

BPA Policy 120-1

Policy Management

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1. Purpose & Background

The purpose of this policy is to define the program for managing enterprise-wide internal policies and procedures at Bonneville Power Administration (BPA). This includes, but is not limited to, the development, review, approval, publication, implementation, validation, and disposition of enterprise-wide internal policies and associated enterprise-wide procedures.

2. Policy Owner

The Executive Vice President, Compliance, Audit, and Risk Management is the owner of this policy. Governance & Internal Controls is responsible for managing the enterprise-wide internal policies program at BPA and for implementation of this policy.

3. Applicability

BPA Policy 120-1 is applicable to all enterprise-wide internal policies and procedures, which are stored in a central repository known as the [BPA Internal Policy Library](#), located on BPA Connection. All BPA federal employees must adhere to all enterprise-wide internal policies and associated enterprise-wide procedures located in the BPA Internal Policy Library.

4. Terms & Definitions

- A. **BPA Internal Controls Oversight Team (ICOT):** The ICOT is a subcommittee of the executive Audit, Compliance and Governance Committee (ACGC) charged with monitoring application of the required governance needed to identify, assess, manage, and monitor risks and controls across BPA. Among other things, it oversees the Internal Controls Program.
- B. **BPA Policy:** An enterprise-wide executive management directive to comply with an organizational strategic direction and with applicable laws, regulations, and operational requirements.
- C. **BPA Procedure:** Documentation of a standardized and consistent way to implement a BPA enterprise-wide policy, outlining the tasks and activities to execute a business process. A procedure typically identifies who does what, when, and how, but is still broad enough to apply to the activities of all organizations to which it applies.
- D. **BPA Policy Library:** The official BPA repository and central reference source for enterprise-wide internal policies and procedures.
- E. **Enterprise Wide:** *Enterprise wide* refers to those policies and procedures that affect more than one Tier 1 organization.
- F. **Policy Working Group (PWG):** The group reporting to the ICOT and staffed by policy management representatives appointed by the business units for which the members work to represent the interests of the organizations and serve as liaisons on all policy planning and policy issue resolution.

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5. Policy

- A. BPA issues enterprise-wide internal policies and procedures to define the requirements governing its operations and the conduct, decisions, and actions of its management and employees. The requirements of BPA internal policies are binding on all BPA operations.
- B. BPA executive management is responsible for BPA internal policy content and implementation. BPA internal policies are concise and high level.
- C. Enterprise-wide BPA internal procedures associated with BPA internal policies are developed by the organization responsible for the policy.
- D. BPA internal policies and procedures are managed according to the requirements specified in this document.
- E. BPA internal policies are published in the [BPA Internal Policy Library](#) as established and maintained by the ACGC.

6. Policy Exceptions

Policies, standards, guidelines, procedures, desk books, work instructions, manuals and other written materials that are limited to the internal operations of an individual business line, organization, or work group are outside the scope of this policy.

7. Responsibilities

- A. **Policy Owner:** Ownership of a BPA internal policy is designated to the Vice President (VP) level of a business line with primary responsibility for the subject matter. The BPA Administrator, Chief Workforce & Strategy Officer, Chief Operating Officer, or Chief Administrative Officer may delegate policy ownership to the Director or Manager level as documented in a delegation. The policy owner has the primary responsibility for the policy and assigns resources as necessary to support development and implementation of the BPA internal policies for which they are responsible. Policy owners are accountable for implementation and compliance of policies they own.
- B. **Policy Author:** A policy author writes the revision of an existing policy and drafts new policies. The policy author is often the functional subject matter expert (SME) and defines the purpose and scope of the policy. The policy author is responsible for identifying and responding to conflicts or concerns that arise during review or analysis of a revised or draft new policy and may also be responsible for defining and coordinating plans that may include: implementation, change management, communication, and training requirements associated with the policy rollout.
- C. **Subject Matter Expert (SME):** A subject matter expert is consulted by the policy author when an existing policy is being revised or a new policy is being drafted. SMEs may also be responsible for writing procedures that accompany or supplement policies. SMEs may also be responsible for defining and coordinating plans that may

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include: implementation, change management, communication, and training requirements associated with the policy rollout.

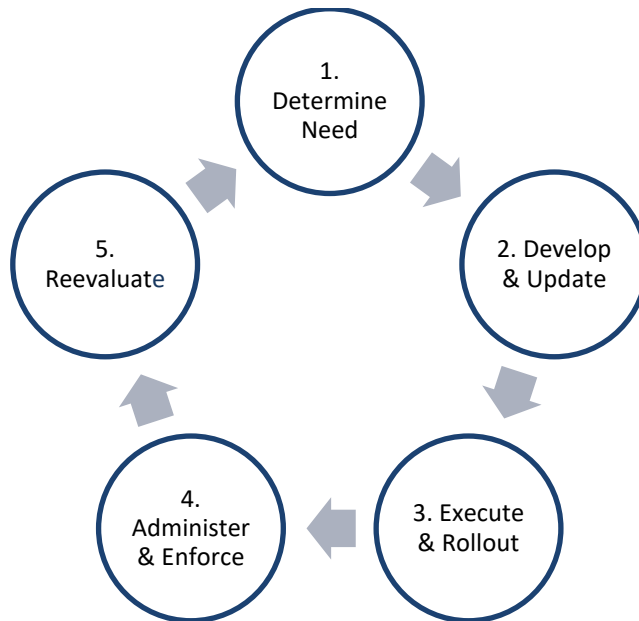
- D. Policy Working Group (PWG):** Provides review and impact analysis of proposed policies and associated procedures (new or revised) and conducts policy sunset reviews. Specifically, the PWG:
1. Validates the purpose and scope of the policy.
 2. Identifies conflicts or gaps with existing and/or proposed policies and ensures their resolution prior to publication.
 3. Defines impact analysis parameters.
 4. Conducts and/or coordinates the impact analysis.
 5. Reviews draft policies and associated procedures prior to submission to the policy owner for adherence to policy management program principles, standards, and processes.
 6. Coordinates sunset reviews for and disposition of authorized policies with appropriate stakeholders and SMEs.
 7. Identifies policy stakeholders within their organization and provides those names to the policy author or appropriate PWG member for inclusion in the drafting stage, if needed.
- E. Policy Coordinator:** The Policy Coordinator has primary responsibility for the implementation of the policy management program as defined by this policy. This position is appointed by the Governance & Internal Controls Supervisor. The Policy Coordinator:
1. Serves as liaison to executive committees, program offices, and organizations for matters regarding BPA enterprise-wide internal policy and program management.
 2. Serves as Team Lead for staff in the policy program management office.
 3. Manages the agenda and workload for the PWG.
 4. Maintains policy management and policy workflow procedures, models, plans, templates, and specifications necessary for implementation of this policy.
 5. Coordinates the style, format, and content review of draft policies.
 6. Publishes authorized policies to the BPA Internal Policy Library and maintains the library.
 7. Coordinates communications with the policy owners.
 8. Implements the policy disposition decisions of the BPA executive governance body (ICOT).

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- F. **Office of General Counsel (OGC):** Provides legal expertise with respect to the review of content, authorization, and citations associated with each revised or new draft policy.
- G. **BPA Executive Governance Body (ACGC):** Approves the BPA internal policy management system. The group also provides strategic direction to the PWG with respect to policy development and prioritization, reviews and approves the Policy Roadmap, annual policy work plans and schedules.
- H. **Internal Audit:** Provides evaluation of authorized policies with respect to compliance and effectiveness when required by policy management procedures, the PWG, or as directed by the ACGC or the ICOT. Internal Audit refers requests for modifications of a policy to the PWG.
- I. **Human Capital Management (HCM):** Provides coordination between the PWG and the Labor Relations organization as appropriate with regard to review requirements of revised and new draft BPA internal policies. HCM also approves and authorizes organizational functional statements for incorporation into corresponding BPA internal policies as appropriate.

8. Standards & Procedures

The standard phases applied to BPA internal policy management at BPA are captured in the following Policy Lifecycle Model.

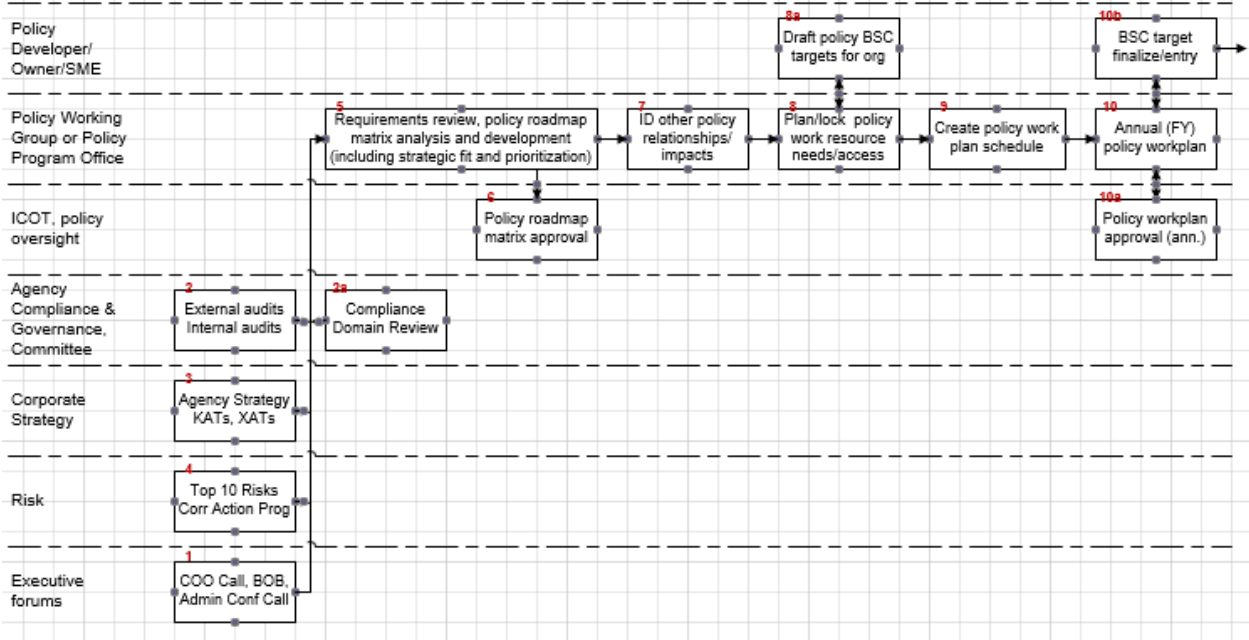


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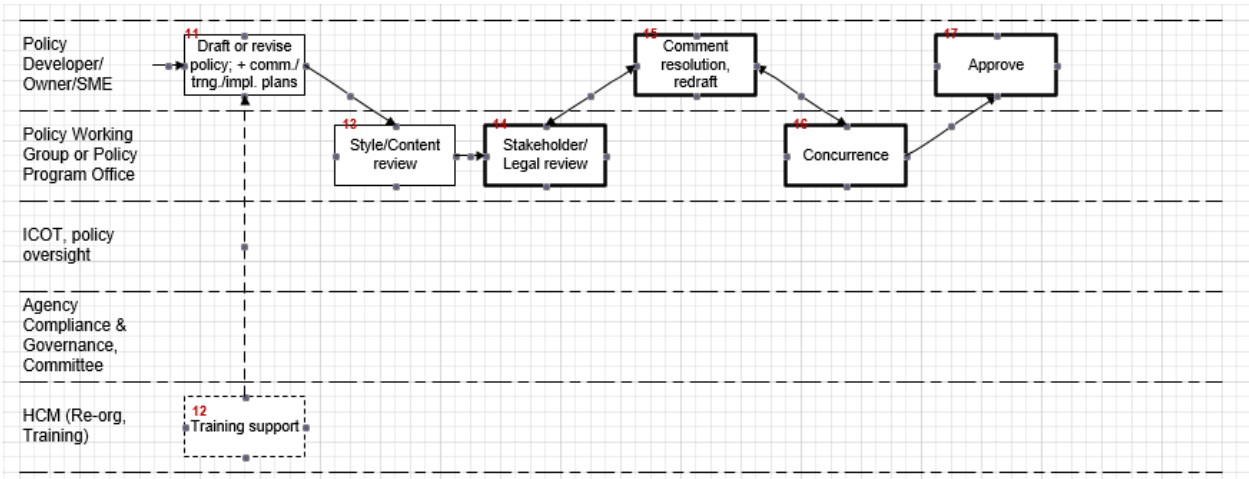
The procedures for policy development, review, approval, and publication are established by the PWG and Policy Program Office (PPO) as a policy workflow. The policy workflow is based on the five phases of the Policy Lifecycle Model.

A. Determine Need

Steps illustrated in this phase of the policy workflow may occur independently of one another to begin the policy workflow process. Each section represents a separate activity, and it is not necessary for each action to occur (sequentially, concurrently, or at all) in order for the policy workflow process to move forward.

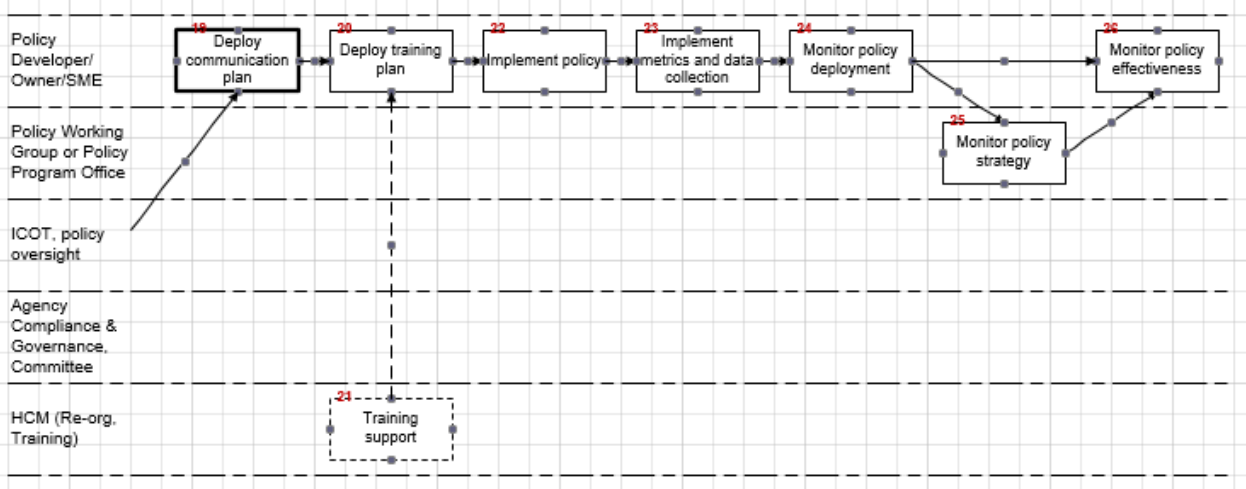


B. Develop and Update

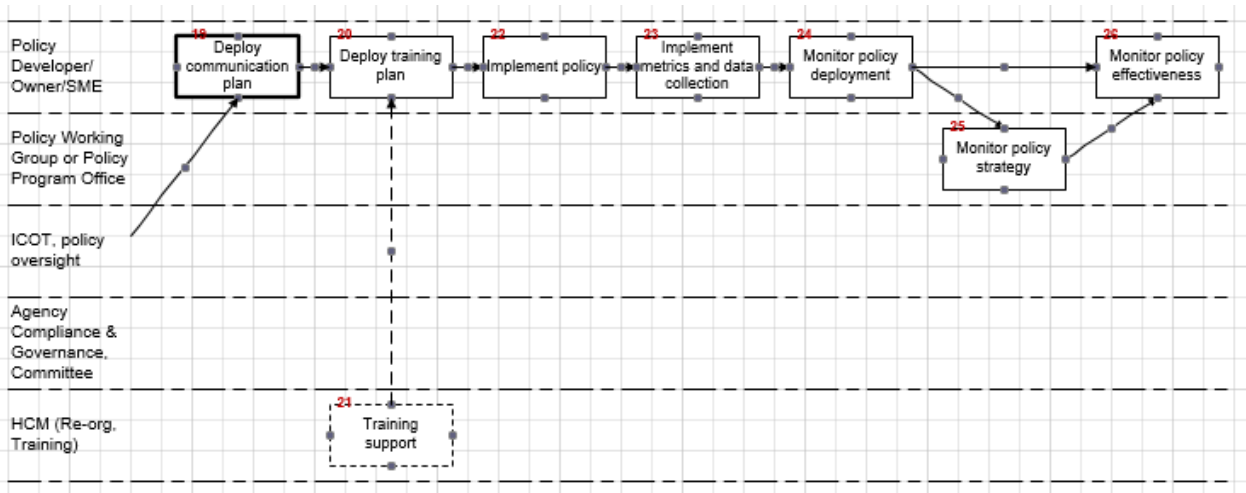


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C. Execute and Rollout



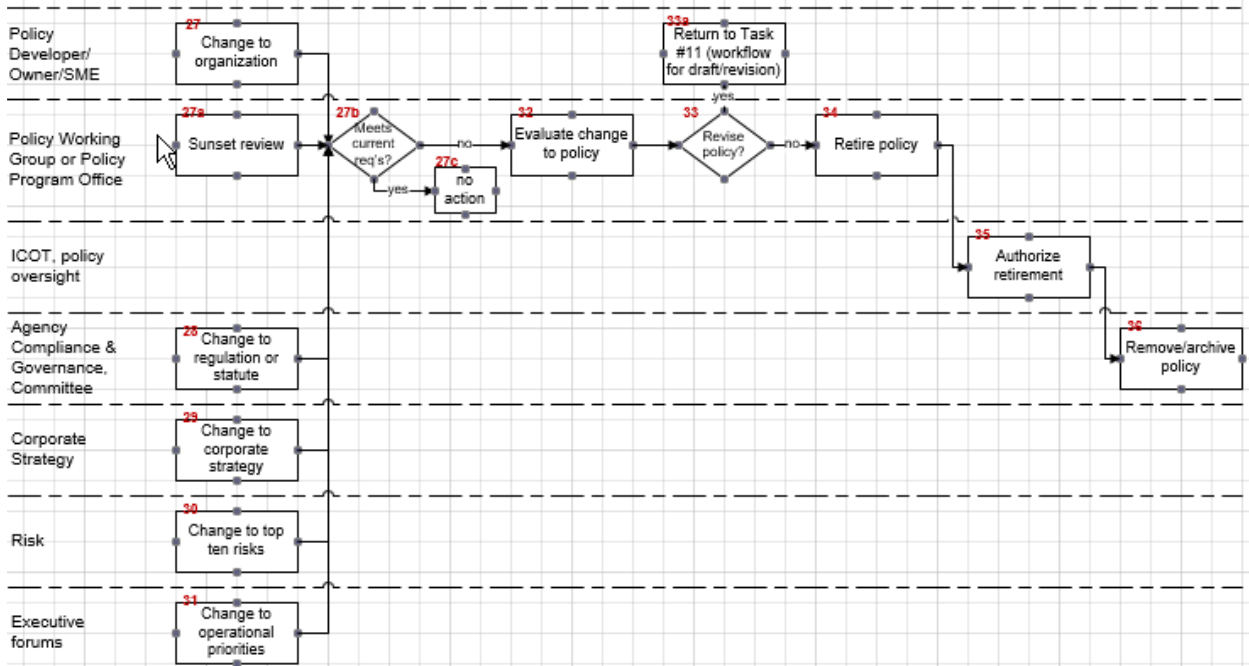
D. Administer and Enforce



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E. Re-evaluate

Steps illustrated in this phase of the policy workflow may occur independently of one another to begin the policy workflow process. Each section represents a separate activity, and it is not necessary for each action to occur (sequentially, concurrently, or at all) in order for the policy workflow process to move forward.



9. Performance & Monitoring

- A. The Policy Coordinator will track the ratio between authorized and unauthorized policies and the ratio between current (within the 5-year sunset review date timeline) to track the effectiveness of this policy's implementation.
- B. The PWG will conduct a quality control review of draft policies prior to submission to the policy owner for adherence to policy management program principles, standards, and processes.

10. Authorities & References

[DOE Order 251.1C](#), The U.S. Department of Energy Departmental Directives Program.

11. Review

The PWG reviews this policy every 5 years after implementation. The review determines the policy's effectiveness at documenting standards for the creation, management, and governance of enterprise-wide BPA internal operating policies and confirms the effectiveness of employee access to the BPA Internal Policy Library.

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12. Revision History

Version	Issue Date	Description of Change
1	7/1/2014	Archive BPAM 100 and document new Policy on BPA Internal Policy Management.
1.1	10/29/2018	Current template
1.2	12/17/2021	Sunset review, minor changes.

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