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## **Policies Review Update**

**Governance & Audit Report No. 2024-07**

Report Issued July 25, 2024

## EXECUTIVE SUMMARY

### Background

During late 2023 the Governance & Audit team, with input from management and its subject matter advisors, compiled a heat map to identify and illustrate the agency's risk universe. Perspectives were sought on agency-wide risks, external risks, and threats to IndyGo's mission and objectives.

The FY2024 Internal Audit Work Plan was approved In January 2024 by the Governance & Audit Committee. Included in this approved work plan was the Policies Review Update.

We would like to thank IndyGo staff and all those involved in assisting us in connection with the review. Questions should be addressed to the IndyGo Department of Governance and Audit at: [batkinson@indygo.net](mailto:batkinson@indygo.net).

### Objective and Scope

Examine the processes and controls related to IndyGo's policies. Considerations included:

- Management, update, publication, expiration and approval processes
- Oversight, monitoring and enforcement practices
- Housing, storage and filing practices
- Board-level vs. management-level policies

### Overall Summary and Review Highlights

As noted in the FY2023 Policies Review:

- Developing Corporation (referred to as Agencywide in previous review) and Departmental policies and consistently reviewing these policies should be at the top of IndyGo's strategy. Identifying the current policies in place is the first step for moving towards a solid policy framework for the organization. From the creation of the inventory listing of current existing policies, subsequent identification of gaps in policies still needed should be determined.
- Policies should be categorized by Corporation or Departmental. A policy owner should be assigned to each policy within IndyGo and policies should be retained in a central repository. Housing all Departmental and Corporation policies on the IndyGo SharePoint hub was recommended.
- An approval process needs to be defined for both Corporation and Departmental policies. Expiration, review and reissue parameters need to also be defined for these policies as well. Management should determine what format or consistent language should be included In Agencywide and Departmental policies.

For FY2024, Governance & Audit performed an update review to ensure the prior audit recommendations were being properly addressed and corrected. This report serves to inform the Committee on what's been done to date to satisfy these recommendations.

IndyGo has adopted a formal Policy and Procedure Management Policy. The purpose of this policy is to bring uniformity to corporate and departmental operations and increase organizational efficiencies; whereby mitigating risk to the Corporation and protecting its interest.

## SUMMARY OF SELECTED COLLISION CATEGORIES

Objective	Summary Details						
<p><b>1. Policy Specialist</b></p>	<p><b>Recommendation:</b>            Policy coordinator assignment for oversight of all Department and Corporation policies.</p> <p><b>Update:</b></p> <table border="1" data-bbox="600 592 1864 704"> <tr> <td>Position Title: <b>Corporation Policy and Procedure Specialist</b></td> <td>Safety Sensitive: <b>No</b></td> </tr> <tr> <td>Supervisor's Title: <b>Chief Administrative Officer</b></td> <td>FLSA Status: <b>Exempt</b></td> </tr> <tr> <td>Department: <b>Executive</b></td> <td>Division: <b>Administration</b></td> </tr> </table> <p>The above represents a portion of the published job description for the Corporation Policy &amp; Procedure Specialist position that was filled on October 23, 2023. As of August, 2024 the duties of the Policy and Procedure Specialist were transferred to the Department of People and are being shared with the Executive Team.</p> <p><b>Position Purpose:</b>            The Corporation Policy and Procedure Specialist evaluates, maintains, and improves efficiencies of multiple business functions for the Corporation and is also responsible for reviewing current departmental standard operating procedures (SOP's), policies, and corporate Intranet; revising as needed.</p>	Position Title: <b>Corporation Policy and Procedure Specialist</b>	Safety Sensitive: <b>No</b>	Supervisor's Title: <b>Chief Administrative Officer</b>	FLSA Status: <b>Exempt</b>	Department: <b>Executive</b>	Division: <b>Administration</b>
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<p><b>2. Housing, Storage and Filing Practices</b></p>	<p><b>Recommendation:</b>            Complete inventory listing of all IndyGo policies.</p> <p><b>Update:</b>            A request was sent to all departments by the Policy Specialist, to provide an all-inclusive list of policies and standard operating procedures (SOPs). The complete inventory of all policies is currently being developed as various departments review and submit their current policies.</p>						

**Recommendation:**

Create a central repository as for all Corporation and Department policies that will be visible by all teammates utilizing such policies.

**Update:**

A document repository has been developed on the IndyGo Intranet Hub for all departments to house policies and SOPs. The IT Team will ensure that SharePoint site is property maintained, and the capacity of the document storage platform is sufficient. They will also enact and sustain proper security features to ensure the retention of all current and retired corporation policies and procedures.

**Corporation Documents**

Documents > Policies

Share Copy link Sync Download Export to Excel All Documents

Name	Modified	Modified By	Document ID
Capital Planning	May 23	Cathy Johnson	
Corporate	May 23	Cathy Johnson	
Department of People	May 23	Cathy Johnson	
Facilities	May 23	Cathy Johnson	
Finance	May 23	Cathy Johnson	
Fleet Services	May 23	Cathy Johnson	
IT	May 23	Cathy Johnson	
Maintenance	May 23	Cathy Johnson	
Mobility Solutions	May 23	Cathy Johnson	
Public Affairs	May 23	Cathy Johnson	

	<p><b><u>Recommendation:</u></b>          Categorize policies as Corporation Policies and Departmental Policies.</p> <p><b><u>Update:</u></b>          The policy section in the HUB has been developed with both a Corporate Policy section and a Departmental Owned Content section.</p>
<p><b>3. Policy Ownership</b></p>	<p><b><u>Recommendation:</u></b>          Issuer should be assigned for each Corporation or Departmental policy.</p> <p><b><u>Update:</u></b>          Generally, Departments are considered the owners of the policies. If the Executive Team determines that a policy should be expanded to cover the organization, it becomes a “Corporation Policy”.</p>
<p><b>4. Policy Management</b></p>	<p><b><u>Recommendation:</u></b>          Ensure Corporation and Departmental policies include an expiration date to force mandatory review process and approval.</p> <p><b><u>Update:</u></b>          The new policy format includes a review/renewal date for each policy. Dates are currently set at 12-month intervals. The listing of the documents includes an effective date, review date, next review date, revision date and date approved.</p>

Document Type	Document Number	Document Version	Document ID	Effective Date	Review Date	Next Review Date	Revision Date	Date Approved	Policy Reference(s)	SOP Reference(s)	WI Reference(s)
Policy (POL)	001	001	POL.TRN.015.001	2/5/2023	2/5/2023	2/5/2024		2/4/2023	POL.TRN.008.002, POL.PPL.050.001	SOP.TRN.010.001	WI.TRN.010.001
Standard Operating Procedure (SOP)	005	001	SOP.FLTSVC.005.001	1/30/2024	1/30/2024	1/29/2025		3/1/2024			WI.FLTSVC.001.001
Work Instruction (WI)	001	001	WI.FLTSVC.001.001	2/6/2024	2/6/2024	2/5/2025		2/6/2024		SOP.FLTSVC.005.001	
Standard Operating Procedure (SOP)	006	003	SOP.FLTSVC.006.001	1/4/2016	5/7/2024	5/7/2025	5/7/2024				
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						12/30/1900					

All policies are reviewed by the Executive Team and the Deputy Chief Legal Officer/Sr. Director of Compliance and Civil Rights. The department chief signs as the approver. The policy will be sent through the DocuSign process after approval.

<i>Prepared By:</i>	<i>Reviewed By:</i>	<i>Approved By:</i>
<p>_____</p> <p><b>Name of Preparer</b> Preparer's Title</p> <p><b>Date Prepared:</b> _____</p>	<p>_____</p> <p><b>Name of Reviewer</b> Reviewer's Title</p> <p><b>Date Reviewed:</b> _____</p>	<p>_____</p> <p><b>Name of Approver</b> Approver's Title</p> <p><b>Date Approved:</b> _____</p>

If a proposed policy requires approval of the Board of Directors, the CEO and Chief Legal Officer will consult with the respective members or committees.

**Recommendation:**

Ensure parameters are set so that Corporation policies are reissued and redistributed to staff.

**Update:**

To ensure that all employees governed by the Policy or SOP, are informed, via a "corporation-approved" communication, that the new or updated Policy or SOP has been implemented, to include the effective date.

<b>5. Standardization</b>	<p><b><u>Recommendation:</u></b> Develop a standard template format to be used for all Corporation and Departmental policies.</p> <p><b><u>Update:</u></b> The Executive Administrative Department is responsible for standardizing and facilitating the Corporation’s policy and procedure management systems. Templates have been developed for both policies and SOPs moving forward to ensure they are standardized.</p>

 <b>Indianapolis Public Transit Corporation Policy</b>	<b>Document ID</b>	XXX XXXXXX XXX XXX
	<b>Document Number</b>	000
<b>Policy Name</b>	<b>Document Version</b>	000
	<b>Effective Date</b>	XX/XX/XXXX

As the largest public transportation provider in the state of Indiana, Indianapolis Public Transportation Corporation (IPTC), branded as IndyGo (the "Corporation"), is committed to expanding mobility options to improve connectivity with the mission to "connect our community to economic and cultural opportunities through safe, reliable, and accessible mobility experiences."

1. Purpose

In accordance with the goals of fostering a collaborative, employee-centric culture; innovating and leveraging best practices; and establishing and sustaining a performance-driven organization, IndyGo has adopted a formal <Policy Name> policy. The purpose of this Policy is to bring uniformity to corporate and departmental operations and increase organizational efficiencies, whereby mitigating risk to the corporation and protecting its interests.

2. Definitions

3. Covered Employees

4. Scope

5. Policy

6. Procedure

7. References

Prepared By:	Reviewed By:	Approved By:
Name of Preparer Preparer's Title	Name of Reviewer Reviewer's Title	Name of Approver Approver's Title
Date Prepared: _____	Date Reviewed: _____	Date Approved: _____