
 **RLS**  
Associates, Inc.

**Moving Public Transportation  
Into the Future**

**Policy and Procedure Development  
Why Do We Need Policies &  
Procedures?**

**January 23, 2025**

  
**Integrated Mobility Division**  
N.C. DEPARTMENT OF TRANSPORTATION

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**Welcome!**

- ◆ **What This Course Is About**
  - Why we need policies and procedures
  - Basics for development of policies and procedures
- ◆ **Not Meant To Be a Comprehensive List of All Policies Every Organization Should Have**
  - YOU decide what policies/procedures are best for your organization
- ◆ **No “One Size Fits All” Policy**

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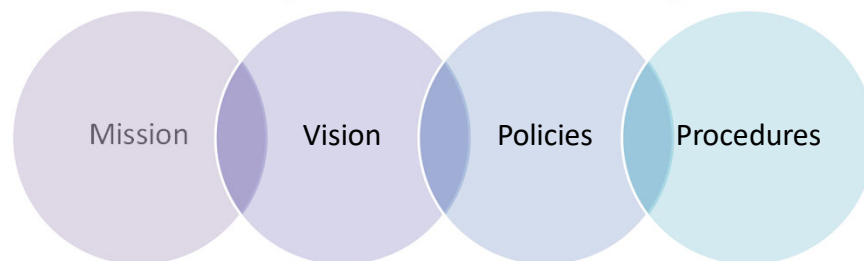
## Why Do We Need Policies & Procedures?

- ◆ Without Them, Daily Operations Would Be Chaotic
- ◆ Our Riders Would Not Understand How the System Works
- ◆ Our Employees Would Have No Guidance
- ◆ Our Financial Loss Would Be Great Due to Inefficiency, Ineffectiveness and Probable Lawsuits
- ◆ Regulatory Requirements

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## Components Needed



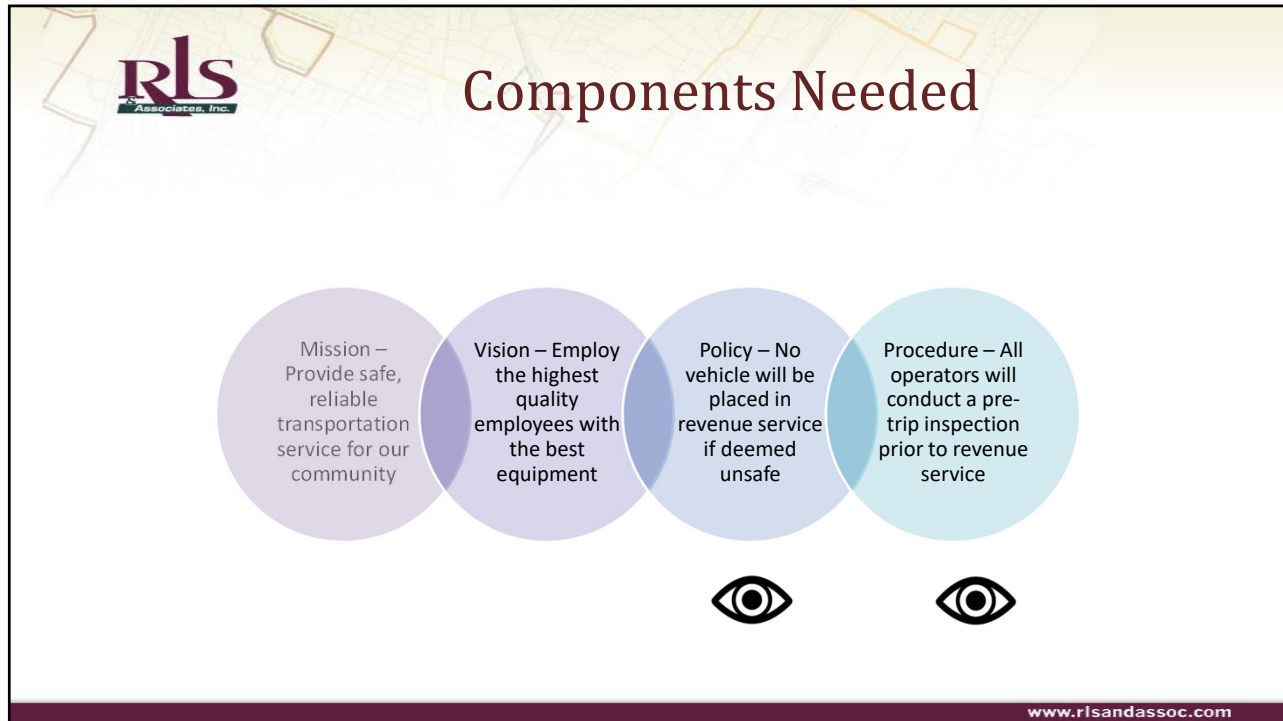
What we  
do and for  
whom

Hope  
to  
achieve

How we  
plan to do  
it

Actions to  
support  
policy

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## Components of Policy Development

- ◆ What Is a Good Vs. Bad Policy?
- ◆ How Many Policies Should Your Organization Have?
- ◆ How Do You Communicate Policies?
- ◆ Do You Take Your Community Into Account?
  - Do you recognize issues prevalent in your community and address them in your policies?

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## What Are Policies?

- ◆ Policies Are Guidelines That Regulate Organizational Action
- ◆ They Control the Conduct of People and the Activities of Systems
- ◆ Explains the Organization's Stance on a Subject and Why There's a Rule About It
- ◆ Tells How the Organization Intends to Operate

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## What Are Procedures?

- ◆ Implementation of Policies
  - The "how to"
- ◆ Procedures Are Action Oriented
- ◆ Outlines the Steps You Expect People To Take
  - Plus, the sequence in which to perform those steps
- ◆ Details Consequences of Failing to Comply
  - Helps to understand the seriousness of the situation

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## Ambiguity in Policies

### ◆ Ambiguity – What does that Mean?

#### Merriam Webster Definition:

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- 4#e: d#z rug#ru#{suhvlrq#kdw#fdq#eh#qghuwrrg#q#z r#ru#p ruh#srvledh#d|v: dq#dp eljxrxy#z rug#ru#{suhvlrq
- 5: [UNCERTAINTY](#)

\* fdsdedh#i#hlqj#qghuwrrg#q#z r#ru#p ruh#srvledh#hqvhw#ru#z d|v

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## Ambiguity in Policies

- “It is our intent to provide the safest transportation service in the industry”.
- ◆ Is This a Policy Statement? Vision Statement? Mission Statement?
- ◆ This Does Not Tell Employees How to Provide the Best Customer Service

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## Ambiguity and Subjectivity

- ◆ Procedures Are More Specific Than Policies But Can Still Be Ambiguous
  - For example, allowing a dispatcher to make professional judgment calls based on information obtained
- ◆ There Is No Way To Be Completely Objective
- ◆ You Don't Want Employees To Use Their Personal Standards To Interpret Policy Directive or Procedural Steps
  - You want them to use sound professional judgment

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## Scenario

85 year old Gertrude Shawn was returning from her dialysis appointment and ABC transit was dropping her off at her apartment building. It had been snowing for the last couple of hours and her building's sidewalk had not been shoveled. ABC transit is a curb to curb demand response service.

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## Scenario (cont.)

- ◆ What should the driver do in this scenario?
  - ◆ What factors should the driver take into account when deciding proper action?
  - ◆ Would a policy amendment be necessary as a result of this scenario?
- 85 year old Gertrude Shawn was returning from her dialysis appointment and ABC transit was dropping her off at her apartment building. It had been snowing for the last couple of hours and her building's sidewalk had not been shoveled. ABC transit is a curb to curb demand response service.

## Professional vs. Personal Judgement

### Professional

- ◆ Based on training
- ◆ Adherence to policies and procedures
- ◆ Industry experience
- ◆ Agency standards
- ◆ Know when to apply modifications
- ◆ Respectful

### Personal

- ◆ "How I was raised"
- ◆ May go against regulations or may follow when should be broken
- ◆ Applied inconsistently
- ◆ Disregards training
- ◆ Safety risk
- ◆ Unconscious bias



## When You Need Policies and Procedures

- ◆ Do Not Create a Policy or Procedure Because It Seems Like a Good Idea
  - It needs to accomplish something
- ◆ Proactive Vs. Reactive
  - This will be discussed more later
- ◆ A Policy Is Needed for Any Issue That Is Important or Benefits from Clarification

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**WRITTEN POLICY OR NOT**





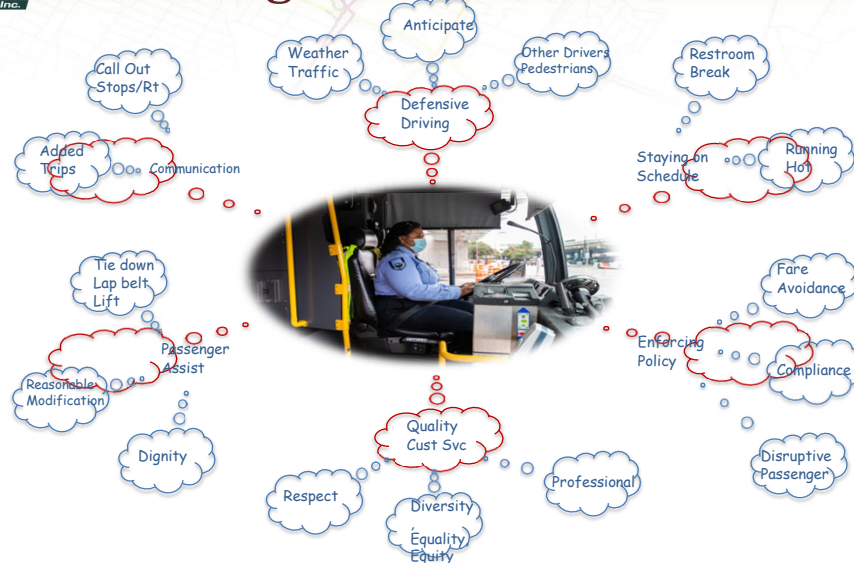
## Written vs. Unwritten

- ◆ You Can't Write a Policy and Procedure for Everything
- ◆ Consider Leaving a Policy or Procedure Unwritten When:
  - It involves organizational culture and norms
  - It cannot be consistently enforced
  - It is potentially offensive or intrusive
  - It simplifies
    - Everyone understands the rules, they work well without formalizing them, and it's one less piece of paper

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## Cognitive Overload



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## When To Write the Unwritten Rules

- ◆ Sometime the Unwritten Rules That Have Been Working Well Informally Begin to Break Down
- ◆ This Happens Most When:
  - An organization grows
  - Change increases
  - Complexity arises
- ◆ You Are Asking for Trouble if You Ignore These Signals
  - Proactive movement is needed

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## Write It Down When Encountering

- |                                  |  |
|----------------------------------|--|
| ◆ Common Accidents               | ◆ Misunderstandings  |
| ◆ Changes                        | ◆ New Laws or Regulations                                    |
| ◆ Complaints (Rider or Employee) | ◆ Sensitivity or Volatility                                  |
| ◆ Confusion                      | ◆ Stress or Frustration                                      |
| ◆ Financial Loss in an Area      | ◆ Technology Changes   |
| ◆ Frequent Questions             | ◆ Negative Trends  |
| ◆ Inconsistency                  | ◆ Unique Interpretations of Unwritten Policies or Procedures |
| ◆ Security Exposure              | ◆ Reasonable Modifications                                   |
| ◆ Negative Publicity             |  |




## First Steps To Develop Policies

- ◆ Questions To Ask Ourselves
  - Why is our system here? (Mission)
  - Who do we serve?
  - How do we plan to be successful?
  - What value do we bring to our community?
  - What specific needs/issues does our community have?

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## Steps in Developing a Policy


- ◆ Planning
- ◆ Analysis
- ◆ Research
- ◆ Prewriting
- ◆ The law
- ◆ Finalization
- ◆ Implementation
- ◆ Communication
- ◆ Updating



# Planning

- ◆ Keep the Plan Simple
  - It should include tasks, sequence and deadlines (Gant chart)
- ◆ Use a Team to Help With the Development of the Policy and Procedure
- ◆ Is Your Plan Realistic?
  - Are the deadlines reasonable based on the teams workload?

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# Sample Gant Chart

Revising Drug and Alcohol Policy

	Week 1	Week 2	Week 3	Week 4	Week 5	Week 6	Week 7	Week 8
I. Determine Changes resulting from 49 CFR Part 655		▲						
II. Draft Changes to current policy		▲						
III. Evaluate changes with union, DOT & collection site			▲					
IV. Finalize policy and procedure				▲				
V. Obtain board approval						▲		
VI. Disseminate new policy and conduct training							▲	

▲ Advisory Committee Meeting

◐ Deliverable

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## Analysis

- ◆ Begin With an Analysis of the “What” and the “Why” of the Project so That You Understand Both Its Nature and the Reasons Behind It
- ◆ Be Sure You Understand the Goal of the Finished Policy or Procedure.
- ◆ Know the Audience Reading This Document
- ◆ Know the Conditions Where This Will Be Read
- ◆ Is This an Operational Item or an Emergency Item?

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## Research

- ◆ You Must Determine How Much Research Is Needed Based on the Subject
- ◆ Meet With Experts To Discuss the Subject and Content
- ◆ Consider Your Employees and Riders Who Will Be Directly Affected by This Policy or Procedure
- ◆ Talk With Other Transit Agencies or Associations To See How They Have Dealt With the Issue

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## Prewriting

- ◆ Make Sure You Have All the Information First Before Beginning To Write
- ◆ Identify Which Information Should Be Included in the Writing
- ◆ Keep in Mind the Document Must Be Organized in a Systematic Fashion and Should Flow Easily for the Reader

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## The Law

- ◆ One Wrong Policy Can Open Up Your Transit System to an Incredible Financial Loss
- ◆ Know the Laws and Regulations
- ◆ Suits Can Originate From Passengers As Well as Employees
- ◆ Inconsistent Treatment of Passengers or Employees From the Stated Policy Can Result in Unfair Labor Practice Charges, Discrimination Lawsuits, and Charges of Negligence
- ◆ Policies Can Be Viewed as an Implied Contract in Some States

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## The Law

- ◆ Use Disclaimers To Allow Changes To Be Made at Managements Discretion.
- ◆ Disclaimers Can Be Used on Schedules and Ride Guides Alerting the Riders That the Schedule, Fares and Hours of Service Are Subject to Change

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## The Law

- ◆ The Specific Writing Techniques and Content Considerations That Can Help You Avoid Legal Trouble Fall Into Six Categories:
  1. Word your policies and procedures carefully
  2. Check the content
  3. Reserve management's right to discretionary action
  4. Preserve your right to make changes
  5. Consider the informal or unwritten rules
  6. Use and enforce the rules

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## What Readers Want To Know

- ◆ If You Don't Capture the Reader's Interest, They Quit Reading
- ◆ There Must Be Something in It That Interests Them
- ◆ Here Are Some of the Common Questions Your Employees or Passengers Have and What You Can Do About Them:

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## What Readers Want To Know (Cont'd)

- ◆ Why Am I Being Required To Do This?
- ◆ What Will This Do to Me? For Me? Will It Make My Life Easier or Harder?
- ◆ Will I Get Enough Training, Time, Money, and Staff To Do What's Required?
- ◆ What Do I Do if I Don't Understand or Get Stuck?
- ◆ Will I Have a Chance To Voice My Concerns and Problems?
- ◆ What if It Doesn't Work?
- ◆ Will I Be Blamed if This Goes Wrong?

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## Manuals and Handbooks

- ◆ The Best Way To Document and Distribute Your Policies and Procedures Is Through the Use of a Manual, or Handbook
- ◆ This Document Should Be a Part of Your “New Employee” Orientation and Training
- ◆ Updates Can Be Done Through Addendums Circulated to Employees and Passengers
- ◆ Employees Should Sign Off That They Understand the Policies and Procedures of the Company

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## Level of Detail

- ◆ The Level of Detail Must Be Both Sufficient and Appropriate to Your Subject and Your Audience
- ◆ If the Subject is Complex, Level of Detail Should Be High
- ◆ Are You Writing for Your Employees or the Passengers?
- ◆ Consider the Audience

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## Finalization/Implementation

- ◆ Finalization of Policy
  - Have the policy reviewed and signed by your Board or governing authority
  - Have the policy reviewed by legal counsel, if required by your organization.
- ◆ Implementation
  - Once your policy has been approved, you need to make sure it is actually put into action
    - There is no point in developing a policy if it is not going to be carried out

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## Communication

- ◆ Communication
  - Distribute the policy to all employees
    - Hold in-house training to fully explain the new policy
    - Have employees sign an acknowledgment
- ◆ The Employee or Passenger Will Be Less Likely To *Read* a Document That Is Not Appealing To Look at Despite the Content
- ◆ Avoid Visual **Clutter** and *Fonts* That Are Hard To Read
- ◆ Marketing Professionals Can Help With Information Being Prepared for the Public
  - That audience has a wide range of visual values

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## Updating Policies

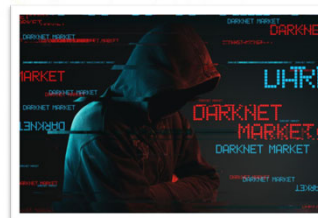
- ◆ Updating Policies
  - Policies need to be revisited and updated as needed
    - Do regulations require updates every so often to your particular policy?
    - Revisit a policy internally to make changes and adjustments

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## Policy & Procedure Updates

- ◆ Technology
  - Cyber security
  - Social media
  - Data continuity
- ◆ Fleet
  - Vehicle replacement
  - Electric vehicles/charging stations/maintenance



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A decorative background for the slide featuring a stylized map with various colored lines and shapes representing streets and buildings.

## ESSENTIAL ELEMENTS



## Essential Elements of a Policy

- ◆ Title of Policy
  - i.e., “Personal Care Attendants”
  - Put date initiated
- ◆ Purpose
  - State what the intent of the policy is
    - i.e., “To ensure the mental and physical well-being of passengers, as well as assuring the well-being of other passengers”



## Essential Elements of a Policy (Cont'd)

### ◆ Policy Statement

- What is the goal in implementing this policy?
  - i.e., “ABC Agency is committed to making sure all of our passengers are able to get where they need to go. ABC Agency recognizes some passengers may need assistance in order to complete a trip”

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## Essential Elements of a Policy (Cont'd)

### ◆ Guidelines

- Definitions
  - Anything that needs defined should be listed
    - i.e., definition of “personal care attendant”
- Policy details/action items
  - Spell out the specific procedures that need to be followed
    - i.e., “One personal care attendant may ride with the passenger at no additional cost”

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## Essential Elements of a Policy (Cont'd)

- ◆ References
  - If there are other policies that correlate to the policy you are developing, make reference to those other policies
- ◆ Consequences
  - State what the consequences will be if the policy is not followed

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## Essential Elements of a Policy (Cont'd)

- ◆ Management Responsibilities
  - List any responsibilities of management
    - Management is responsible for investigating complaints of non-compliance
    - Deciding any disciplinary action



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## Proactive Vs. Reactive

- ◆ Be Proactive in Developing Policies
- ◆ Do Not Wait Until Something Happens Before Implementing a Policy
- ◆ Decide if You Want Your Policy To Be Regulation Based or Mission Based
  - Are you simply developing a certain policy only to satisfy regulatory compliance? OR
  - Are you developing policies based on your organization's mission and specific issues

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## Avoid Reaction: First Ask These Questions

- ◆ Has Such an Incident Ever Happened Before?
- ◆ Is It Really Likely To Happen Again?
- ◆ Is This an Isolated, Once Every Twenty Years Occurrence?
- ◆ Are the Consequences of the Mistake So Serious (Financially, Legally, or Operationally) That You Need To Be Sure It Never Happens Again?



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## What's Important

- ◆ Issues for Transit System
  - Safety
  - Efficiency
  - Riders
  - Finances
  - Productivity
  - Staffing
  - Liability
  - Regulations
- ◆ Issues for Employee
  - Benefits
  - Hours
  - Working Conditions
  - Job Security
  - Family
  - Personal Goals
  - Personal Principles
  - Satisfaction



## What Needs Clarification

- ◆ Certain Issues Need Clarity
- ◆ Policies and Procedures Are Needed if the Subject Matter:
  - Is lengthy
  - Is complex
  - Is routine but nonetheless essential to successful operations
  - Affects the employees ability to function
  - Affects the employees status
  - Affects the employee personally
  - Involves significant change or high volumes of change





## Communicating New Policies

- ◆ Notifying employees about a policy or procedure can be done one or all of three ways.
  - Announce it in person
  - Communicate it in writing
  - Send it by e-mail
- ◆ Notifying the public can be trickier.

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## When to Revise a Policy or Procedure

- ◆ Regularly scheduled reviews
- ◆ As needed review and revision
- ◆ A balance of both
- ◆ Develop a review or standards committee
- ◆ Clarify changes through highlights or notations
- ◆ Require signatures for policy updates.
- ◆ Date of Revision

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## Questions?

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