

College Policy Adoption and Administration

This policy outlines the process for adopting and administering college policy.

Responsible office:	President's Office
Responsible party:	The President of the College
Last revision:	January 2023
Approved by:	The Audit Committee of the Board of Trustees
Approval date:	May 2012
Effective date:	August 2013
Additional references:	None

Scope

All financial and administrative policies involving community members across campus are within the scope of this policy. If there is a variance between departmental expectations and the common approach described through college policy, the college will look to the campus community to support the spirit and the objectives of college policy.

Policy

This policy explains the adoption and administration of college policy. Certain elements of this policy may be administered by members of the campus community at the invitation of the President. The President, however, is ultimately responsible for college policies.

Ethics: The purpose of this policy is to ensure that the CC community operationalizes a standard framework for equitable policy development, maintenance, revision, and archive at the direction of and approval of the president, cabinet, and audit committee of the board of trustees.

Policy: Colorado College is committed to ensuring that all policies and related procedures are developed, maintained, revised, and archived in a manner that meets legal and regulatory requirements and upholds the core values and mission of the institution. This policy details the college's expectation for all responsible offices and constituent groups who take part in policy development and requires all stakeholders to engage in thoughtful, inclusive, equitable, methodological practices through the policy lifecycle.

Colorado Colleges has made a commitment to becoming an antiracist institution. In an effort to mobilize this commitment, policy developers and reviewers are encouraged to utilize an equity analysis tool during construction to mitigate unintended inequities from the onset. Equity analysis tools offer valuable insight and comprehensive consideration to help center the margin and reduce disparate impact to dismantle structural barriers in systems of systemic oppression.

Procedure:

Equity Analysis Tools:

Equity tools are used to challenge critical thinking that considers all impacted parties during the construction and review of the policy. Under Forms are some suggested instruments to help prioritize equitable policy practices. All CC community members are encouraged to use equity analysis tools to evaluate and develop policy using an antiracist lens.

Policy Creation, Modification, Review, Archive, and Approval

Academic Policy:

The Faculty Executive Committee (FEC), Curriculum Executive Committee (CEC), or another appropriate college committee may propose changes to existing academic policies or create new academic policies. These proposals are decided by the full faculty.

Administrative Policy:

Campus community members are encouraged to recommend new administrative policies or changes to existing policies by contacting any member of the President's Cabinet or the college's Ombudsperson. If the President decides to move the process forward, the President designates a Responsible Party to draft the policy or revisions. The Responsible Party presents a draft to the President, who shares it with the Cabinet for input.

The proposed policy is then shared with the campus community. Members of the community will have a minimum of thirty (30) days to comment on the proposed policy before any final action is taken. Comments from the community will be considered by the President and/or the President's Designee(s) for inclusion in the policy.

The President's Cabinet reviews and approves all college policies. In cases of externally required policies, the added approval of the Board of Trustees Audit Committee is required.

Interim Policies:

Under extraordinary circumstances, a situation may arise in which a college-wide, administrative policy must be established and the time required to take action does not accommodate the methodology outlined above. In those rare instances, as the chief executive officer and the administrative leader of the college, the President, in consultation with the Cabinet, may establish an interim policy. The rationale for the interim policy and the policy's anticipated duration should be clear. If the policy is needed beyond this duration, the President works with the Cabinet to (1) adopt it as a formal policy via the process outlined above (2) continue with the interim policy with a revised duration or (3) rescind the policy.

Archival Policy:

Archived policies are stored in the Office of the President

Communication of Policy

The policy shall be shared timely and widely to foster campus awareness of any changes or introduction of any new protocols.

Board Approval and Reporting Requirements

1. Policies requiring approval by the college's governing body shall be reviewed by the Audit Committee of the Board of Trustees, who in turn recommends approval by the Full Board;
2. Periodic review of policies shall take place in accordance with each policy's individual review frequency.

Definitions:

Policy – A statement for a specific topic that must be followed. May be externally driven based on regulations or compliance or internally driven based on college best practices, values, or philosophies. A policy will say “what” but not “how”. Procedures, guidelines, and checklists are used to reflect and support the applicable policy or policies.

Policy Approval Date – The date on which the policy is approved.

Policy Effective Date – The date on which the policy goes into effect.

Responsible Party – A member of the President's Cabinet or designee who assumes responsibility for drafting and updating a policy and for ensuring awareness and education related to the policy.

Procedure – An established sequence of activities performed to accomplish a task. A checklist of items or tasks dictating how to accomplish something to ensure consistency and completeness. A procedure may describe “how” to implement a policy.

Guidelines – Suggestions or instructions that are not mandatory, but are a good idea or best practice, that show or tell how something should be done.

Handbook/Manual – A concise reference book that gives useful information and/or instructions about a particular subject.

Related Exhibits and Forms

- Equity Impact Analysis
- Policy Procedure Practice Comprehensive Equity Analysis Tool

Related Policies

None

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Colorado Colleges has made a commitment to becoming an antiracist institution. In an effort to mobilize this commitment, policy developers and reviewers are encouraged to utilize an equity analysis tool during construction to mitigate unintended inequities from the onset. Equity analysis tools offer valuable insight and comprehensive consideration to help center the margin and reduce disparate impact to dismantle structural barriers in systems of systemic oppression.

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Equity Analysis Tools:

Equity tools are used to challenge critical thinking that considers all impacted parties during the construction and review of the policy. Below are some suggested instruments to help prioritize equitable policy practices. All CC community members are encouraged to use equity analysis tools to evaluate and develop policy using an antiracist lens.

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Policy Creation, Modification, Review, Archive, and Approval

• Policy Creation/Modification/Approval Process: Academic Policies

Academic Policy:

Proposals for new academic policies are administered through the Faculty Executive Committee (FEC), Curriculum Executive Committee (CEC), or another appropriate college committee may propose changes to existing academic policies or create new academic policies. These proposals are and decided by the full faculty.

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• Policy Creation/Modification/Approval Process: Administrative Policies

Administrative Policy:

Campus community members are encouraged to recommend new administrative policies or changes to existing policies by contacting any member of the President’s Cabinet or the college’s Ombudsperson.

If the President decides to move the process forward, the President designates a Responsible Party to draft the policy or revisions. The Responsible Party presents a draft to the President, who shares it with the Cabinet for input.

The proposed policy is then shared with the campus community. Members of the community will have a minimum of thirty (30) days to comment on the proposed policy before any final action is taken.

Comments from the community will be considered by the President and/or the President’s Designee(s) for inclusion in the policy.

The President’s Cabinet reviews and approves all college policies. In cases of externally required policies, the added approval of the Board of Trustees Audit Committee is required.

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• Policy Creation/Approval Process: Interim Policies

Interim Policies

Under extraordinary circumstances, a situation may arise in which a college-wide, administrative policy must be established and the time required to take action does not accommodate the methodology outlined above. In those rare instances, as the chief executive officer and the administrative leader of the college, the President, in consultation with the Cabinet, may establish an interim policy. The rationale for the interim policy and the policy’s anticipated duration (in terms of blocks) should be clear. If the policy is needed beyond this duration, the President works with the Cabinet to (1) adopt it as a

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Communication of Policy

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Policy Review and Modification

~~Similar to the approach for new administrative policies, the campus community is encouraged to recommend changes to existing administrative policies through any member of the President's Cabinet or the college's Ombudsperson. The community member receiving the recommendation coordinates and shares the proposed change with the President. If the President and the Cabinet agree that the change should be adopted, the President designates a Responsible Party to draft the modification. The Responsible Party presents the modified policy to the President, who shares it with the Cabinet for input.~~

~~The proposed policy updates are then shared with the campus community. Members of the community will have a minimum of thirty (30) days to comment on the modifications before any final action is taken. Comments from the community will be considered by the President and/or the President's Designee(s) for inclusion in the policy.~~

Board Approval and Reporting Requirements

1. Policies requiring approval by the college's governing body shall be reviewed by the Audit Committee of the Board of Trustees, who in turn recommends approval by the Full Board;
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Procedures

None

Definitions

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Related Exhibits and Forms

- [Equity Impact Analysis](#)
- [Policy Procedure Practice Comprehensive Equity Analysis Tool](#)

Related Policies

- None

Equity Impact Analysis

Who are the communities impacted by the work described in the potential change/policy/practice? Is there already a table where these communities are present? What does research tell us about the issue?

Question from Impact Analysis	Areas for Discussion
Are all groups who are affected by the change at the table?	
(What results is it trying to achieve?) How will the change affect each group?	
How will the change be perceived by each group?	
Does the change worsen or ignore existing disparities?	
Based on the above responses, what revisions are needed in the change under discussion?	

Policy/Procedure/Practice A Comprehensive Equity Analysis Tool

"[Antiracism](#) is the commitment to fight racism wherever you find it, including within yourself" – Ijeoma Oluo

Antiracism can be conceptualized as a lens, framework, and intentional action to dismantle systems of oppression. The difference between antiracism and diversity, equity, inclusion, belonging, or the countless list of acronyms that can be added to this list is that all these efforts, although critical to forwarding progress, do not seek to address injustices deeply rooted in our systems.

Organizations are racialized and draw on the Country's founding history and societal hierarchies, reproducing inequities that naturally uphold white supremacy's power. We cannot erase the past; however, we are responsible for changing the trajectory for future generations. This requires unlearning, deconstruction, and demolition of policies, procedures, and norms that perpetuate the pervasive nature of racism. This means taking bold action to build inclusion through accessibility, language justice, critical thinking, checking our bias, addressing gatekeepers, empowering human agency, challenging the status quo, removal of physical/mental obstacles, ensuring equitable implementation practices, scrutinizing discretionary conduct, questioning the lack of unwritten policy/procedure, challenging complacency, and giving credit to whom it's due. It's about minimizing excessive burdens and rethinking organizational structures or practices that appear "neutral." Antiracism requires the courage to challenge and critique the reinventive nature of racism in all its creative forms and to be an active part of the change!

Direct racism: treating someone less favorably than others based on someone's racial identity

Indirect racism: equal application of a norm, policy, practice, or program that people of a particular racial group cannot comply with, putting them at a disadvantage.

Institutional racism: the collective failure of an organization to provide quality service to people because of their racial identity, culture, or ethnic origin resulting in prejudice, ignorance, thoughtlessness, and racist stereotyping, which disadvantage racially minoritized groups.

Structural barriers- are physical, tangible, intangible, psychological, and dynamic actions and governing expectations that hinder organizational justice and anti-racism progress. Administrative burdens include established norms, policies and procedures, design methods, attitudes, territorialism, implementation, practices, and unchecked discretionary conduct. Additionally, gatekeeping, rigid thinking, inadequate auditing, actions, behaviors, futile data, organizational rules, resource allocation and distribution, procedural application, ineffective communication, social closure, positional segregation, lack of acknowledgment and credit, and unreasonable expectations that intentionally or unintentionally place an inequitable burden or harms members of a marginalized group.

Most impactful to engage a set of diverse stakeholders as you thoughtfully discuss these questions.

1. **BE CLEAR** about the difference between [Policy and Procedure](#)
2. **IDENTIFYING STAKEHOLDERS** – Which racial/ethnic groups may be most affected by and concerned with the issues related to this proposal?
3. **ENGAGING STAKEHOLDERS** – Have stakeholders from different racial/ethnic groups — especially those who may be adversely affected — been informed, meaningfully involved, and authentically represented in the development of this proposal? Who's missing, and how can they be engaged?
4. **CREATE SUSTAINABILITY**- Is the innovation funded appropriately? Have adequate data collection methods been identified, established reporting/progress communication plan, and public accountability sponsorship?
5. **IDENTIFYING SUCCESSES**- What are the success indicators and progress benchmarks? How will impacts and outcomes be measured, documented, communicated, evaluated, and addressed?

Alignment

How does this program/policy/practices align with the institution's mission, vision, and values?	
What is the intended outcome of this change?	
List any competing priorities that could be interconnected or threaten to undermine progress with the change being considered.	
Can you align the current change with existing organizational initiatives to better coordinate and operationalize the change?	
List any policies that the change could impact.	

What organizational justice principles (i.e., distributive, procedural, interactional, interpersonal/communication) require addressing to enhance successful implementation? (Sustainability)	
People	
How are marginalized populations across the organization/institution (e.g., BIPOC, lower socio-economic status, positional, women, LGBTQ+, etc. , impacted by the change? List known root causes of any identified inequities.	
What opportunities exist to include the voice of those impacted by the change (data, survey, in-person invitation, virtual, call, etc.)?	
What will be done to mitigate barriers so voices are heard and have real influence concerning the change?	
How might the change affect agency for historically marginalized groups?	
What positive and/or negative impact(s) does any discretion concerning this change have on the application for all groups?	

<p>Suppose external resources are needed, and financial expenditure will occur. What opportunities might there be to invest in services/businesses from socially disadvantaged groups (e.g., women-owned businesses, minority-owned businesses, etc.)?</p>	
Resources	
<p>What research exists about implementing this change that can be leveraged (data, people)?</p>	
<p>What existing stakeholder groups (committees, advisory boards, etc.) may be leveraged for perspective?</p>	
<p>List the resources the change will require (training, funding, staff capacity/schedules).</p>	
<p>What skill refreshers might be needed to mitigate complacency (e.g., after critical incidents, as an annual accountability expectation)</p>	

Fidelity	
What accessibility mechanisms will be considered to support equitable access and informed understanding of this change (e.g., communication plan, language justice, plain language, visual/auditory, neurodiverse).	
What accountability measures will be implemented to mitigate manipulation of the change as intended (e.g., internal compliance auditing, survey)?	
What consequences will be put in place for intentional violation of the quality application of the change, and how will this be communicated/reinforced?	
How often is your organization committed to a quality assurance review (1-2 years), and how will you ensure this process is objective?	
Make sure your change is free from biased language .	
What opportunity is there to consult with an ADEI expert as an additional layer of accountability?	

References

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