

Responsible Office: Code J/Office of Management Systems
Subject: Policy Formulation Process



Office of Management Systems

Office Work Instruction

Policy Formulation Process

Original Approved by: _____
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Associate Administrator, Office of Management Systems

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DOCUMENT HISTORY LOG

<u>Status (Baseline/ Revision/ Canceled)</u>	<u>Document Revision</u>	<u>Effective Date</u>	<u>Description</u>
Baseline		12/06/99	
Revision	A	04/26/00	Revisions reflect review of HQOWIs to address Pre-Assessment Audit of Feb 2000, as follows: (1) Correct technical errors in flowchart, (2) Revise steps in section 6 to improve congruence with the flow chart.

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1. Purpose

The purpose of this procedure is to describe the steps of formulating and approving Code J directives.

2. Scope and Applicability

This OWI covers: Code J sponsored Policy Directives (NPD's), NASA Procedures and Guidelines (NPG's), Charters, and interim policy guidance requiring approval by the Associate Administrator for Management Systems or the Administrator. The process for formal review and approval of directives is done in accordance with NPG 1400.1.

3. Definitions

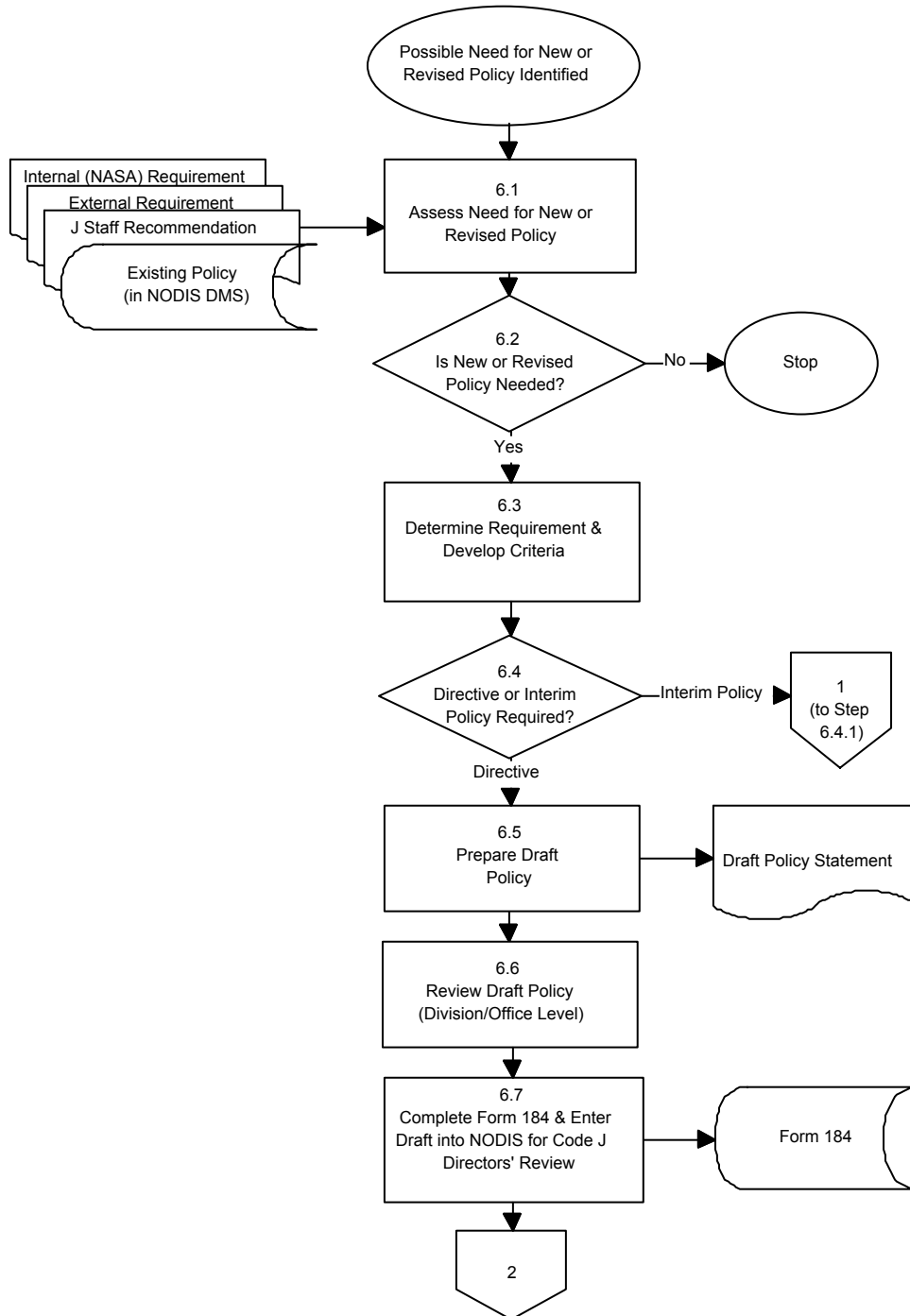
- 3.1 Charters. Documentation for Code J sponsored Agency-level Councils, Boards, and Committees are incorporated into the NPG 1000.3, The Organization Manual.
- 3.2 Code J AA. Associate Administrator for Management Systems.
- 3.3 Code JM. The Management Assessment Division, Office of Management Systems.
- 3.4 Directives Manager. The Code J designated Directives Manager.
- 3.5 Director. Division or office director reporting to the Code J AA.
- 3.6 DMS. Directives Management System within NODIS.
- 3.7 Interim Policy. Policy Statements meeting the requirements of NPG 1400.1, section 3.3.3.
- 3.8 NODIS. NASA On-line Directives Information System. Provides a management system for directives in the review and concurrence cycle and a library of approved, in-effect directives.
- 3.9 NPD. NASA Policy Directive. Establishes Agency-level policy.
- 3.10 NPG. NASA Procedures and Guidelines. Establishes Agency-level processes, procedures, and guidance.
- 3.11 Originator. Code J employee(s) (subject matter expert) assigned the responsibility to identify the need for, recommend action, and to draft, revise, and ensure policy is appropriately reviewed.
- 3.12 Policy. Statements of policy, procedure, process or charter incorporated into NPD's, NPG's or Charters.

4. References

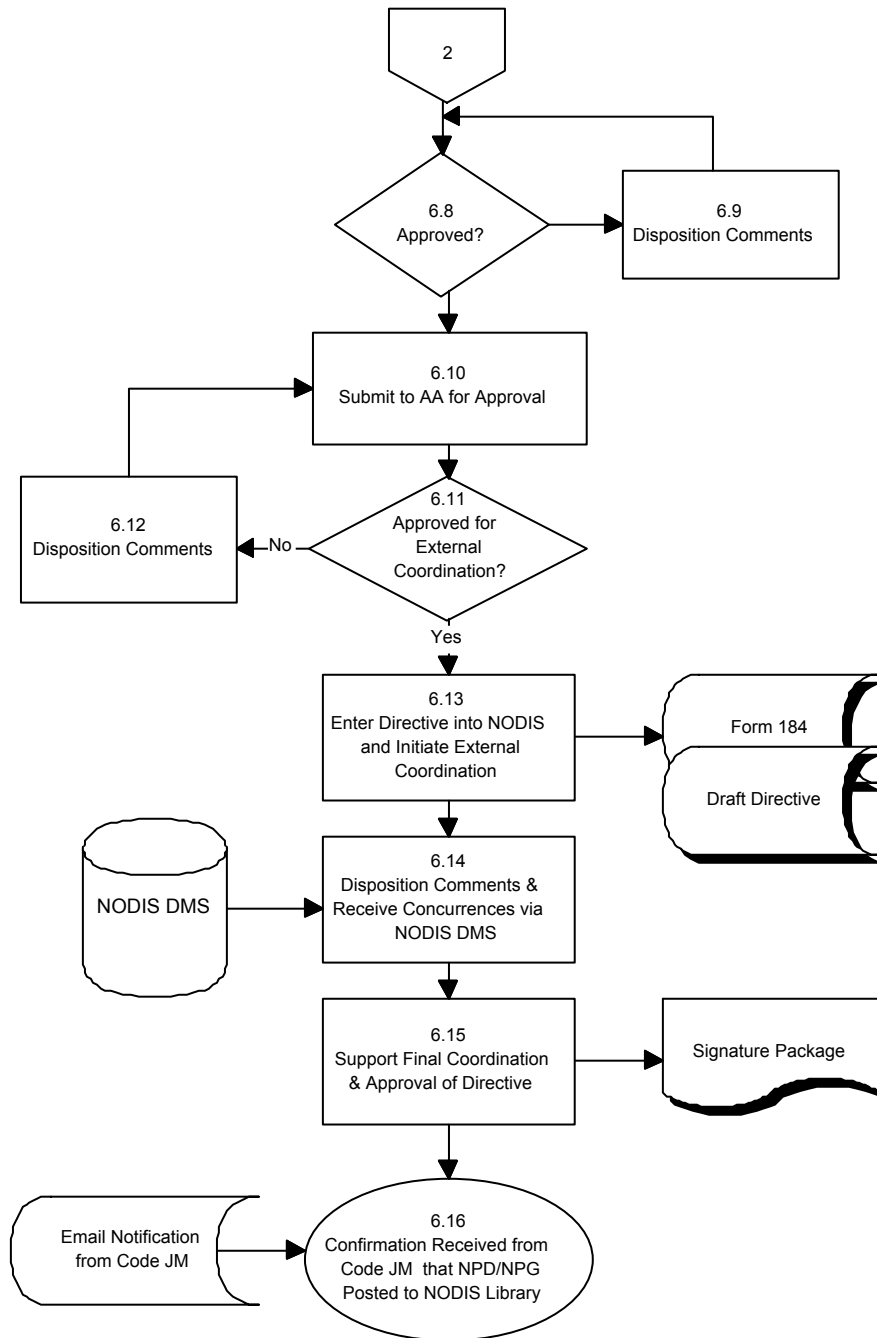
- 4.1 NPD 1400.1 NASA Directives System
- 4.2 NPG 1000.3 The Organization Manual
- 4.3 NPG 1400.1 NASA Directives System Procedures and Guidelines

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5. Flowchart

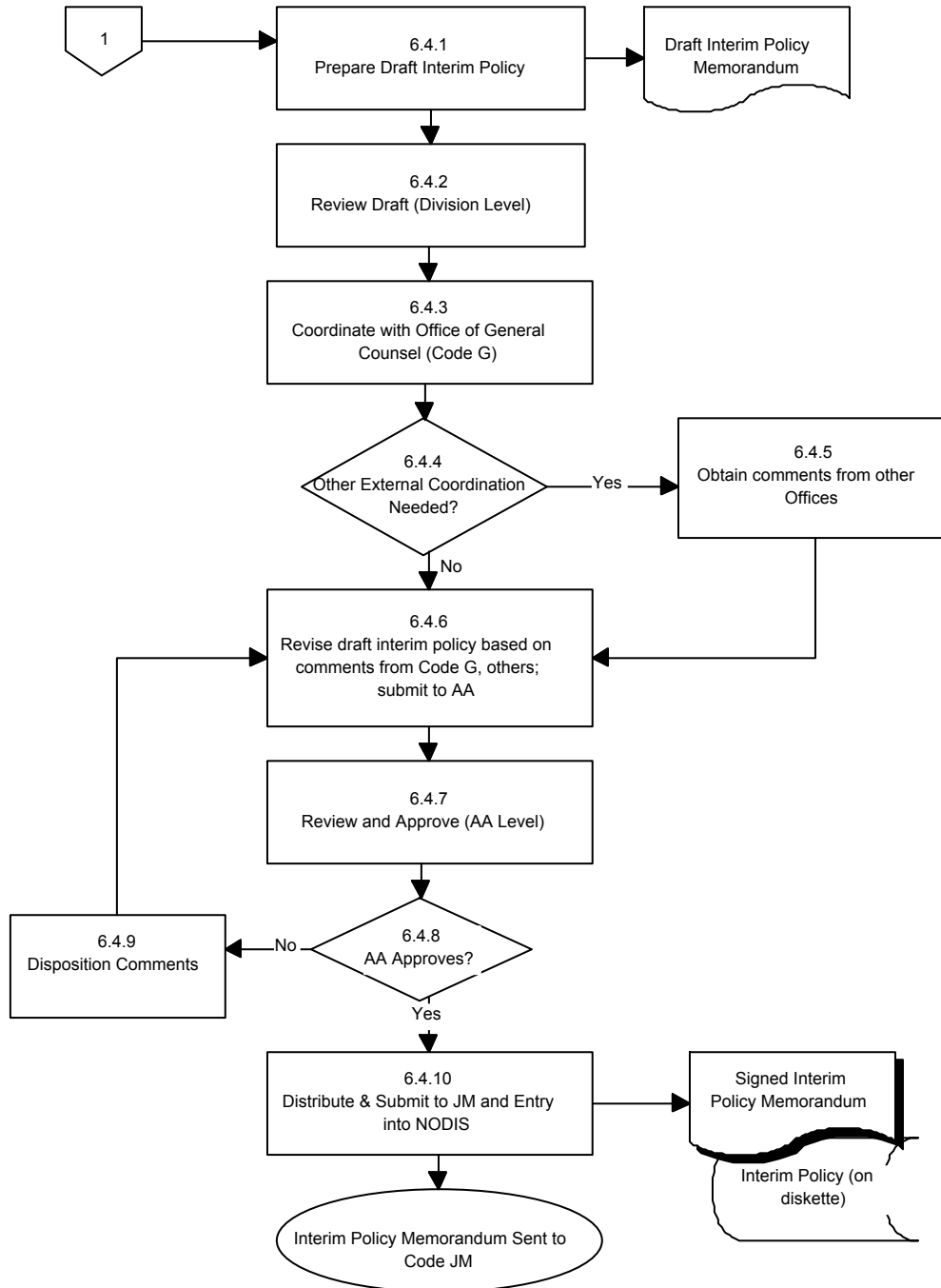


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Interim Policy Formulation Process



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6. Procedure

<u>Step</u>	<u>Actionee</u>	<u>Action</u>
6.1	Originator Director	Assess the need for new or revised policy based on internal or external requirements, Code J staff recommendations, and existing policy. Discuss with Director. Determine whether new or revised policy is needed based on originator input.
6.2	Director	<i>Is new or revised policy needed?</i> If yes, proceed to step 6.3. If no, process stops.
6.3	Originator, Director	Determine requirement and develop criteria. a. Tailor the development of a policy position to the circumstances of each identified need for new or revised policy. Consider the following factors: <ul style="list-style-type: none"> i. an analysis of existing policy; ii. range of alternatives; iii. prior involvement of customers and stakeholders; iv. whether the policy will be developed by an individual, Division/Office team, teaming with other affected Headquarters and/or Center parties; v. extent of and mechanism for review by customers and stakeholders on proposed policy prior to approval by Code J AA. b. Gap analyses and formal project plans approved by the Originator's Director are optional, as determined by the Director. c. Criteria for adequacy to pursue developing a policy include: providing reasonable assurance of legal sufficiency; customer and stakeholder opportunity for review and comment; consideration of information and recommendations developed prior to and during the drafting of policy; and identification of significant issues related to the new or revised policy that provide a basis for the Director and Code J AA to make decisions on draft policies or make recommendations to the Administrator for decision. d. The Director shall determine, for each policy, the extent to which a written approach is required and whether Director approval of the approach is necessary. If an approved approach is required, it will be considered a working document rather than a quality record. Determine whether the policy will be incorporated in a new or revised policy directive or if it meets the criteria (established in NPG 1400.1) and will be issued as interim policy.

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<u>Step</u>	<u>Actionee</u>	<u>Action</u>
6.4	Originator, Director	<i>Directive or interim policy required?</i> If the policy will be issued as an interim policy memorandum, go to step 6.4.1 and follow the interim policy sub-process. If it will be incorporated in a new or revised NPD or NPG go to step 6.5
6.5	Originator	Prepare draft policy statement. a. The development of a draft policy statement is an iterative process including consultation and review with customers and stakeholders, as necessary. b. Comments on various draft policy statements should be dispositioned and significant issues should be identified. c. The draft policy statement should be sent to the Director with appropriate working papers alerting the Director to potential issues. d. The Originator's draft policy statement together with the working papers will be a Division/Office-level document.
6.6	Director, Directives Manager	The Originator's Director and Directives Manager review the draft policy statement and working papers for sufficiency (see criteria in step 6.3) and other requirements established in NPG 1400.1. The Director is reviewing for substance; the Directives Manager is reviewing for conformance with NPG 1400.1.
6.7	Originator, Directives Manager Directors	When the Director approves the draft policy statement, the Originator will work with the Directives Manager to complete a Form 184 in the NODIS DMS and load the draft policy statement into the DMS for Code J Director-level review. After entry into NODIS, the policy takes the form of a draft directive. Each Director will review, or have staff review, the draft directive and comment to the Originator within NODIS. Concurrence is recorded on the associated Form 184.
6.8	Originator	<i>Approved?</i> If the directors concur without comment, go to Step 6.10. If comments are provided, go to Step 6.9.
6.9	Originator	Disposition review comments. Return to Step 6.7 to obtain concurrence.
6.10	Originator AA	Submit draft directive to the AA for approval. Review draft directive. If approved, sign the Form 184 and initiate external review of the directive. If not approved, provide comments to originator.
6.11	Directives Manager	<i>Approved for external coordination?</i> If further change is needed, return to Originator with directions at Step 6.12. If approved, go to step 6.13.
6.12	Originator, Director	Incorporate AA's comments. Review with Director. No review by other Directors is needed. Repeat review with AA in step 6.10.

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<u>Step</u>	<u>Actionee</u>	<u>Action</u>
6.13	Directives Manager	Enter AA-approved Directive into NODIS and initiate external coordination. Follow the NODIS coordination process as established by NPG 1400.1.
6.14	Originator	<p>a. Disposition all comments received from reviewing offices via the NODIS DMS.</p> <p>b. For disagreements on significant substantive issues, attempt reconciliation. If agreement cannot be reached, develop a position paper for review by approving official.</p> <p>c. Significant revisions of substantive issues may require additional opportunities for re-review.</p>
6.15	Originator, Directives Manager, Quality Control Liaison	<p>Support final coordination and approval of directive when Agency-level review is complete:</p> <p>a. develop the final signature package as defined in NPG 1400.1. Signature package is submitted to Code JM.</p> <p>b. Revise final signature package as necessary based on reviews by the Office of General Counsel and the Headquarters Correspondence Management Office.</p> <p>c. Directives Manager coordinates development and clearance of the signature package.</p> <p>d. Quality Control Liaison checks signature package before it goes out of Code J.</p> <p>e. NPD's cleared through the NODIS process are signed by the Administrator.</p> <p>f. NPG's cleared through the NODIS process are signed by the AA and returned to Code JM for entry into the NODIS Library.</p>
6.16	Directives Manager	<p>Directives Manager receives confirmation that signed directive has been placed in the NODIS library and Code JM is retaining the final signature package. The final signature package includes the signed original versions of the directives. For a list of Code J and other NPD's and NPG's, go to:</p> <p>http://nodis.hq.nasa.gov</p>

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Interim Policy Formulation Sub-Process

<u>Step</u>	<u>Actionee</u>	<u>Action</u>
6.4.1	Originator	<p>Prepare draft interim policy.</p> <p>a. The development of a draft interim policy memorandum is an iterative process to meet the criteria set forth in step 6.3.c. However, since timeliness is a factor, the consultative process may be eliminated or reduced.</p> <p>b. Rather than formally dispositioning comments, the Originator should prepare a memorandum identifying significant issues and options considered in resolving such issues.</p> <p>c. The Originator's draft interim policy memorandum together with the working papers will be a Division-level document.</p>
6.4.2	Director, Originator	<p>Review draft within division.</p> <p>a. Review is against criteria set forth in step 6.3(c).</p> <p>b. The Director may determine customers, stakeholders, or others who should pre-review the interim policy and provide them an opportunity to review and comment. While this procedure is optional, it will provide a basis for support by the General Counsel and AA. The Director briefs the AA before submission to the Office of General Counsel (Code G). Forward to Code G for concurrence.</p>
6.4.3	Originator	<p>Coordinate with Code G. Ensure that Code G's review comments are dispositioned and coordinate with offices that the Code G requests review the draft interim policy before adoption.</p>
6.4.4	Originator	<p>If Code G requests review by other offices, go to Step 6.4.5. If no further external review, go to Step 6.4.6.</p>
6.4.5	Originator	<p>Obtain comments from other offices, as requested by Code G.</p>
6.4.6	Originator Director	<p>Revise draft interim policy memorandum to disposition comments from reviewing offices. Submit to Director for review.</p> <p>Review to ensure that recommended changes to the draft interim policy have been fully dispositioned and the draft is ready for AA review and approval. Include evidence of Code G's concurrence in forwarding to AA. Submit to Code J AA for approval.</p>

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<u>Step</u>	<u>Actionee</u>	<u>Action</u>
6.4.7	AA	<p>Review and approve interim policy memorandum. The AA review is based on the draft interim policy memorandum as approved by the Director after all comments received have been fully dispositioned. If approved, sign the memorandum and provide to Directives Manager. If not approved, provide comments to Originator. The AA may also request additional external review and comment.</p> <p>NOTE: The AA has sole authority to approve an Interim Policy Memorandum. The authority may not be delegated below the AA. The policy can remain in effect for up to six months in accordance with NPG 1400.1. When interim policy expires, it may not be extended.</p>
6.4.8	AA	If the AA approves, go to step 6.4.10. If not, go to step 6.4.9.
6.4.9	Originator, Director	Disposition AA's comments and/or seek further external comment.
6.4.10	Originator	Distribute approved interim policy memorandum. File signed original in Division/Office files. Send electronic copy of memorandum to NODIS Systems Manager (in Code JM) for filing and inclusion in the NODIS library. The Interim Policy Memorandum remains in effect until expiration or notification of rescission.

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7. Quality Records

<u>Record Identification</u>	<u>Owner</u>	<u>Location</u>	<u>Record Media: Electronic or Hard Copy</u>	<u>Schedule Number & Item Number (NPG 1441.1)</u>	<u>Retention/Disposition</u>
Draft Directive	Code JM	NODIS Document Management System	Electronic	Schedule 2, 2400, Item 13A	If paper records exist, and the electronic media represents a duplication, release media for reuse not later than 30 days after the need for it has been met and that it will not be required for further use.
Form 184	Code JM	NODIS Document Management System	Electronic	Schedule 2, 2400, Item 13A	If paper records exist, and the electronic media represents a duplication, release media for reuse not later than 30 days after the need for it has been met and that it will not be required for further use.
Signature Package	Code JM	Code JM	Hard Copy	Schedule 1, 1410, Item 72A	Permanent; retire to FRC 1 year after becoming obsolete or superseded. Transfer to NARA in 5-year blocks when 20 years old.
Signed Interim Policy Memorandum	Director of Division/ Office which originated the memo	Division/ Office Files	Hard Copy	Schedule 1, 1410, Item 72A	Permanent; retire to FRC 1 year after becoming obsolete or superseded. Transfer to NARA in 5-year blocks when 20 years old.