



Why Some Policies are Ignored

There's an old expression, "rules were made to be broken." Although most rules exist for a good reason, people tend to forget or take for granted why a particular rule is needed. Take traffic lights for instance. They keep traffic moving in an orderly fashion and help prevent accidents. But when traffic lights first appeared about 100 years ago, people ignored them. Even today, some people tend to ignore traffic lights, which is why there are several seconds during which all lights at a traffic intersection are red, and it's also why red-light cameras are getting more and more common. There are also exceptions to rules. In the traffic light example, emergency vehicles and funeral processions are allowed to break the rule of stopping at a red light.

A group of rules along with their background and implementation details are often packaged in a document called a "policy." In the federal government, we usually call a policy an "instruction" (or INST for short). Essentially, policies are the rules, guidelines, and processes we use to conduct our day-to-day business in an orderly manner. We have literally hundreds of such instructions in our environment. Generating a new instruction or merely updating an existing instruction may take many months and sometimes even years, as there are numerous organizations to be solicited for comment and concurrence before a policy is issued.

One of the problems with policies (like traffic lights) is that they are often ignored. This could be for several reasons. One is that the people affected by the policy are not aware of it; you can't follow a policy you don't know about.

Policies can also get ignored if they're too long and complicated. I recently saw a draft policy that was 90 pages long, with 53 references and 11 appendices—and one appendix was just the list of all the references! Most people don't have time to read, let alone digest and implement, such a long and complicated policy.

Third, if the wording in the policy is too vague, it's subject to a wide variety of interpretation and implementation. Examples are using nonquantified and nonmandating words such as "some," "large," "sparingly," and "should."

Yet another reason for policies being ignored is that they do not include the measurements, reviews, and inspections required to assess compliance. Even when measurements are required by the instruction, they may not be generated, submitted, collected, or analyzed on a basis regular enough to assure compliance.

To avoid wasting time and effort, we should not generate policies that are likely to be ignored. A good policy should:

- Focus on the problem, clearly stating what it is, why it had to be addressed, and how the policy addresses the issue.
- Attempt to eliminate any loopholes. If someone can too easily get around the policy, the wording should be made tighter. A good policy has any exceptions listed clearly within it.
- Be simple, clear, and as succinct as possible. If people don't have time to read the policy, they won't have time to follow it. And surely if they don't understand the policy, they won't be able to follow it either.
- Specify the consequences of not following the policy. Consequences need to be enforceable. If a policy can't be enforced, it becomes merely a guideline rather than a rule.

We should also keep in mind that policies should be created only when there is a widespread and repeated problem and pattern of actions that are inconsistent with the organization's values. Even then, there should be a period of questioning whether the problem is best addressed by a policy, education, or both.

Before any organization starts to create a new policy—or even renew or modify an existing policy—there should be a reality check as to whether that policy is worthwhile and will likely be followed. Unless it meets all of the above criteria, it will likely be ineffective and not worth the time to write or the paper it's printed on. We should aim to keep the number of policies we have small and to assure compliance with those few that truly need to exist.

I have developed a checklist as an aid to developing policy. It is available as a PDF file in the electronic version of *Defense AT&L* at <http://www.dau.mil/pubs/damtoc.asp>.

Al Kaniss

POLICY CHECKLIST

Al Kaniss

1	Is it clear which organization and code “owns” the policy, can provide additional information, or has authority to modify it and/or grant “process waivers”?
2	Is it clear to which programs, project, and people this policy applies? Government, industry, or both? Is it clear <i>when</i> the policy applies? For example, any specific program may at one time not be covered, and at a later time, be subject to the policy.
3	Does the distribution and availability ensure that this policy will be available (e.g., in a directives list and on a Web site) to reach the programs, projects, and people affected by it? Is the location of the policy well-known and -publicized, especially long after its initial release?
4	Are there plans to ensure that the policy will be sufficiently advertised so that those who need to comply will be aware of it and understand it, both initially and later on?
5	Are exemptions to the policy identified and the waiver process explained? Is the turnaround time for getting a waiver processed specified?
6	Is the policy based on higher-level—OSD, SECNAV, ASN(RDA), etc.—direction, or is it internally imposed? Is the higher-level policy identified as a reference?
7	Is the policy consistent with overall systems engineering, acquisition, and software strategic directions of DoD and the Navy?
8	Is there a conflict, lack of consistency, or redundancy between this and another policy?
9	Is the policy legal and ethical?
10	Might private industry balk at this policy?
11	Does the policy state what the objective is, why the objective is being sought, and how the policy helps reach the objective?
12	Is the policy simple, clear, and unambiguous? Are there words, acronyms, or terms that are vague, undefined, or that could be misinterpreted?
13	Will the policy be vetted before approval and implementation with all who may be impacted, including other government agencies and private industry?
14	Is there education and training needed to implement the policy? Who will arrange it? How much will it cost? Who will pay for it? (This may be more applicable at the level at which the policy is implemented, rather than at which the policy is established.)
15	Is any burden on the actionees worth the value or gain provided by the policy?

16	Are there incentive(s) for compliance? Are there penalties for noncompliance?
17	Will support people be needed to check for compliance and deal with noncompliance? If so, where will they come from, and who will pay for them?
18	Are there loopholes in the existing policy (areas that should be addressed)? Who looks for these loopholes (i.e., how is the policy vetted)?
19	Will implementation of the policy put a strain on resources (e.g., personnel, funding, DAU class capacity, etc)?
20	Will programs be able to determine the cost of implementing this policy? Who will fund the cost of implementation?
21	Is the policy one-size-fits-all or tailorable? Is it tailorable to the size or development stage of the program? Is the policy applicable to all contractors/sub-contractors or only contractors of a certain size or that support specific phase of development?
22	Are there implementation timeframes? If so, are they clearly stated and reasonable?
23	Does the current Navy organization and acquisition system enable the policy, or does it work against its implementation? If there are inhibitors, how can they be dealt with?
24	Are the policy's objectives measurable by programs so that programs can quantify and qualify if they are meeting its objectives?
25	Is the policy of benefit (i.e., value added) to either programs or in the aggregate? Can the benefit be measured? Is the expected measure specified in the policy?
26	Is a person or organization designated to monitor policy compliance? Are there measures in place to ensure compliance and enforcement? How often is compliance measured?
27	Are there provisions to periodically update the policy as appropriate? What is the frequency of review of the policy?
28	Is there a process to measure the payoffs vs. costs in the implementation stage to see if the policy is actually providing the benefits sought?