

ccNSO Council comments on the RoR CCG Refined Outline

12 May 2026

To: Avri Doria, Chris Disspain and Manal Ismail, Review of Reviews Co-Chairs

General Observations

General supportive of the proposed reviews and suggested purpose

- Accountability and Transparency Review (ATR)
- Structural Review
- On-demand Review
- Review of the Continuous Improvement Program (CIP) pilot to inform whether the CIP initiative should be continued, discontinued, or refined. With possibility to add how the CIP results should be used and reviewed in the future.

The purpose statements of these reviews will undoubtedly be further refined following this consultation. The ccNSO Council will make some suggestions below in the specific comments section.

The full cycle of a review

The ccNSO Council appreciates that the CCG has first focused on the purpose and scoping of reviews.

In its earlier comments with respect to the current reviews system, the ccNSO Council raised the need to consider the system as a whole, pointing to concerns that specific and organizational reviews are ineffective and inefficient. This sense is also reflected in the charter of the CCG that the system as designed should *‘ensure that reviews as a system and implementation of Board-adopted recommendations thereof will be effective and efficient and inspire trust’*.

The ccNSO Council looks forward to proposals of the CCG on how to ensure that the two other phases of each review – the board consideration and implementation – will become more effective and efficient than under the current system.

The Council notes and welcomes that the CCG already suggests that an assessment of the extent to which ATR recommendations have been implemented should feed into the next ATR scoping cycle. We suggest that this mechanism is extended to cover the implementation of the recommendations from all reviews and be included into the ATR scoping cycle. Effectiveness and efficiency could be further enhanced, for example, by proposing an owner for recommendations, and/or requiring a management response within a fixed period on progress of implementation.

Support the separation of scoping and conducting the review.

The ccNSO Council welcomes and strongly supports the separation of powers between the team that defines the scope and a team that will conduct a review. We suggest that this separation is further enhanced by:

- Avoiding that a person (whether from an SO/AC, staff or Board) serves both on a scoping team and on an actual review team.
- Narrowing down the role of the SO/AC leadership. The rationale is to ensure continuity, despite factors such as term limits and limited availability. One possible approach would be for the CCG to suggest that every SO/AC develops a procedure to select representatives for the scoping and review group.

Preliminary specific observations to assist the CCG

The purpose of reviews in general

The ccNSO notes that the CCG suggests that the general purpose of reviews is *‘to assess whether ICANN is fulfilling its Mission, Commitments, and Core Values, as set out in the ICANN Articles and Bylaws, in a transparent and accountable manner.’*

It is also noted that, for example, the proposed ATR and Structural Review contain elements that allow for improvements i.e learning. We appreciate and strongly support that both accountability and improvement are necessary. However, we note the risk that, when they are conflated, accountability tends to crowd out learning, because the demands of compliance are louder, more visible, and more consequential than reflection. The ccNSO suggests finding a middle ground, which does not mean abandoning accountability. It means designing the overall system in such a way that the two modes coexist deliberately, for example by:

- Including the concept of improving (learning) in the general review purpose statement by “and to enable ICANN to improve and adapt”
- Designate the CIP one-time review also as a learning review. The Outline already frames it formatively (“continued, discontinued, or refined”). Make the improvement-side more explicit, by suggesting a mechanism for how to refine the CIP.
- Convert the output analysis at ATR initiation into a formal after-action review of the previous cycle, decoupled and protected from absorption into the accountability conversation.

Structural review

With respect to the structural review, the ccNSO Council notes the following:

1. **Cadence of reviews** - The ccNSO Council is very supportive of a 15 years cadence. However it is not clear to us when the initial 15-year clock will start ticking (what is day-zero?).
2. **Comprehensive scope** - the Structural Review should not only look at SO/AC and NomCom structures. It must also look at the Board and the interactions between the various structures. This is not quite clear in the current draft, but was acknowledged as the intended approach in one of the webinars held in the week beginning 4 May.
3. **Addressing suggested structural changes** - The Council further notes that the structural review should, among others, address situations when an SO/AC independently considers restructuring (for example as the result of its continuous improvement work). We also note that an SO/AC suggesting a structural change cannot unilaterally change their relationship with the rest of the community without the agreement of the other parties. This principle is supported.
4. However, it is unclear to us when the structural review will be launched to address these questions related to ICANN's overall structure. Will the structural review start when an SO/AC suggests a change? Does it need to wait for the next cycle of the structural review?
5. **Overlap between Structural review and Continuous Improvement cycles** - Assuming the Continuous Improvement Program (CIP) will continue, there is already an overlap between scope of the structural review and Principle 1 of the CIP:
 - According to the outline, after an External Landscape assessment is concluded, a Cross Community Group is convened to review all SO and AC structures, investigate any existing or longstanding issues, and produce recommendations (if any).
 - Informed by the External Landscape Assessment, the intent of Phase 2 is among others to determine whether:
 - **the ICANN structure of SO/ACs and the NC is fit for purpose for ICANN to achieve its mission** (emphasis added)

This could potentially overlap with evaluation, assessment and improvements under the Continuous Improvement Program, specifically with Principle 1: The SO, AC, or NomCom is fulfilling its purpose.

(see: <https://www.icann.org/en/system/files/files/cip-framework-02jul25-en.pdf>)

6. **Clarification of the role of the Affected SO, AC or NC under a Structural Review** - Although it is understood the affected SO or AC may advise on the recommended change, it is unclear whether a change of the structure may be imposed without the support of the affected SO, AC or NC.

7. **Introducing the separation of scoping and review teams under the Structural Review** – It is our understanding that in Phase 2 of the Structural Review a CCG would investigate any existing or longstanding issues and produce recommendations (if any) and the investigation would be informed by the External Landscape Assessment. The ccNSO Council suggests that under this review the role of scoping of the review and the reviewing itself will be distinguished and separated, similar to the ATR process.

Accountability Transparency Review

1. **Cadence of the ATR** – The Outline refers to a cadence of the ATR once every planning cycle, and we suggest clarifying what is meant by this. Related, in proposing the cadence, we trust that the CCG will design the system in a way that addresses a major ccNSO concern: starting a review before the implementation of the previous review(s) is completed. We understand that the deferral of the ATR is suggested to address this concern. If this assumption is correct, we suggest that the start date for the review following a deferred review be calculated based on the deferred review's revised timeframe, rather than on the date the deferred review was originally scheduled to begin.
2. **Refine proposed mechanism that community analyses/monitors implementation of recommendation** - It is our understanding the community is expected to be analyzing the implementation of prior review outputs and the effectiveness of deployed solutions. The ccNSO Council suggests that this mechanism is introduced as a principle and should be strengthened and more detailed in the next iteration of the outline or as part of implementation of the CCG's recommendations. The Council believes that the ability to monitor progress of Board consideration and implementation of adopted recommendations in an easy, transparent, way will greatly enhance the trust in the effectiveness and efficiency of the system of reviews, also suggests that this mechanism should not be limited to implementation of the ATR recommendations, but additionally include implementation of the other 3 suggested reviews.
3. **Review by CCG** - The outline suggests that actual review will be run and overseen by a CCG. We suggest including a set of criteria or design principles that such a CCG must meet, for example:
 - a. Should the CCG include staff and Board members?
 - b. How should SOs and ACs be represented?
 - c. Should appointing organizations endorse/support findings and recommendations?
4. **Monitoring of progress of actual review** - The outline suggests that the Scoping Group shall maintain an up-to-date dashboard to track progress and ensure transparency of meetings and deliberations. The ccNSO Council suggests that the actual review team (the CCG) be the group responsible to keep an up-to-date dashboard to track progress of the actual review and ensure transparency of meetings and deliberations.

On-demand review

1. **Support envisioned role of SOs and ACs** - The ccNSO Council supports the envisioned role of SOs and ACs in launching and scoping of On-Demand Reviews, including the proposed thresholds.
2. **Review by CCG** - The ccNSO Council also assumes that the separation of scoping and reviewing will be more detailed in the next iteration of the design of the process. The outline suggests that actual review will be run and overseen by a CCG. We suggest to include a set of criteria that such a CCG must meet when designed, for example:
 - a. Should the CCG include staff and Board members?
 - b. How should SOs and ACs be represented?
 - c. Should appointing organizations endorse/support findings and recommendations?
3. **Monitoring of progress of actual review** - The outline suggests that the Scoping Group shall maintain an up-to-date dashboard to track progress and ensure transparency of meetings and deliberations. The ccNSO Council suggests that the actual review team (the CCG) be the group responsible to keep an up-to-date dashboard to track progress of the actual review and ensure transparency of meetings and deliberations.