DEVELOPING A STANDARD OPERATING PROCEDURE (SOP) HANDBOOK FOR U.S.
CITIZENSHIP AND IMMIGRATION SERVICES

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ABSTRACT

The purpose of this applied research project was to provide U.S. Citizenship and Immigration Services (USCIS), a component under the U.S. Department of Homeland Security, with a Standard Operating Procedures (SOP) handbook for the clerical department in the San Bernardino (SBD) and San Diego (SND) Field Offices. To maximize consistency and quality across the clerical department, it is vital to understand the process of employing a SOP for a large-scale organization. This was determined by conducting participant observations, semi-structured interviews and a thorough document analysis, focusing on three specific research questions: 1) What key components of a SOP are not in place/missing in the supporting documents? 2) How does the use of effective language and format incorporate to convey a clear instructional tone? 3) In what ways do regulations, guidance, and institutional policies correlate with the goals of the clerical department? The study was conducted in the Spring Semester of 2020 in the clerical department at the SBD Field Office.

This report offers guidance to leadership at USCIS to implement a SOP as a communication vehicle to promote uniformity, increase productivity, and reduce the risk of errors, thus, contributing to the success of the clerical department. The deliverable for this project is a reference guide located in Appendix B that provides a guide, *How to Develop an Effective Standard Operating Procedures* (SOP), to facilitate the development of reference documents.
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LIST OF ABBREVIATIONS

**ADJ**: Adjudications

**FOD**: Field Office Director

**ECN**: Enterprise Collaboration Network

**ISA**: Immigration Services Assistant

**QA**: Quality Analysts

**REC**: Records

**RM**: Records Manager

**RPM**: Records Policy Manual

**SBD**: San Bernardino Field Office

**SISA**: Supervisory Immigration Services Assistant

**SME**: Subject-Matter Expert

**SRMS**: Supervisory Records Management Specialist

**USCIS**: United States Citizenship and Immigration Services
CHAPTER ONE: INTRODUCTION

1.1 Project Overview

While effective communication is at the forefront of building a productive work environment, this idea is often difficult to realize. The structure, objectives, and processes of an organization are all examples that require a comprehensive strategy for continuous improvement to ensure the efficiency of routine operations. Whether the purpose is to update employees on new procedures, prepare for upcoming changes, or assess potential risks, organizations should select the best communication vehicle to use with employees\(^1\). An effective communication vehicle for public organizations involves the implementation of a Standard Operating Procedures (SOP) handbook. To drive a line of work that sustains productivity, organizations must establish a platform with a set of clear written instructions that documents routine procedures for employees to use as a reference. SOPs require specific criteria such as defining clear objectives, responsibilities, and procedures to help broaden the level of communication among the key players within an organization. The purpose of this project is to provide USCIS leadership at the San Bernardino Field Office (SBD) with a guideline on how to develop a well-written SOP to showcase the iterations of procedures that are best fit for the clerical department.

1.2 Background

The clerical department at USCIS administers the proper management of records. The pace of growth in the department has been determined by the level of the workload, causing internal changes to take effect in efforts to address growth-related challenges. To meet the

demands of the agency, the government contracts independent non-employees who are required to perform respective obligations as per the provisions of the contract. Independent contractors are under a provisional agreement that stipulates the termination period. In this way, the clerical department at SBD employed a cadre of independent contractors; however, the contract terminated at the end of 2019. The ceasing of the contract created a foreseeable issue of staff attrition, resulting in not having enough personnel with clerical knowledge to perform the duties. Staff attrition is defined as the loss of employees through a natural process (i.e. resignation or elimination of position) that has several drawbacks. While the elimination of contractor positions cannot be prevented, it may result in the loss of valuable employee knowledge. The reduction in staff due to attrition interrupts workplace efficiency, considering how the clerical department continuously produces effective results. The concern of the management team is to maintain the same pace and scale of work for productivity purposes.

While the organization hired additional clerical employees to resolve the shortage of personnel, it is critical to understand that having enough ISAs and performing the duties correctly are two different things. In addition, the clerical department faced a shortage of management personnel. Prior to October 2019, there was only one SISA overseeing the clerical team. As a result, one SRMS and two additional SISAs were hired to keep an equitable distribution of work in order to maximize organizational value. Enhancing team efficiency and productivity is a priority for the leadership team at SBD. In turn, this concern enabled a discussion to implement a formal SOP as a reference tool for the clerical department. To maintain productivity in the department, the leadership team opted to employ a SOP to ensure greater consistency and address growth-related challenges.
Since the inception of the clerical department in the early 2000s, it has evolved from a workforce of about four clerical workers, a relatively small group, to a total of twenty-four Immigration Services Assistants (ISAs), three Supervisory Immigration Services Assistants (SISAs), and one Supervisory Records Management Specialist (SRMS). Figure 1 showcases a graphic representation of the internal structure, the relationship of the positions within the clerical department as described above. The SRMS provides management oversight to achieve agency objectives in the department, while SISAs provide technical and administrative support to ISAs. As shown below, there is an equal distribution of ISAs per SISA to balance the growth.

Today, the clerical department continues to expand and has experienced periods of rapid growth, especially in the last decade. Due to the rapid growth of the department, it is critical to support succession planning to ensure long-term viability of resources without diminishing core capabilities.

Figure 1. Records Management Organizational Chart
Clerical employees participate in daily activities that range from screening applications for immigration benefits and determining whether requests sought are valid, to ensuring validity of documentation submitted and preparing a variety of reports utilizing different software applications and retrieving information from other software systems (e.g. databases, spreadsheets, and graphics). Prompted by numerous responsibilities, the application of a SOP provides the best way to communicate information to clerical employees regarding day-to-day operations. Because the clerical department evolves frequently, planning for future changes is key for growth. To ensure policies reflect real-time conditions, it is useful to devise a strategy to increase internal communication and prepare for the future needs of the clerical department. Consequently, the development of a SOP for clerical employees at USCIS requires an assessment of the current processes, guidance, and responsibilities that will contribute to the success of the department.

The procedures performed in the clerical department can be separated into two streams: adjudications and records. The adjudication stream, on the one hand, consists of functions that are broken down according to tasks handled by different ISAs, some of which include: front desk operations, naturalization preparation, rescheduling process, bundling of various form types N-400, I-730, I-751, N-336, I-751, etc. The records stream, on the other hand, consists of functions that involve interfiling, file maintenance, creation of files, incoming mail, incoming files, outgoing mail, pull-tickets, etc. As the custodian of immigration records, this department is responsible for a wide array of duties regarding the proper management of files. In each of these functions, there is not a centralized body of information that can provide guidance to ISAs or SISAs.
This SOP would take over as the governing word of the clerical department for guidance purposes. With an upswing in workload, the organization must be prepared to sustain its growth in the upcoming fiscal years by centralizing critical information. The goal of this SOP would be to help new hires assimilate with the expectations of the department to support the team’s performance. A SOP gives employees information to articulate their specific roles and responsibilities with respect to the policy. This SOP can be used as a base for standardized training for new employees and/or re-training purposes. It also avoids process shutdowns if key employees are not available, enabling other employees to complete these tasks. By following SOPs, it reduces dependency on verbal communication, a matter of which can be subject to interpretation.

1.3 Problem Statement

Establishing an effective set of written processes for fast-growing organizations is paramount to deal with inevitable challenges. The clerical department at the USCIS SBD Field Office faces its own unique challenges as they expand in staff size, but the main challenge for the leadership team rests on developing a long-term strategy to maximize productivity and minimize risks by employing a SOP. Lack of centralized guidance may pose several risks to the department that include maximizing productivity, assuring consistency, and quality in adjudication and management of records. Due to the lack of a centralized body of information, there is a growing concern to deploy information under a single SOP to assist the clerical department to move forward with assurance. This current issue may have been avoided if written guidelines that define expectations of operations were established sooner. As the custodian of records, the clerical department performs a variety of functions that require well-
written instructions and process mapping. While there are numerous sources of guidance and reference material available to clerical employees, the information is not consolidated, which in turn, may cause confusion or hinder communication across the department. Centralization of resources alone does not provide a solution, but it promotes quality, clarity, and consistency. The issue, then, which presents a disadvantage for the clerical department in the SBD Field Office is twofold: the wide range of reference material for procedures is decentralized, and secondly a lack of written instructions for particular processes. In the clerical department, it is typically normal to have most reference material, if not all, based on only partial information or stored in various repositories.

In response to this issue, the leadership team has referred to the Records Policy Manual (RPM), the official policy governing immigration information management. While the RPM is extensive and contains useful material to remain compliant with the organization’s policies, the information is not written in an easy-to-read format for employees, i.e., step-by-step instructions. Also, leadership relies on informal SOPs that have been created for certain procedures. However, locating some of these resources is time consuming because they are not centralized. It is in this sense that the reference materials—or information processing activities—are “decentralized,” i.e., dispersed in varying locations. To be more specific, the reference material can be retrieved from an electronic database, a shared drive, or external individuals within the organization.

An alternative for the clerical department is to move toward a centralized body of information, considering that efficiency can be measured in terms of the accessibility to information. To a certain extent, dispersed information decreases the likelihood of greater
satisfaction and engagement. More recently, Johnson (2018) uses this line of reasoning to argue that organizing dispersed information to “form a more complete picture of trends” is critical to promote uniformity and understanding of procedures. Centralization, as a principle, is referred to “a set of interrelated and interdependent parts arranged in a manner that produces a unified whole” (Jayaram, 2012). While a SOP does not eliminate uncertainty, it does suggest ways the organization can prepare for and respond to possible situations. The transfer of knowledge is critical to give employees a sense of mastery over the job and build up esprit de corps. Decentralized information may place a burden on new ISAs who are not familiar with the wide range of procedures. Under a decentralized structure of information, SISAs would have to seek specialized knowledge elsewhere in the event that arises a concern, causing an unnecessary burden to coordinate the working unit. Prior research indicates that organizational consequences result from information ambiguity, namely an uncertainty regarding the description of procedures and roles (Linda and Tyler, 1988). ISAs perform various day-to-day interrelated operations that are complex and multifaceted to be satisfactorily performed. Thus, the leadership team should attempt to centralize information to strengthen the efficiency of SISAs to manage process interruptions.

To avoid a high rate of staff turnover, a SOP stipulates the core details about how procedures are supposed to function, which in turn, improves job satisfaction. The loss of specialized knowledge is a potential risk to an organization, especially if the employee is an independent contractor. In terms of institutional knowledge, the processes and procedures

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2 Esprit de corps: refers to team spirit i.e., harmony in the work groups and mutual understanding among the members. It inspires workers to work efficiently.
could be documented in a SOP to build towards the retention of institutional knowledge. The lack of a centralized body of information may be counterproductive to the department to complete tasks in a timely manner and cause a production backlog.

Without a centralized body of information, the transfer of knowledge between current ISAs and new clerks may affect the flow of processes because supervisors are unable to properly identify internal issues without undue delay. To ensure consistent communication and access to information, employing a SOP delineates the authority, roles, and procedures within an organization (Davila et al., 2012). The reasons to implement a SOP is three-fold: 1) increase communication among SISAs and ISAs, 2) ensure consistency of processes and 3) support the rapid growth of the department. Moreover, these intricacies may hamper clerical personnel from having complete access to a reference guide. This poses a challenge not only for leadership, but also SISAs, and most importantly, ISAs who are the front-line personnel carrying out the work for the department.

1.4 Research Objectives

There are several objectives of the research on SOPs to be addressed by this project. One objective to help develop a formal SOP for the clerical department by reviewing organizational theory as a reference by examining organizational models. This research involves a qualitative approach to determine the effectiveness of employing a SOP to address the needs of the clerical department. The research considers the challenges associated with the lack of proper guidance that may prevent long term sustainability within an organization. The fundamental principles of organizational theory were used as a model to inform the process of developing the reference guide. This project also describes the benefits and best practices for
effective SOPs, which in turn, maintains organizational knowledge accessible by those responsible to perform the procedures. Finally, results of the research should serve as a fundamental guideline for revision and control of a SOP.

1.5 Significance of Research

The significance of this research is to understand how the application of a SOP is a great tool to help streamline day-to-day operations and enable employees to improve productivity. The project objectives are significant for the organization because they present a method to identify best practices for SOP and facilitate the dissemination of information. Based on the findings of the research, there are several benefits associated with the application of a SOP: improves performance, decreases the error rate, and promotes consistent operation of a given process. To better understand the concern in the department, management identifies the challenge of delivering consistent training for new clerical personnel due to lack of a SOP. Management understands that inadequately trained employees are likely to experience poor job performance because limited information leads to misunderstandings among employees in regard to respective tasks. This is a vital consideration because standardization of training is necessary in order to maintain a consistent training platform in a fast-work environment. To give an example, management shares that there is one ISA, a former contractor who carries substantial knowledge about clerical processes, responsible for training new ISAs. In a broader sense, this ISA represents the value of retaining organizational knowledge, yet it could be a challenge to provide adequate training to every new employee as a result of limited time and competing priorities.
The end-result of developing a SOP is to preserve standardized practices across the department to keep a consistent pace with the changes of the organization. Results of the project should assist the leadership team to determine how well the SOP addresses the needs of the clerical department. Therefore, an exploration into the best practices of SOPs can provide insight on how to develop a guide, thereby ensuring the seamless movement of processes within the organization.

1.6 Research Questions

This project addresses three related questions. First, what key components of each supporting document are not in place? Secondly, how does the format and language for each document use active sentences and instructional tone to convey a clear instruction? Thirdly, in what ways do regulations, guidance, and institutional policies correlate with the goals of the clerical department? These research questions will explore the meaning of roles and responsibilities in terms of the challenges without adequate SOPs.

1.7 Limitations

There are some limitations in conducting the research regarding the development of a SOP in the clerical department. The results of the participant observations are only as comprehensive and current as provided by the participants in the program. The project is limited to only one clerical department and results may not be representative of the attitudes toward the creation of the SOP. In addition, due to the short time frame to cover the development and implementation of the project, there may not be enough time to cover the process of developing and implementing the project. In turn, this implies that there may not be enough time to capture the program improvements from the SOP. The project focuses on
developing a SOP in accordance with best practices and the potential effect of implementing a
SOP in the clerical department.

1.8 Chapter Summary

The deliverable for this project is a SOP handbook that disseminates information related
to clerical procedures. By creating a report, this project will help identify the best practices to
develop a SOP and offer possible guidance to leadership at USCIS to improve communication
regarding clerical processes, thus, contributing to the success of the department. As noted, the
transition from an informal to a formal SOP A well-written SOP with clear descriptions of
processes and personnel roles serves as a management tool. Therefore, the purpose of this
project was to improve the method of instruction for operational procedures from an informal
to a standardized application.

1.9 Upcoming Discussion

The next chapter provides themes that emerged from the literature and what scholars
find to be useful forms of SOPs for large-scale organization. The literature is divided into two
main components with sub-sections: 1) organizational theory and 2) best practices for SOPs.
This literature review informs the process on how to develop an effective SOP for the clerical
department at USCIS. This is followed by the research design and methods; the findings and
analysis section. The last chapter of this report will provide a conclusion, discussion, and
recommendation section addressed to the leadership team regarding the application of a SOP.
CHAPTER TWO: LITERATURE REVIEW

2.1 Chapter Overview

An initial assessment of the document analysis and participant observation revealed that there is no centralized guideline to create a SOP. This section seeks to identify the intersections between these two avenues: 1) organizational theory and 2) best practices for standard operating procedures (SOPs). The first section provides a three-folded examination of how classical, neoclassical, and new public management (NPM) theory is valuable to organizations since it enables the integration of standardization in public organizations. The application of standardized processes is followed by a review of best practices for SOPs to explore the most effective approach to create a written guide for public organizations like USCIS.

2.2 Organizational Theory

It is key to disentangle the various aspects of organizational theory before generalizing the purpose to create a SOP. The value of theory is to help organizations establish predictability, reduce errors, maximize productivity, and improve efficiency. A central theme of organizational theory relies on management processes and its applicability in a practical situation that forms the base for the implementation of a SOP. The roadmap of scientific management was drawn by contributors of the classical field, which traces the origins of neoclassical and new public administration (NPM) theory (Sarker et al. 2013; Ferdous, 2016). In accordance with the principles of organizational theory, people in the vanguard of management should understand the relationship between management theory and standardization in order to achieve organizational goals (Stoner. 1978).
2.2.1 Classical Theory

As Koontz and Weilhrich (2006) propose, management is the process of designing and maintaining an effective workspace, a discipline founded on classical principles that depends on two interrelated components: standardization and theory (Lawal, 2012). At the core of each of these components, SOPs drive organizations to maintain quality control and impact employee performance (Grusenmeyer, 2003). The role of standardization, therefore, involves a series of characteristics that transition into “management procedures, processes, and controls that are geared to maintain order and predictability” (Land & Jaman, 1992). In turn, this reinforces the importance of implementing a well-written SOP to address the operational challenges in the organization to achieve maximum prosperity.

The classical view of organizational theory is best illustrated by Taylor’s (1911) belief that “maximum prosperity” pushes the development of each area of the organization, coupled with the development of employees’ abilities, to its highest state of excellence through standardization in order to secure a permanent state of organizational prosperity. A common method used to achieve maximum prosperity is the application of a SOP. Amare (2012) points out that the application of a SOP has the role of minimizing errors that are prone to occur due to misinterpretation of information, including serving as a tool to transfer guidance. The application of a SOP is part of a greater effort to enable a streamlined assessment for organizations that builds on existing knowledge and expertise. To avoid procedural mix-ups and promote effectiveness at work, Taylor argues that standardizing organizational procedures and processes is centered around the concept of production maximization and minimization of wasted time (Taneja, Golden, Toombs 2011). At its core, the classical approach emphasizes
practices to improve the quality of work, manage workers to produce at a larger scale, and increase productivity. Taylor’s core idea of management is for organizations to implement standardized practices for training purposes in order to tutor the workforces to perform the labor. In “The Principles of Scientific Management,” Taylor discusses the four fundamental principles of management theory highlighting the concept of standardization (1911):

1. Replace the old rule-of-thumb method through the development of science for every component of a man’s work.

1. Select, train, show and improve the workman through scientific method.

2. Collaboration with men wholeheartedly so as to complete the assignment scientifically.

3. Divide the work between management and labor so that management can plan and train, and workers can execute those tasks effectively.

In short, Taylor’s theory presents an accessible set of tools for organizations to implement practices related to division of labor, standardization, and productivity, three of which are still prevalent today (Adeyemi et al, n.d.). The application of the classical approach brings about change to develop strategic methods that clarify purpose and responsibilities of processes to create the most effective structure. In this sense, Taylor was concerned with developing simple management practices in efforts to facilitate production by using standardized written guidelines. A central part of his scientific management theory is the deferment of complex practices since it trumps production, which in turn, causes organizations to face challenges of inefficiency (Ferdous, 2016). Several scholars also recognize the importance of enabling management efforts using a standardized system.
Echoing the ideas of Taylor, Henri Fayol (1949) hones the concept of standardization, focusing specifically on the principles of policies and procedures. Considering the significance of Fayol’s contribution to management thought, Tushman and Nadler (1977) suggests that procedural objectives can be achieved through the employment of SOPs. In his theory, Fayol stipulates the following five basic functions of management: planning, organizing, commanding, coordinating, and controlling. With strong management principles in place, policies, procedures, and guidelines to achieve the objectives of an organization and establish the standard of expected performance become less complex to adopt. Ideally, management must ensure adequate policies and procedures are disseminated to allow employees to carry out their work in an orderly, effective, and professional aware environment (Walonick, 1993; Manghani, 2011). While Fayol’s approach concurs with Taylor that standardization is critical to meet certain quality of practices, it is not the sole determining factor. Scholars share a consensus that the purpose of these five functions is to establish standard practices for incremental validity over uncertainties of procedures to improve transparency within the organization (Amare, 2012). While the major benefit of standardization is to “supply a structure that is necessary to support change,” other scholars highlight the limitations of standardization, emphasizing the imposed restrictions, which can result in failure mode (Blomerg, 2005; Cargill, 2011). It occurs, for example, when a SOP limits creativity, restricts shortcuts, or denies flexibility (Amare, 2012). This contradiction is perhaps due to the potential limitations of SOPs, requiring a long period to complete and creating a controlled work environment, which is a common trait of bureaucratic management. However, without a SOP, trust in management can
be weakened, and the frequency of errors may arise. Such conditions could lead to inadequate
decision making by employees, in turn, demoralizing performance.

Although Max Weber (1947) attributes an efficient organization to well-defined standard operating procedures, bureaucratic practices are a framework of trust that all such action should accord with formal rules, specified policy, and rationally efficient procedures (Hilbert, 1987). These bureaucratic practices take the form of formal rules and regulations, division of labor, hierarchical management structure, impersonality, and formal selection process (Weber, 1947). Bureaucracy is, after all, a belief of subjective dimension that rests on legitimacy and authority, which is intended to stabilize social action, yet rules and policies do not influence behavior. The belief in formal rules, if practiced inappropriately, may cripple organizational vitality, causing organizational pathologies (Rockman, 2016). While previous scholars focus on the benefits of bureaucracy, others attribute its dominance as a form of organization with excessive rules and regulations, central control, and lack of accountability (Hilbert 1987; Rosenbloom and Dolan 2003; Rockman, 2016). Such bureaucratic practices can be adopted in an organization but, in turn, the frequency and extent of these characteristics may conceal the achievement of results, but rather maintain a focus on enforcing restrictions.

While policies and regulations are crucial to provide direction, simply creating a SOP may not always be enough to address internal issues. The policies and procedures need to be continually reviewed to assess information adequacy, suitability, and efficiency for quality improvement by engaging in collaboration and design-thinking with employee input of procedures. Put differently, bureaucracy only leaves decision making in the hands of management, but to develop a SOP requires management and employee collaboration. This
prompts management to be efficient at discerning procedural challenges, proficient at decision making, and strategic to improve process efficiency in order to choose the course of action that will produce the greatest benefits to help employees perform duties (Cooper, 2015). In addition to having a comprehensive SOP, organizations should provide the opportunity for all appropriate employees, including supervisors, to be trained in these policies and procedures. According to Mullins (2011), a stable organization, exemplifies standardization, attaches great importance to the links between process and results of service to write effective SOPs. A streamline of well-defined instructions combined with a resourceful management team is also a pivotal component of a SOP (Adeniyi, 2014).

2.2.2 Neoclassical Theory

Other theorists such as Mayo (1924) and Hawthorne (1927) shift from mechanical variables to behavioral sciences, specifically to identify the underlying behavioral factors that result from the application of a SOP. From the neoclassical approach viewpoint, the basis for taking a step is to move toward the actions to (1) promote a sense of innate conviction in the organization by maintaining a moral code; (2) to develop a system of formal and informal communication; (3) and ensure the willingness of employee collaboration (Oneday, 2016). The course of action to induce a collective effort from employees involves changing the state of mind or attitudes by employing different strategies, centered on the needs of employees with the purpose to eliminate burdens (Khan and Sarker, 2013). Unlike the classical approach, which pays attention to the job itself, the neoclassical approach perceives social considerations as the force of motivation and performance to improve human relations among staff and supervisors. Table 1 showcases points of distinction between the classical and neoclassical approach.
Common situations that impact human relations in an organization could be the lack of proper resources, such as written guidelines for completing procedures, much like a SOP. The perceived conflict arises when employees who work in settings with limited resources may be faced with performing several complex tasks, which in turn, can demoralize the employee’s motivation in a moment of doubt, even under supervision.

Table 1. *Classical and Neoclassical Differences* (Yahaya & Haruna, 2015)

<table>
<thead>
<tr>
<th>Points of distinction</th>
<th>Classical Approach</th>
<th>Neoclassical</th>
</tr>
</thead>
<tbody>
<tr>
<td>Focus</td>
<td>Functions and economic demand of workers</td>
<td>Emotion and human qualities of workers</td>
</tr>
<tr>
<td>Structure</td>
<td>Impersonal and mechanistic</td>
<td>Social system</td>
</tr>
<tr>
<td>Application</td>
<td>Autocratic management and strict rules</td>
<td>Democratic process</td>
</tr>
<tr>
<td>Emphasize</td>
<td>Discipline and rationality</td>
<td>Personal security and social demand</td>
</tr>
<tr>
<td>Work goal of worker</td>
<td>Maximum remuneration and reward</td>
<td>Attainment of organizational goals.</td>
</tr>
<tr>
<td>Concept about worker</td>
<td>Economic being</td>
<td>Social being</td>
</tr>
<tr>
<td>Relation</td>
<td>Formal</td>
<td>Informal</td>
</tr>
<tr>
<td>Work Performance</td>
<td>SOP as a product</td>
<td>SOP as a process</td>
</tr>
</tbody>
</table>

The neoclassical reassessment generates a unique perspective of the complex dynamic between behavior and leadership in an organization (Khan & Sarker, 2013). The application of knowledge drawn from behavioral science to address management issues should incite awareness of the role of human factors to achieve organizational goals (Cole, 1984). Formal guidelines address a myriad of issues: tension among employees, loss of production, moral deficiency, possible errors, and noncompliance. If a reference guide is accessible to employees,
it should reinforce credibility and give assurance for an uninterrupted completion of processes without inducing unfavorable perceptions from employees. Karl (1995) concurs with Onday’s (2016) idea of human relations and advances the importance of how organizational deficiencies may influence emotions in employees. In organizational settings, unexpected issues are likely to occur when an organized behavioral sequence is interrupted unexpectedly, causing the interruption to last longer than normal due to simultaneous conflicting reactions (Karl, 1995). For example, an organization has an individual designated to perform XYZ; however, the individual resigns, yet there is no written guidance on how to perform XYZ, so now the sequence of production has been interrupted. This is certainly a pressing issue for management and staff because processes are expected to continue regardless of externalities. Written rules can address the limitations in high-functioning settings in order to build employee morale, which in turn, offsets emotions of frustration, increased collaboration and high turnover rates (Karl, 1995). Organizations face a challenge to build, maintain, and embody good leadership practices by making decisions that promote objectivity and transparency. Personnel need support from top management and designated officials to be aware of procedural objectives, which in turn, improves morale in the workplace. This includes the application of SOP to counter the possible loss in confidence, promote accountability, and compliance with law. Thus, there is a direct impact of applying a SOP to aid employee performance, which benefits the organization on a greater level.

2.2.3 New Public Management

In response to the limitations of the old public administration, the New Public Management (NPM) adds meaning to rationality, in part because of its decentralization from
bureaucratic practices. NPM, as a new paradigm of public administration, provides not only awareness to research and application, but also on the allocation and management of public resources (Runya et al. 2015). Part of the difference can be attributed to the input and output control on performance management and the growth of use of contracts for resource allocation and service delivery within public services. While cost effectiveness is among the most salient characteristics, the principles of competition and private sector management are at the core of the NPM approach (Robinson, 2015). There is consensus among scholars NPM that define the common attributes of New Public Management (NPM) as shown on Table 2 (Robinson, 2015; Runya et al., 2015).

Table 2. The Paradigm of NPM (Robinson, 2015)

<table>
<thead>
<tr>
<th>Paradigm</th>
<th>New Public Management</th>
</tr>
</thead>
<tbody>
<tr>
<td>Theoretical Roots</td>
<td>Rational/public choice theory, management</td>
</tr>
<tr>
<td>Nature of the State</td>
<td>Regulatory</td>
</tr>
<tr>
<td>Focus</td>
<td>Service (organization)</td>
</tr>
<tr>
<td>Emphasis</td>
<td>Management of organizational resources and performance</td>
</tr>
<tr>
<td>Resource Allocation Mechanism</td>
<td>Market</td>
</tr>
<tr>
<td>Nature of the Service System</td>
<td>Calculated openness</td>
</tr>
<tr>
<td>Value Base</td>
<td>Performance</td>
</tr>
</tbody>
</table>

While the approach is a progressive paradigm for public administration, it advocates strongly for standardization. However, the approach steers away from traditional public
administration to *open governance*. The difference between the other approaches and NPM relies on management decentralization within “public services (e.g. the reaction of autonomous agencies and devolution of budgets and financial control), downsizing, performance contracting, contracting out and user charges” (Larbi, 1999; Kalimullah 2012). To summarize, the NPM approach draws numerous management techniques and practices from the private sector. The central criticism of NPM is that the reward system in the public sector “does not [promote] incentives to control costs” (Larbi, 1999). Confronted with bureaucratic failures of traditional public administration, the NPM is challenged with creating organizational arrangements, such as providing incentives to minimize the costs of unwanted activity in an organization (Weimer and Vining, 1991).

In the quest for efficiency, the NPM movement reinforces the base built with classical principles in order to reassess the functions of public managers in organizations: planning, organizing, strafing, directing, coordinating, reporting, and budgeting (Den Heyer, 2011). According to Gruening (2001), the reformers also advocated reorganization to streamline and consolidate organizations and to standardize administrative procedures (Lee, 1995; Henry, 1975, Arnold, 1995). The scope of NPM examines the deficiencies of the bureaucratic system and how these have shaped the public sector, emphasizing how top-down control diminishes when large organizations are not prepared for growth, which in turn, dampens its productivity (Gruening, 2001). Le Grand and Barlett (1993) argue that quality in service may diminish in pursuit of cost reduction alternatives by adopting NPM, which in turn, may undermine the capacity of the organization.
Although the old public administration system highlights the subject of standardization, NPM attempts to address the gaps in terms of the “central principle of work” that has been largely disregarded in research work procedures. On the one hand, the private sector has approached the study of work procedures in efforts to simplify processes, which reveals untapped potential for improvement. On the other hand, there is limited research on the impact of work procedures within the public sector to demonstrate areas of convergence or divergence. Of course, processes themselves, while seemingly simple, can be difficult to define. The NPM approach provides a new perspective on the conceptual framework for the application of work procedures in the public sector. To conceptualize work procedures requires the organization to employ “a sequence of tasks towards the achievement of a goal” in order to design parameters to approach the development of work procedures (Den Heyer, 2011). The task of NPM is to design a response to an issue at hand that addresses the immediate short-term situation but examines the bigger picture of organizational deficiencies to identify long-term solutions. It also combines a more flexible approach to management with a focus on internal organizational control such as work processes.

Work processes, while complex to define, are the tool kit that describes the ‘what’ needs to be completed and the ‘how’ behind the completion of these activities. Part of effective work processes is to highlight the roles and responsibilities, including control points regarding the sequential steps. To enable effective communication between employees, facilitating the integration of resources, a section establishing roles and responsibilities must be included into a SOP. The general framework of work processes includes a process flow chart of sequential steps, clear roles and responsibilities, an aim to organizational outcomes, and
descriptions of interrelated activities. In doing this, the NPM approach is the agent of change to integrate flexibility in decision-making systems to deal with the complexities of public needs. The role of management is not only to improve the level of efficiency, but to foster a process to deliver quality services, which in turn, promotes equity, participation, and transparency within the organization (Den Heyer, 2011).

Holmes and Shand (1995) contend the scope of NPM as a business-like approach intended to improve the quality of public services by performing democratic decision making, operating with a strong customer focus and increasing efficiency with minimal bureaucracy. The NPM approach, from Islam’s (2015) viewpoint, moves towards privatization by contracting-out services and encouraging decentralization in public organizations to reduce government spending, which in turn, improves economic efficiency. This argument has merit, but only in a limited sense according to Luke et al. (2015). While it is true that privatizing government functions is intended to preempt the increase in autonomy, it creates a division of core areas. Because Federal law prohibits private contractors from performing “inherently governmental functions,” it is crucial, in settings like USCIS, to determine which functions may be carried out by contractors and implement SOPs for contract termination purposes. The clamor for bureaucratic autonomy has restructured the overall direction of the public sector, which are useful to understand the use of SOP in contemporary public organizations.

The drawback of employing the NPM approach, Islam (2015) admits, is that private business models are not adequate for the public sector since there are more complex objectives, intricate accountabilities, and increased commercialism. In support of Islam, other scholars also share disagreement about various NPM principles that have limitations in terms of
the level of freedom in the private sector versus the public sector (Luke et al., 2015). In other words, the restrictions in the public sector are, ultimately, intended to strict adherence to the rule of law while privatized approaches highlight better accountability practices (Painter 1997; Cheung and Lee, 1995). As with Arora (2003), the traditional model of administration embodies a dominant role of the government in the provision of centralization, calling for greater attention to the achievement of results and management accountability. The argument here is that NPM sets forth a plan to reform civil service, improve the delivery of services, and reduce waste of resources. Despite these differences, the NPM presses the need for SOP as a fundamental means of communication for all employees within an organization. It is certain that more of these approaches (i.e. classical, neoclassical, and NPM) may be a solution for the issues of the public sector, but a wise application of a SOP may enable organizations to foster a sense of accountability and transparency to respond in the best interest of public goods and services.

2.3 Best Practices for Developing Standard Operating Procedures (SOPs)

A systematic approach to promote regularity in the clerical department is to centralize the body of information using a SOP to understand policies, procedures, and other aspects of a records management program in more detail (NARA, 2016). The clerical department can be complex due to the large size of differences between components, competing priorities, and lack of centralized guidance. USCIS is responsible for assessing the proper management of records to assure government accountability, preserve sensitive records, and protection of rights to ensure compliance with Federal regulations. Moreover, a distinctive feature of a SOP is that it can be established with minimal impact on personnel, fiscal, and equipment related
sources (FEMA, 1992). A SOP contains formal, written guidelines, constituting both operational and technical components that facilitate the flow of processes by minimizing errors that may occur due to misinterpretation of information (DHS, 2019).

2.3.1 Review of Effective SOPs

Effective SOPs provide the basic structure to build a strong quality assurance framework, embedded in the Quality Management System (QMS), defining the rules of quality control (Barbe et al., 2016). To better serve the needs of the organization, a SOP provides a standard working tool that can be used to describe daily activities and quality system management procedures. While there are different approaches to structure a SOP, if not written correctly, results in a document with limited value (EPA, 2007). A well-written SOP should be readily accessible for reference in the respective work areas of the individuals performing the tasks. According to the Western Regional Office (WRO) of USCIS, the SOP format should include the following components as shown in Table 3:
Table 3. Summary of SOP Format Based on DHS WRO USCIS

<table>
<thead>
<tr>
<th>SOP Section Titles</th>
<th>Description</th>
<th>Possible Topics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title</td>
<td>For reference and usability purposes</td>
<td>1. Simple topic to make it clear to the reader.</td>
</tr>
<tr>
<td>Purpose</td>
<td>Describes the purpose of the SOP, why it is needed, and what it intends to accomplish</td>
<td>“This SOP describes the procedures for XYZ process.”</td>
</tr>
<tr>
<td>Background</td>
<td>Clarifies the principal objective or resource that is the subject of the SOP.</td>
<td>1. Why is the SOP necessary? 2. What has changed recently or what has prompted this SOP?</td>
</tr>
<tr>
<td>Applicability/Scope</td>
<td>Describes the policies and procedures applicable to all personnel involved in the SOP.</td>
<td>1. What are the boundaries of this SOP? 2. Who does this SOP apply to?</td>
</tr>
<tr>
<td>Qualifications and Training</td>
<td>Identify specific qualifications SOP users should have, such as certification or training experience.</td>
<td>1. “Employees should have XYZ certification complete before performing procedures.”</td>
</tr>
<tr>
<td>Maintenance</td>
<td>The regularity in which the SOP will be updated or meetings will be held.</td>
<td>1. How often will the quality of the work be reviewed?</td>
</tr>
<tr>
<td>Acronyms/Definitions</td>
<td>This section should provide a list of relevant words, phrases or acronyms that have special meaning or application for the SOP.</td>
<td>1. Define unfamiliar terminology 2. Provide an acronym table to showcase the most common.</td>
</tr>
<tr>
<td>Roles and Responsibilities</td>
<td>Defines the responsibilities of each employee involved in the task.</td>
<td>1. Keep it simple and clear. 2. Consult with employees to get an accurate description.</td>
</tr>
<tr>
<td>Procedures</td>
<td>Provide step-by-step details of the procedure, in sequential order. Include headings where appropriate.</td>
<td>1. Include process maps, diagrams, examples, and other artifacts supporting the SOP.</td>
</tr>
<tr>
<td>Appendix</td>
<td>Any relevant information to the SOP.</td>
<td></td>
</tr>
</tbody>
</table>

The scope of a well-structured SOP involves multiple agents to ensure an efficient work environment. SOPs serve as the operational framework for any organization, serving as the backbone that formalizes the standards. Several scholars assert that the development of a SOP
encompasses a spectrum of three key elements for organizations: 1) increase the flow of productivity to best achieve expectations, 2) stimulate employee performance to advance processes, and 3) ensure all organization units follow a consistent operation for compliance purposes (De Trevil et al., 2005). These studies suggest that standardization is a compilation of products, processes, and procedures that should interoperate in complex organizations, much like USCIS. Because the agency is responsible for the administration of immigration, non-immigration, and naturalization adjudication operations, the use of a coherent SOP grants several benefits.

The complexity of the DHS Records Management department is reflected in the diverse mission of its objectives and the high volume of work. The diversity of missions in the department poses several challenges to the proper management of records. An SOP contains formal written guidelines for operational and technical components. To develop a cohesive and reliable standard operating procedures handbook, there are several details to consider for the design stage. These guidelines should be designed to inform, rather than to pressure the staff. In exploring the relationship between the best practices of standardization, the components discussed in the next sections seek to provide a solid understanding to create SOPs according to several scholars: purpose, benefits, writing style, preparation, review and approval.

2.3.2 Purpose

The purpose of the SOP is to assign specific procedures that support direction and structure to meet the desired outcomes of the organization. In order to warrant an efficient SOP, scholars assert that this document should provide clarification to define the expected tasks, identify who is qualified to execute each task, and determine under what conditions the
procedures can be performed with reliable results (Akyar, 2012). Because the clerical
department at SBD evolves frequently, either by hiring new employees and/or adopting new
policies, a SOP can help achieve uniformity to ensure the standards are met. To preserve
consistency and raise awareness related to risks, various scholars encourage the use of SOPs in
the workplace (Matzen, 2009; Akyar, 2012; NARA, 2016; Nissinboim and Naveh, 2018). It is the
responsibility of management to sustain and reinforce the SOP once it is adopted. The revision
of a SOP promotes quality of processes in efforts to improve credibility, accountability, and
strengthen legal defensibility (Akyar, 2012). It is fundamental to protect the reputation of the
organization, particularly because the management of immigration files is sensitive, so a
reliable SOP supports compliance as well as other key benefits. FEMA (1999), in particular,
notes that SOPs are essential to address the various laws and regulations that departments
must follow to ensure safe work practices. Among other benefits, documenting laws and
regulations in SOPs help organizations remain compliant, which in turn, limits the risk of
liability.

2.3.3 Benefits

Improving standardized practices at USCIS can provide a wide-range of benefits for the
department, which in turn, impacts the health of the organization. Implementing improved
standardized practices can achieve the following for the department as it increases in size: 1) reduce ambiguity, 2) prevent errors, 3) guarantee quality assurance, 4) enhance employee productivity, and 5) increase employee morale (Matzen, 2009; Akyar, 2012). As immigration policies evolve, a SOP reduces ambiguity by implementing written instructions for complex processes in order to ensure compliance with regulations. In written instructions, ambiguity is
not merely the lack of clarity, but rather a sequence of words understood in two or more possible senses that fall under two categories: lexical and structural ambiguity. This not only confuses the reader, but also hinders the meaning of the text, which in turn, may result in misinterpretation. Several studies recommend addressing the issue of ambiguity in efforts to prevent errors that may lead to other consequences (Matzen, 2009). Ambiguity also occurs when a certain procedure is not well defined and makes it difficult for employees to understand the end-result. The likelihood of miscommunication is increased among staff, since it is possible people may not know how to properly perform a particular task. Hence, the application of a SOP would seem to avoid the issue of ambiguity and give employees guidance to execute the task correctly.

Kaleta and Barbian (2017) claim that it is especially important to tailor a SOP with clear instructions to reduce the number of errors performed by employees. While procedural errors may still occur, a SOP serves as an accountability tool that provides the steps to produce the best possible quality and consistency (Nissinboim and Naveh, 2018). A well-written SOP protects not only the quality of services, but protects the work of the employee performing the function. A lack of standardized instructions can hinder productivity. For purposes of error prevention, it is recommended to implement standardized instructions that are clear and easy to read. Part of the solution is to maintain a SOP that serves as a resource for staff to access pertinent information regarding procedures. The third benefit of a SOP occurs once the standards are captured and documented, enabling the phase of quality control to ensure that the best practices have been implemented (Manghani, 2011). Employing a SOP is a basic

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3 Lexical ambiguity: Applies to a single word. Structural ambiguity: Applies to a sentence or a clause.
component of a successful quality system since it supplies ISAs with the information to perform a job consistently. It also aids permeance in the quality and integrity of the end-result (Akyar 2012). A sound SOP not only optimizes quality in the department, but it also serves as a reference for QAs to evaluate the effectiveness of the procedures (EPA, 2007).

The fourth benefit of SOPs is enhancing employee productivity. It is a vital management component to any organization. Due to fast pace growth in the records department, leadership faces new changes as well as challenges to maintain a constant flow of production. In this sense, implementing an improved SOP emanates a more conducive learning environment for the current and future ISAs to help them subsist on upcoming changes and/or challenges more easily (Elnaga and Imran, 2013). Adopting a formal reference guide bridges the gap of utilizing current employees to provide informal training practices to new employees. Past research showcases a positive connection between training and employee productivity, as formal written procedures reduce guesswork and errors. Human error is a primary concern for organizations that process highly sensitive information. To mitigate procedural errors, ambiguity in written instructions should be addressed with careful examination. The SOP should serve as a reliable reference tool that helps USCIS create a productive environment, helping employees recognize a broader meaning in work, which in turn, impacts employee morale.

The fifth benefit of SOPs is associated with increasing employee morale. The SOP is not only a vital training document, but it also enables employees to perform tasks with assurance, which in turn, stimulates a strong sense of achievement (Frank, 2010). The SOP enables anyone within the department to perform tasks in a consistent manner (Iowa State University, 2010).
While there are temporary or permanent personnel changes in any organization, a SOP guarantees continual execution of procedures, which in turn, increases employee morale. The impact of ineffective communication may increase the probability for misunderstandings, diminish trust, and damage employee morale, causing significant consequences for the environment of the organization.

2.3.4 Writing Style

Well-written SOPs present information that is easy to read but is detailed enough to allow anyone to understand the material. Matzen (2009) suggests the use of controlled languages such as Simplified English (SE), a writing method designed for use in aerospace industries, characterized by a standardized subset of English words that are limited to only one sense, is the most appropriate for a SOP. Because written procedures run the risk of misinterpretation, it is useful to implement SE to enhance comprehension, even if the reader is not native to the English language. The objective of using controlled language is to convey clear, unambiguous writing that can be applied to other writing domains, such as SOPs for large-scale organizations. To support Matzen’s claim, empirical research showcases that SE methods can improve comprehension and reduce errors, especially for the description of complex processes (Chervak, Drury & Ouellette, 1996; Schubert et al., 1995). A well-written SOP commissions jargon free language and incorporates visual graphics, such as processing maps, to make information easy to follow. While SE contains a limited use of the English language, it is not meant to weaken the message, but rather to reinforce the description, eliminate complex grammar, and identify jargon. To understand the functional use of SE, AECMA (1980) lists about sixty rules to describe the restrictions on grammar and style, including a restricted base
vocabulary of about one-thousand words and a large set of technical names/verbs. When creating a SOP, the rules summarized in Table 4 should be considered:

**Table 4. AECMA Simplified English Rules**

<table>
<thead>
<tr>
<th>Rule Category</th>
<th>Description</th>
<th>Example</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Words</strong></td>
<td>Used approved words only. Keep approved meaning. Do not use unapproved words.</td>
<td>Approved: <em>Obey</em> the safety instructions. Not: <em>Follow</em> the safety instructions.</td>
<td>Follow means “to come after.” It does not mean “to do what the rules tell you.” Using approved words to describe written instructions is key to avoid confusion.</td>
</tr>
<tr>
<td><strong>Verbs</strong></td>
<td>Use the verb in these tenses: the infinitive, the present tense, the past tense, the simple future, and the past participle (as adjective). Use the active voice as follows.</td>
<td>Procedures: use only the active voice Description and Operation: use the active voice as much as possible.</td>
<td>Using the active voice is the best choice because the subject of the sentence comes first and performs the action that the rest of the sentence describes.</td>
</tr>
<tr>
<td><strong>Length of Sentences</strong></td>
<td>Keep sentences as short as possible. Keep to one topic or one instruction per sentence. Write more than one instruction per sentence only when two actions have to be done at the same time.</td>
<td>“Enter the information to “TEST” and make sure the screen shows the result.</td>
<td>Keeping sentences short and concise is useful to make the instruction clear to the reader. If many words are used in one sentence, there is a possibility that the reader may misinterpret the intended meaning.</td>
</tr>
<tr>
<td><strong>The Grouping of Words</strong></td>
<td>Use an “article” (the, a, an) or a “demonstrative adjective” (this, that, these, those) before a noun.</td>
<td>Approved: “Set the alternate control lever to NORMAL” Not: Position alternate control lever back to NORMAL.</td>
<td>It is important to keep in mind that the reader may interpret the meaning of the text differently. Grouping words using SE makes it easy to understand the instruction.</td>
</tr>
<tr>
<td><strong>Punctuation</strong></td>
<td>Punctuation marks must not be scattered according to “taste.” Use hyphens as a joining signal.</td>
<td>When the light comes on, set the switch to NORMAL. Adjectives that consist of three or more words: three-to-one ratio, soap-and-water solution.</td>
<td>Readers should never have to reread a text to work out which words were intended to be read together.</td>
</tr>
</tbody>
</table>
To make documents easier to understand, implementing this set of writing rules into a SOP is recommended. The writer may use the words on the approved list that are combined with a definition. For example, “about” is used for “concerned with.” This term may not be used for “around” or “approximately” (AECMA, 2017). While controlled language considers the technical factors for effective writing, other scholars, Matzen (2009) examines the internal factors, such as the distinction between analytical and operational procedures when writing SOPs. Operational procedures define the supporting processes that are performed (i.e. data review, mail-box checks, naturalization certificate preparation), which may not be detailed in published methods while analytical procedures define how (the specific steps) tests correspond to analytical methods (EPA, 2007).

2.3.4 Preparation

A review of empirical research on the development of a SOP by the EPA (2007) indicates that when SOPs are written by proper subject-matter experts (SMEs), it increases the likelihood of developing a well-rounded reference guide. The development of the SOP is a multidisciplinary collaboration that requires a small group of SMEs to avoid reinventing the wheel. As with any new process, preparation of a SOP can be challenging, but if they are not written properly with accurate information, SOPs are of limited value to any organization. Other scholars note that the best practice to develop a coherent SOP involves an inclusive process to allow workers to participate in the process in order to obtain their input. Based on the EPA (2007), a team approach is an effective approach because there is collective knowledge. Generally, it is recommended to follow certain preparation steps for a SOP: plan, draft, review, revise, test, pot, train, and check and act (De Trevil et al., 2005).
Colligon and Rosa (2006) also make a useful recommendation for the preparation phase: process mapping for SOP development. In a broader sense, process maps, also referred to as flowcharts, is a graphical representation of steps to execute a task. Mapping procedures can compress the extensive descriptions in a SOP, into a simple depiction that provides a logical order for individuals steps. Furthermore, flowcharts are described as a tool for the improvement of processes that can help managers identify the “pitfalls” or gaps in the process since it depicts a start and end, which in turn, provides insight into the interrelationships among the various steps (Kaufman, 2019). Considering the benefits of flowcharts, the clerical department can utilize this tool to solicit input from workers who perform tasks, examine routine changes, and identify inefficient use of resources. The critical, but often overlooked benefit of flowcharts is that this approach warrants attention to the actual steps, using symbols to describe the process, especially if there are language differences between participants. Despite the value of flowcharts, scholars share the limitations are linked directly with oversimplification, considering that details underlying within each step require substantial information. Table 5 showcases the elements of a flowchart, each symbol representing a unique piece of information.
Table 5. *Flowchart Symbols* (Kaufman, 2019)

<table>
<thead>
<tr>
<th>Symbol</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>⬤</td>
<td>The end marks the completion of a process. Only one end is permitted per flowchart.</td>
</tr>
<tr>
<td>⬤</td>
<td>Every flowchart begins with a start. It describes the starting point of the process. Only one start is permitted per flowchart.</td>
</tr>
<tr>
<td>□</td>
<td>A process step describes a specific subprocess to be performed. The level of detail should be brief, but provide a clear description.</td>
</tr>
<tr>
<td>□</td>
<td>The parallelogram represents the input or output.</td>
</tr>
<tr>
<td>□</td>
<td>The diamond represents a decision. The output contains relevant values (yes/no, etc).</td>
</tr>
<tr>
<td>➔</td>
<td>The line that serves as a connector to show connections between the varying shapes.</td>
</tr>
</tbody>
</table>

While the advantages of flowcharts are evident, it is critical to use each symbol in accordance with the reference, otherwise, it will lead to misunderstanding about the process. Scholars recommend that creating a flowchart as a starting point is helpful to understand the process from point A to point B. Also, in the preparation stage the active involvement of workers is critical to employ a SOP. As a time-consuming process, it is recommended to create a list of the procedures to determine the format and provide a starting point for the SOP. It is recommended to define the format (e.g. step-by-step narrative, diagrams, type of font, etc.) and select a mode that suits the needs of the organization (Pearce 2016).

However, according to Brown (2019), developing a SOP is tied to a fair share of challenges. Assuming that only certain stakeholders are involved in the process, the SOP runs the risk of missing some important elements due to blind spots. In terms of accessibility, visibility, and centralization, it is important to implement a strategy to keep the document alive.
In the preparation phase, a person should be assigned to this document with the purpose of ensuring it does not fall on the backburner once it is complete. Lack of management and maintenance is a common problem that occurs with the development of SOPS. Too often, organizations put more emphasis on the early stages of developing a SOP, but little regard is given to sustaining the SOP. Also, if the SOP involves multiple processes, it is useful to develop the SOP in small iterations to add real value to small add-ons and be prepared to change gears if needed. Establishing a formal review process to obtain approval of the first draft is a critical step to ensure processes are made effective.

2.3.5 Review and Approval

Upon the completion of the first draft, the next step is to send the document to the QA for review. According to several scholars, the end-product of a SOP requires a trial period that is intended to establish the quality and reliability prior to distribution. Other scholars claim that organizations should not only test the reliability of the document, but also implement the input of all relevant parties (Adler, 1999; Imai 1986; Monden, 1983). In turn, this enables a collaborative environment among employees who perform these specific tasks to participate in the discussion of the SOP. In order to promote continuous organizational improvement, scholars suggest that the process of developing an SOP should be inclusive. Scholars suggest that participatory, ongoing process of refining and revising standard procedures is one simple way to resolve inherent issues.

The review stage is necessary for feedback purposes. The author of the SOP is responsible for documenting the comments provided by all intended users. Part of developing a coherent SOP is to include feedback to make changes for improvement. This stage involves
more specialized steps that continue to keep the information current and functional in the SOP. The methods, policies, and procedures for the clerical department continue to evolve over time. In order to ensure that a SOP keeps pace with such changes, scholars recommend publishing an electronic version with references and links to other procedures and guidelines for additional information. A useful recommendation to ensure the SOP is accessible to staff is to raise staff awareness of keeping a centralized copy readily available and appointing a person to direct staff.

More generally, this literature review has examined various scholars that have explored the intricate relationship of organizational theory to highlight the significance of best practices for standard operating procedures (SOPs) within public administration. The literature review reassures that the best practices for the application of a SOP are comprehensive, yet complex in practice. Although it is implied that achieving high productivity is the centralized core value of public organizations through the lenses of classical and neoclassical theory, NPM shifts the focus to the quality of increasing efficiency. As a new paradigm of public administration, it is appropriate to place USCIS under the framework of NPM. In turn, the project will focus on identifying and understanding key functional areas, individuals, and procedures involved in the clerical department at USCIS. Furthermore, this project directs attention to the recent USCIS realignment of the organization across the channels of domestic regional, district, and field offices. In turn, the project will address new procedures as a result of policy and question if there are any indicators that burden maximizing efficiency of current processes. This project also aims to add to the literature by bridging the gaps.
Future research should consider conducting research in practical settings to determine if there are additional components that should be incorporated into the development of a SOP. The information provided by scholars echoes similar information and suggestions in regard to best practices for SOPs. While there is no ‘official’ format to develop a SOP, researchers and practitioners alike should research the possible ways to enhance the current model of SOPs. In assessing the current model of SOP, researchers could address the limitations of process standardization.

Figure 2. SOP Lifecycle Diagram (Beadle, 2015)
Table 6. Summary of the SOP Development Process (Beadle, 2015)

<table>
<thead>
<tr>
<th>SOP Lifecycle Steps</th>
<th>Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scope and Purpose</td>
<td>To begin a SOP there are a few preliminary steps. Scholars suggest that prior to writing a SOP, the writer must know where the SOP is to be used and who is the SOP for. The Scope and the Purpose section should be the foundation of the document. This is the section that highlights the overarching meaning of the SOP.</td>
</tr>
<tr>
<td>Audience and Authors</td>
<td>The audience is identified in the Scope section. The language and writing style need to be tailored to match the intended audience. Also, this stage identifies the people who are the experts for the content of the SOP. All the authors involved will need to work collaboratively in the creation of the SOP to achieve a well-rounded product.</td>
</tr>
<tr>
<td>Format and Writing Style</td>
<td>The most effective way to develop a SOP is to focus on these two components, specifically pre-existing layout, flow charts, hierarchical steps, and simple list of processes.</td>
</tr>
<tr>
<td>Test and Adjust</td>
<td>A complete SOP should be tested and adjusted to ensure that its intended purpose is fulfilled. Effective SOPs undergo an end user test and review to make necessary adjustments. It is important to cover any considerations.</td>
</tr>
<tr>
<td>Distribution and Training</td>
<td>The goal is to distribute and train staff with the SOP. It would be useful to use SharePoint as a distribution tool to ensure employees receive any updates regarding the SOP. Also, SOPs are considered time savers to train employees since it doesn’t require the assistance of another employee.</td>
</tr>
<tr>
<td>Review and Update</td>
<td>This is a crucial stage in the SOP lifecycle. The SOP is a living document that needs to be updated on a regular basis to address the needs of the intended audience. This can be done by self-regulating, setting expiration dates and reminders, assigning ownership, and managing influential factors.</td>
</tr>
</tbody>
</table>

2.4 Summary

Often, the difference between an efficient, productive organization and a not-so-efficient one is the integration of a SOP that provides clear-cut directions as to how certain processes should be completed. Creating and following a SOP for the clerical department at the SBD and SND Field Office will enable strategic alignment to ensure the workforce is aligned with the organization’s goals. The literature reveals several areas to improve the operational functions in the clerical department at USCIS by adopting a SOP: 1) maintain consistency for
quality control of processes; 2) provide operational information necessary to reduce error margin; and 3) serve as a training document to teach new users or reinforce proper performance. The purpose of this project is to incorporate a SOP to strengthen cooperation between clerical staff and the management team with respect to adjudication and records operations. A well-written SOP will enable support for the clerical department to assist with the procedures pertaining to immigration files, while also keeping the field office in compliance with government regulations to minimize risk.
CHAPTER THREE: METHODOLOGY

3.1 Chapter Overview

As an applied project, this research primarily employed a phenomenological qualitative approach regarding the development of a SOP for the clerical department at USCIS. The primary methods considered for data collection are participant observations, semi-structured interviews and document analysis. The phenomenological method is credited to Edmund Husserl (1859-1938), a German philosopher whose approach relies substantially on observations and experiences. Phenomenology is a common research strategy that is appropriate for exploring challenging issues in workplace settings. As outlined by FEMA (1999), a SOP is the best method to help departments to “operationalize” other organizational documents, such as by-laws, plans, and policies, etc. In short, SOPs simplify the critical concepts, techniques, and requirements into a format that is easily understood by the intended end-user. This chapter includes details regarding the research design, sample size, and procedures used to conduct this study, as well as a brief overview of the methods used to analyze the resulting data. As mentioned in the literature, the application of a SOP should emphasize who does what, how it is done, and the desired end-result. The themes that emerged from the qualitative data were used to examine inconsistencies, obtain clarity, and determine the best strategy to help create a SOP. The author facilitated the collection of data from October 2019 to March 2020 at the SBD Field Office.

3.2 Research Design

The purpose of this phenomenological study was to explore how management personnel in the clerical department understand the importance of employing a SOP.
Specifically, this project adopts the core principles of a phenomenological research design in order to describe the commonalities of the experience shared by the participants. A phenomenological study “is an attempt to deal with inner experiences un-probed in everyday life” (Merriam, 2002, p. 7). The phenomenon of interest was to understand the grounds to create a SOP. In practical applications of phenomenology, the researcher relied on purposive sampling to identify individuals who have management experience and clerical knowledge. The methodological approaches utilized in this project are all intended to contribute toward a collective understanding of standard practices. Qualitative methods included coding and identifying themes from responses in the participant observations, semi-structured interviews and document analysis. A purposeful collection of documents related to the procedures and policies related to the clerical department is used to gain insight into practices not otherwise observable.

3.3 Sampling

A sample of 6 clerical personnel participated in this program improvement study. The total sample for this phenomenological study included one RM, one SRMS, two SISAs, and two ISAs from the clerical department. A purposeful sampling strategy was utilized to select the participants involved in the clerical department. The participants were selected purposefully since this strategy attempted to acquire a managerial perspective to provide depth into the needs of the clerical department and information relative to the use of SOPs. The purposeful sampling strategy in this project involved a homogeneous approach to describe a particular subgroup, such as management personnel, in order to reduce variation and simplify analysis by facilitating participant observations and semi-structured interviews. In this study, selecting
management personnel to discuss the challenges and benefits of implementing a SOP is critical
to simplify the analysis. This study presented only minimal risk to those who participated
because the data was collected and a pseudonym was applied to maintain anonymity.
Participants may have benefited knowing they were contributing to a body of knowledge that
further informs the needs of the clerical department.

3.4 Data Collection Methods

The data collection process for this project involved three variants: participant
observation, semi-structured interviews, and document analysis. The benefits of qualitative
research are that the approach to collect data provides insightful information about the
phenomenon. The role of the researcher is to attempt to access the thoughts of participants. In
terms of the participant observations, the researcher documented descriptive field notes in
discussions between SRMS and QAs. Also, the researcher held semi-structured interviews with
SISAs to ask for clarification about clerical practices in the supporting documents. This particular
method of collecting data is necessary in order to understand and interpret a participant’s
perception on the meaning of the context. In short, the study collects data that helps the
researcher identify common themes in the participant’s perception of their experiences.

3.5 Document Analysis

Document analysis is a research technique that analyzes the words, language or text in
documents to identify trends (Bowen, 2009; Bryman, 2012). This method is a useful tool for
program improvement and evaluation initiatives because it grounds front-end analysis that
makes inferences about past and current organizational practices. It is designed to identify
specific elements from the content in the reference material. As outlined by Leedy and Ormrod
(2001), the procedural process for document analysis attempts to define the characteristics or patterns in order to examine the text. To establish a guideline that highlights the functions in the clerical department, a focused document analysis is instrumental for this project. In particular, the researcher conducted an inductive content analysis of the Records Policy Manual (RPM) and the supporting documents that serve as SOPs for the clerical department. In order to remain equitable in the document selection, the SOP material was retrieved from SISAs who determined the documents pertinent to clerical procedures. Because clerical personnel carry out SOPs within an operational environment that uses several internal and external components, these documents should be considered when developing the centralized SOP. The researcher also used selective editing, a general approach to the detection of errors in documents, in efforts to capture inconsistent areas of the supporting documents. Further, the researcher employed a constant comparative analysis drawing on grounded theory methodology. Refer to Appendix C for subsequent sampling of documents provided that showcase the breakdown on how the documents were analyzed.

To conduct a document analysis, the researcher collected the supporting documents from clerical supervisors who decided which ones warranted most attention for this study. Next, the researcher arranged the documents into manageable categories, defining specifications with a concentration on two components: adjudication and records procedures. These official sources of information were essential to ground the front-end evaluation criteria to develop the Records-SOP. The researcher examines the outcomes and issues of existing documents with the purpose of using this information to make inferences about current organizational standards. After the classification was completed, the next step included
mapping out the operational procedures for both adjudication and records management in order to define competencies. This required the creation of a list showcasing the varying roles and responsibilities for positions within the department to ensure validity. In doing this, the author was able to capture the bigger picture of the operational functions and organize the codes into the respective categories, either adjudications or records. The two categories provide guidance to inform this project because it helped identify the prescribed format for assembly of records and adjudications using current standards, policies, procedures, and other aspects of a records management program to create the SOP.

The researcher reviewed records management policies, directives, and other documentation provided by USCIS to establish the groundwork for the management of records. Records management for USCIS, including operational and support components, is guided by DHS Directive 0550.1. This directive establishes the DHS records management program and it was approached to highlight the implementation of rules. Throughout the document analysis, the researcher kept notes to capture ideas and questions as concepts emerged (Refer to Appendix C). These memos were developed for each supporting document in order to build credibility in the themes that emerged during the analysis.

Table 7 showcases five aspects to conduct the document analysis. The following five layers are considered: (1) document development and location; (2) authorship and audience; (3) document context; (4) document text; (5) document outcomes. To address each aspect a range of varying questions are listed to enable critical probing of the documents. The answers to these questions should be drawn out within the documents itself or could be noted as omissions from the text. Some of these questions apply better to some documents than others.
The purpose of having these questions is to identify the basic contextual information of the document, such as authorship and when the document was created.

Table 7. *Questions for Document Analysis (Bowen, 2009)*

<table>
<thead>
<tr>
<th>Category</th>
<th>Questions</th>
</tr>
</thead>
</table>
| **Document Development and Location** | ➔ When was the document created?  
  ➔ Was it easy or difficult to access? |
| **Authorship and Audience**     | ➔ Who was it written for?  
  ➔ When was the last revision?  
  ➔ Who is the individual(s) responsible to ensure the document is current?  
  ➔ Who wrote it? |
| **Document Content**            | ➔ What is the principal objective of the SOP?  
  (indication of roles, procedures, authority).  
  ➔ What is the recognized need?  
  ➔ Why is this concern being addressed? |
| **Document Text**               | ➔ Does the document contain defined abbreviations?  
  ➔ Are specialized terms defined properly?  
  ➔ Are procedures listed in a coherent and clear manner?  
  ➔ Is Simplified English used to describe procedures?  
  ➔ Is the process very long and involves various levels of audience?  
  ➔ Are there references to the person (You, He, She, Him, Her)? |
| **Document Outcomes**           | ➔ How is this document intended to be monitored?  
  ➔ How and when is the document to be reviewed? |

The author also assessed the formal guidelines to create a SOP in accordance with the format of the Western Region Office (WRO), a component incorporating six district offices under USCIS. This guide explains how SOPs should be developed, the lists of topic areas that
should be covered, and describes a style and format for USCIS. The WRO basic guideline to writing effective SOPs served as a reference document to develop, implement, and maintain a SOP. This document was a focal point to develop a visual trial strategy that could support the needs of the clerical department.

3.5 Participant Observations

Participant observation is considered a staple in SOP studies, especially for program improvement research. In participant observation, the researcher participates and observes people’s behavior in the environment in which it typically occurs. This data collection method offers several benefits, particularly the ability to understand the experience of the group being studied. The researcher conducted participant observations with SISAs and Quality Analysts (QAs) during normal work hours. Supervisors were observed on their interactions in meetings with QAs and were documented with field notes. During the observations, the researcher took extensive notes to identify the themes that emerged from the responses. Included in Appendix E is the template that the researcher used to record the meeting minutes and field notes. The responses and interactions were documented with descriptive field notes. In these meetings, the principal stakeholders discussed the limitations involving the clerical department in terms of productivity and efficiency. The QAs and SRMS held meetings to discuss how to improve the efficiency in the department. In addition, the researcher observed ISAs in their work environment as part of the participant observation.

3.6 Semi-structured Interviews

A semi structured interview protocol was developed, and then reviewed to create a thematic analysis of the responses. Semi-structured interviews were conducted with
supervisors in their workspace. In the interview process, probes and follow-up questions were added with the purpose of acquiring clarification or further information. Specific questions were added as the interview progressed in response to create the themes. The semi-structured interviews were conducted by the researcher who took notes of the conversations. The researcher asked the participants the following questions to establish the base for the SOP guideline:

1. What are the main responsibilities of the ISAs?
2. How do SISAs respond to the needs of the clerical department?
3. What are the primary duties of the clerical department?
4. Is the guidance centralized and accessible for all clerical personnel?
5. Which procedures lack written guidance? Are flowcharts used?
6. How many ISAs are new to the clerical department?
7. How effective is the current guidance for clerical personnel? Do personnel utilize it?
8. Are there procedures that could be improved to ensure better efficiency?
9. Who writes the current guidance for the clerical department?
10. Are the supporting SOPs written in a user-friendly manner?

The researcher had discretion about the order of the questions, yet the questions were standardized to facilitate the structure of the interview. This interview collected detailed information using a conversational style with the interviewee.

3.7 Limitations

In conducting this research project, several limitations emerged including but limited to: 1) the sample size of participants, 2) purposeful sampling, 3) lack of guidance for the document
analysis, 4) lack of time and 5) self-reported data. The sample size for the participants did not capture the perceptions of a large pool of supervisors. It would have been useful to include perspectives of other management personnel from different offices in order to obtain a holistic understanding. For example, the sample size indicates that the groups may not be representative of the larger workforce of clerical personnel. Also, the phenomenological approach employs a purposeful sampling method, which does not require a random selection. In other words, these participants were selected based on their experience and background with clerical management. In addition, a limitation of purposive sampling may produce inaccurate assumptions and it be ineffective when applied to a large group, which results in possible biases. A particular limitation of qualitative document analysis is that there is not a guideline to conduct the analysis. It is difficult to find specific techniques to help guide the context of the analysis because each inquiry is different in nature. While document analysis is the most appropriate approach to analyze the supporting documents, it entails several challenges for the researcher. Another limitation was the lack of time to collect the data as a result of IRB approval and there were time conflicts to schedule semi-structured interviews with participants. Lastly, the self-reported data cannot be independently verified due to several factors. Despite its common use, the limitation with this approach is that the sole presence of the researcher could influence the behavior of those under observation. In the same way, if the researcher adopts the role of the participant observer, the likelihood of biases may result from developing relationships with the participants.

In spite of these limitations, this project can contribute to a better understanding of functions within the clerical department from locating an immigration file, managing the
movement of files, to processing in-coming correspondence. As the custodian of records, the employment of a SOP would assist USCIS leadership to streamline and centralize routine operations for greater efficiency across the department. This project is intended to be a source of information and a general statement of present USCIS policies for the management of records. The material is designed for use by leadership and clerical personnel to facilitate the communication platform for adjudicative and records procedures. When considering the benefits of this project, it is useful to regard it as a communication tool for administrative requirements, organizational policies, and procedural methods to address the department’s needs. Furthermore, this project can enhance usability, ease of revision or updating, and provide an organizational blueprint for operational efficiency to encourage a collaborative environment among the clerical team. As noted above, SOPs operationalize the strategies of the clerical department and will continue to act as a vital component for performance efficiency.

3.8 Summary

The leadership team seeks to support the development of the department by employing a SOP to ensure consistent and coherent practices, drive collaboration, ultimately, to make processes associated with adjudication and records management more effective. This research helps clarify, reduce ambiguity, and create a consistent design of the current functions for the clerical department. Following this method, the researcher ensures that grounded theory from the literature review is embedded in the data collection part of the research process. The next section examines the varying themes that emerged from the document analysis, participant observations, and semi-structured interviews.
CHAPTER FOUR: FINDINGS/ANALYSIS

4.1 Chapter Overview

The chapter discusses a systematic review of documentation that served to ground the research and the responses from the participant observations and semi-structured interviews, describing concerns about streamlining procedures to improve efficiency in the department. The process used to analyze the notes obtained from the observations and semi-structured interviews to examine the underlying themes is described in this chapter. As such, the researcher presents the results from the document analysis, participant observations and semi-structured interviews that reveal three key themes for each method. Included in this chapter are tables and graphics used to emphasize the primary themes that emerged.

4.2 Document Analysis

A thorough analysis of documentation provides background information that helped the author understand the context for this project. As articulated by Max Weber (1978) in his work *Economy and Society*, “the modern world is made through writing and documentation,” providing insight into the use of documents in research. Aside from providing contextual value in the research, documents were useful to draw the basic conceptual structure of the SOP. In Appendix C, the document analysis chart demonstrates how the documents were evaluated based on seven categories: 1) document name/date/source; 2) topic/policy; 3) glossary; 4) discussion of responsibilities; 5) document grade regarding ‘language’ elements; 6) flowchart; 7) coding. Each category is useful to provide factual information of the document. The first category lists the document name, when it was written, and who wrote the SOP. The second category focuses on the clarity of the topic/policy being discussed. In the third category, it
specifies if there is a glossary section included, while the fourth category discusses the responsibilities. The fifth category requires the researcher to grade the document based on its use of effective language, punctuation, grammar, syntax, and use of active voice. The sixth category identifies the use of processing maps, while the seventh category assigns a code to the document for the purposes of classification.

The analysis of documents was instrumental in clarifying ideas, identifying conceptual frameworks, and pinpointing the relevance of categories. However, several documents were uneven, either containing extensive information related to certain activities or limited information. The use of documents, particularly the Records Policy Manual (RPM), is integral to the development of the Records-SOP. The RPM reflects current policies, procedures, and best recordkeeping practices and it was used to inform the format of the SOP. This existing document affords a complete source of policy guidance, including other reference material related to existing procedures (i.e. SOPs), to create a structure to disseminate information. In order to determine the range of documents needed for the analysis, the researcher retrieved sources from supervisors. The author reviewed approximately 30 supporting documents, placed them in context, and coded them for analysis as outlined in the charts (Refer to Appendix E). The documents were compiled in order to recognize central themes that emerged from the analysis.

Three major themes emerged from the review of the document analysis: “inconsistent format”; “use of effective language”; and “lack of uniformity.” The first theme relates to the assessment of what SOP components are absent in the supporting documents. The second theme relates to the use of effective language to examine if STE is provided to write
procedures. The last theme relates to the application of uniformity in terms of grammar, format, style, or typography. To conduct the document analysis, a guiding framework of questions was implemented to ensure that the key areas are included.

Table 8. Themes from Document Analysis

<table>
<thead>
<tr>
<th>Keywords on Document Analysis</th>
<th>Themes</th>
</tr>
</thead>
<tbody>
<tr>
<td>➔ No supporting introduction/background</td>
<td>Inconsistent Format</td>
</tr>
<tr>
<td>➔ No definition/acronym section</td>
<td></td>
</tr>
<tr>
<td>➔ No process mapping (responsibilities)</td>
<td></td>
</tr>
<tr>
<td>➔ Unclear roles and responsibilities</td>
<td></td>
</tr>
<tr>
<td>➔ Unclear order of procedures</td>
<td></td>
</tr>
<tr>
<td>➔ No appendix</td>
<td></td>
</tr>
<tr>
<td>➔ Images/diagrams intercept flow of text</td>
<td></td>
</tr>
<tr>
<td>➔ Use of passive voice</td>
<td>Use of Controlled Language</td>
</tr>
<tr>
<td>➔ Long sentences (more than 25 words)</td>
<td></td>
</tr>
<tr>
<td>➔ Inconsistent choice of verbs</td>
<td></td>
</tr>
<tr>
<td>➔ Complex verb tenses</td>
<td></td>
</tr>
<tr>
<td>➔ String of non-approved nouns</td>
<td></td>
</tr>
<tr>
<td>➔ Unapproved forms of verbs</td>
<td></td>
</tr>
<tr>
<td>➔ Technical names as verbs</td>
<td></td>
</tr>
<tr>
<td>➔ Use of 1st, 2nd, and 3rd person</td>
<td>Lack of Uniformity</td>
</tr>
<tr>
<td>➔ No version numbers</td>
<td></td>
</tr>
<tr>
<td>➔ No author/POC for SOP</td>
<td></td>
</tr>
<tr>
<td>➔ Grammatical errors</td>
<td></td>
</tr>
<tr>
<td>➔ Inconsistent punctuation marks</td>
<td></td>
</tr>
<tr>
<td>➔ Full spelling of acronyms</td>
<td></td>
</tr>
</tbody>
</table>

4.2.1 Inconsistent Format

It is important to analyze the content of supporting documents to establish not only what is included, but also to identify what isn’t included. These supporting documents are decentralized SOPs that provide guidance for certain procedures and serve as reference material to develop the formal SOP. To conduct the document analysis, the author focused on the quality of the document, particularly by considering the components that are critical for
effective SOPs. In terms of the key components, it was found that the documents either had missing or inconsistent components, namely purpose, background, scope/applicability, acronyms/definitions, maintenance, clear roles and responsibilities, and procedures section.

The first component was to identify if the supporting documents had a clear purpose and background section since these describe the recognized need for procedures and list the parties that will share the procedures. Based on the findings, the majority of the documents did not include a purpose or background section in the beginning of the document. Some of the SOPs listed a title and a brief table of contents prior to listing the procedures. There is no indication of clarification regarding the principle objective or resource that is the subject of the SOP. On the other hand, there are some documents that include brief introductions, delineating the particular authority or procedures, but the documents did not establish the reasons for such procedures. As the literature showcases, a purpose and background section are pivotal to a SOP because it establishes the regulatory standards that are appropriate to the process (Akyar, 2012).

In terms of the scope, this section is intended to list all the participants, including agencies and jurisdiction, that will perform the procedures. Scholars describe that the scope/applicability section provides details on the end-users by defining the level of command (Akyar 2012). As expected, the supporting documents did not incorporate a scope/applicability section. Other documents, on the other hand, deviated from including a scope/applicability description rather than explicitly stating it, which in turn, required drawing the inference. While this section is a concise statement, it is especially important because it provides a conceptual overview of the particular affordances and limitations. According to the FEMA (2019), the
scope/applicability section provides a description that specifies the area, range of activities, or personnel involved in order to develop a better understanding for the reader. To include a scope/applicability section also enables the reader to distinguish the limitations on the protocol’s effective use. This will not only suitably identify the document to prevent unintended use, but it will also build receptivity for future changes, therefore, this section is necessary to include in the formal SOP.

The next component involves identifying the application of maintenance in the supporting documents that is used as an indicator of quality control. Well-maintained documentation is a critical requirement of keeping information at peak efficiency. Necessary changes to regulations, federal guidelines, policies and procedures may result in updating the SOP. In short, additions and modifications are required for maintenance precision.

Interestingly, the findings showcase that the supporting documents do not have an indication of maintenance nor information regarding the point of contact. The RPM, on the other hand, indicates the last revision on the bottom left of the document and contact information to submit an update request, which in turn, prompts the question: What distinguishes an effective SOP from merely good ones? It is not the structure or the depth of information, according to Bhattacharya (2015). It is sustainability: an integral concept that focuses on promoting growth and stability to maintain operational validity, otherwise, the document becomes outdated.

Despite the value of document maintenance, this factor is often overlooked by organizations who create SOPs. Because SOPs are a living document, the primary stakeholders should review the document on a periodic basis, particularly bi-annually. As indicated earlier, it is useful to assign an individual(s) to take control of the document to ensure that there is only one version,
preferably enabling special permission to a master list of all SOPs. Such practice should not be readily dismissed because it contributes to the viability of the SOP.

Like the maintenance component, acronyms and definitions is another component that warrants attention. Based on the SOP guidelines, the use of an acronym and definition section provides contextual information to the end-user who may not be familiar with the material (EPA, 2007). For the benefit of the end-users, it is essential to define terms and abbreviations as part of the development process. The findings indicate that these supporting documents did not integrate a section for acronyms and definitions. Clarifying specialized terms and writing out acronyms that end-users would not generally know is necessary. While the term may be familiar to the writer, this component provides contextual information for training or clarification purposes. The SOP guidelines under FEMA (2019) suggests specialized terms and definitions should only be procedure specific. To do so, the writer of the SOP should ensure the abbreviations are written to identify the phrase descriptor. In the document analysis, there are several abbreviations throughout the text without a reference to the descriptor. This, in turn, may confuse the reader, especially if there are multiple meanings to the abbreviation. Likewise, some documents included definitions for specialized terms, but were disseminated in several areas of the document. This is not an efficient practice because definitions and acronyms should be readily accessible in the document for the end-user, preferably prior to listing the roles and responsibilities.

With regard to roles and responsibilities, it is a vital component to integrate in a SOP because it describes the specific duties that employees are expected to complete as a function of their roles, including the skill set necessary for employees to advance the work. Establishing
clear roles and responsibilities is necessary to avoid duplication of effort, increase communication, and improve efficiency. Based on the findings, more than half of the supporting documents do not emphasize this information. The document analysis reveals that the roles and responsibilities overlap with the procedures section, so they are not easily recognized. To illustrate this information, a textual example from one of the SOPs is provided below:

*Once the mail has been delivered, it is FCI staff responsibility to pick up the mail from its drop area and to sort it out.* (Sorting Incoming Mail SOP)

This is the opening sentence from the Incoming Mail SOP, which inserts an instruction that overlaps with the responsibility of the employee. Generally, roles and responsibilities are listed in a separate section for quick reference, referred as preliminary information to set the expectations prior to the procedures’ section. Defining the roles of those responsible to execute procedures is critical because it helps facilitate the full integration of the department. It is evident that a role is not a responsibility, and vice versa. There is a distinction between these two elements since it is possible for multiple individuals to have one of the same roles, depending on the task. Scholars suggest that an approach to make the distinction is to think of roles in general terms while the responsibilities are the specifics. If the SOP lacks clear roles and responsibilities, scholars recommend using the job description of that specific position as a guide to help the employee or supervisor understand the overall function (Luenendonk, 2016).

The component of procedures, on the other hand, encompasses a substantial part of SOPs because it provides detailed descriptions to carry out the line of work. In terms of describing procedures, it is critical to keep it simple, yet provide enough information to get the
message across in the best possible way. Other alternatives to assist the end-user is to implement process mapping, a visual communication tool, that helps streamline processes and increase understanding of important details. Well-designed process maps determine the inputs, outputs, steps, and process time in a procedure that provide a snapshot. Experts agree that process mapping benefits large organizations, otherwise, optimization and improvement become difficult to attain (Colligon and Rosa, 2006). As such, the use of process maps among the various documents is depicted in Appendix E. However, it is important to note that process mapping is a missing element in each document. In addition, procedural sections constitute the core structure of the SOP since it describes the details of the activity that needs to be performed. Some of the documents divided the text into levels to describe the procedure thoroughly, but it was broken apart by multiple diagrams and tables, which in turn, interrupts the course of information. However, the supplemented material includes. While procedural sections could contain diagrams, charts, or tables as reference material to the instructions, it is recommended to use the appendix section to organize non-textual information. However, non-textual information could be incorporated in the procedural section if deemed necessary. Several documents include screenshots of operating systems that are interspersed between the text. To improve the clarity and uniformity of the document, these screenshots could be moved to the appendix section. In doing this, the text is arranged in an orderly way for the reader, which unifies the form as a whole consisting of coordinated sections. Another element that adds to the process of structuring the text into a form that will ensure efficiency is the use of controlled language.
4.2.2 Use of Controlled Language

This analysis begins with an independent examination of the text in the supporting documents to determine if the information is consistent with the core meaning through the lenses of Simplified Technical English (STE). The results from this analysis showcase limited use of effective language within the supporting documents. Among other STE rules, it is essential to keep sentences short, use active tense over gerunds, and limit sentences to one instruction to improve the quality of written documents, especially SOPs. A hallmark of effective writing is the ability to eliminate excessive wordiness in phrases in order to convey critical information in a clear manner. Table 9 showcases examples of limited use of effective language found in several supporting documents. The first column is labeled as “Non-Simplified English,” which includes phrases derived from the documents, and the second column is labeled “Simplified English,” which provides the revised version that conforms to the rules of Simplified English.
Table 9. *Uses of Controlled Language*

<table>
<thead>
<tr>
<th>Non-Simplified English</th>
<th>Simplified Technical English</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. “Note if the Special Handling is <strong>addressed</strong> to the office without a specific receiver name, USCIS will be <strong>used</strong> for the Delivered to field.”</td>
<td>“Write <strong>USCIS</strong> in the field “Delivered To” if the Special Handling mail does not have a receiver name.”</td>
</tr>
<tr>
<td>2. “Date, Time, First and last name, and <strong>Signature</strong> will be completed by the employee who receives mail”</td>
<td>“Write <strong>first and last name</strong>, and signature in the Special Handling Receive Log. <strong>Include</strong> the date and time.”</td>
</tr>
</tbody>
</table>
| 3. “Before **you** discard the empty file jacket, **check** for any annotations, cut them out, and **staple** to a piece standard size paper. **Fasten** it to the inside of the left of the primary jacket.” | 1. **Do a check** of the empty file jacket for annotations  
   2. **Make sure** to cut annotations  
   3. **Attach** the annotations to a letter size paper  
   4. **Put annotations on** the left side of primary jacket |
| 4. “**Place** the paperwork in an empty file (burgundy), create a barcode, **place** the appropriate cover sheet on the file and place the paperwork in the file.” | “**Put the paperwork inside an empty file jacket. Create a barcode and put** the appropriate cover sheet on the file.” |
| 5. “**Peek inside each envelope to determine** the primary contents.” | “**Examine each envelope to find** the primary contents” |

The use of controlled language enables the writer of the SOP to deliver concrete and clear statements. While the procedures were written by subject-matter experts, some of the sentences are too complex, which in turn, makes the instructions unclear. As shown in Table 9, each instruction in the Non-Simplified English column contains several unapproved terms that warrant multiple interpretations. For example, the first instruction, “Note if the Special Handling is addressed to the office,” the term *note*, and *address* is used incorrectly. Here, the term *note* could be interpreted in two ways, either as a notice or a notation. According to the
ASD-STE100, the term note is only approved in a safety instruction, such as providing a warning to the reader. If the writer includes instructions in a note using the imperative form, the note becomes a work step, rather than a statement that indicates a possible issue. Each document was given a grade based on the use of controlled language, grammar, and format consistency. The average grade for the supporting documents was a C- due to the common pattern of inconsistent format, grammar errors, and quality of written instructions (Refer to Appendix D).

In addition, for the second instruction, “date, time, fist and last name, and signature,” the terms are not used in accordance with the rules of STE. The choice and structure of the words muddle the message of the instruction because they are not organized properly. In a descriptive instruction, the writer must give information gradually to ensure each sentence is limited to one instruction. Because this sentence provides multiple work steps, the instructions become difficult to follow, which in turn, may cause the reader to overlook a step. The improved version of the second example uses STE approved words. In the example, the key words and key phrases are underlined. Here, the terms “write” and “include” are approved STE verbs, which have specific meanings. To replace a term, the writer should ensure that the alternate choice does not change the meaning of the sentence. In this case, the use of those two terms help connect the sentence and keep the intended meaning. In turn, this makes the instruction easier to follow.

The third instruction, “before you discard the empty file jacket, check for any annotations, cut them out, and staple to a piece of standard size paper…” is like the previous example because it provides multiple work steps in one sentence. It is notable that the terms chosen to describe the procedure do not conform to STE rules, considering that “check,”
“staple” and “fasten” are unapproved because technical names are used as verbs. In short, the writer can use a technical name only as a noun or as an adjective that is associated with a technical name. To revise the instruction, the author referred to the list of categories in the STE guideline to use technical names correctly. Here, the technical names use a different construction, “do a check,” “attach,” and “put it on” as a noun rather than a verb, which in turn, emphasizes the action step. In line with previous studies, this example also demonstrates a lack of logical links between the words because the sentence exceeds the maximum number of 20 words. Following this simple rule is essential because it prevents ambiguity and establishes transparency.

The fourth instruction, “place the paperwork in an empty file, create a barcode, place the appropriate cover sheet on the file...” is a descriptive statement that includes several action steps with unapproved STE terms. This example includes a total of 26 words to explain four separate work steps. First, the term “place” was chosen instead of “put,” which indicates that there are several possible definitions of a word. Secondly, the example includes multiple actions in one sentence. When multiple instructions need to be included, the writer could put them in a vertical list. This vertical list improves readability because it lists complex procedures in an organized sequence. However, it is critical for the writer to distinguish between technical names and technical verbs to describe various procedures. In this case, “place” is a technical name used as a verb, so the best option is to replace it with “put” based on STE rules. The term “put” is defined as to move or place in a particular position. In contrast to the original, the improved version is consistent and each step is user-friendly. While the original example is still comprehensible if the reader is a native speaker, it can become difficult for non-native
speakers. Other scholars have shown that using STE for procedural descriptions improves the understanding of instructions (Werfelman, 2007). This unique scope of STE, however, is challenging to implement, but it aims to develop a text that is “technically correct and simple to understand” (Werfelman, 2007, p. 19). Ensuring that instructions are written with more precision and less ambiguity increases the readability within complex procedures.

The last example, “peek inside each envelope to determine the primary contents,” includes two non-STE terms “peek” and “determine.” It is evident that the choice of the term “peek” is a technical name that is used as a verb. To “peek” does not mean the same as ‘scan.’ Much instructional content, such as procedures and warnings, use terms that are ambiguous for the end-user in order to complete the tasks. The choice of words to describe procedures have a big impact for organizations. For example, the word “peek” means to look quickly and “determine” means to occur in a particular way. Based on the definition, the instruction is subject to multiple connotations. To solve this, the author selected two terms from the STE approved dictionary to replace the terms “peek” and “determine.” This can be especially troubling for individuals who are non-native speakers. The term “examine” and “find” were used to replace the initial choice of words. Here, the result of using controlled vocabulary yields content that is clear to follow, “examine each envelope to find the primary contents.” Thus, the application of STE is not intended to change the core meaning of the instruction, but rather rephrase the statement to build a clear interpretation.

In short, the result of using controlled language with STE recommends simplifying sentences and rephrasing phrases with tangible descriptions to help the reader visualize the action step. These basic findings are consistent with research showing that controlled language,
specifically STE, is the best method to write procedural documents in order to create content that is clear, consistent, and concise. Others have shown that a controlled language specifies grammatical structures and provides approved words to write procedural documents. The source procedures had several issues. In English, words can have different variations that refer to the same concept. While STE is intended to give the maximum benefit to the reader, it is not necessarily simple to write; however, the application of STE is to provide instruction in layman’s terms.

4.2.3 Lack of Uniformity

In the same way, the supporting documents indicate a lack of uniformity because the structure of each document is inconsistent. Structuring the SOP in accordance with the reader’s perspective requires organizing the elements in a logical sequence to ensure each topic and subtopics are arranged properly. The easiest way to establish uniformity for written documentation is to develop an outline for SOPs. Creating an outline as part of the SOP process can help preserve a sample for consistency that serves as reference to initiate, coordinate, and record the results of the activity. Uniformity is an important principle in SOPs because it facilitates the order of information that allows the reader to follow with ease.

The findings of inadequate SOP versioning are linked to causes of deficiencies in organizations as depicted by the literature. Akyar (2012) states that organizations should establish a consistent outline as a reference guide to create SOPs in order to promote uniformity with the purpose of fulfilling the end-user’s perspective. Among the supporting documents, the researcher identified variations of format, writing style, and typography, which in turn, reveals lack of uniformity. The best approach is to write SOPs using a template based on
a practical perspective using the point-of-view of the end-user. These documents, however, were developed by different sources that took a unique approach to organize the information. Inconsistent practices, such as punctuation approach, writing style, format choice, interrupts the cognitive process of the reader. Moreover, Akyar (2012) argues that variations of format are not a good practice to produce high levels of quality in written documents: “high quality is not an additional value; it is an important elementary necessity.” In short, it is essential to use a SOP guideline to eliminate barriers between end-users and understanding, facilitate communication, and thereby increase the likelihood of delivering consistent information.

While the importance of writing procedures is evident, it is a challenge to produce an effective document that benefits the end-user. Based on the findings, the supporting documents also depict other format conundrums. The style parameter for numbering, bullets, and headings are not consistent in various sections of the documents. This is especially important because it helps distinguish the order of action steps in a procedure that way the end-user does not overlook details. In the reference guide, it is useful to highlight the parameters that set the standards of punctuation, word choice, bullet styles and sizes, number approach for multiple steps in a procedure. In terms of writing style, the supporting documents had a mixture of first and third person. The general preference for standard writing is third person, but this must be defined in the SOP guide to inform the reader to select one style for the entire document. From the perspective of text characteristics, SOP guides should have a default reference with a preferred ordering of sections. Indeed, consistency should be regarded as an essential component of technical communication.
4.3 Findings on Participant Observations and Structured Interviews

After conducting participant observations and semi-structured interviews with the SRMS and SISAs in the clerical department regarding the procedural steps to develop a SOP, similarities emerged in responses. Table 10 shows three themes that emerged from the responses: 1) lack of centralized resources; 2) organizational alignment to improve communication; 3) trends in clerical department. Supervisors recognized the value of providing a well-developed SOP to the clerical department as well as concern over the efficiency of the procedures. Moreover, supervisors expressed the unique challenges the clerical department faces if ISAs take control of the duties previously assigned to independent contractors.

To exemplify the scholarly literature, the supervisors are aware that the lack of a well-developed SOP is posing a challenge to the department, especially to the new ISAs who are not familiar with clerical procedures. The findings highlight the challenges of developing effective personnel and ensuring that they have the resources to face operational demands. The application of a SOP would improve clarity about roles, work guidance, and policies. Because independent contractors were responsible for a number of activities, some of which were supported by task orders, can potentially interrupt the streamline of procedures if ISAs are not given reference material to resume those tasks. It is implied that some degree of centralized coordination is necessary for the clerical department in order to incorporate required guidance. Not to mention, training ISAs without a centralized body of information may result time consuming or ineffective. The following summaries of semi-structured interviews with SISAs unfold current practices and inefficiencies.
Table 10. Themes from Participant Observations and Semi-Structured Interviews

<table>
<thead>
<tr>
<th>Keywords based on participant responses</th>
<th>Themes</th>
</tr>
</thead>
<tbody>
<tr>
<td>➔ Centralizing information for procedures</td>
<td>Lack of Centralized Resources</td>
</tr>
<tr>
<td>➔ Lack of SOP for records</td>
<td></td>
</tr>
<tr>
<td>➔ Streamlining processes</td>
<td></td>
</tr>
<tr>
<td>➔ Outdated guidance</td>
<td></td>
</tr>
<tr>
<td>➔ Short staffed</td>
<td></td>
</tr>
<tr>
<td>➔ Lack of guidance for procedures</td>
<td></td>
</tr>
<tr>
<td>➔ Defined job roles and responsibilities</td>
<td>Organizational Alignment to Improve Communication</td>
</tr>
<tr>
<td>➔ Meeting expectations in clerical area</td>
<td></td>
</tr>
<tr>
<td>➔ Compliance with existing policies</td>
<td></td>
</tr>
<tr>
<td>➔ Effective methods to train new ISAs</td>
<td></td>
</tr>
<tr>
<td>➔ Transparency of resources</td>
<td></td>
</tr>
<tr>
<td>➔ Improving clarity in guidance</td>
<td></td>
</tr>
<tr>
<td>➔ Training tool for clerical staff</td>
<td></td>
</tr>
<tr>
<td>➔ Redundant practices</td>
<td>Trends in the Clerical Department</td>
</tr>
<tr>
<td>➔ Loss of clerical knowledge</td>
<td></td>
</tr>
<tr>
<td>➔ Use clerical personnel to train new ISAs.</td>
<td></td>
</tr>
<tr>
<td>➔ Slow process</td>
<td></td>
</tr>
<tr>
<td>➔ Trim the fat</td>
<td></td>
</tr>
<tr>
<td>➔ Lack of process maps to illustrate procedures</td>
<td></td>
</tr>
<tr>
<td>➔ Unclear steps in procedures</td>
<td></td>
</tr>
<tr>
<td>➔ Enhancing steps to perform procedure</td>
<td></td>
</tr>
<tr>
<td>➔ Using SOP</td>
<td></td>
</tr>
</tbody>
</table>

4.2.1 Lack of Centralized Resources

Establishing a high-level reference to improve communication and ensure that all necessary elements are included to achieve a better understanding is imperative. Several factors were discussed regarding inefficient practices that hinder day-to-day operations, such as lack of guidance, which gives employees the tools to perform in an accurate manner. Also, the increase in workload was discussed since there appears to be a staff shortage to perform the various tasks in the clerical department. A clerical department employee explained how a SOP would be useful:
“Even though I have been working in the clerical department for many years, I still have to do my research about a procedure prior to moving forward to ensure we are being compliant since policies are frequently updated. It can take a while to fully understand how all the procedures work. The available guidance is not centralized. A SOP would be helpful to have in hand, especially for new employees.” (SISA)

The participant’s response provides insight to the gradual development of the clerical department. It is evident that the department faces constant growth, which in turn, emphasizes the importance of identifying priorities to inform planning decisions to meet the needs of the clerical personnel. This finding highlights the challenges faced by front-line supervisors. It was apparent that the extent of the response represents a notable source of strain for supervisors who face the responsibility of guiding clerical staff in the right direction. As mentioned previously, the clerical department only has one SRMS and three SISAs overseeing twenty-four clerical staff who execute multiple procedures. These supervisors are held liable to ensure processes are performed accurately to avoid a decrease in production. The findings identify the lack of centralized resources as problematic for two reasons. First, there are new employees who need contextual information of responsibilities in order to understand the end-result. Second, current ISAs are training the newcomers, but this causes a change of pace in the workflow since he/she must explain the process step-by-step. In a broader sense, the lack of centralized resources restricts personnel from obtaining the proper level of guidance forthwith.

During the participant observation discussions, the commonplace response was lack of guidance to fully execute the clerical functions. Assuming that a SISA has a concern about a particular procedure, whose information is not readily available, it is likely that he/she would spend a considerable amount of time searching for the specific source of information. In other
cases, information is readily accessible depending on the procedure. According to Bernstein (2013), searching for guidance is a time-consuming activity that may take up to eight attempts to find an accurate search result, which may result in an average of twenty minutes looking for one document. In turn, the time spent is eating into workplace productivity. To not be able to find accurate information at one’s fingertips, especially in the middle of a deadline, the supervisor may be subject to tension. While time spent on searching for information is cost incurred, finding an answer to a concern would be the main benefit of employing a SOP.

Concerns about the lack of guidance have sparked a movement to promote transparency with the purpose of streamlining procedures. Independent contractors were contracted to perform certain duties that were guided by task orders, a type of documentation with a set of instructions that conform to the needs of the organization. It was emphasized how the loss of institutional knowledge from independent contractors and limited guidance affects the clerical department because “some activities were performed solely by independent contractors.” Without a succession plan to transfer knowledge of processes to other employees, the department may be faced with continuity issues, translating into higher costs and lower efficiency. The application of a SOP in the clerical department is a retention method that can help curtail the loss of institutional knowledge and facilitate the dissemination of information. The retention of institutional knowledge is an important attribute to ensure continuity for the clerical department in efforts to lessen the burden on SISAs.
4.2.2 Organizational Alignment to Improve Communication

USCIS strives to provide its employees with the adequate resources to perform required work duties, such as additional training, to improve internal communication. The organization is committed to foster effective communication between SISAs and ISAs. In efforts to keep up with the growth of the clerical department, the SBD Field Office employed a SRMS and two more SISAs to manage the growing number of ISAs. All stakeholders in the discussions shared a consensus that the ultimate purpose is to provide effective guidance to assist ISAs, especially to those who are new to the department. Supervisors identified a degree of progress in relation to streamlining processes, but the apparent concern to prioritize the clarification of roles and responsibilities. Although the SRMS and SISAs have similar job responsibilities, the most expressed concern is to define job roles and responsibilities for ISAs, which explains the incentive effects of the rules to include in a SOP. It follows that the importance of roles and responsibilities is critical to ensure ISAs understand their assigned tasks. The practice of defining clear roles and responsibilities in a SOP is normally connected to individual goals, respectively, with a stronger emphasis on collective team performance.

The clerical department is tasked to follow federal regulations for compliance purposes. Concerns regarding the preservation of organizational knowledge were addressed by SISAs since it is an important attribute to the success of the department. To keep a record of processes not only preserves organizational knowledge, but also allows newcomers to resume the work easily. Discussions pointed out that the absence of independent contractors impacted the continuity of some procedures because ISAs were not primarily responsible to handle those duties. While a few of these independent contractors moved on to becoming permanent ISAs,
helping preserve operational consistency, this example alone demonstrates the importance of process documentation to prepare for sudden changes. ISA training and development, and access to improved guidance, were identified as priorities for attention by the participants. Process documentation is considered an effective method to transfer information; however, devising a plan to organize information is a challenge as the literature suggests (Shubert et al., 1995). One SISA added that a reference guide can also serve as a training tool for ISAs. Due to the influx of newcomers in the clerical department, the need for a guide has become apparent. As mentioned previously, current ISAs train individuals with limited experience, which has potential drawbacks, such as missing information, time conflicts, concept barriers, etc.

It is evident that there is an effort to build a culture involving process documentation in the clerical department. Because there are nebulous issues associated with internal communication within organizations, the best approach to achieve a sustainable process documentation, is to review the documented material regularly to increase usability. To overcome these barriers, process documentation has become central to understanding and disseminating tasks, which in turn, improves learning and contributes to communication. Literature suggests that effective documentation involves a complex process in terms of illustrating detailed steps, particularly the compilation of small changes, but this approach is necessary to ensure uniformity (Colligon and Rosa, 2006). To address the loss of institutional knowledge, the U.S. Office of Personnel Management (OPM) recommends that organizations should implement a plan to ensure continuity and preservation of knowledge. Addressing the risk of losing knowledge is notably a primary matter of concern for the participants. Succession
planning does not encompass extracting all the core knowledge from an expert, but rather preserving imperative steps to ensure reliability and validity.

### 4.3.3 Trends in the Clerical Department

To establish a reference guide that encourages the exchange of information among employees, and to support submission of suggestions, research suggests that end-users of the SOP should be involved in the development phase (Adler, 1999; Imai 1986; Monden, 1983). The SRMS and SISAs are encouraged to support open lines of communication with ISAs in order to address issues within the department. Supervisors attributed the increased demand of workload among current ISAs to the absence of previous intuitional knowledge from the independent contractors. From the perspective of participants, there is a distinct lack of flow, a kind of fragmented approach to some procedures. While there is not an easy issue to solve, one helpful approach involves reviewing the procedure. This approach, in turn, is particularly important in the complex nature of the department and is able to help stakeholders understand how a process outcome is achieved. Revisions to current processes should occur as frequently as possible to identify potential drawbacks and enable continuous improvement within the department. In other words, process evaluations should be undertaken by the stakeholders to know whether and how well the objectives are met.

To explore perceptions, the participants agreed on the significance of process evaluation and how it can impact the clerical department in terms of eliminating ineffective practices. As reviewed in the literature, process evaluation is necessary to enhance the confidence of the staff by using their feedback (Grusenmeyer, 2003). Process evaluations are helpful to uncover strengths and weaknesses to improve a procedure, therefore, verifying the accuracy in the
steps. The quest for continuous improvement, in many ways, is committed to optimizing the process with the purpose of determining the factors that cause major delays (Brown, 2019). In the clerical department, existing procedures are performed in a consistent manner due to established norms, a long-standing method. In part, there is an appeal to a sense of apparent stability to perform tasks by adhering to norms in order to not cause interruptions. Moreover, norms are embedded within the department, yet these assumptions may be misleading to the organization. Certainly, it is important to follow efficient methods to perform tasks, but process evaluations are essential to any organization committed to refining the process.

In doing process evaluations, it provides opportunities to remove non-value-add steps. For instance, moving files to multiple shelf spaces in the same file room was identified as a practice that could be improved to save more time. The ISA expressed that it would be more efficient to keep the particular batch of files on the same shelf since it takes considerable effort and time to rotate the same batch of files from one shelf to another within the same room. Due to the high influx of files in the office, another issue was limited shelf space to store files. The ISA identified a large number of old boxes that took space from two large shelving units, which could be removed to provide additional open-shelf space. In terms of file movement, these ISAs shared suggestions to the QAs in order to improve effectiveness. This process evaluation gave the QAs insight into the needs of the department, filtering steps for quality control. Understanding each of the suggestions is important to explore strategies, such as the use of a flowchart, to illustrate the process being described or identify potential bottlenecks.

The emphasis on identical elements of tasks included consideration of mapping, a seamlessly connected process intended to improve the efficiency of internal processes with a
goal of eliminating redundant steps. Process mapping, if done properly, can provide a substantial return on investment for the clerical department in time and effort since it draws a pathway of end-to-end processes in a measurable way. In the content of SOPs, process maps are a graphical representation of the sequence of steps in a process using symbols to describe different steps or actions (Colligon and Rosa, 2006). As was discussed in the literature review, to draw the process depends on the complexity of the procedure, but it is a valuable tool (Pearce, 2016). The key improvement brought about by drawing the process, within the context of a SOP, involves developers to focus specifically on the actual activities, which in turn, provides a quick snapshot for continuous improvement.

4.8 Chapter Summary:

These issues merit further attention to examine the workforce implication of centralizing information, including how to ensure clerical personnel are appropriately supported to deal with the demands of their role. The use of participant observations, semi-structured interviews and document analysis provided detailed information to inform the development of the Records-SOP. Responses from both observations and interviews, as well as results from the document analysis have established relevant information necessary to determine the most effective way to create a SOP that is suitable for the clerical department. The next chapter culminates this project by providing a conclusion, discussion, and recommendation regarding the development of the SOP.
CHAPTER FIVE: CONCLUSION, DISCUSSION, AND RECOMMENDATIONS

5.1 Chapter Overview

The aim of this study was to explore the range of integral parts to develop a successful quality document as it provides end-users with information to perform a job properly. This chapter presents a summary of the research conducted and data reviewed in support of the research objectives set forth in Chapter 1. The purpose of this study was to explore the benefits of standardization and how it can help the clerical department minimize the opportunities for miscommunication and to promote quality through consistent implementation of processes. The process of consolidating a fragmented but extensive selection of information is a basic need for clerical personnel to retain institutional knowledge. Staff attrition, such as the loss of independent contractors, can have a detrimental effect on morale and productivity, which in turn, increases the workload for remaining employees. To provide a standard for quality, as well as flexibility, this report describes the requirements for planning, implementing, and assessing the effectiveness that helps develop a SOP. The result of this research is improved communication, greater-accountability, and reduced liability for the department.

5.2 Research Summary

A qualitative approach was adopted using a range of complementary methods: document analysis, participant observations, and semi-structured interviews. The study provides insight on the types of activities that clerical personnel need to carry-out. It also identified a range of aspects relating to the weaknesses and potential issues due to the lack of centralized guidance. It should be in the interest of organizations to employ a SOP to disseminate information in efforts to manage a solid communication strategy. USCIS is
committed to providing employees with clear information, proper resources, and training to ensure management of cases are completed in a timely and efficient manner. However, it can be a challenge to undertake such responsibilities for a large-scale organization like USCIS as processes become complex. This challenge, often not noticeable to the public, creates greater complexity in terms of procurement, training, and production sequencing. In addition, the assessment of the Records Policy Manual is the primary step for the development of a SOP for the clerical department at USCIS. The integration of SOP is a time-consuming and resource-intensive task, so the intention of this project is to distribute the document to site leadership before extending it to clerical staff.

Around 30 procedural documents from the clerical department were taken to further the step of creating a SOP that is well-rounded, whereby research. Again, the total sample for this phenomenological study consisted of up to 6 clerical personnel from the office. The program improvement process involves internal documents, departmental collaborations, flowcharts, and clerical processes as data collection. Turning attention to the SOP process, the latter may be driven, not only by supporting knowledge transfer, but also by promoting the use of the SOP in the department.

5.3 Project Summary

The SOP guide strives to provide transparency, including outlining procedures that are easy to understand, while also furthering consistency and quality to streamline procedures. While developing the Records-SOP required up-front work, the end-product will help reduce information variation by consolidating the recurrent practices into a single document. The extent of resource variation across the department is an issue for clerical personnel in terms of
having access to immediate information with a centralized document. While a degree of consistency across the department is likely to improve internal communication, it is also necessary to accommodate the needs of clerical personnel. The lack of standardized guidelines and centralized resources makes it particularly challenging for clerical personnel to keep up to date with the requirements to properly perform clerical procedures.

Based on this research, the concept of standardization encompasses a broad range of considerations – from the development of written standards to its concurrence and implementation in an organization. Also included are the methods of designing a SOP in accordance with the general format – processes, systems, services, flowcharts, and personnel. The integration of standardized practices realigns the processes in question and allows team members to move forward in a singular, cohesive manner. Furthermore, this project demonstrates how the integration of a SOP is useful to improve communication between management and employees. Not to mention, lack of standard practices is a fundamental oversight that results in organizations becoming susceptible to redundant tasks and frequent errors.

5.4 Discussion

The author believes that the guidance and template in this research will increase the efficiency of the end-product. In this report, the contributions of well-written SOPs have been described. The researcher supports the use of qualitative methods combined with quantitative evaluations to assess the SOP in order to enhance the design, which in turn, improves the quality of the SOP. Research shows that combining these distinct frameworks benefit the efficiency of the document because it keeps it sound for the end-users. For example, once the
SOP is distributed to the end-users, the next course of action would be to test the procedures. Because the writer for the SOP has become snow-blind to how the process actually works, it is necessary to select a content expert that has not participated in the development phase. This selected individual will start at the top and sequentially check off the steps until the end is reached. Here, the content expert should make notes to clarify any concerns or ambiguities in the procedure, including errors in the margin.

The SOP guidelines for developing procedural documents underpin a substantial amount of information to standard practices. At another extreme, procedural documents should not be rigid, otherwise, it could form bottlenecks that affect the overall condition of the department. It is important to establish a balance between flexibility and standardization in order to provide adequate detail. To ensure a SOP has a demonstrable impact on efficiency, the document should aim to achieve greater alignment with the clerical department’s needs and priorities.

5.5 Recommendations

Based on the findings, the study recommends for the clerical department to consider developing a formal SOP using specific guidelines to ensure the information is documented properly (Grusenmeyer, 2003). A guideline, How to Develop an Effective Standard Operating Procedure, found in Appendix F may prove helpful for the clerical department. By using the research material, the author created this guideline that outlines topic areas that should be covered in a SOP, describes style and format, and provides content recommendations. In the guideline, the seven predominant sections are established as the framework to develop a coherent SOP: 1. Purpose; 2. Background; 3. Scope; 4. Definitions/Acronyms; 5. Roles and Responsibilities; 6. Procedures; 7. Appendix. This guideline is intended to serve as the planning
reference document that explains the parameters for the clerical department to develop, implement, and maintain SOPs. The development of a SOP should rely on a specific template. This is merely a guideline that provides detailed and practical advice for procedural documents that incorporates specific best practices that can be changed at the author’s discretion. In fact, this SOP template welcomes discussion about the selected best practices to further the opportunity to learn from other preferences used by other organizations. In short, the clerical department may use this information to their own unique preferences and change it to address their needs.

Based on the findings, the researcher identified a range of areas attributed to the effectiveness of a SOP. This report recommends further work to ensure the following: 1) document procedures with the assistance of end-users; 2) quantify the effectiveness of the SOP once it is implemented and 3) review and update the document. In order to maximize the benefits from implementing a SOP, it is useful for management to consider the following best practices:

- Foster a culture that encourages clerical personnel to utilize SOPs as a viable communication tool.
- Define clear roles and responsibilities to prevent any miscommunication and establish expectations.
- Develop a strategic process to establish authorship, management, and support of SOPs. Creating a group that specializes in creating procedural documents.
- Integrate SOP development as training material. It should clarify the content and intent of the SOP.
• Obtain feedback from end-users in order to identify areas of improvement and enhance collaboration resulting in improved performance.

• Review the SOPs on a regular basis, preferably on a bi-annual time period to ensure the documents maintain reliability and control.

Implementing these recommendations in a systematic manner may help the clerical department improve the development of SOPs. Although the research indicates that a SOP is a viable communication vehicle for information dissemination among employees, it is essential to review the document, preferably on a bi-annual basis in order to maintain sustainability. It is recognized that the development of a SOP is critical for organizations because it results in high levels of collaboration. More importantly, the number of procedures in the clerical department could be complex for non-expert readers regarding clerical responsibilities. In terms of management and maintenance of SOP, there are three important factors to consider: 1) keeping the SOP accessible; 2) reviewing the SOP and 3) training end-users. A strategic, centralized document provides opportunities for training and assessing practices among employees.

While it is not difficult to document work processes, this step could be time-consuming. Prior to starting the document, it is useful to gather detailed information on the process and question the end-result. To save time, the documentation method works best if content experts explain the details of procedures, otherwise, there could be gaps in understanding the process. A useful approach for documentation is to have the content experts, such as long-time clerical personnel or clerical personnel who will perform the procedure, write out the steps to establish the base. This information could facilitate consistency in the quality and integrity of the
objective or end-result. In this way, the content experts assume the responsibility of setting the quality standards for the clerical procedures while the SOP writer assumes the responsibility to organize the information that is easy to follow. Another approach is to have clerical personnel verify the order of instructions, from start to finish, if there are existing process maps as reference. In support of this, it would be useful to acquire any procedural documentation and review it with content experts to ensure accuracy. The clerical personnel responsible to conduct the tasks should indicate if the process map is accurate or point out missing details in order to cover the major functions of the procedure. When writing procedures, it is critical to have the appropriate level of detail. Consider some of the questions below:

- Do end-users have enough information to complete the action?
- Is the level of detail appropriate for the subject?
- How comfortable are readers with the subject?

Effectively creating and managing SOPs requires an appropriate process to handle the development of the document in terms of having a system for the review, approval, and control of SOPs. During the drafting stage, the document is typically shared amongst a team of reviewers for collaborative purposes. Here, the leadership team at SBD should select a cadre of clerical personnel that can collaborate to develop a well-rounded document. As such, the review must be controlled by one review owner whose responsibility is to ensure that all the reviewers are actively involved in the review by implementing proposed changes or comments. In turn, the document goes back to the review owner who either accepts or rejects the comments and changes the draft version (e.g. from draft version 0.1. to 0.2). The last step of
the review process transitions to the approval stage of the document at which point requires electronic signatures from approvers in compliance with 21 CFR Part 11.

The strategic interactions between the document and clerical employees contributes towards the clerical department’s goal of successfully centralizing resources to personnel. At a time when there is an expansion within the clerical department, it is essential to assess areas of improvement that, if overlooked, may negatively impact productivity or lead to possible mistakes. This formal SOP should define a numbering system, review table, and revision policy for the department’s procedures. From the research conducted and the data collected from management clerical personnel, it was recognized that having a centralized source of information is supported by the clerical department. In addition, it was established that a SOP serves as a framework for any quality system. The increased level of workload requires the use of a standardized approach in order to maintain consistent quality and results in clerical practices.

Once the SOP is developed, it is critical to ensure that the SOP is accessible to all stakeholders who need to engage with the document. If the SOP is not accessible, then it will be placed aside, which in turn, brings the department back to square one with employees operating without formal guidance. Placing the document in a repository platform is the most effective way to keep the SOP accessible to employees. In doing this, the document will be available to USCIS employees at all times; however, selected individuals should have access to monitor necessary changes. This document could be sustained on the Enterprise Collaboration Network (ECN), a web-based repository that would allow to publicly archive previous versions with tracked changes. As such, this option would allow users to submit requests for additional issues and/or changes to be addressed.
A good course of action to maintain the SOP current is to assign a primary user who manages any updates to the document. Generally, a Quality Analyst (QA) within the organization is best suited to initiate a revision of the document. Because processes evolve over time, it is useful to make these changes to ensure the document is viable and relevant to the end-user. There are external factors that may require the team to revisit the SOP such as policy changes or shifts in procedures. Included in Appendix F is a sample SOP template for the clerical department, which illustrates a structure that outlines the most critical components (e.g. background, scope, definitions, etc.).

Also, it is recognized that SOPs are recommended for training purposes. This, of course, can be used as a refresher for clerical employees because the document contains information pertaining to the current procedures. The idea of training team members with regard to the SOP should be approached with a focus on instilling a mindset of working towards a collective goal. While the team may have a solid notion of the expectations, this will reinforce the value of productivity, which in turn, promotes greater efficiency. One way to understand if the SOP serves as a training tool is to listen to employees’ feedback.

5.6 Limitations and Future Research

One of the limitations of this research study was the constitution of the sample. Due to the nature of the research, the participants were not randomly selected from a larger population to participate in the study. As a result, the responses were collected from a small management team, so other information may not have been identified in the research process. The development of additional fundamental responses from independent contractors who left prior to December 2019 did not occur because IRB had not approved the study. Also, there were several barriers for the research in terms of evaluating the effectiveness of the SOP. It can
be assumed that once the SOP is implemented in the clerical department there will be an improvement in communication, productivity, and understanding of responsibilities. The development of measures to evaluate the quality of the SOP is a topic for future research to understand how the document has benefited ISAs.

Future research should also survey and evaluate the perspective of clerical personnel after the SOP is implemented in the department. This project focused on identifying the best practices to create a well-rounded SOP to help management distribute information about procedures to ISAs. Another topic for future research is to include management from other clerical departments from the organization that may need SOPs to improve processes. It would be useful to approach this suggestion with a type of pilot-program to obtain tangible responses from employees after the SOP is implemented.

5.7 Conclusion

Quality management systems are the backbone of efficient organizations. This research led the author to propose a new structure to develop SOPs for the clerical department by creating a specific template. The objective of this research was to address the lack of centralized guidance that affects clerical personnel and management. In short, the use of SOPs is applicable to any organization and they should be adopted as a tool to transfer knowledge to cultivate an effective management system. In turn, this promotes transparency, reduces errors, and facilitates improvement actions. The approach to employ SOPs is essential to help departments manage operational risks, enhance performance, and prepare for future growth. Documentation of procedures is the most practical manner to protect the organization from knowledge loss, ensuring that valuable information is retained as employees come and go.
Works Cited


Akyar, Isin (2012). Standard operating procedures (What are they good for?). Latest research into quality control. Intech Open.


Iowa State University (2010). Hotel, restaurant and management extension. Available at: http://www.extension.iastate.edu/HRIM/HACCP/restaurants.htm


APPENDIX A: IRB APPROVAL

Memorandum

California State Polytechnic University, Pomona

Institutional Review Board -- Office of Research Compliance

Federalwide Assurance 00001759 -- IRB principles: respect for persons, beneficence, and justice

Date: April 18, 2020
PI Name: Estephanie Munoz; Department/College: GEM studies, Political Science
Co-PI(s): Brady Collins
IRB Protocol Number: IRB-19-223
Protocol Title: Standard Operating Procedures- Records Management
Protocol Submission Type: Initial; Review Board Type: CPP IRB members
Review Type: Expedited
Decision: Approved

Dear Investigator(s),

The protocol as described above has been reviewed by the Cal Poly Pomona Institutional Review Board (IRB) by the expedited review method. It was found to be in compliance with applicable federal and state regulations and Cal Poly Pomona policies regarding the protection of human subjects used in research. Thus, the Cal Poly Pomona IRB grants you approval to conduct the research. On its behalf, I thank you for your adherence to established policies meant to ensure the safety and privacy of your study participants. You may wish to keep a copy of this memo with you while conducting your research project.

You may initiate the project as of April 18, 2020.

It would be appreciated that you advise the IRB upon the completion of your project involving the interaction with human subjects. Please use the "Closure or termination of the protocol" form in the Cayuse system.

Approval is conditional upon your willingness to carry out your responsibilities as the principal investigator under University policy. Your research project must be conducted according to the methods described in the final approved protocol. Should there be any changes to your research plan as described, please advise the IRB, because you may be required to submit an amendment (with re-certification). Additionally, should you as the investigator or any of your subjects experience any “problems which involve an undescribed element of risk” (adverse events in regulatory terms), please immediately inform the IRB of the circumstances. There are forms for both in the Cayuse system.

The committee wishes you success in your future research endeavors. If you need further assistance, you are encouraged to contact the IRB.

Sincerely,

Heather Taylor Wizikowski, Ph.D.
APPENDIX B: How to Develop an Effective Standard Operating Procedure (SOP)

This is not an SOP; it is a guide for writing the SOP for the clerical department. This document is a combination of instructions and sample text. It is meant to be modified to reflect the clerical department’s procedures.

Cover Page Format
- Header
- Title
- An identifying number
- Revision number
- Identify the activity in question
- A point of contact or author’s name

Header:
The page header should include the name of the organization and the department or group. The header will then include the SOP number, title, Version number, page number, and effective date. Often, the author’s name of the SOP is in the header. At the end of the SOP, indicate a section for documenting SOP reviews with space for reviewer’s signature and date signed. If the SOP is to archive or retired, add a line to document this purpose. The page footer should include the complete filename and path.

Table of Contents [Separate Page]

Purpose:
State the objective or reason for the procedure. The purpose of this procedure is to ... (define, describe, identify, provide, outline, establish) (guidance, guidelines, and requirements) for:
[Purpose is mandatory/Policy is optional]

Background:
The SOP reflects the current policies, procedures, and best recordkeeping practices. It serves as a comprehensive outline that includes the records’ description, use, retention and disposition instructions, and other specific instructions that provide guidance for effective management of records. This SOP addresses three Sections, each divided into Parts, each divided into Chapters.

Scope
Specify area, function or personnel involved. This procedure... (encompasses or applies to) (all, any, each):
[Mandatory] This statement should be followed by information regarding limitations or specifications of compliance.
Definitions/Acronyms
This section includes terms used in this model Records-SOP; Any terms that are not typically used by non-clerical personnel should be defined in this section. Uncommon acronyms should be fully written. It is not necessary to define each term.

Responsibilities
All functional and any support personnel (including contracting employees) will comply with this SOP as it pertains to their job functions. If there is a substantial amount of responsibilities it is useful to narrow the list and create multiple SOPs to complete the task.

Define the roles there are in the team (e.g. ISA, SISA, ARMS) for each procedure. For each role, it is useful to have each member of the clerical department clarify their own responsibilities. Each clerical personnel should describe what they believe their role entails. It is likely that there will be responsibilities with no established owner. These “unassigned responsibilities” should be noted. If responsibilities overlap, it is useful to define the primary owner.

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<tr>
<th>Position</th>
<th>Responsibilities</th>
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<tr>
<td>SOP Author</td>
<td>List specific expectations, preferably 3-5 things that this role is responsible for.</td>
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6.0 Procedures
This is the most substantial component of the SOP and requires a complete, step-by-step description of each function. Reference the Simplified Technical English (STE) rules to write out the procedures. It describes who, what, when, and how. In this section, there are three important components that need to be included:

- Major Steps: Describe the steps to accomplish the objective of the procedure. Each heading is a major step and it should be assigned to each procedure.
- Individual action steps within each major step.
- Notes: Any information that provides a possible warning should be addressed.

Divide each task into two categories: Adjudication and Records. The breakdown of each procedure could be organized in parts, each divided into chapters in order to make it easier to follow. Below is a depiction of how the procedures could be divided.

7.0 Appendix
This section includes supplementary material that provides detailed information related to the content such as flow charts, figures, examples, charts, or checklist. Non-textual information regarding the SOP should be included in this section.

8.0 Revision History
The functional head or QAs should ensure the Records-SOP is revised as needed, at a minimum the Records-SOP should be revised bi-annually.
All suggested edits should be reviewed and approved by the functional head. Minor changes or addition to existing methods can be implemented by the functional head or a supervisor. Major changes, however, may require additional review.

The functional head and the QAs should ensure that process changes are communicated with clerical personnel.

In order to keep track of any changes, it is useful to include a table that lists changes made to the SOP since the original publication date. Record the changes made to a procedure and justification or the reason why the procedure was created.

9.0 Additional Requirements

The document should contain the following format structure to improve readability:

1. Font size 11 or 12 for narrative. Font size 14 for headings and main titles. The size should be consistent across the document.
2. Font type can either be Arial, Calibri or Times New Roman. Keep font consistent.
3. Include the “DRAFT” mode watermark on the document.
4. Use Plain Language (PL) or Simplified Technical English (STE) to communicate procedures in a clear and concise manner. It is not necessary to use controlled language in other sections of the document.
5. Include an effective date to inform the end-user of the current version.
6. Conduct a “peer review” of the SOP draft to collect information from the end-users with the purpose of obtaining feedback.
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<td>What key components of a SOP are not in place/missing in this document?</td>
<td>- Well-defined roles and responsibilities, but poor structure.</td>
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<td>- Lack of acronym/definitions section.</td>
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<td>- Lack of purpose/background.</td>
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<td>- Applicability/scope section is not defined.</td>
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<td>- Procedures are not organized in a cohesive manner.</td>
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<td>- No indication of maintenance. No version number.</td>
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<td>- No process-maps attached.</td>
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| How does the use of effective language and format incorporate active sentences to convey an instructional tone? | - Use of passive voice to describe procedures. |
|                                                                                                           | - Example: “The mail is received by the ISA.” |
|                                                                                                           | - Limited use of active voice (subject +verb +object). |
|                                                                                                           | - Ex: ISAs scan the files. (correct). |
|                                                                                                           | - Moderate use of Simplified English. |
|                                                                                                           | - Grammatical, mechanical, and syntax errors. |
|                                                                                                           | - Procedures are not aligned in a practicable form. |
|                                                                                                           | - Use of second/third person. |

| In what ways do regulations, guidance, and institutional policies correlate with the goals of the clerical department? | - No reference to reference material/directives. |

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### Meeting Minutes:

**Title**
Applied Public Administration Project (APAP) Discussion

**Meeting Start and Finish Time**
2:30-3:30PM

**Attendees (USCIS)**
- (FOD)
- (Section Chief)
- (ST Trainee)

**Location**

**Meeting Purpose**
Discuss the scope of possible projects to fulfill the requirements of the APAP project.

**Summary of outcomes**
Dr. Collins provided a brief overview of possible projects that would satisfy the requirements of the capstone project.

The FOD decided that the records department needs a standard operating procedures (SOP) reference guide.

The Records Policy Manual and task requests will serve as the foundation to spearhead this project.

**Action Steps**
- FOD will contact Shonna Wilson, the manager of records for District 43.
- Review the RPM and find task order requests on ECN site.

**Follow-up meeting**
TBD
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<tr>
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<td>Date Implemented: MM/DD/YY</td>
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# Table of Contents

[Expand Table of Contents as Necessary]

1. Purpose/Policy
2. Background
3. Scope
4. Definitions/Acronyms
5. Roles & Responsibilities
6. Procedures
7. Appendix

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I. Purpose

This Standard Operating Procedures (SOP) is to provide immigration personnel with all information necessary for compliance with government record keeping regulations under USCIS. The principal objective of this reference guide is to delineate the authority, roles, and procedures to enhance the efficiency of the Records Department. It intends to promote standardization, eliminate redundancy, and streamline adequate processes to achieve quality assurance across the department.

II. Background

The SOP reflects the current policies, procedures, and best recordkeeping practices. It serves as a comprehensive outline that includes the records’ description, use, retention and disposition instructions, and other specific instructions that provide guidance for effective management of records. The manual is structured to house several volumes pertaining to different functions of the clerical department. Tables and charts supplement and simplify policy information to facilitate understanding of complex topics and instructions.

III. Scope

This SOP applies to employees who handle the records at USCIS.

IV. Definitions/Acronyms

Definitions

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V. Roles and Responsibilities

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VI. Procedures

A. Detail 1
B. Detail 2
C. Detail 3

VII. Appendix

If applicable, include process maps, diagrams, examples, and other supplementary materials that support the SOP.