

RrSG Public Comment: Continuous Improvement Program Framework

17 January 2025

The Registrar Stakeholder Group (RrSG) welcomes the opportunity to provide a comment on the Continuous Improvement Program Framework. The development of this Framework was a significant undertaking by the Continuous Improvement Program Community Coordination Group (CIP-CCG). 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.

- 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)? See pages 6 and 8.***
 - *Please provide your rationale and related suggestions for improvement.***

The RrSG believes the Framework is fit for purpose to evolve the Organizational Reviews into a Continuous Improvement Program (CIP) led by the ICANN Community. Transitioning to a CIP led by the Community should result in time and cost savings due to no longer requiring third-party independent examiners. This is essential as ICANN considers additional efficiencies in its budget and strategic plan; to support this, ICANN must ensure that ICANN Org is staffed appropriately to accommodate the CIP. Additionally, the Community members participating in the CIP will not require onboarding or other training to understand ICANN's unique structure and the nuances of the particular SO, AC, or the NomCom (which an independent examiner would require).

Any CIP and accompanying reviews should have checks and guardrails in place to minimize bias. As cited in numerous academic studies, "*...positive bias on self-evaluation is mainly explained by the self-enhancement motivation which minimizes negative feedback and emphasizes positive*

ones.”¹ Although there can be significant savings and improvements by moving to a CIP model over a model structured around independent examiners, any Framework must clearly avoid such biases, and the resulting reviews must be critically evaluated to identify and rectify any biases.

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)? See page 7.

- ***Please provide your rationale and related suggestions for improvement.***

The RrSG agrees that the five principles are proper for the CIP, and apply appropriately across the organizational structures. Although some broader principles were considered during the deliberations of the CIP-CCG, the principles should be within the boundaries of the ICANN bylaws and its limited remit which these current principles reflect.

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? See pages 9 and 10.

- ***Please provide your rationale and related suggestions for improvement.***

The RrSG agrees with the proposed two, 3-year assessment periods. These CIP efforts should be, to the extent possible, coordinated with other ICANN review initiatives to maximize efficiency and minimize duplication of efforts. The Community must ensure that the various CIP results are reviewed to ensure that the outcomes are fair, balanced, and productive.

¹ <https://pmc.ncbi.nlm.nih.gov/articles/PMC10852250/>. See also <https://www.sciencedirect.com/science/article/abs/pii/S0092656602005354>, <https://pmc.ncbi.nlm.nih.gov/articles/PMC6041499/>, and <https://www.frontiersin.org/journals/psychology/articles/10.3389/fpsyg.2022.966947/full>

Relatedly, the RrSG would like to note its concern regarding the multitude of different work tracks underway at ICANN pertaining to reviews and the improvement of work methods.² It is understood that these efforts are called for in ICANN's bylaws and the concluded ICANN Accountability Review, but it has become apparent in practice that the difference between and the need for all of these reviews taking place concurrently is unclear. It has also become a strain on member resources in staffing these various activities. In this light, the RrSG urges 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. We recognize that coordinating these efforts must also put a strain on ICANN Staff, but that Staff is bound to proceed. We hope this comment starts a Community conversation that steers the ship down a productive path.

Thank you,

Owen Smigelski
Registrar Stakeholder Group Chair

² These efforts include the Continuous Improvement Program Framework, the Standing Committee on Continuous Improvement (SCCI), the development of operating standards for specific review, and the Pilot Holistic Review, as well as the other reviews soon to be initiated including the Evolution of the Multi Stakeholder Model and Security and Stability Resiliency Review.