

American Public Health Association PUBLIC POLICY DEVELOPMENT PROCESS

Guidelines For Preparation, Submission, Review, Revision, Consideration, And Adoption Of Proposed Public Policy Statements

Introduction

The public policy development process is the mechanism by which the American Public Health Association (APHA) addresses external policy matters. It is intended solely to develop recommendations for the policy guidance of others.

These guidelines, adopted by the Governing Council, are to give direction to the Association's public policy development process by setting forth principles to govern, and outlining procedures to guide, the coordinated participation of all parties. The Executive Board is charged to monitor operation of the public policy development process, to assure adherence to the principles set forth here, and to report any procedural modifications adopted to facilitate the development of more valid public policy for APHA.

Role of Association Units

Constitutional and Procedural Responsibilities: Development of the public policy positions of the American Public Health Association involves coordinated effort by several Association units. The constitutionally defined public policy functions for specific units involved in this process can be summarized as follows:

- **Section Councils:** The Section Council is to consider and transmit to the Governing Council resolutions originating in Section. (Bylaws, Article XIV, section 9(f)).
- **Science Board:** The Science Board is to stimulate and coordinate the development of the scientific basis for the Association's professional and public policy programs (Bylaws, Article XI, Section 1). It reviews proposed resolutions and position papers, and for those with a science/evidence-based content, evaluates the adequacy of this content.
- **Action Board:** The Action Board is to plan, organize and pursue the implementation of Association public policy positions. It is to initiate and assist in the development of a comprehensive body of public policy for the Association (Bylaws, Article X). It does this by identifying topics in need of new policies or gaps in existing policies, as well as outdated policies that should be considered for archiving. The Action Board members, as liaisons, advise the sections, affiliates and other policy units of these policy needs and, as appropriate, coordinate collaborative activities among these units to address the identified policy needs.
- **Education Board:** The Education Board is to maintain and enhance professional knowledge, to promote and protect environmental and community health, and to educate the public concerning public health issues (Bylaws, Article XII, Section 1).

- **Joint Policy Committee:** The Joint Policy Committee is to review, and assess all proposed resolutions and position papers, report its initial recommendations for adoption to authors, make a final decision to submit them for hearings, review late-breaking resolutions and recommend those that meet the criteria for hearings, organize and coordinate the hearings, review the comments and suggestions presented at the hearings and incorporating those that improve the proposed policy, create a consent agenda and report its final recommendations for adoption to the Governing Council for its vote.

The JPC shall select chairs for each public hearing to include one member of the JPC and one APHA staff member. The chairs of each hearing are responsible for presiding at the hearings, to take notes, and to prepare a report on the hearing to the JPC.

The JPC also oversees the association's annual policy review and archiving process. In coordination with the Action Board, the JPC approves the list of policies to be reviewed each year and approves the list of policies designated for archiving to be considered by the Governing Council at the annual meeting.

- **Governing Council:** The Governing Council is responsible for establishing the public policy of the Association (Constitution, Article VI Section2).
- **Executive Board:** The Executive Board is authorized to adopt interim public policy, which shall be in effect until the next meeting of the Governing Council (Constitution, Article VIII, Section 3) and may commission the development of policies and position papers. The Executive Board reviews appeals from the decisions of the Joint Policy Committee regarding proposed resolutions and position papers and decides whether to uphold the JPC decision or submit the proposed policy statement for hearings. The Executive Board carries out the policies of the Governing Council between annual meetings, monitors operation of the public policy development process and implementation of public policy.

Organizational Support: APHA's system relies heavily upon the volunteer efforts of able, interested members for the initiation and development of public policy. All organizational constituents – sections, affiliates, SPIGs, caucuses and the Student Assembly – are urged to work cooperatively with authors in the development and revision of proposals within the scope of these guidelines

Definitions

Policy Statement: In the context of APHA public policy considerations, "policy statement" is a generic term inclusive of both "resolution" and "position paper". Each policy statement should represent the statement of substantially new external policy, or a major modification (revision or extension) of existing policy. Policy statements must be consistent with APHA's goals, aims, and objectives, be relevant to current or future public health issues, and avoid conflict of interest or the appearance of conflict of interest between the author's financial or other personal interests and the goals and policies of the Association.

Resolution: In the context of APHA public policy considerations, a "resolution" is a concise statement of the Association's stance on a particular issue affecting the health of the public. Resolutions describe and endorse a defined course of action, ranging from legislation and regulations desired to needed new policies of non-governmental organizations and private enterprises. Support for legislation or regulations should not include language with specific bill numbers, names, year or presidential Administration so as to not date the resolution.

Position Paper: In the context of APHA public policy considerations, a "position paper" is an authoritative evidence based report on a broad issue affecting the public's health whose purpose is to educate and inform policy makers, funding agencies, the media and others about the nature of existing or emerging problems affecting the public's health and ways to investigate and resolve them utilizing current scientific and evidence-based knowledge related to best public health practices. A position paper is differentiated from a resolution by the more general nature of the problem considered, the broader audience addressed, its objectivity, and the lack of emphasis upon defined action.

Preparation

Announcement: A call to the membership for submission of proposed public policy statements will be issued annually by electronic notice and in appropriate publications of the Association. Official contacts for sections, affiliates, SPIGs, caucuses, forums and the Student Assembly will be notified of the process schedule and procedures by special notice.

Origination: Any APHA individual or organization constituent is eligible to submit a proposed public policy statement for consideration. Individual members are encouraged to seek endorsement from an organizational component – section, affiliate, SPIG, caucus or Student Assembly.

Submission: Each year the Association calendar has a deadline date for the submission of proposed public policy statements. Proposals should be submitted electronically via email or CD/disc to the Joint Policy Committee at APHA's national office at policy@apha.org.

Resolution Format: Proposals should be drafted as concisely as possible. The recommended format for resolutions is relatively simple, and should facilitate clear and succinct expression. APHA uses a modern, international format supporting evidence is presented in paragraph form, with action steps listed in clause form. A resolution does not include extensive background information or discussion relative to the issue; rather it contains pertinent facts that justify the call for defined action. Footers should be used and include the date of submission and page numbers.

Position Paper Format: Drafts of proposed position papers should identify a public health problem, and present an objective summary of the situation and possible solutions rather than focusing on a specific preferred solution. Authors are encouraged to be thorough and objective with the aim of educating and informing. Ideally, position papers emerge from APHA Task Forces or other entities within the organization.

Procedures

Details of schedule, format, and processing considerations are subject to periodic review and revision by the Executive Board. Staff will provide specific information and procedural assistance upon request.

1. Preliminary Processing

Acknowledgment: Receipt of each proposed public policy statement will be acknowledged by APHA staff to the person identified as its submitting originator.

Classification: Upon receipt, each proposed public policy statement will be classified tentatively by staff as to type (i.e., resolution or position paper), and as to subject matter, and assigned to one of four or more public hearings (see below). The subject areas to be handled at each hearing (e.g., personal health services, environmental health, personnel & training, social factors in health etc.) may vary from year to year, depending upon submissions.

Distribution: Immediately after the proposal submission deadline, copies of all submissions which appear to meet the criteria given above will be posted on APHA's website for review by each section, SPIG, Affiliate, caucus and the Student Assembly, all members of the Science Board and each JPC member of the Action Board and the Education Board.

2. Review and Comment

Association Units: Sections, Affiliates SPIGS, caucuses and the Student Assembly will be notified in advance of the spring meeting of the Joint Policy Committee, that proposed public policy statements are available for whatever internal review they deem desirable and feasible, and to return any comments to the Joint Policy Committee by the deadline for consideration at the initial review of public policy proposals during its spring meeting. The Action Board representatives will work with the Units they represent to solicit feedback by the deadline.

Joint Policy Committee (JPC): The Joint Policy Committee is an instrument of the Governing Council, which defines its composition and receives its reports. The JPC will consist of twelve persons; the Action Board Chair and three designees from the Action Board membership, the Science Board Chair and three designees from the Science Board membership, and the Education Board Chair and three designees from the Education Board membership, and will be co-chaired by the Chairpersons (or Vice-Chair Person) of the Action Board, Science Board and the Education Board. The Co-chairs will select members of the JPC to chair each of the public hearings.

Spring JPC Meeting: The Joint Policy Committee undertakes its first collective review of proposed public policy statements at its spring meeting. At this time it: affirms initial staff classification of proposals as to type and hearing group assignment [determined by subject area]; discusses the results of preliminary review by its own individual members and any other Action Board, Science Board or Education Board members who may have commented; considers all input from sections, Affiliates, and other association units; confirms the status of submission deemed to be other than public policy proposals (e.g. internal operations items, commemorative resolutions, technical standards, etc) and comes to an initial group assessment of each public policy proposal.

Referral of Inappropriate Proposals: This public policy development process is the mechanism by which APHA addresses **external** policy matters. It is intended and appropriate solely to develop recommendations for the policy guidance of others. Accordingly, submission deemed by the JPC to be other than public policy proposals will be referred as follows.

- Any items relating to internal operations of the Association (including APHA budget, staff and programs) will be referred to the Executive Director.
- Items in the nature of technical standards (e.g. program guidelines, evaluation criteria, etc) will be referred to the Science Board.
- Non-policy resolutions (such as commemoration of a significant event) will be referred to the Governing Council Secretary and Speaker for separate handling.

d. Items in the nature of educational standards or professional qualifications will be referred to the Education Board.

Initial Assessment Report: After its spring meeting, the JPC will inform the author/originator/contact person of each public policy proposal that the proposal has been given an initial assessment as follows.

(1) A **positive assessment**, the JPC is favorably disposed to approve the proposal essentially as submitted, and put it forward for a public hearing and Governing Council adoption;

(2) A **conditional assessment**, the JPC will reconsider the proposal for approval and forward for a hearing and Governing Council approval ONLY if it is:

(a) revised addressing the specific suggestions contained in the conditional assessment report and received by the date specified in the letter from the JPC; or,

(b) combined with other, related proposals into a single, succinct, proposal jointly-developed by the separate authors according to the specific suggestions contained in the conditional assessment report, and revised and received by the date specified in the letter from the JPC.

(3) A **negative assessment**, the JPC suggests withdrawal of the proposal, being disposed to disapprove the proposal, calling for its rejection if considered by Governing Council. (A negative assessment report is accompanied by specific reasons for JPC disapproval.) Proposals voluntarily withdrawn by the author or originator proceed no further in the process. Proposals with a negative assessment, which are not voluntarily withdrawn, will not proceed further in the process unless appealed. (See below.)

Author Involvement: APHA's system relies heavily upon the volunteer efforts of able, interested members for the initiation and development of public policy. The JPC is urged to work cooperatively with these authors in accomplishing any recommended revisions of proposals. However, once policy proposals are submitted, the JPC is assigned responsibility and authority for determining their content (i.e., scope, structure, wording, emphases, title, etc).

3. Optional Steps

Special Review & Comment: In addition, the Joint Policy Committee may refer proposals for special review and comment to voluntary consultants of its own choosing (i.e., Association units, public health practitioners, researchers, teachers, or others with relevant expertise and interest).

Combination: The JPC may request authors of separate (but related) proposals, and others to work cooperatively together in the development of a single, succinct, jointly developed proposal.

Appeals: Any proposals disapproved by JPC (i.e. recommended for withdrawal), but not withdrawn by author(s), will be identified (by subject only) and listed for information of the Governing Council -- the reasons for rejection being available to Councilors upon request. The author(s) of a proposal disapproved or combined by the JPC may appeal that JPC decision to the Executive Board. Requests for such appeal must be made in writing to the Executive Director for consideration by the Executive Board by the date specified in the letter notifying the author of the negative assessment.

An appeal to the Executive Board must include the original proposal and: 1) specific reasons why the author does not agree with the JPC's decision; 2) documented peer-reviewed scientific findings or other evidence showing support for the refuting recommendations made by the JPC; and, 3) justification of urgency for the APHA policy in this APHA policy cycle.

The Executive Director will make certain that a copy of the appeal is sent to the JPC. An appeal will not be considered by the Executive Board if the author failed to follow the APHA guidelines and timelines, including the three points identified above. If the Executive Board decides in favor of the appeal, it may request the author to work with the JPC and the Science Board [if appropriate] to revise and improve the proposed policy within 30 days of the date of notification of the upheld appeal. The Executive Board will communicate the reasons for its decision in writing to the JPC within 7 days of its decision. The revised submitted policy statement will then re-enter the policy process which means it will be included in the public hearings, reviewed by the JPC and, if approved by the JPC, will be available to Governing Council members at the first session of the Governing Council at the Annual meeting.

4. First JPC Report

Official Distribution: At least thirty days prior to the scheduled opening of the regular annual meeting of the Governing Council, each councilor will be mailed a copy of the first JPC report, consisting of the title and text of public policy proposals as submitted (or revised), with an initial JPC assessment. Included in this distribution will be a list of public policy proposals, by title, which were disapproved by JPC and not withdrawn by the authors. Copies of the full text of these proposals are available to Councilors prior to the meeting from the association upon request.

Membership Notice: Proposed policy statements reported out by the JPC for hearings and Governing Council consideration will be summarized in "The Nation's Health" and made available in full to the membership on the APHA website, or otherwise as appropriate and necessary.

Other Provisions

Extra-Process Adoption: Apart from the established public policy development process defined herein, under conditions of an emergency or otherwise compelling nature, the Governing Council can vote to suspend its own rules and take up consideration of a specific proposed public policy position (e.g. one not considered by the process established herein). In such circumstances, both consideration of, and adoption of public policy shall require affirmation by two-thirds vote of the Governing Council.

Late-Breakers: Provision is made for consideration of "late-breaking" resolutions, that relate directly to important, emergent events occurring after the proposal submission deadline. The author of a proposed "late-breaking" resolution should submit it as soon as possible. Ordinarily, the last day for submission of "late-breakers" will be the first day (Saturday) on which the Governing Council meets each year. The Co-chairs of the JPC are the only arbiters in judging the eligibility of "late-breaking" proposals, and they will be rigorous in applying the criteria of time and relevance to their joint decisions. All accepted "late-breakers" will be assigned to a public hearing.

Because "late-breaking" resolutions cannot benefit from the full public and technical review of the established policy development process, any resolution adopted by the Council under "late-breaking" provisions will be considered valid, but interim, policy -- subject to full review and reaffirmation in the next annual policy development cycle. The authors are expected to revise and update their "late-breaker" and submit it into the standard policy review process the following spring. APHA will send a notice after the annual meeting and then again in early

February reminding authors of adopted "late-breaking" policies of the need for revisions, possible updates and the need for the policy to conform to guidelines.

Policy Shifts: Over time, any public policy position of APHA can be expected to experience incremental changes as the details of new policy statements bring marginal policy modification. In all such cases, of course, the most recent explicit statement of policy obtains.

Policy Reversals: Ordinarily, APHA neither "rescinds" all, nor "deletes" part of previously adopted public policy statements. In the rare case of a new policy statement which effectively reverses or essentially negates all or major elements of an earlier policy statement, it may be appropriate to note, by explicit reference, that the former "supersedes" the latter.

Executive Board Policy Initiatives: The Executive Board may adopt interim public policy that shall be in effect until the next meeting of the Governing Council. Such interim policies shall be posted on the APHA website and will be treated as late-breakers by the JPC at the next annual meeting.

In addition the Executive Board may commission the development of public policy proposals and position papers. The Executive Board may request one or more organizational constituents-- sections, affiliates, SPIGs, caucuses, and the Student Assembly- to work with other APHA constituent groups and experts from outside of the Association. The Action Board should be consulted in this process and coordinate the implementation. Commissioned policies and position papers may be adopted by the Executive Board as interim public policy or may be directly submitted into the public policy process for the forthcoming annual meeting.

Public Hearings

Assignment and Scheduling: Each proposed public policy statement will be tentatively classified by subject matter and assigned to one of four or more public hearings. The subject areas to be handled at each hearing (e.g., personal health services, environmental health, personnel & training, social factors in health etc.) may vary from year to year, depending upon submissions. Public hearings on proposed policies accepted by the JPC will be held at the time of the annual meeting. Each public hearing is intended as the open forum provided for detailed exploration, discussion, and debate of assigned public policy proposals. These public hearings will be scheduled and published in the annual program so as to provide reasonable opportunity for input from all interested parties during the APHA annual meeting prior to the Joint Policy Committee's final meeting.

Testimony: Any member of the Association is permitted to present relevant oral or written testimony at these public hearings, however, the hearing chair may limit debate if circumstances warrant. Representatives of sections, Affiliates, SPIGS, caucuses, the Student Assembly and Governing Councilors with special interest in specific proposals are urged to participate in these hearings. An originator of each proposal is expected to be present at the public hearings to answer any questions that may arise regarding their proposal. Any modifications or wording changes must be submitted in writing prior to the conclusion of the hearing in order to be considered.

Final JPC Report

JPC "Mark-Up" Session: After the public hearings, but before submitting its final report to the Governing Council, the Joint Policy Committee will schedule a "mark-up" session. This will be a closed meeting of the committee in executive session, usually scheduled for all day on Monday. With regard to each public proposal, at this final "mark-up" meeting, the JPC will review recommendations from the public hearings including any changes agreed to by the author(s) of the proposed policies during the hearings, and any additional relevant information. The JPC will then prepare its final report to the Governing Council.

Form and Content: The JPC will draft a final report to the Governing Council, consisting of its precise recommendations for Governing Council action on public policy statements on which hearings were held, utilizing a format which facilitates ready identification of any changes recommended from the proposed policy statements officially distributed to Governing Council. The report will also include the proposed "consent agenda" and the residual list. The JPC shall also have available upon request a brief summary of any changes suggested during the hearings whether or not they are recommended by the JPC in its final report. Every effort will be made to deliver the final JPC recommendations to Governing Councilors prior to scheduled consideration.

Consent Agenda: The Joint Policy Committee will first report to the Council a proposed "consent agenda" which lists, by title, those proposed public policy statements it recommends to Governing Council for adoption, and relative to which it believes no issues remain unresolved among identified interested parties.

The simple request (without explanation) of any Governing Councilor will result in the removal of any title(s) from the consent agenda as proposed by the JPC. After reasonable time, and without further discussion, the Speaker of the Council will call for the adoption of all proposed public policy statements remaining on the consent agenda, by unanimous consent of the Governing Council.

Separate Consideration: The JPC will then present (in a rational sequence of its choosing) its final recommendations for each remaining public policy proposal not already adopted by unanimous consent.

The committee's presentation will initially be limited: (1) to summarizing any changes in JPC recommendations since its previous report to the Council, and (2) to explaining briefly its reasons for its recommendations. Subsequently, JPC representatives will be given opportunity to elaborate in response to questions or challenges raised from the floor of the Governing Council.

Residual List: The JPC will then list for the Council any previously reported public policy proposals, which were not eventually brought to Council consideration for action, including those disapproved or revised by JPC, but not withdrawn by authors. Upon request by a Governing Council member, and by majority vote of the Governing Council, any proposal on this list may be brought to the Council for consideration. Adoption of any such proposal will require affirmation by a majority vote of the Council. Copies of the full text of these proposals will be available at the council meeting for review.

Post Approval

Publication: Public policy statements adopted by the Governing Council will be posted on the APHA Web site. Notification will be provided to the members through the usual Association channels. Staff will maintain a compendium of APHA public policy statements, and updated versions periodically published, as determined by the Executive Board.

Sunset Provision: Because "late-breaking" resolutions and policy statements passed under a suspension of the rules cannot benefit from the full public and technical review of the established development process, any resolution adopted by the Council under "late-breaking" provisions will be considered valid, but interim, policy -- subject to full review and reaffirmation in the next annual policy development cycle.

Policy Review, Updating and Archiving: Over time, any public policy position of APHA can be expected to experience incremental changes as the details of new policy statements bring marginal policy modification. Ordinarily, APHA neither "rescinds" all, nor "deletes" part of previously adopted public policy statements. Each year members are asked to identify public health subjects within APHA's policy database that are in need of review and submit their suggestions to APHA. The Action Board examines the suggested range of topic areas, identifies 3 to 4 priority topic areas for review, and notifies Association units. Once the comment period expires, staff and the Action Board forwards a list of policies within the topic areas to be considered for review to the JPC. The list is published on the APHA website and all APHA units receive it via the *Member News* along with the criteria for the review. The Action Board collects the recommendations from the review process and can recommend for or against archiving, combining, updating and must provide a brief rationale for the decision according to the established review criteria. The Action Board provides the consent calendar of proposed policies for archiving to the JPC and provides a copy to the APHA Executive Board. The Executive Board provides final approval to send the proposed policy statements to post on the APHA Website, "members only" section, and for archiving to the Governing Council. Members can then review these policy statements that will be archived by a vote of the Governing Council during the annual meeting.

At the annual meeting, any Governing Councilor may remove an individual policy from the archiving consent calendar and propose moving it to another category or removing it from consideration entirely. If the motion fails, the policy remains as is on the consent calendar. The consent calendar is then passed.

Adopted by the 1985 APHA Governing Council
Amended by the 1988 APHA Governing Council
Amended by the 1990 APHA Governing Council
Amended by the 2002 APHA Governing Council
Amended by the 2003 APHA Governing Council
Amended by the 2007 APHA Governing Council