

OFFICE OF POLICY & COMPLIANCE

The Policy Development Process at CSU



Creating University Policies

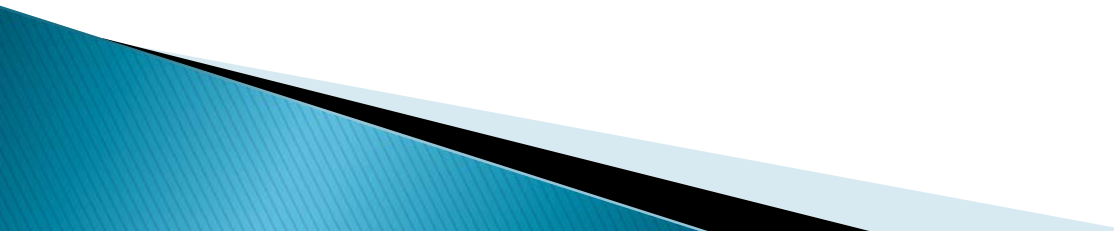
PHASE I: Development, Approval and Implementation



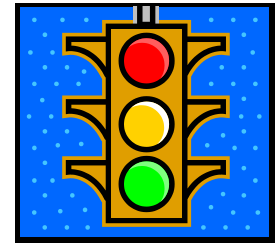
Step 1: The proposal

Propose a new policy or revise a current policy

The Proponent may be any campus unit or constituent with an interest in changing university policy. At least one member of the President's Cabinet who supports the proposal must serve as Executive Sponsor.

- ▶ The Proponent notifies the Office of Policy and Compliance (OPC) of the desire to propose a new policy or revise a current policy.
 - ▶ The Proponent works with OPC to draft a Policy Proposal/Impact Statement ("proposal"). The proposal provides background and justification for the proposed policy, plus an analysis of the impacts that the new or revised policy will have on the campus community and the resources required to adopt, implement, monitor and enforce it. An initial legal review by the Office of the General Counsel (OGC) is also required in most cases.
 - ▶ A Policy Owner is assigned. Usually this is the same as the Proponent, but not always. The Policy Owner is the department or official who will be responsible for implementation, monitoring, enforcement, and updating throughout the life of the policy.
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Step 2: Getting the Green Light

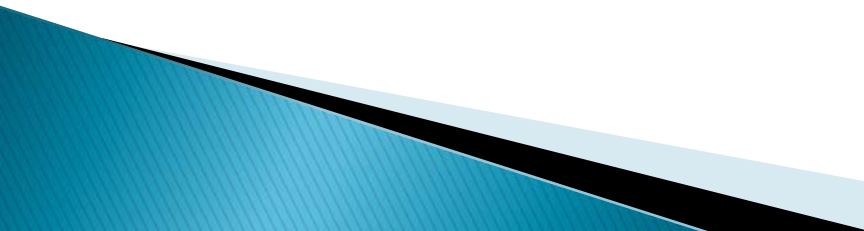


The Executive Sponsor presents the proposal to the President's Cabinet. Cabinet may require further information, may determine that the policy proposal should not be advanced, or may approve the proposal to move forward for policy development.

Exception: Revisions to existing policies may be accomplished using fast-track. Fast-track policies don't require Cabinet approval (although they may be presented there as information items). More about this later.


Step 3: The Development Stage

Research, Draft and Edit

- ▶ OPC and the Proponent/Policy Owner(s) work together throughout the entire drafting and editing process. Oftentimes, a policy working group will be formed with representatives of stakeholder groups and subject matter experts.
 - ▶ OPC will research the laws, regulations and existing policies that impact the proposed measure and will assist in drafting the policy document.
 - ▶ A resulting initial draft is ready for an initial legal review by (OGC), and then for stakeholder input.
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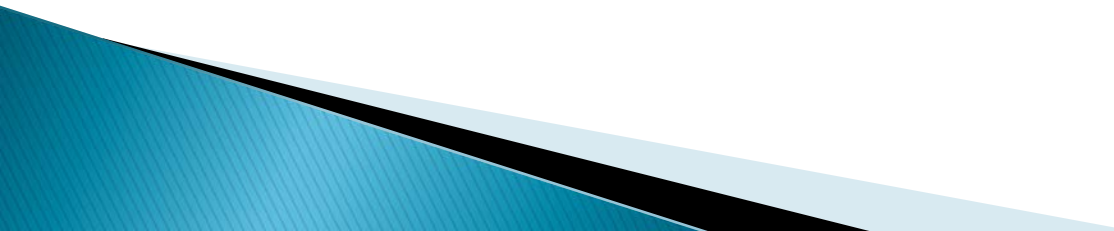
Step 4: Stakeholder Input

Review and Comment

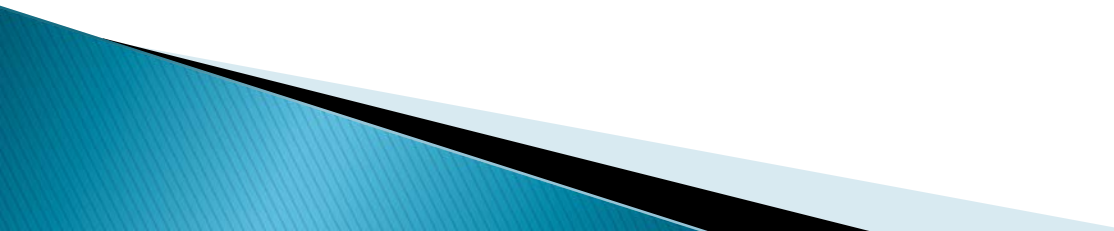
- ▶ University stakeholder input is sought during this stage. Stakeholders include anyone identified in the proposal/impact statement, as well as anyone that may have been identified by the Cabinet as a stakeholder whose review and comment is required.
 - ▶ The proposal and the policy draft are posted to the “Policies Under Development” page on the OPC website, open to the public for anyone to review and submit comments.
 - ▶ If significant changes result from stakeholder or other input, we will review the changes with the stakeholders, the Executive Sponsor, and OGC as appropriate.
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Step 5: Final Draft

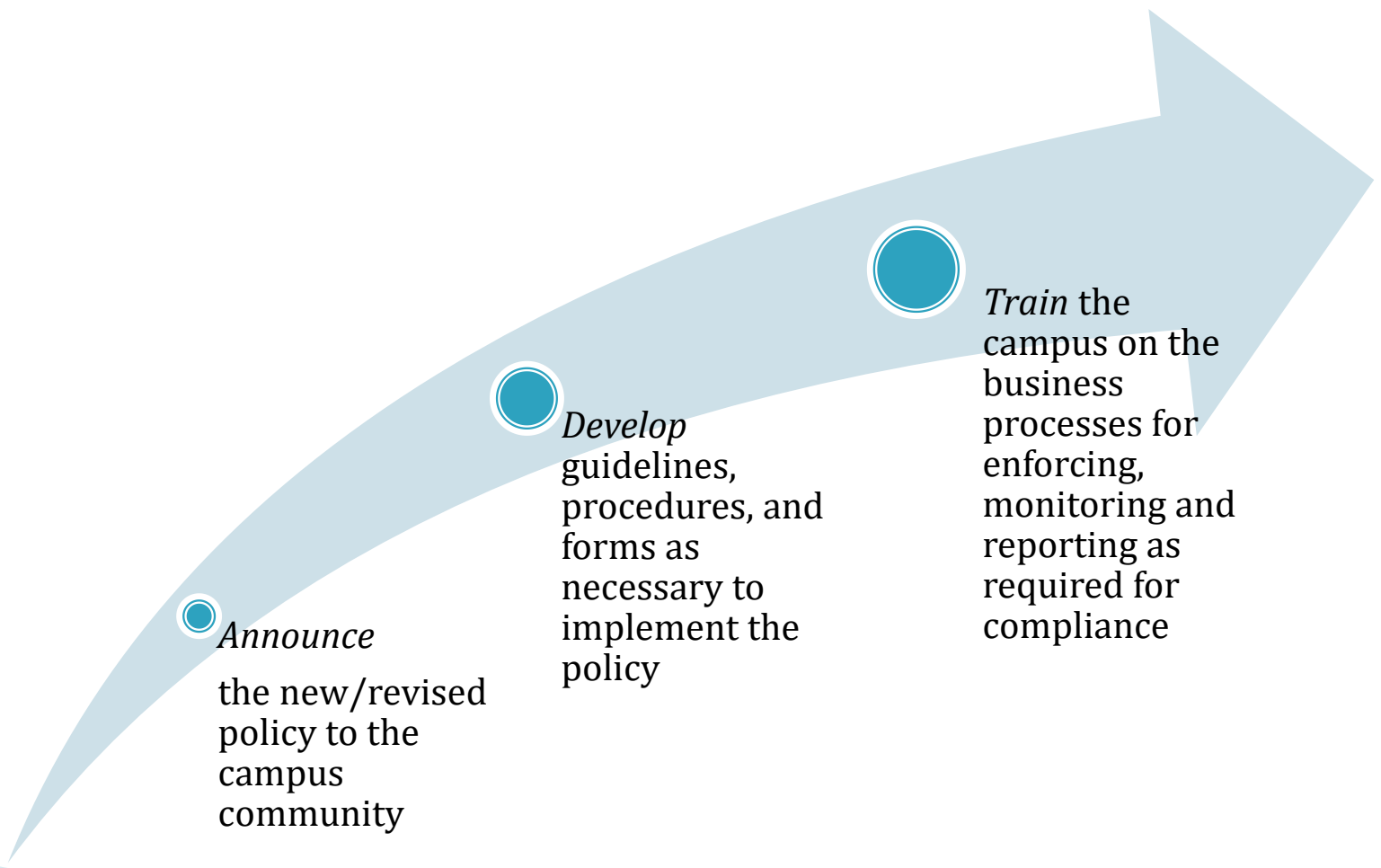
Incorporate changes that result from review and comment

- ▶ The final policy document is presented to Cabinet by the Executive Sponsor. If Cabinet approves it, a recommendation will be made to the President to adopt the policy.
 - ▶ If necessary, the Cabinet may also request changes or additional information before making its recommendations.
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Step 6: Adoption

- ▶ The Cabinet's recommendation for adoption or non-adoption is presented to the President.
 - ▶ The President may approve the policy. His signature constitutes adoption of the policy.
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PHASE II: IMPLEMENTATION



Announce
the new/revised
policy to the
campus
community

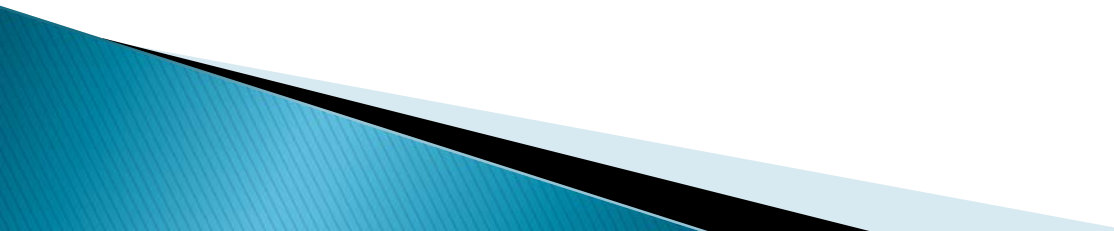
Develop
guidelines,
procedures, and
forms as
necessary to
implement the
policy

Train the
campus on the
business
processes for
enforcing,
monitoring and
reporting as
required for
compliance


Step 1: Communicate

- ▶ The Proponent is responsible for informing the campus about the newly adopted policy. A communications plan is usually recommended. OPC may assist as requested.
- ▶ The policy is published in the Policy Library (policies.colostate.edu).

Step 2: Educate and Train


- ▶ If necessary, training should be offered to campus constituents who are expected to enforce or comply with the policy.
 - ▶ OPC, along with the responsible department, other units such as Training & Organizational Development, may assist.
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PHASE III: Monitoring and Enforcement

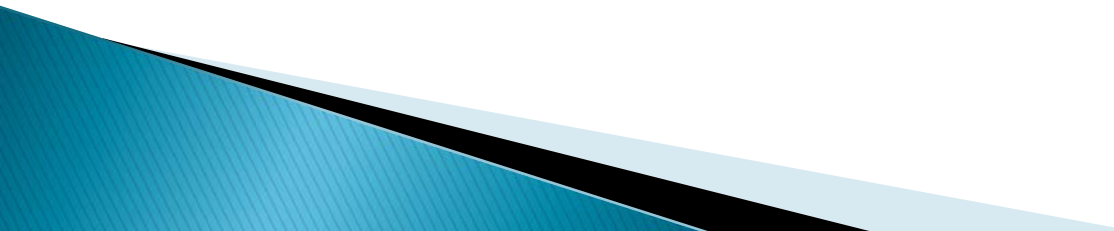
- ▶ After implementation, it may be necessary to monitor compliance with the policy and note any problems that arise as a result of its implementation. This is primarily the responsibility of the Proponent, though other compliance officials may be involved.
 - ▶ The policy is enforced through the "internal controls" identified in the proposal and policy documents.
 - ▶ Campus units must comply with any reporting requirements contained in the policy. Internal Audit, Business & Financial Services, or other units may be charged with responsibility to periodically audit compliance.
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THE FAST TRACK OPTION

Sometimes, a revision of an existing policy doesn't warrant the use of resources for the full development, approval and communications processes that otherwise would apply.

- ▶ The Executive Sponsor and the VP for University Operations must agree on using the fast track method.
 - ▶ Signature authority is delegated by the President to the VPUO.
 - ▶ All post-adoption steps are the same, including publication of the policy in the Policy Library.
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Final Phase: Review

- ▶ Policies change over time. Changes to laws and regulations, best practices, and the campus community must be considered periodically.
 - ▶ OPC will remind Policy Owners of their responsibilities to review policies in their areas on a periodic basis (usually 1, 2 or 3 years).
 - ▶ The Policy Owner is responsible for periodically reviewing the policy. Any changes will be handled in the same way as a new policy; often they can be fast-tracked.
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Questions, Problems, Concerns?

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