

# PROCEDURES REVIEW POLICY

for  
The Gulf Consortium

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## DEFINITIONS

The following terms defined in this section shall have the meanings set forth below whenever they appear in the Gulf Consortium Policies:

1. “Board” means the Board of Directors of the Gulf Consortium.
2. “Consortium” shall mean the Gulf Consortium, created under the Florida Interlocal Cooperation Act (Part I of Chapter 163, Florida Statutes) and the Interlocal Agreement entered into by its members on September 12, 2012.
3. “General Counsel” shall refer to the person or persons retained to provide legal counsel to the Consortium.
4. “General Manager” shall refer to the staff so designated by the entity contracted to provide General Manager services for the Consortium.
5. “Person” means any business, individual, committee, club, other organization, or group of individuals.
6. “Procurement” means buying, procuring, leasing, or otherwise acquiring any materials, supplies, services, or equipment. It also includes all functions that pertain to the obtaining of any material, supplies, services, construction, and equipment, including description of specifications and requirements, selection and solicitation of resources, preparation, and award of contract.
7. “Services” means the furnishing of labor, time, or effort by a contractor, not involving the delivery of a specific end product other than those which is not defined as supplies and which are merely incidental to the required performance.
8. “Specification” means any description of the physical or functional characteristics of the nature of a material, supply, service, construction, or equipment item. It may include a description of any requirement for inspection, testing, recycled, or degradable materials content, or preparing a material, supply, service, construction, or equipment item for delivery.

## **PR-1. BACKGROUND**

Outdated policies can expose the Gulf Consortium to risk. Old policies may fail to comply with new laws and regulations. They may not address new systems or technology, which can result in inconsistent practices. This Procedures Review Policy is intended to ensure periodic review of the Gulf Consortium's policies and procedures in order to ensure that such policies and procedures remain up to date with the latest regulations, technology, and industry best practices.

## **PR-2. OBJECTIVE**

Each policy review will address the following questions:

### **a. Is the policy being implemented as intended?**

Each review should consider whether employees, consultants, subrecipients, or other persons or parties to which the policy is addressed are complying with such policy and/or procedure. If there are instances of non-compliance, a review of the reasons why should be conducted. Is the policy outdated? Are the procedures difficult to follow? Have accounting or technology platforms changed during the year that the policy doesn't address? Has sufficient training been completed?

### **b. Is the policy having the desired effect?**

Each policy is intended to meet a clear goal or objective. Over time, review of the policy objectives will help to assess whether a policy is effective. For example, if a policy was put in place to improve employee safety and employees are following the policy but accidents are still occurring at the same rate, the policy should be examined to identify how to revise it to be more effective.

### **c. Are the policies and procedures current and relevant?**

Each review should confirm that policies and procedures align with current systems and structures. If the policies and procedures refer to outdated structures or technology, employees, consultants, subrecipients or other persons or parties to which the policy is addressed are more likely to ignore them or think that they are no longer relevant. For example, if the policies refer to contact individuals that are no longer in place, updates are necessary.

## **PR-3. PROCESS**

Unless the Board approves a different schedule, ninety days prior to the established annual review date for all policies, which shall be the anniversary of acceptance by the RESTORE Council of the Consortium's OSA unless the Board approves exceptions to this schedule, the following process will commence. Exceptions are likely to occur in years when Board member transitions result from elections, and new Board members are not seated until late January.

### **PR-3.1 Determine the parties involved with each policy**

Depending on the policy, the individuals and entities involved with the policy may differ. One or more Policy Review Committees shall be created by the Board. The

purpose of such Policy Review Committees shall be to review the Consortium's current policies in accordance with the criteria described in Section PR-2 and recommend any proposed changes to the Board. Generally speaking, the Policy Review Committee(s) shall be comprised of a member of the General Counsel, at least one Board representative, at least one non-Board RESTORE Coordinator and representatives from Accounting, Procurement and Grants Administration. A Consortium staff person or consultant will be designated as a point person for the review of each policy. In addition, General Counsel will be asked to conduct a legal review of statutory references throughout existing policies to ensure they remain accurate and relevant. The following policies at a minimum will be formally reviewed:

- a. Accounting and Financial Management
- b. Communications and Public Records
- c. Conduct and Conflict of Interest
- d. Grant Management
- e. Internal Controls
- f. Procurement
- g. Subrecipient Management

**PR-3.2 Convene a review session to propose changes**

The Policy Review Committee shall convene at least one group session to review proposed changes put forward by the point person for each policy and to receive the report from General Counsel of any required updates. As needed, additional sessions may be scheduled to allow time for consideration and discussion of all proposed updates or refinements to policy.

**PR-3.3 Document all proposed comments and changes to the policy, prepare for Board consideration**

The General Manager will maintain an inventory of all policies and procedures and log all proposed changes to each policy proposed by the Procedures Review Committee(s). A summary of all proposed changes and supporting justification will be prepared for the Board's consideration.

**PR-3.4 Finalize and disseminate updated policies**

Changes that are approved by the Board to any policy will be updated in all Gulf Consortium documents and made available within 30 days as a part of the permanent record.