

Policy Book

Membership and Structure Committee 2018-19

The following members were instrumental in creating this policy book for AFT-CT.

Jan Hochadel-President
John Brady-Executive Vice President
Jean Morningstar-First Vice President
Ed Leavy-Secretary/Treasurer

Stephanie Johnson-Chairperson of Membership Structure

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Deb Kern

Laila Mandour

Steve McKeever

Mission Statement

With passion and integrity, we are creating a way forward for the labor movement in CT. Our unwavering dedication to economic, educational, and social justice provides a collective voice for workers and their families. We organize, educate, and empower our members while protecting rights, wages and benefits.

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Financial Policies

AFT Connecticut

Investment Policy Statement

Introduction

The statement of Investment Policy has been adopted by the Executive Committee of AFT Connecticut to provide guidelines for the investment of funds held by the organization.

For the purposes of managing investment risk and to optimize returns within acceptable risk parameters, the funds held will be divided into three separate investment pools. The process for determining the dollar amount in each pool is set forth in the "Procedures" section of this document. The three investment pools shall be called the "Operating Reserve Fund," the "Emergency Reserve Fund," and the "Endowment Fund."

Procedures

- 1. The following procedures will be followed to ensure the investment policy statement is consistent with the current mission of AFT Connecticut and accurately reflects the current financial condition:
 - A. This investment policy shall be reviewed annually by the Chair of the Finance and Budget Committee for any necessary revisions.
 - B. Recommendations for any revisions or modifications will be made by the Chair of the Finance and Budget Committee to the Executive Committee for approval.
- 2. The following procedure will be used to determine the dollar amounts to be placed in the Emergency Reserve Fund and the Endowment Fund. Dollars not specifically designated for the Emergency Reserve Fund or Endowment Fund will be restricted to investments designated in the "Investment Guidelines" for the Operating Reserve Fund.
- 3. It is anticipated that from time to time the services of a Financial Advisor may be sought to manage portions of AFT Connecticut funds. The following procedure shall be followed to engage a new or replace a current Financial Advisor. The same procedure shall apply for both individually managed accounts and mutual funds (with exception of money market mutual funds).
 - A. The Financial Advisor will recommend the hiring or replacing of a money manager to the Chair of the Finance and Budget Committee.
 - B. The Chair of the Finance and Budget Committee will review the candidate(s) with the Finance and Budget Committee, which will then make a recommendation to the Executive Committee, which shall have final approval.

AFT Connecticut

Operating Reserve Fund

Purpose

The purpose of the Operating Fund is to provide sufficient cash to meet the financial obligations of AFT Connecticut in a timely manner.

Investment Objectives

The Investment objectives of the Operating Reserve Fund are:

- 1) Preservation of Capital;
- 2) Liquidity; and
- 3) To optimize the investment return within the constraints of (1) & (2) above.

Investment Guidelines

Allowable Investments

The Financial Advisor shall be authorized to invest the AFT Connecticut Operating Reserve Fund as follows:

- 1) Federally insured Certificates of Deposit not to exceed \$100,000 including interest at commercial banks or savings and loan institutions
- 2) Money Market Funds
- 3) Interest bearing checking accounts in federally insured banks and savings and loans not to exceed federally insured amounts
- 4) Direct obligations of the U.S. Government, its Agencies and instrumentalities
- 5) Agency Discount Notes; and
- 6) Repurchase agreements with institutions whose senior debt rating is rated double A or better by Standard & Poor's and/or Moody's or where physical delivery of the collateral is made to a third party custodian.

Maturity

The maturities on investment for the Operating Reserve Fund shall be limited to 6 months or less.

Reporting

The Financial Advisor shall prepare the following reports for presentation by the Treasurer or their designee on a quarterly basis to the Executive Committee.

- 1) Schedule of investments
- 2) Interest income year to date
- 3) Current yield

AFT Connecticut

Emergency Reserve Fund

Purpose

The purpose of the Emergency Reserve Fund is to meet expenses occurring as a result of unanticipated activities, improve the return on funds held for expenditure over the next one to five years, and to manage investment risk.

Investment Objectives

The investment objectives of the Emergency Reserve Fund are:

- 1) Preservation of Capital;
- 2) Liquidity; and
- 3) To optimize the investment return within the constraints of 1 and 2 above.

Investment Guidelines

Allowable Investments

The Financial Advisor shall be authorized to invest the AFT Connecticut Emergency Reserve Fund as follows:

- 1) Federally Insured Certificates of Deposits not to exceed \$250,000 including interest at commercial banks or savings and loan institutions;
- 2) Money Market funds
- 3) Direct obligations of the U.S. Government, its agencies and instrumentalities;
- 4) Agency discount notes; and
- 5) Mutual funds consisting of a portfolio of adjustable and floating rate securities.

Maturity

The Emergency Reserve Fund shall adhere to the following maturity guidelines: Average maturity or duration of the Fund shall be three years or less.

Reporting

The AFT Connecticut Treasurer shall prepare the following reports for presentation on a monthly basis to the Finance and Budget Committee:

- 1) Schedule of investments
- 2) Interest income year to date
- 3) Current yield

AFT Connecticut

Endowment Fund

Purpose

The purpose of the AFT Connecticut Endowment Fund is to help facilitate long-term financial stability of the organization by providing an alternative funding source.

Objectives

The objectives of the Fund should be pursued as a long-term goal designed to maximize the returns without exposure to undue risk, as defined herein. It is understood that fluctuating rates of return are characteristic of the securities markets. The greatest concern should be long-term appreciation of the assets and consistency of total portfolio returns. Recognizing that short-term market fluctuations may cause variations in the account performance, the expectations of the account will be to achieve the following objective over a 3 year moving time period:

The Fund will achieve a net of fees average annual total rate of return that is at least three (3) percentage points greater than the annual rate of inflation as measured by the Consumer Price Index (CPI) by investing in a diversified portfolio of approved investments. Actual returns should exceed the expected about half the time.

Understanding that long-term positive correlation exists between performance volatility (risk) and expected returns in the securities markets, we have established the following short-term objective:

The portfolio should be invested to minimize the likelihood of low negative total returns, defined as one year return worse than negative 10%. It is anticipated that a loss greater than this will occur no more than one out of ten years.

Investment Guidelines

The management of the Fund should be consistent with the *Prudent Man Rule*, which states:

When investing, trustees shall faithfully exercise sound discretion. They are to observe how individuals of prudence, discretion and intelligence manage their own assets, not in regard to speculation, but in regard to the permanent disposition of their funds, considering the probable income, as well as the probable safety of capital to be invested philosophy of investing. Appropriate due diligence should be performed to ascertain the credit quality and investment merits of the selected securities.

Performance of the Fund should be measured on a three year to five-year basis and monitored at least quarterly.

Under normal economic conditions, the Fund's asset allocation should be invested in the following manner:

Asset Category	Min. weight	Target weight	Max. weight
Fixed Income Fund	20	40	50
Equity	20	50	70
Cash	0	10	20

Approved Investments

- Money Market Instruments
- Mutual Funds Fixed Income and Equity
- Common Stocks
- Certificates of Deposits

- US Government Obligations
- Investment Grade Cornorate
- Preferred Stocks
- Institutional Money Market funds

Performance Reporting

The Fund will be evaluated bi-annually on a total return net of fees basis. Returns will be compared to:

- 1) Consumer Price Index plus 3%
- 2) Three month Treasury Bill Index plus 4%
- 3) An index comprised of 50% of the S&P 500 index and 50% of the Lehman Intermediate Govt./Corp index

Comparisons will show results for the latest quarter, year to date and since inception. The report will be prepared by the Investment Consultant and will be presented to the Investment Committee.

Distributions

AFT Connecticut may take income distributions from the Fund on either a quarterly or annual basis. Income distributions cannot exceed 50% of annual income. Annual income is defined as accumulated interest, dividends, capital gains distributions, and capital appreciation.

AFT Connecticut may borrow assets from the Fund. Terms of the loan will be determined by the AFT Connecticut Finance and Budget Committee and approved by the AFT Connecticut Executive Committee.

No income distribution or loan shall be made from the Fund, except under extraordinary circumstances, until total Fund assets had exceed three hundred fifty thousand dollars (\$1,000,000) for a minimum period of four consecutive calendar quarters.

Both income distributions and Fund loans must have prior approval of the AFT Connecticut Executive Committee and cannot invade Fund donor contributions.

Investment Policy Changes

Changes to the Fund's investment policies must have prior approval from the AFT Connecticut Executive Committee.

Investment Committee

The AFT Connecticut Investment Committee shall consist of no less than three and no more than five committee members. With an Investment Committee of three individuals, at least one of the committee members must not be an AFT Connecticut Executive Committee member. With an Investment Committee of five, at least two committee members must not be AFT Connecticut Executive Committee members. Individual members must be approved by the AFT Connecticut Executive Committee.

AFT Connecticut Contributions Policy

Contributions will be made in accordance with AFT Connecticut goals.

The AFT Connecticut President or his/her designee may authorize all routine contributions up to a total of \$250 per request. A listing of all contributions made by the full-time officers will be distributed to members of the Executive Committee on a monthly basis.

Grants Opportunities

The AFT Connecticut grant program makes funds available to AFT Connecticut members for financial assistance toward programs designed to enhance union leadership skills. A total of \$4,000 is available in each fiscal year (July 1 through June 30). Individual members are eligible for a maximum grant of \$500 once every three years. A maximum of two (2) members per local unit, per fiscal year. Grant applications may be submitted at any time, and will be reviewed in the month following the nearest deadline.

Grants Policy

AFT Connecticut grant funds in the amount of \$4,000 per fiscal year (July 1 through June 30) are available for financial assistance toward programs designed to enhance union leadership skills. Said funds are available:

- 1) To any individual members in good standing of any AFT Connecticut local in good standing that does not already receive rebates from AFT Connecticut;
- 2) Up to a maximum of \$500 per individual member;
- 3) For travel, housing, meal and registration costs;
- 4) For one (1) application per the same individual member within a three (3) year period;
- 5) With a maximum of two (2) members per local unit, per fiscal year.
- A) Applications for grant funds must be submitted for review, where possible, at least thirty (30) days prior to the registration date of the program. Where notice of the program is less than thirty days, the application shall be submitted as soon as practicable, but under no circumstances less than one week prior to registration. Untimely applications will not be considered. An untimely application is one that has been submitted outside the required timeline listed above.
- B) Applications for grant funds must be completed in full and accounts aimed by the required documentation specified in the application. Incomplete applications will not be considered. An incomplete application is one that has not been completed in full and/or is missing required documentation.
- C) Applications for said grants shall be reviewed and provisionally approved by the Membership Structure Committee and presented to the Executive Committee at the next scheduled meeting for final approval.
- D) In the event that a grant is approved and funds dispersed and the member does not attend said conference, the local shall be responsible for reimbursing AFT Connecticut in the full amount of the grant.
- E) Each member receiving grant funds shall submit a written report and attend the next Executive Committee/Delegate Assembly meeting to report on the program attended.
- F) In the event of exigency circumstances, said applications, after review by the Membership Structure Committee, may be submitted to the Executive Board for approval and reported to the Executive Committee at the next regularly scheduled meeting.

Grant applications will be considered for the following:

AFL-CIO SUMMER SCHOOL – This course is held each year in June at the University of Connecticut Campus in Storrs. Participants usually spend the week on campus, but may commute. Topics vary and may include negotiations, collective bargaining, politics, grievances, and arbitrations, etc.

AFT CONSTITUENT ISSUES CONFERENCES – Includes QUEST for PreK-12; PSRP Conference for paraprofessionals and school related personnel; Health Care Conference for all health care related workers; Public Employee Conference for state, county, or municipal workers; Higher Ed Conference for all higher ed personnel.

GEORGE MEANY CENTER COURSES – Covering a wide-range of topics such as collective bargaining, leadership development, grievance handling, how to run a local, etc.

OTHER PROGRAMS THAT CONTRIBUTE TO UNION LEADERSHIP SKILLS – Consideration will be given for any program, including attendance at AFT-sponsored conferences or training.

Deadline for Application Submission:

January 31, April 30 and September 30.

Name				
Street Address				
City	State		Zip	
Home Phone #	Home Phone # Work Phone		e #	
Employer J		Job Title		
Local Name & Number				
How long have you been a member of AFT Connecticut?				
Signature of Local Official is required to verify that applicant is a member in good				
standing.				
Local Officer (print name)				
Local Officer Signature				

I am submitting my name to be considered for *(check one only – a separate application must be submitted to be considered for each grant)*

Please include with this application:

- A written description, flyer, or brochure describing the program.
- A narrative describing how you intend to use the grant money and how it will enhance your leadership skills.

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Send this page with

accompanying materials

to:

35 Marshall Road Rocky Hill, CT 06067

		Signature
Executive Committee.		
F		
I agree that at the conclusion of the program I	will present a written or ora	I report to the

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Building and Grounds

Use of AFT Connecticut Building and Equipment

- It shall be AFT Connecticut policy to encourage cooperation, collaboration and support for efforts consistent
 with the stated purposes and goals of AFT Connecticut. This includes actions taken to support initiatives of
 AFT Connecticut.
- AFT Connecticut offices and facilities may be used for these purposes provided prior permission is granted by
 the AFT Connecticut President or his/her designee. Before granting such permission, the AFT Connecticut
 President will obtain assurances that the activity will be properly supervised, the facilities will be secure and the
 offices will be left in the same condition in which it was found.
- * Please refer to Appendix A on page 30 for Facility Guidelines form

Smoking

Smoking will not be allowed in the AFT Connecticut building or the entrance way.

Technology

Proposed Policy on Computers and Technology

Objective

AFT Connecticut recognizes that use of the Internet and e-mail has many benefits and can make workplace communication more efficient and effective. Therefore, employees are expected to use the Internet and e-mail systems appropriately. Unacceptable use of the Internet and e-mail can place AFT Connecticut and others at risk. This policy outlines the AFT Connecticut guidelines for acceptable use of the Internet and e-mail.

Scope

This policy must be followed in conjunction with other AFT Connecticut policies governing appropriate workplace conduct and behavior. AFT Connecticut complies with the provisions contained within collective bargaining agreements with its employees, and all applicable federal, state and local laws as they concern the employer/employee relationship. Nothing contained herein should be construed to violate any of the rights or responsibilities contained in such collective bargaining agreements or laws.

Use Guidelines

AFT Connecticut has established the following guidelines for employee use of the organization's technology and communications networks, including the Internet and e-mail, in an appropriate, ethical and professional manner.

- 1. All technology provided by AFT Connecticut, including computer systems, communications networks, organization-related work records and other information stored electronically, is the property of the AFT Connecticut and not the employee. In general, use of the organization's technology systems and electronic communications should be job-related and not for personal convenience.
- 2. Employees may not use AFT Connecticut's Internet, e-mail or other electronic communications to transmit, retrieve or store any communications or other content of a defamatory, discriminatory, harassing or pornographic nature. No messages with derogatory or inflammatory remarks about an individual's race, age, disability, religion, national origin, physical attributes or sexual preference may be transmitted. Harassment of any kind is prohibited.
- 3. Disparaging, abusive, profane or offensive language; materials that might adversely or negatively reflect on AFT Connecticut or be contrary to its legitimate business interests; and any illegal activities—including piracy, extortion, blackmail, copyright infringement and unauthorized access to any computers on the Internet or e-mail—are forbidden.

- 4. Copyrighted materials belonging to entities other than AFT Connecticut may not be transmitted by employees on the organization's network without permission of the copyright holder. Employees must respect all copyrights and may not copy, retrieve, modify or forward copyrighted materials, except with permission or as a single copy for reference only. Saving copyright-protected information to a network drive without permission is prohibited. Sharing the URL (uniform resource locator or "address") of an Internet site with other interested persons for business reasons is permitted.
- 5. Employees may not use the system in a way that disrupts its use by others. This includes sending or receiving excessive numbers of large files and "spamming" (sending e-mail to thousands of users.)
- 6. To prevent contamination of AFT Connecticut technology and communications equipment and systems by harmful computer viruses, downloaded files should be checked for possible infection through the appropriate software. Also, given that many browser add-on packages (called "plug-ins") may not be compatible with other programs and may cause problems for the systems, downloading plug-ins is prohibited without prior permission from the AFT Connecticut President or designee.
- 7. Every employee of AFT Connecticut is responsible for the content of all text, audio or image files that he or she places or sends over the company's Internet and e-mail systems. No e-mail or other electronic communications may be sent that hide the identity of the sender or represent the sender as someone else. AFT Connecticut's identity is attached to all outgoing e-mail communications, which should reflect the federation's values and appropriate workplace language and conduct.
- 8. E-mail and other electronic communications transmitted by AFT Connecticut equipment, systems and networks are not private or confidential, and they are the property of AFT Connecticut. Therefore, AFT Connecticut reserves the right to examine, monitor and regulate e-mail and other electronic communications, directories, files and all other content, including Internet use, transmitted by or stored in its technology systems, whether onsite or offsite.
- 9. Internal and external e-mail, voice mail, and text messages are considered business records and may be subject to discovery in the event of litigation. Employees must be aware of this possibility when communicating electronically within and outside the organization.
- 10. Employees are expected to report malfunctions of technology and accidental exposure to inappropriate materials, websites, etc. to the President or designee.

AFT Connecticut's Right to Monitor and Consequences for Misuse

All organization-supplied technology, including computer systems, equipment and organization-related work records, belongs to AFT Connecticut and not to the employee. Employees understand that AFT Connecticut may routinely monitor use patterns, and employees should observe appropriate workplace discretion in their use and maintenance of such company property.

Because all the computer systems and software, as well as e-mail and Internet connections, are the property of AFT Connecticut, all AFT Connecticut policies apply to their use and are in effect at all times. Any employee who abuses the AFT Connecticut-provided access to e-mail, the Internet, or other electronic communications or networks, including social media, may be denied future access, and, if appropriate, be subject to disciplinary action up to and including termination, within the limitations of any applicable federal, state or local laws, or collective bargaining agreements.

Questions Regarding the Use of AFT Connecticut Technology

If you have questions regarding the appropriate use of AFT Connecticut electronic communications equipment or systems, including e-mail and the Internet, please contact the AFT Connecticut President or designee.

Personnel

Staff Involvement in Elections Policy

- AFT Connecticut employees, that is, those persons who are not elected officers who are paid salaries by the State Federation to perform specific functions, shall refrain from all activities related to the election of AFT Connecticut officers.
 - *Elections* are defined as officer elections and any other elections called to fill a vacancy thereto.
 - Election activities shall include endorsement, publicity, financial contributions. The State
 Federation acknowledges the local unions' prerogative to define criteria for membership and
 delegates; therefore, casting a vote in an AFT Connecticut election is not included on the list of
 prohibited activities.
- 2. AFT Connecticut employees shall have the right to respond to specific charges against them raised during the course of a campaign.

AFT Connecticut Policy on Affirmative Action

Policy

It is the policy of the AFT Connecticut to provide equal opportunity in employment for all persons and to prohibit discrimination based on race, gender, sexual preference, color, religion, age, physical handicap, ancestry, or national origin in every aspect of personnel policy and practice or in recruitment, employment, development, advancement and treatment of employees. The AFT Connecticut will promote the total realization of equal employment opportunity through a continuing affirmative action program.

Outreach Recruitment

The AFT Connecticut commits itself to recruiting and hiring qualified minority and women employees in all job categories. The AFT Connecticut will help facilitate this commitment by broadly advertising employment opportunities, seeking the help of affiliates to secure applications for available jobs and requesting their assistance in implementing this policy.

Job Analysis

The AFT Connecticut Personnel and Policy Committee will review each job description and validate the job requirements. Job specifications must be clearly set forth along with skills necessary to job performance. Required training and experience related to those skills should be clearly stated. These job specifications should be reviewed and updated at least once every two years, based on a careful analysis of the job.

Selection Devices

The AFT Connecticut Personnel and Policy Committee is responsible for selection devices (applications, interviews, tests, etc.) that are based on the job requirements. These selection practices should be fair to all applicants. The AFT Connecticut will provide each rejected candidate for employment or promotion a written explanation of his or her rejections when requested. The AFT Connecticut will maintain records on the flow of applications through the selection process.

Promotion

The AFT Connecticut will ensure that each employee is aware of opportunities for promotion and is encouraged to take advantage of such opportunities. Information on ways to qualify for promotion will be made available to employees on request. The AFT Connecticut will provide on an equal basis opportunities for training and development.

Assessment of Affirmative Action Program

The Executive Committee or Board will make an analysis at least once yearly of the racial, ethnic and gender composition of existing staff by every multi-position job title and for the union as a whole, the Executive Committee or Board shall report on this utilization analysis in his or her Annual Report to the AFT Connecticut Business Convention. If there are inadequacies found as a result of this analysis, the Executive Committee or Board will devise ways of correction and forward recommendations to the Personnel and Policy Committee Chair and the AFT Connecticut President or his/her designee. These recommendations will be considered by the Personnel and Policy Committee and the President and then taken to the AFT Connecticut Executive Committee for action. The recommendations will include reasonable goals and timetables.

Policy adopted October 11 2007 CAUsersInconti\Desktop\AFFIRMATIVE ACTION 042717.doc

Operations

Policy on Organizing

AFT Connecticut is committed to organizing -- internally and externally. Our strength as a union stems from the number of members we have and the active participation of those members. Because we lose members through attrition, times change, working conditions change and perceptions of members change, we must be continually organizing. Moreover, in the current economic climate, we are under attack in both the public and private sector. Our ability to successfully respond to these attacks and continue to move forward for our members and for social change depends on constantly organizing.

AFT Connecticut supports the AFT Organizing Model adopted to enhance organizing effectiveness.

The decision to attempt to organize a particular unit will be determined by the President and Director of Organizing with **notification to** the Executive Committee.

The following criteria will be considered:

- 1. the size of the prospective unit
- 2. the interest of the unit members
- 3. the compatibility of the prospective unit with other constituent groups in AFT Connecticut
- 4. geography and density
- 5. community assessment
- 6. the projected time and cost of organizing

AFT Connecticut Strikes Policy

AFT Connecticut supports the right of <u>all</u> employees to bargain collectively, including the right to strike and will work continually to protect this right. Strikes should not be entered into without overwhelming support of members of the bargaining unit, support of affiliates, clear articulation of the issues and a clear understanding of what is needed for a victory.

- AFT Connecticut will support the local and its members in the following ways:
- 1. AFT Connecticut will maintain an open line of communication with all interested parties.
- 2. AFT Connecticut will mobilize available support including support from other locals and unions, and will provide, through the use of AFT Connecticut attorneys, legal advice.

Policy on AFT Connecticut Assistance in CB Elections

Collective Bargaining Elections in Bargaining Locals

Defending An AFT Connecticut Local

Bargaining locals will be aware of window periods and set up alert systems to monitor actions of potential challengers. Whenever the local receives information of a possible challenge by a raider union, the president of that local will inform the assigned AFT Connecticut Field Representative and the AFT Connecticut President or his/her designee. The AFT Connecticut President will promptly inform the AFT. A meeting will be held, including but not limited to the local president, assigned AFT Connecticut Field Representative and the AFT Connecticut President and/or his/her designee to assess the local's strengths and weaknesses and the severity of the challenge and to discuss a program for a campaign which would include staff assistance and support. The potential for outside help, including assistance from other affiliated unions or coalitions will also be considered as part of the assessment.

AFT Connecticut will designate appropriate staff to provide technical advice and assistance to the campaign and to keep AFT Connecticut President and/or his/her designee apprised of developments. The AFT Connecticut Staff will advise on matters of AFT Connecticut policy as they relate to campaign issues. Questions of total campaign financing and staff assistance shall be referred to the AFT Connecticut President by the local president. With the assistance of the AFT Connecticut Staff, the local shall develop a collective bargaining election campaign budget that will be sent to the AFT Connecticut President prior to initiating any Labor Board or election processes.

The AFT Connecticut President will discuss with the AFT all pertinent information related to the campaign and together review what AFT Connecticut and AFT resources are needed and how they can be provided.

The local is responsible for making timely assessments, submitting a budget and sending a completed AFT election report and a financial report along with copies of receipts to the AFT Connecticut President within 60 days after the election. The AFT Connecticut will reimburse the local according to its policy and approved budget and submit a request to AFT for similar action.

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In exceptional circumstances, a vote of the Executive Committee may be required.

Collective Bargaining Election in Non-Bargaining Locals

Challenging Another Union

When a local that is not the bargaining agent wishes to challenge the union that does represent the employees, the decision to challenge or not to challenge is ultimately made by a local. Since AFT Connecticut and AFT can be directly affected by this decision, prior consultation is required before any decision is made to challenge a current bargaining agent if assistance will be needed from either AFT Connecticut or AFT. This consultation shall begin with the local president and assigned AFT Connecticut Staff.

Locals that move forward with Collective Bargaining elections without approval of AFT Connecticut or AFT will be responsible for all costs incurred. Should the local win the Collective Bargaining election, the local shall be responsible for all services needed to fulfill the duty of representation for that new local. AFT Connecticut will notify the Executive Board of any local that opts to organize on

AFT Connecticut Voluntary Administrator-ship Policy

For locals who have no recall language in their Constitution, the following process for voluntary administrator-ship will be in place to protect the rights of members:

- 1) At least 75% of the local's Executive Board must petition AFT CT to take an action to address significant concerns regarding one or more officer that has a significant negative impact on the orderly management and/or financial responsibilities of the local which affects the membership.
- 2) During the next scheduled AFT CT Executive Committee meeting, the petitioning members of the local's Board or their designee will present their concerns to the AFT Executive Committee.
- 3) By vote of 75% of the Executive Committee in attendance, the AFT Executive Committee will agree to place the local in voluntary administrator-ship for not less than six months and no more than one year. An administrator for the local will be appointed by the AFT CT President. The administrator will be responsible for the financial functions, the orderly running of the organization, internal organizing, and all other related functions.
- 4) The administrator will report to the AFT Executive Committee monthly about the progress of the local.
- 5) Within two weeks of the end of the voluntary administrator-ship, the local will have elections for all Executive Board positions.
- 6) Upon the election, all Constitutional provisions will resume.

AFT Connecticut Local Lifeline Policy

While we hope to never have to implement any of the steps below, the dangers of so-called right to work make it imperative that we establish statewide guidelines to help avoid any members losing the protection of their union due to lack of awareness or inaction on our part.

These guidelines are intended to enhance transparency and communication, not to create an inflexible set of rules. AFT or AFT Connecticut will implement this process in a way that considers the local's size, overall trajectory, and potential for success (e.g. choosing not to send a notice if a local dips below a benchmark but is generally on the right track).

<u>If locals fall below 75% membership, AFT or AFT Connecticut shall</u>: Send written notification to entire leadership team of the local and the AFT Connecticut Executive Committee warning about the dangers of non-majority status and offering strong encouragement to attend trainings and work with AFT and AFT Connecticut to develop an organizing plan.

<u>If locals fall below 60% membership, AFT or AFT Connecticut shall</u>: Send written notification warning about the dangers of non-majority status and offering training and support to entire membership.

<u>If locals fall below 35% membership, AFT or AFT Connecticut shall</u>: Convene leadership & dues-paying members to discuss potential paths forward:

- 1. Launching an organizing drive to regain majority status; or
- 2. Following one of the paths below.

Notify all members of the unit that an emergency membership meeting is necessary to decide on a path forward:

- 1. Voluntary administrator-ship and "re-organizing drive" by AFT or AFT Connecticut: AFT or AFT Connecticut assigns an administrator and organizer to attempt to rebuild the local.
- 2. Voluntary "partial administrator-ship" by AFT or AFT Connecticut: Local turns over financial functions to AFT or AFT Connecticut. Limited telephone support from rep and no organizer assigned.

Policy on Stipends for Part-time Officers

It is expected that part-time officers will make a good-faith effort to attend every Executive Committee meeting and to stay for the entire meeting. It is understood, that in spite of good-faith efforts, there will be times when it is impossible for an officer to attend a particular meeting.

Stipends are paid to officers in recognition of the time utilized for AFT Connecticut work, their contributions made to fulfilling the mission of the AFT Connecticut. It is expected that AFT Connecticut officers will attend Executive Council meetings as well as meetings of committees on which they serve.

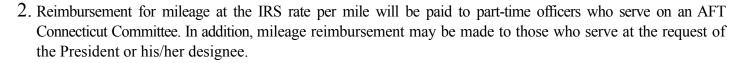
- A. Eight percent (8%) of the base pay of AFT Connecticut part-time officers will be deducted for every Executive Committee absence after the first three (3) absences in any year. Attendance at two other AFT Connecticut committee meetings' can be counted as equal to attendance at one Executive Committee meeting.
- B. In the event a regularly-scheduled Executive Committee meeting is postponed or rescheduled (due to inclement weather, conflict with other priority events, etc.) attendance at the rescheduled meeting shall not be counted as part of this policy.
- C. Attendance at two other committee meetings will be counted as equal to attendance at one Executive Committee meeting. It is the responsibility of each officer to provide the required documentation.
- D. For the purposes of this policy, the "year" shall be defined as the period of July 1 through June 30.
- E. Part-time officers' stipends are paid in arrears, i.e., stipend checks will be issued on the first of the month following the month for which the stipend is paid (eg stipend for July will be issued on August 1).
- F. An officer choosing to appeal a deduction to their stipend as a result of the application of this policy must do so within one month of the close of the year in which the stipend was reduced.

The following meetings qualify for "C" above.

Executive Committee	Executive Council	Councils	Others
Legislation/COPE/LPAC Budget/Financial Management Local Assistance Awards/Scholarshins Negotiations Retiree/Retiree Issues Membershin Structure Internal Organizing	Convention Program Convention Credentials Constitutional Amendments	Prek-12 Public Employees PSRP Healthcare Retirees Higher Education	Ad-hoc Committees appointed by president AFT Committees representing AFT Connecticut when appointed by Legislative Committees representing Connecticut when appointed by Officer Retreats

Policy for Reimbursement of Expenses for Part-Time Officers and Committee Members

1.	. The AFT Connecticut will reimburse, upon approval of the President or his/her designee, part-time officers and
	committee members when such expenses are incurred while doing state federation business.



Policy on AFT Connecticut Reimbursement for Workshops, Conferences, and Travel

The following procedure must be followed to secure AFT Connecticut payment or reimbursement of expenses related to workshops, conferences, seminars, etc.

- 1. The desire to attend and the potential benefit to the AFT Connecticut should be discussed with the AFT Connecticut President or appropriate Vice President as soon as possible before the event.
- 2. Information related to the cost must be submitted to the AFT Connecticut President or his/her designee to be considered, along with potential benefit. This information should be as complete as possible (registration fee, travel, room, meals, etc.) and should be submitted as soon as possible. Normally, the reimbursement for meals shall not exceed the GSA per diem rate.
- 3. The AFT Connecticut President or his/her designee must approve the request.
- 4. After the event has concluded, receipts must be submitted to the AFT Connecticut office.
- 5. A report on the event will be required by AFT and will be presented at the next Executive Committee meeting.
- 6. Reimbursements of expenses will be made after completion of #4 and #5 unless there is an advancement.

 Advancement of extraordinary expenses may be made based on the completeness of information requested in #2.
- 7. No expenses of a personal nature (e.g. health club, movies, laundry, newspapers, room service, etc.) will be reimbursed.

Policy for Guest Attendance at Executive Committee Meetings

- The AFT Connecticut Constitution defines the Executive Committee composition as the President, the Vice Presidents, and the Secretary/Treasurer. Therefore, a "guest" shall be defined as any person who is not an officer of AFT Connecticut.
- Attendance at all regular meetings of the Executive Committee is open to local officers, members, and persons invited by the President and/or his/her designee who need to be present for a particular agenda item.
- Guests <u>may observe</u> but not participate in discussion and/or debate unless recognized by the presiding officer. <u>They are asked to sit away from the table.</u>

Committee Meals Policy

	The following are guidelines that Committee Chairs should follow for provision of sustenance to the
	committees:
1.	AFT Connecticut office should be notified of all committee meetings, time and place.
2.	Committee chair must have approval of the cost of the meeting from the President or his/her designed before expending funds.
3.	Committee chair is responsible for making arrangements, once authorized, through the appropriate AFT Connecticut support staff.
4.	Fifteen dollars (\$15.00) per person is the limit for meeting (food and beverage

Policy Development

As AFT Connecticut develops policies and procedures for our organization, it is appropriate to establish guidelines for policy creation and approval. The Policy Development Policy establishes procedures and documentation requirements for all policies of AFT Connecticut.

Policy Development – Policy

- I. AFT Connecticut shall develop and maintain policies and procedures to meet the changing needs of the organization and to ensure compliance with the AFT Constitution, AFT Connecticut Constitution, resolutions of their respective conventions and federal, state, and local laws.
- II. The Executive Committee shall oversee the development and modification of, and shall have the authority to adopt organizational policies and procedures. All proposals and suggestions for policies and procedures shall be directed to the Membership and Structure Committee to oversee the review and recommendation process.
- III. Led by the Membership and Structure Committee, the development, modification, review, and approval process of organizational policies and procedures shall involve a collaborative effort. In drafting organization policies and procedures, all Executive Committee members—and staff, when appropriate—shall have access to the draft and an opportunity to participate in this process at all stages of policy development. Legal counsel may be consulted as necessary.
- IV. Policies and procedures go into effect upon Executive Committee approval unless a specific effective date is noted in the policy.
- V. Any changes in procedures shall not violate or contradict the intent of any associated organizational policy, or collective bargaining agreement with AFT Connecticut staff.
- VI. A policy and any accompanying procedure shall be presented together; neither shall be considered in isolation during the approval process.
- VII. If the AFT-CT President acts on matters of urgency and believes there is a need for more specific policy or direction, he/she shall notify the Membership and Structure Committee and the Executive Committee of the actions taken and recommend consideration for policy and procedures through an expedited process.

Policy Development - Procedures

I. Stage One – Initiation and Development

Any officer, executive committee member, or organizational entity (e.g. standing committees, local boards) may propose the need for a new policy or procedure or the modification of an existing policy. All such proposals shall be made using the Policy Development/Design Documentation found in Appendix B on page 31.

II. Stage Two – Membership and Structure Committee Review

The Membership and Structure Committee shall review, consider and make a recommendation on the proposed policy and/or procedure.

III. Stage Three – Policies/Procedures Prepared for Executive Committee

The Membership and Structure Committee shall send the proposed policy, with Committee recommendations, to the AFT Connecticut President for placement on the agenda of the next regularly scheduled Executive Committee meeting.

IV. Stage Four – Policy Approval

The proposed policy and/or procedure shall be presented to the Executive Committee for final approval. The Executive Committee shall either:

- (a) approve the proposed policy as written;
- (b) approve the proposed policy with nominal changes; or
- (c) send the proposed policy back to the Membership and Structure Committee with recommendations.

With Executive Committee approval, the proposed policy shall become effective immediately (or as specified by the proposed policy). All local presidents will be notified of the newly-adopted policy or procedure through electronic mail, and said notification will be reported to the Delegate Assembly at their next scheduled meeting.

AFT Connecticut DEFENSE:

POLICIES

- 1) In general locals shall process most contract violations and most grievances. AFT Connecticut strongly recommends that locals consult with AFT Connecticut Field Representatives before drafting or filing such actions.
- 2) AFT Connecticut staff assistance will be assigned as needed
 - a) to advise on contract grievances and/or violations
 - b) process unfair labor practices (prohibited practices)
 - c) conduct or assist in contract negotiations, including mediation, fact finding, arbitration, etc.
 - d) process contract arbitrations.
- 3) AFT Connecticut legal aid shall be provided for the defense of individual members in accordance with the provisions of the AFT Connecticut Legal Services Policy.
 - a) AFT Connecticut legal aid shall be provided for locals in accordance with the AFT Connecticut Legal Services Policy.
- 4) Requests for legal aid for reasons other than those covered in the AFT Connecticut Legal Services Policy shall be decided on their merits. In conformity with past practice AFT Connecticut policy shall be to provide assistance in all defense areas for which AFT provides help.
- 5) No motions on defense matters other than permission to consult with an attorney shall be approved at an Executive Committee meeting unless relevant material and the proper form (see Appendix A) have been sent to the AFT Connecticut retained Attorney and the AFT Connecticut President for review prior to the monthly Executive Committee meeting.
- 6) All recommendations for AFT Connecticut legal aid outside the scope of the AFT Connecticut Legal Services Policy must be approved by the AFT Connecticut Executive Committee. The extent of such legal aid shall be based on (1) the facts and (2) the merits of the case.
- 7) Should the approved type of legal action require further legal action, i.e., (1) court action after arbitration, (2) an appeal to a higher court, such action must be approved by AFT Connecticut and AFT <u>prior</u> to the filing of such action.
- 8) Locals desiring to use attorneys other than AFT Connecticut retained attorneys must be officially authorized to do so by the AFT Connecticut Executive Committee. No payment of legal fees will be made by AFT Connecticut unless AFT Connecticut has approved the use of said outside attorney prior to his/her being retained by the local.
- 9) Locals which have received AFT Connecticut approval to proceed with a defense case shall report periodically (a minimum of once in three months) to the AFT Connecticut President on the status of such defense until final disposition has been made. Cases which have been dropped or are being handled in another way should be so reported.
- 10) Locals or persons who start defense or court cases without following the policies and procedures as outlined shall be responsible for the total cost of any defense step which did not receive prior approval as outlined herein. Note: AFT policy now requires <u>prior</u> approval of any court action by a local or AFT Connecticut.
- 11) AFT Connecticut with the approval of the Executive Committee shall have the right to initiate defense actions on behalf of its members.

AFT Connecticut Policy on

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Legal Fees

- 1. When the AFT Connecticut Attorney handles a case. AFT Connecticut locals and their members will not have to pay attorney's fees, but they are required to pay other costs, i.e., filing fees, subpoena fees, sheriff's fees, printing costs.
- 2. If AFT Connecticut approves the use of an attorney other than the AFT Connecticut retained Attorney, in most cases 2/3 of the cost will be paid by AFT Connecticut, 1/3 by AFT if the case comes under AFT defense policy and the local will be responsible for any additional expenses. Alternative financial arrangements for which AFT Connecticut will be liable must be approved by the AFT Connecticut Executive Committee upon recommendation by the Defense Committee.
- 3. A member or local who prefers to use an attorney of their own choice is free to do so at their own expense. In such actions, the local may be eligible for a 1/3 reimbursement from AFT. (Must be cleared with AFT first.)
- 4. Ultimate fee responsibility rests with the local. If assistance is applied for and denied after legal services have been rendered, the local must reimburse the attorney unless the local and/or attorney have made other arrangements about fee responsibility. Locals are required to submit AFT payments promptly to the attorney. Attorneys may require locals to pay all or part of the fee in advance.

Coordination Among Retained Attorneys and Defense Committee

- 1. There shall be consultation between the AFT Connecticut retained Attorney and the AFT Connecticut President to determine and recommend responsibility for routine defense matters.
- 2. Where AFT Connecticut financial assistance is expected, the recommendation to refer to a retained attorney shall be made by the Defense Committee through the AFT Connecticut President. The Defense Committee shall consist of the President, the First Vice President, the Second Vice President, the Secretary/Treasurer, the Divisional Vice President for K-12 Teachers, the Divisional Vice President for State Employees and the Divisional Vice President for Paraprofessionals and School Related Personnel, and the Vice President for Employees covered by the NLRA.
- 3. A comprehensive Defense Report shall be presented at each AFT Connecticut Executive Committee meeting.

Local's Fee Responsibility

Usually the local's share should be assumed by the local. However, the local is free to make whatever financial arrangements it desires with the person or persons being defended for payment of his/her share. (See Procedures for Obtaining Legal Assistance)

- 1. Where the case is expected to result in recovery of monies for the person or persons being defended, they will reimburse from 1/3 to all of the cost (depending upon the amount of money involved and the number of persons involved).
- 2. Where a non-member has joined the local in anticipation of getting legal assistance, that person should pay the local's share.
- 3. Where the local is small and unable to pay its share, the person being defended should pay the local's share.

Advice to Local Presidents

- 1) Be sure your Officers and Stewards know your contract and the AFT Connecticut Defense Policies and Procedures.
- 2) Inform the Members in your unit about
 - a) their rights under the contract
 - b) that if they become involved in a possible defense case, i.e., loss of job, an incident in the line of duty with an administrator, a child, a parent, another teacher, a member of the public, an unfavorable evaluation, they should:
 - i) immediately inform the building steward and president of the local as soon as possible,
 - ii) inform the appropriate administrator and have a Federation representative present if possible,
 - iii) be sure that a Federation representative is present in any action subsequent to #2 above,
 - iv) do not sign anything unless their attorney approves,
 - v) follow administrative instructions (other than those connected with #3 and #4 above) to avoid a charge of insubordination,
 - vi) keep full and detailed notes of incidents, conferences, etc., or anything pertaining to the possible case. Note dates, times, witnesses, etc.
 - vii) get signed statements of witnesses as soon as possible. Witnesses sometimes change their minds about supplying material if too long a time elapses.

Emergency Policy

ANY VERBAL COMMITMENT for any defense action involving AFT Connecticut funds made by ANYAFT Connecticut OFFICER, Member of the AFT Connecticut Defense Committee, AFT Connecticut or AFT Field Representative or the AFT Connecticut retained Attorney, is subject to review by the AFT Connecticut Defense Committee and Executive Committee.

EXCEPTION - Instances where a delay may cause IRREVOCABLE and/or DIRE CONSEQUENCES, the AFT Connecticut President, other members of the Defense Committee or, if they are not available, any other AFT Connecticut Officer can authorize consultation with an AFT Connecticut retained attorney and the attorney can act immediately.

Procedure for Reimbursing Locals for Mediation, Arbitration

(Note: AFT does not have any assistance policy for the above.)

The Executive Committee can reimburse locals up to one-half of the cost of arbitration or mediation (up to \$4,000), on a case by case basis. The Local must be in good standing, have demonstrated fiscal responsibility (ie. Has a budget and adheres to it, collects appropriate dues and adheres to pass throughs, has a clean audit or financial review)

The Local must present to the Executive Committee and demonstrate financial need and merits of the case.

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POLICY FOR SMALL MAJORITY LOCALS

(Assistance to small majority locals)

Qualifications:

- All locals must pay AFT, AFT Connecticut and State and Local Labor Council dues for all members
- Non-teacher local dues must be at a minimum per capita.
- Membership must be less than 30 for small majority locals.

Financial Assistance:

- 1) For Defense:
 - a) Eligibility and procedures as outlined in AFT Connecticut Policies and Procedures including subsequent revisions.
 - b) Funding:

(This is just to make them all with common denominators)

- AFT Connecticut 3/6 of the cost
- AFT 2/6 of the cost
- Local 1/6 of the cost
- 2) For Mediation and/or Arbitration, and/or Fact Finding during negotiations:
 - One-half of the total cost of all three, but not more than a total of \$3,500.00 and \$4,000.00

AFT CONNECTICUT LEGAL SERVICES POLICY

PURPOSE:

The purpose of AFT Connecticut legal service policy for individual members is to provide legal assistance to members in certain employment related disputes. AFT Connecticut shall provide appropriate legal assistance without regard to race, color, creed, sex, national origin, marital status, political or religious beliefs, family, social, economic or cultural background, sexual orientation, age or handicap.

PROCEDURE FOR OBTAINING LEGAL SERVICES FOR INDIVIDUAL MEMBER: The Local President shall notify the AFT Connecticut President about the matter, complete the Request for Legal Assistance Form, and mail it to AFT Connecticut. A copy of this form shall be emailed or faxed to AFT Connecticut retained counsel, Upon receipt of the form, AFT Connecticut President and the law firm shall confer to determine if the request for legal assistance is within the parameters of AFT Connecticut's legal assistance policy.

OTHER LEGAL COUNSEL REPRESENTATION:

Any member who is eligible for legal assistance through AFT Connecticut who chooses to obtain private legal counsel shall not be entitled to payment of such counsel's fees or any expenses incurred by such representation. AFT Connecticut will not represent a member in any matter in which the member is or has been represented by private counsel.

ELIGIBILITY OF INDIVIDUAL MEMBERS FOR LEGAL ASSISTANCE:

- A. To be eligible for legal services, a member must be an active AFT Connecticut member, provided however, that an individual though eligible, is not enrolled as an AFT Connecticut member within 30 days of becoming eligible, and who subsequently elects to join shall not be provided with any legal services other than those legal services related to collective bargaining for any problem or event occurring prior to or during the previously mentioned 30 day period.
- B. Notwithstanding any other provisions of the legal services policy for individual members, legal services provided to agency fee payers and religious objectors shall be limited to collective bargaining contract administration and grievance procedure matters.
- C. Legal services shall be provided to eligible members as follows:
 - 1. Legal services shall be provided in employment related matters approved by AFT Connecticut.
 - 2. Legal assistance for individual members shall be provided for Workers' Compensation claims, Department of Children and Family investigations, administrative appeal hearings, tenured teacher termination hearings, and unemployment appeal hearings. Legal assistance will terminate one hundred and twenty (120) days after the individual is no longer a member.

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- D. Legal services are not provided for the following matters:
 - Criminal proceedings
 - Representation at the Connecticut Commission on Human Rights and Opportunities (except where a Local is a Defendant)
 - Representation of an individual of any State and/or Federal lawsuit unless the individual is also a Union officer and/or agent and the underlying allegations of the lawsuit are regarding Union activities
 - Retained counsel unless are approved by Defense Committee
- E Matters such as grievance arbitration hearings and representation of non tenured teachers shall not be handled by the retained counsel unless there are extraordinary circumstances requiring legal representation.

LEGAL ASSISTANCE FOR AFT CONNECTICUT LOCALS:

AFT Legal Assistance shall be provided for Locals in the following matters:

- 1. Representation for any AFT Connecticut loc
- 2. al that has been sued in State or Federal Court.
- 3. Representation for any AFT Connecticut local that has been a Defendant/Respondent in any administrative proceeding.
- 4. Representation in defense or prosecution of any:
 - Municipal prohibitive practice
 - State prohibitive practice
 - Teacher prohibitive practice
 - Unfair labor practice filed at the National Labor Relations Board.
- 5. Representation for any petitions or hearings before the Connecticut State Labor Board and/or the National Labor Relations Board.

Appendix



EACH GROUP OR ORGANIZATION THAT RESERVES MEETING ROOM IS RESPONSIBLE AT ALL TIMES FOR FOLLOWING THESE PROCEDURES.

FACILITY GUIDELINES

- Normal business hours are 8:15a.m. to 5:00p.m. M-T; 8:15am to 4:20pm on Fridays (arrangements may be made for other times)
- After conclusion of the meeting/function, the facilitator will make sure that *all* exterior doors are locked and secured and lighting is turned off.
- It is the responsibility of the group using the facilities to leave the space as they found it (cleaning supplies will be provided). FAILURE TO COMPLY WITH THIS REQUEST MAY RESULTING A CLEAN-UP FEE OF \$50.00.
- Audio visual technology and extension cords are available for use upon request.
- AFT Connecticut will be reimbursed for any and all damages caused to the facilities and/or the equipment therein.
- The group assumes all responsibility and liability for the requested use and agrees to defend, indemnify and hold AFT Connecticut harmless from any and all loss, damage or injury to any person or property arising from use of the facilities.

Accepted by:	
signature	date ———
title	Organization

G:IAFT CT\Programs and Policies\Use Facilities Guidelines Form.doc Revised 3-14-1

Appendix B

Policy Development/Design Documentation

Policy Title

Enter the exact name for the proposed new policy, or the existing policy being submitted for modification

Effective Date

If the proposed policy is to have an effective date different from the approved date, enter the effective date. If

no effective date is specified, the effective date will be the same as the approval date. No newly adopted or modified policies will be applied or enforced retroactively.

I. Purpose

This section will provide the rationale for the policy. Questions to consider when writing the purpose section:

- Are the objective(s) of the policy clearly stated?
- Does it reflect the mission, values, and strategic directions of AFT Connecticut?
- Are any applicable legal and/or regulatory mandates being addressed by the policy?
- What conflicts or problems are being addressed by the policy?
- Does the policy address financial, operational, and/or technological needs?

I. References

This section lists related laws, regulations and policies. Questions to consider when writing the references section:

- Does it cite applicable authority (federal and state laws, organizational policies, etc.)?
- Should any current organizational policies be read in conjunction with this policy? If so, are policy references cited with full policy title, URL or copy?
- Are legal references cited completely (full name of the law, year, etc?) and URL provided where available?

II. Definitions

This section defines the key terms of the policy. For consistency, when drafting or reviewing a proposed

policy, the Membership and Structure Committee should check for prior usages of specific terms and follow the meaning of the terms. Questions to consider when writing the definitions section:

- Does it define new, uncommon and/or specialized terms?
- Does it define terms that can have different meanings in different contexts?
- Does it list terms in alphabetical order?
- Are terms italicized, followed by a colon and defined with a complete sentence? (e.g. *Term*: The definition of the term goes here.)

III. Policy

This section contains the statement of policy. The *policy statement is the governing principle, plan, or understanding that guides the action.* **It states what we do, but not how**. Questions to consider when writing the policy statement section:

- Does it accomplish the purpose of the policy?
- Does it clearly articulate what the policy is and what it is to accomplish?
- What is the scope of the policy?
- Does this section contain only policy (not procedures)?
- Are the responsibilities for entities or individuals clearly stated?
- Is the policy section consistent with the applicable laws, regulations and policies listed in the reference section?

IV. Procedure

This section prescribes the means of implementing and complying with the policy.

Procedures articulate how the policy will be implemented. Questions to consider when writing the procedure section:

- Is it consistent with the policy statement section?
- Does it contain the specific actions or steps needed to comply with the policy?
- Does it contain implementation plans and dates for policies that require a phased implementation?
- Are procedural requirements reasonable?
- Does this section contain only procedures (not policy)?
- Is the procedure section consistent with the applicable laws, regulations and policies listed in the reference section?

V. Documentation

This section prescribes the means of documenting compliance with procedures. Questions to consider when

writing the documentation section:

- Is it consistent with the procedure statement section?
- Does it contain the specific documents needed to comply with the procedures?
- Are documentation requirements reasonable?
- Is the documentation section consistent with the applicable laws, regulations and policies listed in the reference section