

## **A Primer on Policy Development for Institutions of Higher Education**

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Policy development is often confused and sometimes derailed because of the misunderstanding or misuse of terms with important meanings to a professional policy administrator. Therefore, it is important to clarify the meaning of terms like policy, policies, procedures, guidelines, checklists, and standards.

**Policy.** Policy is a term that can mean different things to different people. As used in the previous section, it can represent the strategic direction or operating philosophy of an organization. “It is the policy of the University to promote academic freedom and open discourse.” Policy is also a term used to describe legislative and regulatory developments, also known as “public policy”. However, in the context of operational statements or directions, colleges and universities tend to think in terms of “institutional policies”.

**Institutional Policies.** Policies are statements that reflect the philosophies, attitudes, or values of an organization related to a specific issue. They are generally represented in a paragraph or perhaps two but not pages. They might say “what” but not “how”. Checklists, procedures, standards, and guidelines all must implement, reflect, and support the applicable policy or policies. The entire set of statements is sometimes considered to be the “Policy.”

**Procedures.** Procedures contain one or more sentences describing how to accomplish a task or reach a goal – i.e., directive statements. The specified actions are

generally mandatory for the specific situation. More explanatory text is usually involved. A sequence is not necessary but sometimes is important.

**Guidelines.** Guidelines contain information about how to accomplish some task or reach a specific goal. They are provided as suggestions; in other words, they are not mandatory, but a good idea. They may also contain an element of “best practice” -- alternate actions might be available and might work, but what is being provided have proven to be the fastest, cheapest, etc. More explanatory text is usually involved.

**Checklists.** Checklists contain one or more statements dictating how to accomplish a task – i.e., “commands”. The items are applicable to an immediate circumstance and mandatory in that situation. They are typically immediately at hand and written in simple language with no amplifying text. The sequence is always important. Flowcharts are also used as a method for conveying similar information.

**Standards.** Standards are statements dictating the state of affairs or action in a particular circumstance. They establish a rule from a recognized authority, with no deviation allowed.

## **Policy Process**

Some institutions have developed a “policy on policies” that provide an institutional statement and set of procedures about how policies are formatted, who develops them, and how they get approved (see “Formulation and Issuance of Policies” from Cornell University at <http://www.univco.cornell.edu/policy/pop.for.html> and “Guide to Writing University Policy” from the University of Minnesota at [http://www.fpd.finop.umn.edu/groups/ppd/documents/information/Guide\\_to\\_Writing.cfm](http://www.fpd.finop.umn.edu/groups/ppd/documents/information/Guide_to_Writing.cfm))

. The benefit of a formal approach is that it makes policy development consistent and recognizes policy development and policy approval authorities.

The Association of College and University Policy Administrators (ACUPA) promote a Policy Development Process with Best Practices (see [www.umd.edu/acupa/projects/process](http://www.umd.edu/acupa/projects/process)) that contains the following stages: 1) identify issues, 2) conduct analysis, 3) draft language, 4) get approvals, 5) determine distribution/education, 6) solicit evaluation and review, and 7) plan measurement and compliance. Stages 1 and 2 are considered “pre-development”. Stages 3-5 are part of “development”. Stages 6 and 7 are “maintenance”.

The process recommended by ACUPA contains several useful features for the development of security policies. First, issue identification contains a proactive component and is designed to build upon a security risk analysis, including the identification of existing information or data security policies. Second, the identification of the policy owner, policy path, and team to develop the policy is critical to ensuring the ultimate success of the security policy. There are mixed views about whether or not to include legal counsel as part of the policy drafting team or whether they should be a part of a subsequent review process to determine the legal sufficiency of policy documents. There is a danger that a security policy could become too legalistic or written in terms too complex for users or employees. On the other hand, lawyers should be knowledgeable about security requirements under Federal or state law. Third, drafting language and getting approvals is a strategic and political process at most institutions. Because of the urgency of computer and network security for our institutions, it may be more expedient to issue “guidelines” or “interim policies and procedures” to protect

assets and ensure legal compliance while using shared governance processes for formal review and adoption of institutional policy. Fourth, increasing education and awareness of security issues and corresponding policies and procedures is critical. A policy that no one knows about or worse yet a policy that is not followed can do more harm than good. Finally, the maintenance stage underscores the importance of regularly evaluating security policies to ensure that they are effective and evolve as technology changes.

### **Policy Elements**

If the goal of institutional policies is to direct individual behavior and guide institutional decisions, then the effectiveness of formal policy statements will depend upon their readability and usefulness. Many colleges and universities suffer from the lack of a common and consistent approach or format to writing organizational policies. The outline below suggests some common elements that should be included in any security policies.

**Rationale or Purpose.** The rationale or purpose statement expresses “why” the policy is being written. The rationale or purpose may also contain or cross-reference “background” materials or more explanatory details regarding legal, regulatory, or other factors that led to the development of the policy.

**Policy Statement.** The policy statement should be a concise statement of “what” the policy is intended to accomplish. The policy should only be a one or two sentence description of general organization intent with respect to the specific topic of the policy. The policy statement should be general enough to provide some flexibility and accommodation to periodic changes in technology.

**Scope of Policy.** The scope of the policy can set important parameters such as to whom will the policy apply (e.g., faculty, staff, students, and guests) and to what (e.g., paper and electronic records, information and computer assets, etc.)

**Procedures.** The procedures will detail “how” the policy statement will be attained. Procedures may included information on how to report computer security incidents. Procedures may also describe enforcement provisions or methods for appeal. Procedures are some times provided in a separate document or left for local determination to provide greater flexibility for updates as well as local control.

**Roles and Responsibilities.** The procedures may contain details about who is responsible for what. The policy should also identify who is responsible for enforcement or compliance and who will provide interpretations in the event of the need for clarification or when there is a dispute.

**Definitions.** Policies should be precise and easy to understand. Some times terms will need to be defined to clarify meaning. However, the policy should attempt to convey messages in simple yet precise terms; excessive definitions may make a policy document unreadable or subject it to greater scrutiny.

**References.** It is possible that there are other policies or organizational documents that complement, supplement, or help explain the provisions contained within the current policy. References to other policies or organizational documents and citations to statutory or regulatory items can improve the usefulness of the policy.