Public Comment Summary Report

Continuous Improvement Program Framework

Open for Submissions Date:
Thursday, 21 November 2024

Closed for Submissions Date:
Tuesday, 21 January 2025 (extended from Thursday, 09 January 2025)

Summary Report Due Date:
Thursday, 13 February 2025 (extended from Thursday, 06 February 2025)

Category: Reviews

Requester: Other

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Open Proceeding Link: https://www.icann.org/en/public-comment/proceeding/continuous-improvement-program-framework-21-11-2024

Outcome:
This Public Comment proceeding was scheduled to remain open from 21 November 2024 through 9 January 2025. The Public Comment proceeding was extended to 21 January 2025 in response to requests for additional time to submit input.

Eleven (11) submissions providing input on the Continuous Improvement Program Framework were received: eight (8) from organizations and groups, and three (3) from individuals. ICANN org will inform the Continuous Improvement Program Community Coordination Group on the inputs received in this Public Comment and will address any necessary updates to the CIP framework. The comments received will greatly support the Continuous Improvement Program Coordination Group (CIP-CCG) to consider whether updates are needed to finalize the Continuous Improvement Program Framework, the final step before the Continuous Program is shared with SOs/ACs/NomCom.

Section 1: What We Received Input On
The CIP-CCG sought input on its Continuous Improvement Program Framework, which:
- Introduced a Principles, Criteria, Indicators framework and its application to evolve ICANN Organizational Reviews led by Independent Examiners into a Continuous Improvement Program led by the ICANN community.
- Suggested five overarching principles based on the existing scope of Organizational Reviews, in accordance with the ICANN Bylaws.
- Provided description of principles, criteria, and indicators that were developed by the CIP-CCG: Volunteers applied the Continuous Improvement Program Framework to

develop 3-5 criteria and related indicators with their groups and identified best practices for collaboration with their groups.

- Provided examples of continuous improvement tools (including criteria, indicators, and a survey) that the ICANN community can use to implement and evolve the Continuous Improvement Program.
- The CIP-CCG sought input on whether the Continuous Improvement Program Framework is fit for purpose for each Supporting Organization, Advisory Committee, and the Nominating Committee.

The Public Comment proceeding was presented as a series of structured questions while also providing an opportunity for respondents to provide general submissions. When submitting the responses, the respondents were also requested to include detailed rationale to support their input. Commenters were not required to answer each question. In total, 11 comments were received, including 3 from individuals.
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Section 2: Submissions

Organizations and Groups:

Name	Submitted by	Initials
Asian, Australasian and Pacific Islands Regional At-Large Organization	Shita Laksmi	APRALO
Registries Stakeholder Group		RySG
Business Constituency		BC
Country Code Names Supporting Organization	Alejandra Reynoso	ccNSO
Registrar Stakeholder Group	Sarah Wyld	RrSG
Governmental Advisory Committee	Robert Hoggarth	GAC
Non-Commercial Stakeholder Group	Mesumbe Tomslin Samme-Nlar	NCSG
At-Large Advisory Committee	At-Large Community Policy Support Staff	ALAC

Individuals:

Name	Affiliation (if provided)	Initials
Alfredo Calderon-Serrano		ACS
Felix Opilli	AFRALO	FO
Alejandro Pisanty		AP

Section 3: Summary of Submissions

The Continuous Improvement Framework received three comments from individuals and eight comments from organizations and groups. The CIP-CCG thanks all of the contributors for their valuable input and feedback.

The submissions expressed general support of the Framework along with questions or concerns regarding the following areas: resistance to change, implementation of the framework, assessment timeline, resource requirements, community fatigue, and the lack of clarity on the relationship between the CIP and the Holistic Review.

Submission from Asian, Australasian and Pacific Islands Regional At-Large Organization (APRALO)
The APRALO expressed support for the CIP Framework, emphasizing its flexibility by offering "each ICANN group to tailor criteria and timelines suited to their unique purposes and resources." It further noted the proposed principles are "critical for ensuring continuous improvement", while underlining the importance of "references to "accountability" (in Principle 4) and the "multistakeholder model" (in Principle 5)" to align the framework "with ICANN's values."

Submission from the Registries Stakeholder Group (RySG)
The RySG expressed support for the CIP Framework as drafted, noting the Principles, Criteria and Indicators approach will enable flexibility and alignment across structures. The RySG further expressed support for the five principles but questioned whether "it is appropriate to evaluate the structures on their external accountability to the ICANN community." It went on to note that external accountability would go "beyond the requirements of the reviews contemplated under Section 4.4 of the ICANN Bylaws", suggesting the groups should instead "determine whether accountability to the external ICANN community is an appropriate criteria for its structure." The RySG expressed support for the CIP's next steps.

Submission from the Business Constituency (BC)
The BC expressed support for the CIP Framework and the transition of Organizational Reviews to a community-led program stating that is believes it is "a positive step towards empowering the ICANN community to take ownership of the process" and that it "aligns with ICANN's mission and core values." The BC further supported the CIP's principles and their alignment with ICANN's Bylaws. The BC suggested that more guidance is needed on the level of customization and flexibility of the framework "to accommodate the unique needs and diverse structures of SOs, ACs, and the NomCom." The BC went on to emphasize "the importance of stakeholder engagement", noting that it plays a "critical role" in the process.

The BC expressed concerns about the proposed two three-year assessment periods suggesting shorter and more flexible timelines to "maintain momentum and adapt to emerging issues." The BC also recommended the addition of "metrics for evaluation, stronger transparency and accountability measures, and safeguards for integrity" to the CIP Framework.

Submission from the Country Code Names Supporting Organization (ccNSO)
The ccNSO expressed support for the proposed approach of principles, criteria and indicators, noting that it meets its design criteria for "a general approach or framework that can be applied across and by the various Supporting Organizations, Advisory Committees and the Nominating Committee." The ccNSO expressed concern that there is a "discrepancy between the core elements of definition (the focus on efficiency, quality improvement and value delivery) and the continuing focus on the goals of the organizational reviews (the continuing purpose of the structure under review, its effectiveness and accountability)." The ccNSO further noted that the

"proposed cycle in the Framework is related to the concept of Holistic Reviews and the time between Holistic Reviews is unknown", adding that the "proposed three-year cycle may not be aligned with the realities of continuous improvement projects."

Submission from the Registrar Stakeholder Group (RrSG)
The RrSG underscored the importance of the CIP-CCG's work, stating that it believes "ongoing reviews and updates are a necessary aspect of ensuring that the work of the ICANN Community can continue in an efficient and effective manner." The RrSG noted that it believes the CIP effort "should result in time and cost savings, due to no longer requiring third party independent examiners." Citing concerns about potential biases inherent to self-evaluations, the RrSG suggested that the "CIP and accompanying reviews should have checks and guardrails in place to minimize bias" and that resulting reviews "must be critically evaluated to identify and rectify any biases." The RrSG expressed support for the five principles and noted that they believe they "apply appropriately across the organizational structures."

The RrSG expressed support for the proposed two, three-year assessment periods, but suggested that "CIP efforts should be, to the extent possible, coordinated with other ICANN review initiatives to maximize efficiency and minimize duplication of efforts." The RrSG went on to express concern regarding "the multitude of different work tracks underway pertaining to reviews and the improvement of work methods", "urging ICANN org to work with the Community to streamline and rationalize these efforts."

Submission from the Governmental Advisory Committee (GAC)
The GAC noted its appreciation for the vision set out in the framework noting that it believes the framework could "be applied across the community in a common manner that also recognizes the unique organizational aspects applicable to each individual group in the multistakeholder community." The GAC also expressed support for the five principles as written, suggesting that they will "offer flexibility within each community structure to apply and aspire to meet the principles."

The GAC requested clarification on the term "collaboration" within the fifth principle to confirm "among and with whom" collaboration is expected, and regarding the statement "flexibility required by different SO/ACs while maintaining consistency of approaches." The GAC also suggested the current list of proposed Principles, Criteria, and Indicators be upgraded with "1) inclusivity/representativeness of the SOs/ACs and 2) effectiveness of decision-making within the community (for those SOs/ACs which have decision making roles)."

The GAC noted that the extensive cross-community participation in the framework development process should "be viewed as an example of the commitment that all the communities will make to following through on implementing the Framework as proposed", adding that the GAC has already included and adopted the consideration of the CIP Framework in its Annual 2024-2025 plan. While the GAC is ready to start implementing the framework, it expressed concerns on the proposed timeline, specifically the "expectation that assessments of identified changes or improvements will potentially only be subjected to a short observation period after implementation begins", asking for "flexibility to adjust the time for implementing individual

phases within each three-year assessment period" and for considering "the three-year assessment cadence is viewed as a "good practice."

Submission from the Non-Commercial Stakeholder Group (NCSG)
The NCSG expressed support for the framework's five principles while suggesting the inclusion of a "brief explanation of the overlapping zones among principles" and suggested the addition of more examples of criteria and indicators based on the principles to guide the structures' work. The NCSG additionally recommended further clarity on specific criteria, indicators and implementation timelines to improve the adaptability and efficacy of the framework. Noting that although provided examples are helpful, "they show disparity of details among different frameworks (see, comparatively, ALAC and NomCom." The NCSG additionally requested additional guidance on the degree of flexibility allowed on the principles to ensure their "application is consistent across diverse groups." The NCSG also asked for a clearer definition for the "relation between structures and substructures", later questioning if substructures should follow the "the same pattern" as the structure and if the structure's framework would be used to evaluate a substructure if the substructure did not develop its own framework.

The NCSG stated that it believes that the SO/ACs "should be ultimately accountable to the ICANN Bylaws." The NCSG expressed support for the proposed next steps but noted that it believes the CIP and Holistic Review should be implemented in a way that ensures "the input generated within the CIP is effectively taken into consideration during the Holistic Review." The NCSG did not express concerns with the timing of the assessment periods but suggested introducing flexibility in the assessment plan timeline by "staggering the periods to apply to different structures or sub-structures as needed."

Submission from the At-Large Advisory Committee (ALAC)
The ALAC expressed support for the proposed model of the Principles Criteria and Indicator approach, including the framework's five principles. ALAC expressed its interest in developing "effective and efficient structures, processes and practices to ensure that their contributions match the high-level standards and expectations of other policy-related sections of ICANN, including the Org itself."

ALAC stated its support for the proposal for two, 3-year assessment periods. ALAC went on to state that it needed ICANN org to "commit to" "providing regular reports on how its support enables the initiatives", "tailored support, including staff assistance, technology platforms, and funding for critical initiatives", "maintain transparency by aligning its support with the At-Large's unique volunteer-driven model", "defined timelines for delivering support and ensuring resource availability for all project phases", ensuring that "deadlines for submissions are realistic", and to "define and publicly share a transparent funding framework to support At-Large initiatives."

Submission from individual, Alfredo Calderon-Serrano (ACS)
ACS expressed support for the CIP Framework, suggesting that the "Principles, Criteria and Indicator approach is appropriate as it provides a structured yet flexible methodology." ACS went on to add that he believed the principles are "well-grounded in the current Organizational Review objectives and suitable for application across SOs, ACs, and the NomCom." ACS also expressed support for the two, 3-year assessment periods for implementing the CIP.

ACS expressed concern that various stakeholders within ICANN structures could be "resistant to change", "hesitant to adopt new processes or methodologies", and may fear "disruptions to their established routines or potential changes in their roles." ACS additionally noted concern

that the CIP will require "significant resources" including "time, personnel, and funding", which may "hinder progress and sustainability." ACS further highlighted the risk of "Inadequate Training and Development" and Poor "Communication and Collaboration" leading to challenges in the work and impeding progress over time.

<u>Submission from individual, Felix Opilli (FO)</u>
FO strongly supported the proposed CIP Framework, noting its consistency and flexibility. FO suggested several improvements to the framework including "adding indicators that address adaptability to emerging challenges, publishing regular progress reports, introducing mid-term evaluations within the three-year assessment cycles for timely adjustments, utilizing digital tools to streamline the implementation and reporting of the CIP, and prioritizing inclusivity metrics to ensure meaningful participation from underrepresented regions." FO suggested that the CIP is a "vital step toward strengthening ICANN's bottom-up multi-stakeholder governance model and achieving long-term organizational resilience."

<u>Submission from individual, Alejandro Pisanty (AP)</u>
AP expressed concerns with the CIP, stating that in its current state, it will lead "to more bureaucracy, more entrenched positions, more deadlock." AP suggested that "independent examiners need to be involved" in a "critical capacity" to overcome potential issues that may arise from community resistance to change. AP also recommended the two three-year cycles timeline be tightened.

Section 4: Analysis of Submissions

Elements of each submission have been sorted by their relevance to the questions asked in the proceeding, organized into categories (Support, Concern, Suggestions, and Additional Guidance Requested), and grouped by theme to reflect the input received.

During this Public Comment, input was requested on:

1. **Whether the Continuous Improvement Program Framework is fit for purpose to evolve Organizational Reviews led by Independent Examiners into a Continuous Improvement Program led by the ICANN community, to inform the eventual Holistic Review:**
   a. **Do you support the Continuous Improvement Program Framework (comprising Principles, Criteria, and Indicators)?**

All eleven commenters submitted comments on this question.

Support for the CIP Framework
Support for the flexibility of the framework
- The APRALO, FO, the GAC, and the RySG appreciated the framework's flexibility that allows each SO/AC to tailor it to their unique purposes and resources.

Addresses issues with the use of independent examiners in Organizational Reviews
- The RrSG noted this effort "should result in time and cost savings due to no longer requiring third-party independent examiners."
- The BC noted that it believes the CIP framework is "a step in the right direction for working on assessments within the ICANN community and a foundation for evolving Organizational Reviews led by Independent Examiners into a Continuous Improvement

Program led by the ICANN community."

- The APRALO stated it believes that the CIP Framework "offers a robust alternative to Independent Examiner-led reviews by fostering community-wide stakeholder participation."
- FO stated that he believes the CIP framework addresses key issues identified in past Organizational Reviews including "the perceived limitations of Independent Examiners", and fosters "a stronger sense of ownership among stakeholders."

Concerns Noted

Barriers to Change

- AP expressed concern with the CIP Framework's ability to facilitate progress suggesting that the way it is structured to run will lead to "more bureaucracy, more entrenched positions, more deadlock."
- AP and ACS expressed concerns that various stakeholders could be resistant to proposed changes coming out of the CIP work.

Application of the CIP Framework

- The ccNSO suggested that "there is a discrepancy between the core elements of definition [for continuous improvement] (the focus on efficiency, quality improvement and value delivery) and the continuing focus on the goals of the organizational reviews (the continuing purpose of the structure under review, its effectiveness and accountability)."
- The ccNSO went on to state that it "would like to understand to what extent, if at all, the evolution of the content of Organizational Reviews into a Continuous Improvement Program that focuses on the efficiency, quality improvement and value delivery of each of SO/AC/NomCom is realized by the framework. Is the evolution a matter of changing the process - from being led by Independent Examiners to being led by the ICANN community — or will the goals i.e. the mandate for the Continuous Improvement Program also evolve from effectiveness and accountability to improving efficiency, quality, and delivery of value?"
- ACS noted that "establishing clear metrics and measurement systems to evaluate the success of the CIP across diverse ICANN structures may prove difficult."

Lack of clarity on the relationship between the CIP and Holistic Review

- The NCSG and ACS raised concerns about the relationship between the CIP and the Holistic Review. The NCSG noted that these efforts should be implemented in a way that the "input generated within the CIP is effectively taken into consideration during the Holistic Review."

Resource requirements

- The ALAC noted the need for ICANN Org to commit to "providing tailored support, including staff assistance, technology platforms, and funding for critical initiatives".
- The RrSG stated "ICANN must ensure that ICANN Org is staffed appropriately to accommodate the CIP."
- ACS noted "implementing a comprehensive CIP across all ICANN structures may require significant resources, including time, personnel, and funding raised the need for resources, staff support, and additional efficiencies in ICANN org's budget and strategic plan to support this program".

Community Fatigue
- ● ACS raised the risk of community "Fatigue or diminishing interest if immediate results are not visible" as the CIP progresses.

Suggestions and Additional Guidance Requested

Suggestions
- ● The BC suggested the CIP-CCG "strengthen the language to emphasize the importance of transparency and accountability throughout the Continuous Improvement Process" and to "consider mechanisms to safeguard the integrity of the process and ensure that the continuous improvement program remains focused on meaningful improvements."
- ● The RrSG recommended "any CIP and accompanying reviews should have checks and guardrails in place to minimize bias."
- ● The GAC suggested that the "CIP-CCG consider enriching the current list of proposed Principles, Criteria, and Indicators to include considerations of 1) inclusivity/representativeness of the SOs/ACs and 2) effectiveness of decision-making within the community (for those SOs/ACs which have decision making roles)."
- ● The NCSG suggested" more examples in-text to guide the structures' work when developing their own specific criteria and indicators based on the principles", in order to avoid a "disparity of details among different frameworks."
- ● ACS suggested the CIP-CCG provide more detailed guidance on "developing SMART indicators, addressing resource allocation for continuous improvement activities, emphasizing mechanisms for sharing best practices between groups."

Additional guidance requested
- ● The BC asked for guidance "on how the framework can be tailored to accommodate the unique needs and diverse structures of SOs, ACs, and the NomCom."
- ● The APRALO recommended "additional guidance on balancing bespoke flexibility with common principles will support consistent application across diverse groups."
- ● The GAC noted that "further clarification might be given to the acknowledged flexibility required by different SO/ACs while maintaining consistency of approaches".
- ● The ccNSO stated that it "would like to understand to what extent, if at all, the evolution of the content of Organizational Reviews into a Continuous Improvement Program that focuses on the efficiency, quality improvement and value delivery of each of SO/AC/NomCom is realized by the framework. Is the evolution a matter of changing the process - from being led by Independent Examiners to being led by the ICANN community — or will the goals i.e. the mandate for the Continuous Improvement Program also evolve from effectiveness and accountability to improving efficiency, quality, and delivery of value?"

b. Do you agree with the five principles, based on the current Organizational Review objectives described in the ICANN Bylaws, to apply across the organizational structures (SOs, ACs, and the NomCom?)

Ten commenters submitted comments on this question.

Support for the Five Principles
- The APRALO stated it believes the principles "are critical for ensuring continuous improvement", adding that "they are sufficiently broad yet actionable, with SMART indicators enabling relevance and adaptability."
- FO stated the principles "are well-aligned with ICANN's mission", adding the "Principles, Criteria, and Indicators (PCI) model is commended for effectively balancing consistency and flexibility."
- ACS considered the principles to be "well-grounded in the current Organizational Review objectives and suitable for application across SOs, ACs, and the NomCom", adding that they "comprehensively cover key aspects of organizational effectiveness and align with ICANN Bylaws' requirements."
- The RrSG stated it believes the five principles are "proper for the CIP, and apply appropriately across the organizational structures", adding they should be within the boundaries of the ICANN bylaws and its limited remit."
- The ccNSO stated they support the principles "in general", given their "flexible nature of the principles, and the need for a baseline to start replacing the organisational reviews with the continuous improvement program."
- The ccNSO expressed support of the design criteria "for a general approach or framework that can be applied across and by the various Supporting Organizations, Advisory Committees and the Nominating Committee."
- The GAC expressed support for the principles suggesting they "will offer flexibility within each community structure to apply and aspire to meet the principles while employing processes/solutions that are unique to each community group."
- The BC believed the principles will provide a "solid foundation for effective governance", and ensure "accountability, transparency, and effectiveness with ICANN's organization structures", noting "the alignment is crucial to fostering trust among stakeholders."

Concerns
Structures external accountability to the ICANN community
- The RySG questioned "whether it is appropriate to evaluate the structures on their external accountability to the ICANN community", arguing that it "goes beyond the requirements of the reviews contemplated under Section 4.4 of ICANN's Bylaws." The RySG went on to suggest that it "would be more appropriate for the structure to determine whether accountability to the external ICANN community is an appropriate criteria for its structure."

Suggestions and Additional Guidance Requested
General suggestions
- The GAC suggested the proposed Principles, Criteria, and Indicators include "considerations of 1) inclusivity/representativeness of the SOs/ACs and 2) effectiveness of decision-making within the community (for those SOs/ACs which have decision

making roles)." The GAC also asked that the "flexibility required by different SO/ACs" should be clarified.
- The BC asked that stakeholder engagement be highlighted in the process when principles are applied across structures.

Principle-specific suggestions
Principle 1 - The SO, AC or NomCom is fulfilling its purpose
- FO asked to include how each structure contributes to the ICANN mission. FO also asked that an indicator be added to assess the adaptability of SOs/ACs/NC to emerging trends.

Principle 2 - The structures of SO, AC, or NomCom are effective
- The BC noted that structures "are effective only when they serve the interests of their substructures and maintain accountability to both stakeholders and substructures", and requested a "distinct consultation process for substructures" to achieve these goals.

Principle 3 - The operations of SO, AC, or NomCom are efficient
- FO suggested adding "a specific example of "outputs implemented "efficiently", e.g. "tracking of the timeliness and impact of implemented policies or recommendations."

Principle 4 - The SO, AC, or NomCom is accountable internally to its stakeholders and substructures (where applicable), and externally to the wider ICANN community
- FO encouraged the publication of progress reports from SOs, ACs, and NomCom, which would include detailing how stakeholder feedback was addressed in the process.
- FO proposed that participation from underserved regions be tracked "to ensure their perspectives are integrated into decision-making processes"

Additional guidance requested
- The NCSG asked the CIP-CCG to confirm whether the substructure should follow a similar framework as the one used by the structure, and if not developing a framework, confirm whether the structure will evaluate the substructure in its framework.
- The GAC finds the reference to "collaboration" in Principle 5 to be ambiguous and requested the CIP-CCG clarify "with whom collaboration is expected to take place."

2. **Agreement for the Continuous Improvement Program Framework to be adopted by each SO, AC, and the NomCom:**
   a. **Do you agree with the plan for the next steps to carry the Continuous Improvement Program out in two, 3-year assessment periods?**

All eleven commenters submitted input on this question.

Support for Next Steps
- The APRALO stated it believed the plan will "allow sufficient time for implementation, evaluation, and iterative adjustments to ensure the Framework's effectiveness."
- FO found the proposed phased assessment approach to be "practical and sustainable."
- ACS considered the plan to be "well-structured" and provide a "a clear timeline for adoption and implementation."

Concerns with the Timeline

- The BC considered the proposed two, 3-year assessment period "excessively long" and invited the CIP-CCG to "consider more flexible timelines (18 months, 1*3 years, 1*4 years) to maintain momentum and adapt to emerging issues."
- The GAC considered the timeframe to be "quite ambitious - particularly the expectation that assessments of identified changes or improvements will potentially only be subjected to a short observation period after implementation begins."
- The RrSG agreed with the proposed timelines, but noted that "CIP efforts should be, to the extent possible, coordinated with other ICANN review initiatives to maximize efficiency and minimize duplication of efforts."
- AP stated that a "much tighter time frame must be instituted."

Suggestions

Improvements to the timeline
- The APRALO suggested "staggering the periods to apply to different structures or substructures as needed."
- FO suggested digital tools be used for real-time tracking of CIP activities and streamlining the implementation and reporting of the CIP.
- FO recommended "conducting mid-term evaluations in each cycle to assess ongoing progress and recalibrate priorities if necessary."

Coordination among ICANN Review initiatives
- The ccNSO noted the relationship between the CIP and the Holistic Review, and suggested that "at least two continuous improvement reporting phases (Phase 3 of the continuous improvement cycle) will need to have been completed between two sequential Holistic Reviews" to allow a "comparable and harmonized approach to community oversight of the continuous improvement programs." The ccNSO also suggested that a general reporting requirement be included at a predefined time and that the third phase "be used as input for the next round of improvements."

Community review of CIP
- The RrSG suggested that the community should review the CIP results to ensure that the "outcomes are fair, balanced and productive."
- ACS suggested developing a formal community feedback loop "after each 3-year cycle to refine the CIP Framework itself."
- FO suggested using case studies from the first assessment period "to identify best practices and provide benchmarks for subsequent assessments."

Training and resources to ensure the success of the CIP
- ALAC asked ICANN org to commit to several deliverables during this process to ensure its goals remain achievable.
- ACS asked that all participants in the CIP program be trained to ensure they have the "necessary skills and knowledge to effectively engage in continuous improvement activities."

Other Reviews Related Input

Concern over multiple Reviews work tracks
- The RrSG raised concern regarding the "multitude of different work tracks underway at ICANN pertaining to reviews and the improvement of work methods" and urged "ICANN

org to work with the Community to streamline and rationalize these efforts and to ensure that they are constructive and effective without placing an unsustainable burden on Community resources."

Section 5: Next Steps

The Continuous Improvement Program Community Coordination Group (CIP-CCG) will consider the input received, address improvements as needed and finalize the Continuous Improvement Program Framework. The CIP-CCG will then share the framework with each SO, AC, and NomCom for adoption.