Policy on Policies – Creating, Format, Approval and Review   Policy Number NSM 0001

Department(s)	ALL
Effective Date	**11/15/2022**
Version Number	**V 1**
Last Review	**11/15/2022 Initial Policy**

Scope

This policy addresses the process for developing, issuing and maintaining all National Seating & Mobility, Inc. and all related entities' policies. This policy applies to all departments and employees of NSM and all related entities equally unless otherwise indicated.

Purpose/Policy Introduction

National Seating & Mobility is committed to ensuring that all Policies are managed in a manner that is compliant and consistent with legal and regulatory requirements and with the company culture and values. This policy defines an NSM Policy and describes the key expectations, requirements, and methodology throughout the policy lifecycle, including development, maintenance, and archiving.

The purpose of this policy is to ensure that all NSM departments and employees have ready access to well-developed and understandable policies. Policies that are easy to find, read and understand will:

- Support NSM's Mission.
- Achieve accountability by identifying the departments responsible for policies.
- Provide employees with clear, concise and current guidelines.
- Document how NSM conducts business.

NSM policies will be:

- Presented in a common format and numbering system.
- Formally approved by the appropriate Department/Leader.
- Maintained centrally and accessible to all employees.
- Kept current within the framework of an organized system of change control.

Policies generally apply to all employees. Internal policies that apply to the operations of individual teams or departments may not conflict with company-wide policy, but may be more restrictive.

Policy

Policy Development

All Policies and Procedures will be created using the standard format and numbering system. A Policy Initiator may identify a need for a policy. The Policy Initiator will submit a policy proposal for review by the Department Head/Senior Leadership or other appropriate Policy Owner.

The Policy Owner will review the draft and consult with appropriate stakeholders to create and approve a final version. Once the policy is approved and signed, the Policy Owner will forward an electronic copy to the Policy Administrator.

The Policy Administrator will maintain copies of signed policies and policy revisions and place an electronic copy on WNSM. The Policy Administrator also notifies responsible parties when policies are scheduled for review or revision. Policy Owners will notify the Policy Administrator any time policies are updated outside the regular review process, and will provide an electronic copy to place on WNSM. When policies are reviewed or updated, the most current copy will be posted and previous versions will be archived.

Policy Format

A standard policy format ensures clarity and consistency. Although not all policies will contain all of the format elements, NSM policies will be written and maintained following the format in the Appendix A.

Note: For policies that predate this policy, they will be updated to the current format during the annual review. (All policies should be reviewed and re-formatted by the end of the first quarter of 2023.)

Location of Policies

To ensure ready access to policies, NSM will maintain a Policies & Procedures section on WNSM with the most current approved version of all polices.

Structure and Organization of Policies

The Policies & Procedures section on WNSM will list all policies by department/category, name and number. The following numbering convention will be followed by all departments:

Policy (Department Code – Policy number) and Title

Example: **Policy F-600 Work Order Transfer Policy** This is a Funding Department Policy (F) number 600 on Work Order Transfers.

Department Codes are:

Dept Code	Department
NSM	Company-wide policies
BC	Billing & Collections with subgroups as needed
C	Compliance
CS	Customer Service
F	Funding
HR	Human Resources
IT	Information Technology
K	Kaiser
S	Tech Services

The Policy Administrator will maintain a Policies Master List that will assist in correct numbering and version numbers of all Policies.

Policy Review

All Policies should be reviewed and updated when changes are necessary. Even when no changes are identified, all Policies should be reviewed at least annually to ensure the content remains current.

Procedure

Any employee who identifies an unmet need for a policy may create a policy proposal. The proposal should be presented in writing to their Supervisor, Manager or Senior Leader. The manager or leader then becomes the Policy Initiator.

The Policy Initiator drafts the policy using the prescribed template. The completed draft is submitted to the appropriate Department Head or Senior Leader whose jurisdiction covers the subject matter of the policy. The Department Head or Senior Leader then becomes the Policy Owner.

Each functional business group may appoint the Policy Owner for their area. If a Policy involves cooperation between multiple departments, those Department heads of the multiple departments may appoint the Policy Owner for that specific Policy. The preferred best practice is to identify Policy Owners by Title and/or Role rather than by an individual's name.

The Policy Owner reviews the draft with appropriate stakeholders, edits as appropriate and creates a final version. Once a final version is completed and approved, the Policy Owner works with the Policy Administrator to review the format and assign the Policy Number.

The Policy Administrator provides an electronic copy of the complete and approved policy to the WNSM administrator to place in the Policies & Procedures section. The WNSM administrator can be either the department's own administrator or the WNSM administrator in the Marketing Department. Previous versions are moved to archived storage in the Policies and Procedures folder on the f:drive; only current versions are posted on WNSM for employee access.

The Policy Administrator adds the Policy to a Policy Master List in the Policies and Procedures Folder on the f:drive, which includes the Policy Number, Policy Name, Policy Owner, Policy Administrator, Effective Date, Last Update, Current Version Number and Next Review Date.

The Policy Administrator will notify the Policy Owner when a routine review is due and will confirm that the review is noted on the Policy and in the version number. The Policy Master List will be updated accordingly, and the current version of the policy will be posted on WNSM.

References/Resources
N/A

Definitions

Term	Definition
Policy	A governing principle that mandates or constrains actions and/or a statement of direction established to provide guidance and assistance to employees in the conduct of company business.
Policy Initiator	Any department manager or leader who identifies a department or company level issue and develops a policy proposal
Policy Owner	The appropriate employee (manager, department head, senior leader as designated by the functional business group) whose jurisdiction covers the subject matter of the policy.
Policy Administrator	The designated employee responsible for posting, storing and cataloguing policies. The Policy Administrator also notifies Policy Owners when a policy is due a routine review.
Stakeholder	Departments or employees who are affected by the Policy in development.

Policy History

Creation/Revision/Review Date	Author/Reviewer	Approved by	Description
11/15/2022	Karen Shell		Initial development of a Policy on Policies

Appendix A – Policy Template

Appendix B – Policy Master List Format

Policy Number	Policy Name	Policy Owner	Policy Administrator	Effective Date	Last Update	Next Review Date