



Coalition's Role in Local Program Sexual Assault Policy and Procedure Reviews

What is a policy and procedure review?

A policy and procedure review describes when a coalition or other entity performs a thorough reading of an entity's policies and procedures, for the purpose of providing better sexual assault services and tailored technical assistance.

Policy and procedure reviews are a chance to give feedback to a local program or other related group about how they are using their infrastructure and organizational culture to support strong sexual assault services.

Policy and procedure reviews can be limited to a specific type of policy or procedure, or they can be more holistic. These reviews can be limited to looking at how policies and procedures impact one specific type of response for sexual assault survivors or sexual assault survivors overall. The coalition may request a program to submit their policies and procedures for review, a funder may mandate or suggest a policy and procedure review, or an agency may request the coalition (or other entity, like a survivor advisory board) perform a review.

Why do the reviews?

Assess existence of meaningful sexual assault services

Policy and procedure reviews are one way to tell if local programs are offering sexual assault specific services to survivors. This can be especially helpful for assessing sexual assault service provision in dual domestic violence or other multi-service organizations. If, for example, all the policies

only refer to domestic violence survivors, lethality assessments, restraining order procedures, or shelter services, this can be a flag that meaningful sexual assault services across the lifespan are not offered. Even if the program only provides sexual assault services, their policies may have been adopted from a domestic violence service lens and reference practices such as short time limits for helpline calls. Identifying the ways that sexual assault services are built, or not, into the advocacy program's policies and procedures provides a tool to help programs see where sexual assault healing services can grow and where the coalition might be able to provide additional technical assistance or training.

Identify barriers to meaningful sexual assault services

Policy and procedure reviews are also a way to examine what barriers may exist to serving sexual assault survivors across their lifespan at a program or entity. Do the policies and procedures mandate the reporting of suspected abuse? What policies or procedures does the program have about providing services to survivors who are minors? What about secondary survivors? Are advocates allowed to transport survivors to appointments? Provide services in a survivor's home? Many dual domestic violence programs may prohibit or require some of these activities, but they can create barriers to accessing sexual assault services. Highlighting potential barriers to meaningful sexual assault services can help programs identify if it's their outreach that isn't working, or if it's what happens once a survivor tries to access help.

Identify internal deterrents to meaningful services

Identifying internal deterrents to meaningful sexual assault services is especially important when local programs or other agencies are establishing sexual assault services for the first time or establishing sexual assault services in a new area. Caseloads may be much smaller, support group turnout may be much lower (or non-existent) for months, and it may take longer to serve one sexual assault survivor due to long drive times for medical care or other complex health needs. If policies and procedures do not outline how job performance will be evaluated, beyond the number of survivors they serve in a given time period, employees and advocates may experience negative performance evaluations. This fear may encourage

workers to provide services using a framework more akin to crisis-oriented domestic violence service provision, potentially turning survivors away with more complex needs or not giving enough time to establish sexual assault services in new areas, so they can serve a higher number of clients. Helpful policies and procedures will outline what training supervisors will receive to understand how to evaluate meaningful employee performance when serving sexual assault survivors.

Identify structural drivers of advocate burnout and turnover

Even the most disciplined self-care advocate will not be immune to burnout or the desire to leave their position if there are policies in place that create a harsh work environment. This can include policies setting low pay scales, difficult time-off approval processes, rigid rules about work hours, unclear employee complaint procedures, and more. These issues are important to a policy and procedure review because reducing advocate turnover reduces costs associated with new employee training and maintains the tacit institutional knowledge gained from lived experience that sexual assault advocates possess about how to provide quality sexual assault healing services.

Expand possible grantee pool for sexual assault funds

When an organization wants to support sexual assault survivors, but doesn't currently have programs that target sexual assault survivors, partnering on a policy and procedure review can help the organization become a more competitive grant applicant. This is one way that coalitions can support access to culturally responsive sexual assault healing services or other services.

How to set up policy and procedure reviews

There are several ways that coalitions can support policy and procedure reviews to improve sexual assault services for survivors.

Coalitions can:

- Let local programs or other direct service agencies know you are available to provide this TA.

- Use part of your time visiting the local program to review their policies and practices
- Run an optional cohort for people to join and review their program policies together
- Make it part of a membership meeting
- Do policy and practice reviews with middle managers to support their confidence in supervising sexual assault advocates
- Include in sub-recipient monitoring

Ways to mitigate power dynamics in policy and procedure reviews

Most local programs are their own 501c3 legal entities or are fiscally sponsored by a larger 501c3. But the coalition's opinion does matter, and in some cases may be legally binding, depending on the relationship between the coalition and the local program.

The coalition's opinion matters because sexual assault coalitions are the entity recognized by federal, state, and territorial governments as an expert on sexual assault services. This is especially true if programs are required to follow service standards set by the coalition to qualify for funding or if the coalition acts as a pass-through entity for any stream of funding.

Therefore, it's vital that coalition staff consider how to minimize the impact of power dynamics when conducting a policy or procedure review.

If the local agency requested the review:

- Allow programs to propose the scope of the review.
- Make it possible for programs to give informed consent. Share an overview of what the process will look like, what information you will ask to see, what kinds of questions you may ask, and what will happen to any information you gain from looking at the program's policies and procedures before you conduct the review.
 - How will the coalition respond if a policy is found that conflicts with best practice?
 - How will the coalition respond if a policy is found that conflicts with federal regulations?

- How will the coalition respond if they notice a mandatory special condition policy is missing?
- What if an advocate shares a story about what they think of as a routine activity, and you flag it as an egregious breach of advocate ethics?
- Will conversations that happen during policy reviews remain private?
- What, if anything, will be communicated to others at the coalition?
- What, if anything, will be communicated to funders? Could there be any negative repercussions to participating in a policy and procedure review with the coalition?
- Collaborate on the time frame and pacing of the review. Since the policy review was requested by the program, make sure the work fits within their capacity to participate as much or as little as they would like.
- Approach areas for possible feedback with curiosity
- Frame feedback as recommendations or suggestions

If the review is required by the coalition or another entity:

- Clearly state why the review is required and who required it
- Let the program know who will be conducting the review
- Provide documentation outlining what policies and procedures will be reviewed in advance of the review and how the review will be conducted.
 - Will the reviewer select random policies?
 - Will the reviewer do a line by line reading of all the policies?
 - Will any program staff need to be available for an interview with the reviewer(s)?
 - How many hours or days will the review take?
- Share the criteria the reviewers will use to judge the policies and procedures.
- Explain possible consequences for failing any parts of the policy and procedure review.

- Let the program know if they will be able to review the coalition's findings and make any changes before any reports about the review are submitted.
- Let the program know if they will be able to submit an appeal or rebut any of the report findings.
- Provide a timeline for when the program will be notified of any outcomes from the review.
- Give the program the name and contact information for who they should submit complaints to in the event they feel their staff were mistreated or the review process was unfair.

Tools needed to conduct a successful policy and procedure review

As you prepare to offer policy and procedure reviews with local programs, organize the tools that will help you complete the review process. Some of the general tools you may need include:

- **Working knowledge of where to find relevant regulations.** It's important to make sure you are up-to-date on what policies and practices are tied to administrative, legislative, or funding regulations, and which ones are not. Local program policies and procedures often balance the requirements of many funding sources. You may find that grant application packets and local, state, and federal department reporting websites offer insights about where to find this information.
- **Time to research.** There are so many gray areas in policy and procedure, places where guidance conflicts, and places where it is unclear what implementation of something looks like in practice.
- **Local program or agency leadership investment.** This is especially important if you conduct the policy and procedure review with someone other than the executive director/superintendent/district supervisor. Make sure the agency leadership knows that the coalition is providing this support to one of their staff.
- **Sexual assault advocacy-specific research and resources.** Coalition TA providers are not, for the most part, legal experts, human resource lawyers, or accountants. Most of the feedback that

sexual assault coalitions can provide is in the realm of improving services for sexual assault survivors, sexual violence prevention, and sexual assault-specific funding implementation.

- Some areas to get you started:
 - What training is mandatory for employees? Do topics include sexual assault-specific content? For example, are staff trained in how to provide emotional support over the phone? What continuing education specific to sexual assault survivor needs is offered?
 - How are sexual assault survivors approved for services?
 - What services are available specifically for sexual assault survivors?
 - If you are working with a program that offers shelter, how are the needs of sexual assault survivors accounted for or not?
- RSP offers several other publications and tools that may help you conduct policy and procedure reviews. For recommendations of other resources to reference, please reach out to an RSP Coalition TA provider.

With these questions and tools in mind, sexual assault coalitions can help expand meaningful services for survivors of sexual assault, especially in dual and multi-service agencies. As you repeat the process with different organizations, document what you learn and share it with the sexual assault coalition community. If at any point you need additional support, please reach out to an [RSP Coalition TA provider](#).

Policy and Procedure Review Planning Worksheet [sample]

1. What is the reason for this review? What is the goal of this review?

2. Who requested the review to happen?

3. What will this review cover? What will this review not cover?

4. Who will conduct the review? Who will be involved in this review?

Who will receive the outcomes of this review?

5. How will recommendations be documented, shared, and stored? *

6. How long do you estimate this review will take?

7. What are the expectations of what happens after the review?

* Consider all the implications for liability, confidentiality, equitable access to information when making this decision.

Policy or Procedure Review Template [sample]

1. What is the text of the policy or procedure being reviewed?

2. Who does this policy or procedure apply to?

3. How and why did this policy or procedure come to be?

4. Are any parts of this policy or procedure mandated or governed by a funding source or other regulatory group? Which parts and what are they governed by?

5. What do people interpret this policy or procedure to mean?

6. How are people made aware of this policy or procedure?

7. If you were to draw an imaginary map of how a sexual assault survivor might get help from this agency, where are all the places this policy or procedure might impact their experience? Consider what might change based on the survivor's age, mental and physical capacities, language fluency, or other relevant factors.

OR

8. If you were to draw an imaginary map of how a sexual assault advocate might provide help to a survivor, where are all the places this policy or procedure might impact their experience? Consider what might change based on the advocate's age, mental and physical capacities, language fluency, or other relevant factors.

9. How might this policy or procedure affect sexual assault survivors who want to access services across those key points on the imaginary map?

10. What might help improve or strengthen places where the policy or procedure creates barriers or improves access to meaningful sexual assault services? Internal agency changes? External environmental changes?



Policy and Procedure Update Plan [sample]

What is the issue?	Impact on SA survivors or services? (high, med, low)	Likelihood to arise? (high, med, low)	Approach to address? (accept, reduce, avoid, transfer)	Priority to address? (high, med, low)	Next steps & notes
<i>Ex. No policy that sets time limits on helpline calls, but it's a common practice during after-hours shifts.</i>	<i>high</i>	<i>high</i>	<i>Reduce – provide new training & guidance to helpline workers</i>	<i>high</i>	<i>Include in plan for next volunteer training potluck</i>

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