districts	Management Services Division District Engineers	2/88
5. Investigate feasibility of developing cross-index of contents of agency manuals, including development of/ investment in appropriate software	Management Services Division	2/88
6. Incorporate and disseminate policy index or cross-index - finalize and issue to all central office and field staff - develop automated on-line access (and/or input onto disks for stand-alone computers)	Management Services Division	3/88
7. Submit plan for reorganization/ updating/maintenance of DPM to Executive Committee	Management Services Division	3/88
8. Develop division action plan with assigned responsibilities and time frames to: - update obsolete materials - incorporate verbal or unbound instructions	Division Administrators	2/88

- consolidate or eliminate manuals as per Recommendation 7
 - meet with functionally-related divisions to merge, eliminate duplicative/contradictory materials and assess feasibility of further manual consolidation
 - develop and incorporate suggested format items (see Recommendation 9)
 - build in input from affected parties
9. Approve action plan outlined in Action #8; submit updated time frame to Commissioner Directors 3/88
10. Establish procedure for manual maintenance, to include: Division Administrators 3/88
- assignment of responsibility
 - updating of instructions
 - incorporation of external changes
 - appropriate distribution
 - follow-up, interpretation, evaluation
11. Approve and monitor procedure; submit copy to Assistant Commissioner Directors 4/88
12. Develop system for incorporating Code and Transportation Board changes into Division policy manuals. Policy Office Management Services Division 1/88

9/30/87

APPENDIX A
 WRITTEN INSTRUCTIONS USED
 BY VDOT

INSTRUCTIONS	SOURCE	CONSOLIDATION/ELIMINATION POTENTIAL (INITIAL ANALYSIS)
DEPARTMENT POLICY MANUAL	MGMT SER	NO; SIZE/BROAD AUDIENCE PURPOSE
HIGHWAY LAWS OF VIRGINIA	MGMT SER	NO; BROAD AUDIENCE/SIZE FORMAT
MSD INTERNAL POLICIES & PROCEDURES	MGMT SER	NO; INTERNAL TO DIVISION
INTERNAL PROCEDURES FOR EST. RULES/REGS FOR APA	MGMT SER	YES; ELIMINATE; COVERS MATERIAL ISSUED BY REGISTRAR
LEGISLATIVE COORDINATION PROCEDURES MANUAL	MGMT SER	NO; AUDIENCE; SPECIALIZED INSTRUCTIONS
HRPS MANUAL MGMT SER	NO; SPECIALIZED/WIDE	AUDIENCE
CTB HANDBOOK AND RULES/REGS	CTB/MGMT SER	NO; AUDIENCE/PURPOSE/APA
RULES & REGS FOR BIG WALKER MTN/ELIZABETH RIVER TUNNELS	CTB/BRISTOL/ SUFFOLK	YES; ELIMINATE; HAS BEEN INCORPORATED INTO HAZARDOUS TRANSPORT REGULATIONS
JAMESTOWN-SCOTLAND FERRY POLICIES AND PROCEDURES	CTB/SUFFOLK	YES; LIMITED APPLICATION; SUBSUME INTO BOARD RULES AND REGS
STYLE MANUAL FOR APA	STATE REGISTRAR	NO; EXTERNAL SOURCE/ LIMITED USERS
BUILDINGS AND GROUNDS MANUAL	DGS/ADM SER	NO; SIZE/PROG/INTERNAL
PURCHASING MANUAL	ADM SER	NO; SIZE/LIMITED USERS/ ABSTRACTED FROM EXT. MANUAL
CLAIMS MANUAL	ADM SER	NO; SIZE/AGENCY-WIDE USE/ SPECIALIZED INSTRUCTIONS

CENTRAL WHSE. TRAINING GUIDE STOREKEEPERS	ADM SER	NO; TRAINING GUIDE
DISTRICT WHSE. TRAINING GUIDE STOREKEEPERS	ADM SER	NO; TRAINING GUIDE
RESIDENCY STOREROOM TRAINING GUIDE STOREKEEPERS	ADM SER	NO; TRAINING GUIDE
REAL PROPERTY MANAGEMENT MANUAL	DGS	NO; EXTERNAL MANUAL
PROCUREMENT/SURPLUS PROPERTY MAN.	DGS	NO; EXTERNAL MANUAL
=====		
MANUAL ON ENGINEERING ESTIMATING SYSTEM	CONSTRUCTION	NO; CODING INSTRUCTIONS/ NARROW AUDIENCE
ROAD AND BRIDGE SPECIFICATIONS	CONSTRUCTION	NO; SIZE/EXTERNAL USERS
PHASE INSPECTION MANUAL	CONSTRUCTION	YES; UNDER REVIEW AS PART OF CMMS WHICH WILL PROBABLY HAVE A MANUAL
CONSTRUCTION MANUAL	CONSTRUCTION	} YES; TO BE COMBINED WITH MEMORANDA. SCHEDULED FOR REVISION.
CD/CDO MEMORANDA	CONSTRUCTION	
=====		
DBE PROGRAM COMPLIANCE PROC.	EEO DIV	} YES; WILL BECOME PART OF DBE PROGRAM MANUAL
DBE PROG. CERTIFICATION PROC.	EEO DIV	
TITLE VI MANUAL	EEO DIV	} YES; WILL BECOME PART OF EEO DIVISION MANUAL
EEO/AA PLAN	EEO DIV	
EEO POLICY	EEO DIV	NO; FREESTANDING POLICY NEEDED FOR POSTING PURPOSES
=====		
EQUIPMENT DIVISION MANUAL	EQP DIV	} YES; CONSOLIDATE WITH INST. MEMORANDA

EQUIPMENT DIVISION INSTRUC. MEMORANDA	EQP DIV	YES; CONSOLIDATE WITH DIVISION MANUAL
EQUIPMENT OPERATORS MANUAL	EQP DIV	NO; WIDE AUDIENCE/ SPECIALIZED INSTRUCTIONS
RADIO OPERATORS MANUAL	EQP DIV	NO; WIDE AUDIENCE/ SPECIALIZED INSTRUCTIONS; FORMAT
=====		
MAINTENANCE POLICY MANUAL	MAINTENANCE	YES; TO BE CONSOLIDATED WITH INST. MEMO
MAINTENANCE DIV INST. MEMOS	MAINTENANCE	YES; TO BE COMBINED WITH POLICY MANUAL
LEVEL OF SERVICE MANUAL	MAINTENANCE	YES; TO BE COMBINED WITH POLICY MANUAL
LAND USE POLICY MANUAL	MAINTENANCE	NO; SIZE/APA/EXTERNAL- OUTSIDE USERS
HAULING PERMIT MANUAL	MAINTENANCE	NO; SIZE/APA/EXTERNAL- OUTSIDE USERS
SIZE, WT., AND OTHER REQUIRE- MENTS FOR TRUCKS, TRAILERS, TOWED VEHICLES (OVERSIZED)	MAINTENANCE	NO; SIZE/APA/EXTERNAL- OUTSIDE USERS
ESCORT VEHICLE GUIDE	MAINTENANCE	NO; SPECIALIZED/EXTERNAL USERS
TIMEKEEPER HANDBOOK	MAINTENANCE	NO; SPECIALIZED INSTRUCTIONS/SPECIAL AUDIENCE
=====		
CONSULT LAB INSTRUCTIONAL MEMOS	L AND D	NO; SIZE/EXTERNAL USERS
SURVEY MANUAL	L AND D	NO; SIZE/EXTERNAL-OUTSIDE USERS
DRAINAGE MANUAL	L AND D	NO; SIZE/EXTERNAL-OUTSIDE USERS
GUIDE SPECIFICATIONS FOR CONSULTANTS	L AND D/ CONSULTING COMM.	NO; SIZE/AUDIENCE/ SPECIALIZED INSTRUCTIONS
ROAD DESIGN STANDARDS (2 VOL.)	L AND D	NO; BLUEPRINT ORIENTATION/ FORMAT; SIZE

POST CONSTRUCTION MANUAL	L AND D	YES; POSSIBLE CANDIDATE-CONSOLIDATION WITH CONSTRUCTION MANUAL
AASHTO GEOMETRIC DESIGN-HIGHWAYS AND STREETS	AASHTO	NO; EXTERNAL SOURCE
GUIDE FOR SELECTING, LOCATING, DESIGNING TRAFFIC BARRIERS	FHWA	NO; EXTERNAL SOURCE
PUBLIC INVOLVEMENT POLICY MANUAL	L AND D	NO; VARIED AUDIENCE/FHWA-APPROVED/SPECIALIZED TOPIC
=====		
VASWANI PAVEMENT DESIGN	TRC	NO; GUIDELINE/LIMITED USERS
RESEARCH COUNCIL PROGRAM MANUAL	TRC	NO; INTERNAL TO DIVISION
HIGHWAY RESEARCH PROGRAM MANAGEMENT OPTION HANDBOOK	TRC	NO; INTERNAL TO DIVISION AND TPD/FHWA REQUIR.
=====		
CULVERT INSPECTION MANUAL	FHWA	NO; EXTERNAL SOURCE
S AND B INSTRUCTIONAL MEMOS	STRUC/BRID	NO; SIZE/EXTERNAL
INSTRUCTIONS FOR THE OPERATION OF MOVEABLE BRIDGES		NO; TRAINING BOOKLET
RECORDING AND CODE GUIDE	STRUC/BRID	NO; SPECIALIZED INSTRUCTIONS/LIMITED USERS
STANDARD SPECIFICATIONS FOR HIGHWAY BRIDGES	AASHTO	NO; EXTERNAL SOURCE
=====		
PPMS IMPLEMENTATION AND TERMINAL OPERATOR GUIDE	INFO SYS/P&S	NO; MGMT INFO SYSTEM USER MANUAL
INFORMATION SYSTEMS DIV. MEMO.	INFO. SYS	NO; SPECIALIZED, LARGE AND WIDELY CIRCULATED
=====		
CARS MANUAL	VA DOA	NO; EXTERNAL SOURCE
STATE TRAVEL REGULATIONS	VA DOA	NO; EXTERNAL SOURCE

INTERNAL CONTROL GUIDANCE MANUAL	VA DOA	NO; EXTERNAL SOURCE
FAACS MANUAL	VA DOA	NO; EXTERNAL SOURCE
CAPP MANUAL	VA DOA	NO; EXTERNAL SOURCE
COMPTROLLER'S DIRECTIVES	VA DOA	NO; EXTERNAL SOURCE
=====		
CPBS MANUAL (4 VOLUMES)	VA DPB	NO; EXTERNAL MANUAL
=====		
BC/BS MANUAL	VA DPT	NO; EXTERNAL MANUAL
BENEFITS/PROCESSING HANDBOOK	VSRS	NO; EXTERNAL MANUAL
OSHA STANDARDS	VA DEPT LABOR & INDUSTRY	NO; EXTERNAL MANUAL
=====		
TOLL COLLECTOR'S MANUAL	RPT	NO; INTERNAL DIV. MANUAL
=====		
R/W MANUAL, VOLS. I & II	R/W	} YES; WITH INSTRUCTIONAL MEMORANDUM
R/W INSTRUCTIONAL MEMORANDA	R/W	
R/W MGMT. SYSTEM USER DATA ENTRY MANUAL	R/W	YES; WITH DIV. MANUAL
=====		
URBAN HIGHWAY MANUAL	URBAN	NO; SIZE/EXTERNAL USERS
=====		
TRANS. PLANNING DIV. POLICY MAN.	TPD	NO; INTERNAL DIV. MANUAL
HIGHWAY CAPACITY MANUAL	TRB #209	NO; EXTERNAL SOURCE
PASS-BY TRIPS POLICY	TPD	YES; WITH CAPACITY MANUAL
TRIP GENERATION MANUAL	ITE	NO; EXTERNAL SOURCE
=====		
HAZARDOUS MATERIALS TRANS. RULES & REGULATIONS	TRAFFIC ENG.	NO; SUBJECT TO APA (STILL IN DRAFT)

COMMERCIAL ENTRANCES MANUAL	TRAFFIC ENG.	NO; SUBJECT TO APA/EXTERNAL USERS
WORK AREA PROTECTION MANUAL	TRAFFIC ENG.	NO; DIVERSE USERS IN & OUTSIDE AGENCY
ACCOUNTING & H.R. SYSTEMS MAN.		NO; CODING INSTRUCTIONS
TRAFFIC & SAFETY DIV. OPERATIONS MANUAL	TRAFFIC ENG.	} YES; WITH INSTRUCTIONAL MEMORANDA
TRAFFIC ENGINEERING INSTRUCTIONAL MEMORANDA	TRAFFIC ENG.	
MUTCD	FHWA	NO; FEDERAL MANUAL
STANDARD HIGHWAY SIGNS MANUAL	FHWA	NO; FEDERAL GUIDELINE

=====

CENTRALIZED ACCIDENT PROC. INSTRUCTIONS	DMV, VDOT, VSP	NO; EXTERNAL CODING INSTRUCTIONS
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SUBDIVISION STREET STANDARDS	SECONDARY ROADS	NO; SUBJECT TO APA
GUIDE FOR SECONDARY ROAD IMPROVEMENTS	SECONDARY ROADS	} YES; SEE BELOW
ADDITIONS, ABANDONMENTS & DISCONTINUANCES	SECONDARY ROADS	
GUIDELINES FOR REVENUE SHARING	SECONDARY ROADS	} YES; INCORPORATE INTO SECONDARY ROADS MANUAL
INDUSTRIAL ACCESS ROAD FUND (SR 45-96)	SECONDARY ROADS	
RECREATIONAL ACCESS ROADS	SECONDARY ROADS	NO; UNIQUE EXTERNAL USERS

=====

VIRGINIA TEST METHODS MANUAL	MATERIALS	NO; MAJOR MANUALS ALREADY TOO LARGE; TOO WIDELY CIRCULATED; TEST METHODS MANUAL HAS DIFFERENT USERS THAN MATERIALS MANUAL)
MATERIALS MANUAL OF INSTRUCTIONS	MATERIALS	} YES; CONSOLIDATE WITH INST. MEMOS

MATERIALS DIV. INST. MEMORANDA	MATERIALS	YES; INSTRUCTIONAL MEMORANDA MANUAL; CONSOLIDATE WITH MATERIALS MANUAL WILL CONTINUE, BUT WILL BE MUCH SMALLER AND PERIODICALLY PHASED INTO MATERIALS MANUAL
CENTRAL MIX AGGREGATE GUIDE	MATERIALS	NO; SPECIALIZED TRNG. GUIDE
BITUMINOUS CONCRETE STUDY GUIDE	MATERIALS	NO; SPECIALIZED TRNG. GUIDE
HYDRAULIC CEMENT CONCRETE STUDY GUIDE	MATERIALS	NO; SPECIALIZED TRNG. GUIDE
=====		
FISCAL DIV. POLICY, PROCEDURES AND CODES	FISCAL	NO; LARGE/SPECIALIZED/WIDELY USED
=====		
CLASSIFICATION/JOB EVALUATION MANUAL	HUMAN RESOURCES	NO; GUIDELINES ONLY
HUMAN RESOURCES POLICY AND PROCEDURES MANUAL	HUMAN RESOURCES	NO; LARGE/WIDELY USED
IMMIGRATION ACT REQUIREMENTS		YES; POLICY AND PROCEDURES MANUAL
=====		
ROAD OPENING POLICY	PUBLIC AFFAIRS	YES; CONSOLIDATE WITH CONSTRUCTION MANUAL
GUIDE TO HOLDING PUBLIC HEARINGS	PUBLIC AFFAIRS	YES; CONSOLIDATE WITH PUBLIC INVOLVEMENT POLICY MANUAL
=====		
INTERNAL AUDIT MANUAL	INTERNAL AUDIT	NO; USED ONLY BY DIVISION
=====		
EROSION & SEDIMENT CONTROL MAN.	ENVIRONMENTAL	YES; ELIMINATE/DUPLICATES SOIL/WATER CONSERVATION MANUAL
VEGETATION MGMT. MANUAL	ENVIRONMENTAL	YES; CONSOLIDATE WITH VEG. ESTABLISHMENT
VEGETATION ESTABLISHMENT MAN.	ENVIRONMENTAL	YES; SEE ABOVE

EROSION/SEDIMENT CONTROL	SOIL/WATER CONSERVATION	NO; EXTERNAL AGENCY MANUAL
OUTDOOR ADVERTISING POLICY	ENVIRONMENTAL	NO; SUBJECT TO APA/ SPECIALIZED; EXTERNAL USERS
JUNKYARD RULES	ENVIRONMENTAL	NO; SUBJECT TO APA
VIRGINIA BYWAYS	ENVIRONMENTAL	NO; SUBJECT TO APA
WATER QUALITY STANDARDS	WCB	NO; EXTERNAL MANUAL
WETLANDS DELINEATION GUIDELINES	FHWA	NO; FEDERAL GUIDELINES
WETLANDS ASSESSMENT MANUAL	FHWA	NO; FEDERAL GUIDELINES
NEPA MANUAL	ENVIRONMENTAL	NO; FEDERAL MANUAL
=====		
POLICIES/PROCEDURES FOR INDUSTRIAL ACCESS RAILROAD TRACKS	RAIL/PUBLIC TRANS	NO; EXTERNAL MANUAL FOR RAIL INDUSTRY
RAIL & PUBLIC TRANS. MANUAL	RAIL/PUBLIC TRANS	NO; INTERNAL DIVISION MANUAL; (STILL IN DRAFT FORM)
=====		
HAZARD COMMUNICATION POLICY	SAFETY	YES; CONSOLIDATE WITH DPM OR P&P
FEDERAL HIGHWAY POLICY MEMOS (FHPM)	FHWA/PROG. &	NO; EXTERNAL SOURCE SCHEDULING

CRITERIA FOR CONSOLIDATION/ELIMINATION RECOMMENDATIONS

1. Users/Audience
2. Size of Existing Document
3. Source of Manual/Policy (Internal vs. External)
4. Relationship of Policy/Procedurals to One Another
5. Degree of Duplication
6. APA Requirement (yes or no)
7. Suggestions from Survey

APPENDIX B

Name _____

Position _____

District/Division/Directorate _____

Instructions: Attached as Appendix A is a list of VDOT policies, procedures, regulations, guidelines, standards and specifications. This list should serve as a point of reference in focusing your answers to this questionnaire. Please answer each question only as it applies to you.

1. Please read through the list of instructional manuals, memoranda, etc. listed in Appendix A. If you know of any other manuals or written instructions not listed, please list them below. (Include any manuals or major instructions issued by either the central office or the districts. Do not include tables, forms, or materials that have been rescinded.)

Written Instruction

Source

2. List the specific manuals or other instructions you use most often. (List no more than five).

3. Please circle the number of the response that best applies regarding the content of VDOT's policies, procedures, and other instructions.

	frequently occurs	sometimes occurs	seldom occurs	never occurs
a) conflict among policies, procedures and other instructions	1 (8)	2 (47)	3 (155)	4 (7)
b) out-of-date or obsolete policies, procedures, or other instructions	1 (25)	2 (96)	3 (88)	4 (6)
c) unnecessary duplication among policies, procedures, or other instructions	1 (8)	2 (46)	3 (151)	4 (9)
d) written policies, procedures, or other instructions with which division or district is unable to comply or enforce	1 (7)	2 (49)	3 (148)	4 (12)
e) written policies, procedures, or other instructions needed where none exist	1 (6)	2 (48)	3 (151)	4 (10)
f) verbal policies or procedures exist that have not been placed in written form	1 (22)	2 (68)	3 (123)	4 (4)

Briefly explain and provide names of manuals or other instructions for any item for which a rating of "1" or "2" has been given.

4. Please rate the overall effectiveness of VDOT's development and communication of policies, procedures, and other written instructions by circling the number that best represents your opinion.

	very ineffective	somewhat ineffective	somewhat effective	very effective
a) system assures that all affected parties have opportunity for input before policy, procedure or other written instructions are implemented	1 (23)	2 (67)	3 (104)	4 (20)
b) system assures distribution of policy, procedures, etc. to all organizational units that need them	1 (5)	2 (19)	3 (122)	4 (69)
c) system enables efficient location of a policy, procedure, etc. or determination if one exists	1 (12)	2 (58)	3 (118)	4 (26)
d) system enables timely information about requirements of federal and other state agencies	1 (12)	2 (30)	3 (151)	4 (17)
e) written policies, procedures and other instructions are clear and easily understood	1 (5)	2 (40)	3 (151)	4 (18)
f) authority for policy, procedures, etc. is documented	1 (2)	2 (21)	3 (149)	4 (41)
g) content of policy, procedures, etc. is consistent with stated purpose	1 (3)	2 (12)	3 (161)	4 (38)
h) latitude for discretion or flexibility in following policy, procedures, etc. is specifically stated.	1 (17)	2 (73)	3 (116)	4 (6)
i) word choice (e.g., "shall" vs. "should", "will" vs. "may") provides clues about flexibility in following policy or procedures	1 (6)	2 (32)	3 (142)	4 (30)

Please use this space to briefly highlight your concerns or reasons for any response scored as a "1" or "2".

5. Those who use policies and procedures are frequently the best source of ideas on how to improve them or the process of their development.

From your perspective, are there particular ways that the development, review, revision or communication of written policies, procedures, etc. might be improved? Please offer your thoughts.

Should any changes be made in the way that policies, procedures, etc. are formatted or organized into the various manuals? Could any manuals or other instructions be combined or eliminated?

6. a) What is your understanding of the current roles of division administrators, district engineers, and other personnel in the development, review, revision or communication of VDDT's policies and procedures?

b) What, if anything, is unclear about these roles?

c) Would you like to see any aspect of these roles changed? If so, what should be changed?

7. How would you describe your flexibility in implementing policy, procedures, rules, guidelines, etc? (Circle all that apply.)

- a) I don't always know what it is (52)
- b) I know, but it is too narrow (32)
- c) I know, but it is too broad (7)
- d) I know and it is about right (100)
- e) I expand my latitude until I'm told to stop by someone in authority (92)
- f) I seldom or never question what is written (11)
- g) other (please specify) (24)

8. What are your major sources of information about policies, procedures, etc?

- a) manuals (183)
- b) loose memoranda (central office) (144)
- c) letters from supervisor (83)
- d) oral instructions (102)
- e) information from co-workers (45)
- f) other (11)

9. Answer this final question only if you issue policies, procedures, or other written instructions.

a) How is the need for new or modified instruction determined? (Please rank according to frequency, with "1" being the most frequent indicator of need, and "5" the least frequent.)

- operational problems or audit exceptions
- request of top management or Executive Committee
- request or concerns expressed by field personnel
- regular review of existing policies/procedures
- other (please explain)

b) Is new or modified policy or procedure generally reviewed by others prior to being finalized?

(81) yes (13) no

If yes, who is responsible for review? (Check all that apply.)

- (40) assistant attorney general
- (42) one or more divisions
- (37) one or more directors
- (24) Commissioner or Deputy Commissioner
- (14) Assistant Commissioner
- (25) Chief Engineer
- (36) one or more districts
- (37) other (please specify)

Thank you for your help.

PLEASE RETURN COMPLETED SURVEY BY AUGUST 21 TO:

Policy Office
Room 414
Central Office Annex

APPENDIX C

Guide for Format for Policy Instructions

Items to be Included in Introductory Section or Through Internal Formatting

- o PURPOSE - Explain the objective of the instruction(s) and the areas covered.
- o AUTHORITY - Cite the title of the specific law, regulation, Executive Order or policy (and source) that drives instructions.
- o DEFINITIONS - Define any terms that are specific to the instructions or that are being used in a new or unusual way.
- o POLICY - State or paraphrase the policy in detail.
- o PROCEDURES OR GUIDELINES - State "how to" implement the policy.
- o EFFECTIVE DATE - The date instructions are to go into effect.
- o CONTACT PERSON FOR INTERPRETATION - Designated position or positions in Division that is available for questions, clarification, etc.

* Based on materials developed by the Management Services Division.