

NEW YORK CITY DEPARTMENT OF HOMELESS SERVICES

Procedure Number: DHS-PB-2019-002

SUBJECT: Drafting, Reviewing, Editing, Approving, and Publishing a Procedure	APPLICABLE TO: OPDI staff, Senior Staff of DHS, OLA, and OPPT	ISSUED: 01/25/2019
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ADMINISTERED BY: DHS Office of Program Development & Implementation and DSS Office of Policy, Procedures, and Training	APPROVED BY: Joslyn Carter, Administrator Department of Social Services/ Department of Homeless Services
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INTRODUCTION

As part of the integration of shared services of the Department of Homeless Services (DHS) and the Human Resources Administration (HRA), the DSS Office of Policy, Procedures, and Training (OPPT) and the DHS Office of Program Development and Implementation (OPDI) have coordinated efforts to create new DHS policies and procedures and to review and update existing ones. OPPT and OPDI, with input from DHS divisions, developed a process for drafting, reviewing, editing, approving, and publishing procedures to promote consistency. This document describes this process.

REQUIRED ACTIONS

I. Drafting Procedures

OPPT, OPDI, or a division or unit within DSS or DHS may write policies and procedures (“drafting unit”).

In addition to writing an initial draft of a procedure using the approved DHS Policy Bulletin template, the drafting unit is responsible for the following:

- Ensuring that OPDI and the division most significantly impacted by the procedure (“lead division”) are aware of the procedure and its status;
- Consulting the DSS Office of Legal Affairs (OLA), the lead division, and all other impacted divisions throughout the process;

- Identifying all affected division(s) in the “Applicable To” and “Administered By” sections on the first page of the DHS Policy Bulletin Template; and
- Drafting and updating all related forms and attachments.

II. Review and Approval Process

When the Office of the Medical Director (OMD) is the drafting unit, OMD will coordinate review for the procedure (“review coordinator”). When OPPT is the drafting unit, OPPT will serve as the review coordinator. In all other cases, OPDI will be the review coordinator for the procedure.

Initial Review

When the initial draft is ready for review, the review coordinator must take the following steps:

- Identify staff required to review the initial draft using the Policy Review Transmittal Sheet (see **Attachment A** for a sample);
- Email those identified, requesting comments by a specific date, and attach the following documents:
 - Policy Review Transmittal Sheet;
 - Draft procedure;
 - Related attachments.
- Send OPPT all new/revised forms associated with the initial draft, for OPPT to edit for plain language and proper formatting;
- Complete a log of responses from staff who received the initial draft, paying specific attention to whether OMD requested a second review;
- When a required reviewer has not responded by the deadline, send a second request for comments with a new specific date that includes the following:
 - Policy Review Transmittal Sheet
 - Draft procedure
 - Related attachments
- In consultation with the lead division, edit draft based on responses and comments, creating the revised draft.

Second Level Review

When the revised draft is ready for review, the review coordinator must take the following steps:

- Forward the revised draft to OLA, OMD (if applicable), the DHS Chief of Staff, the First Deputy Commissioner, and any Chief Officer who oversees the program(s) that are impacted by the draft procedure. Additionally, the Senior Advisor to the Administrator, the lead division, and OPDI must be copied. The email must include the following:

- Policy Review Transmittal Sheet
 - Revised Draft
 - Related attachments
 - Complete log of responses
- If sign off is not received from all second-level reviewers, the review coordinator, in consultation with the lead division, will revise and resend for second level review.

After receiving sign off of the revised draft from the second level reviewers, the review coordinator must forward the revised draft to OPPT for formatting (review of form names and numbers, page breaks, etc.) in preparation for OPPT sending the revised draft to the DHS Administrator.

DHS Administrator Review and Approval

OPPT will handle the Administrator review process.

After reviewing and making any necessary formatting changes to the revised draft, OPPT will take the following steps:

- Forward the revised draft to the DHS Administrator, and copy the DHS Chief of Staff, Senior Advisor to the DHS Administrator, OPDI, OLA, and the lead division. The email must include the following documents:
 - Policy Review Transmittal Sheet
 - Revised Draft
 - Related attachments
 - Complete Log of responses

Note: If there is a specific deadline for the procedure, OPPT will include the date in the email to alert the DHS Administrator.

- If the DHS Administrator requests revisions, OPPT, in consultation with OPDI, and the lead division, will make the necessary revisions and resend for DHS Administrator review.
- If the DHS Administrator has questions about any of the content, OPPT, in consultation with OPDI and the lead division, will obtain responses and respond to the DHS Administrator's questions.

The DHS Administrator will email a response to OPPT, copying OPDI and the lead division, stating whether the procedure is approved. If the DHS Administrator approves, the email will serve as the official sign off, and the revised draft will become the final draft. OPDI will save the email in the procedure folder and log for reference.

Additional Required Review Process

Some procedures require additional review by the DSS Commissioner, the New York State (NYS) Office of Temporary and Disability Assistance (OTDA), and/or the appropriate counsel/advocate.

In such cases, OLA, OPDI, and OPPT will ensure the final draft is sent to the additional reviewer(s) for sign off prior to finalization.

If no comments or suggested edits are received from the additional reviewer(s), the procedure will be sent for finalization.

When additional reviewer(s) comment on or suggest edits, OLA, OPDI, and OPPT will work with the lead division to make revisions, and re-send for DHS Administrator review. If the DHS Administrator signs off on the revisions, the procedure will be sent for finalization.

III. Finalizing the Procedure

OPPT will prepare the final draft for publication by taking the following steps:

- Requesting a procedure number from the Office of Communications and Marketing (OCM).
- Preparing the final draft and all associated forms and other attachments, for publication (e.g., removing the draft watermarks from all pages, inserting the procedure number and form numbers, ensuring accurate hyperlinks when cross referencing other internal procedures, obtaining all required translations).

Once the final draft is ready for publication, OPPT will take the following steps:

- Send a link to the final procedure and its attachments to the distribution list
- Ensure the final procedure is posted in eDocs and on the DHS intranet
- Replace all obsoleted procedures and obsoleted forms with the proper hyperlinks to the new procedure and new forms.

Effective Immediately

Attachments:

Attachment A – Policy Review Transmittal

