Global Domains Division - Consensus Policy Implementation Framework

(Updated insert date)

I. **Goals and Objectives:** ICANN organization's (org's) Consensus Policy Implementation Framework (CPIF or Framework) is designed to support predictability, accountability, transparency, and efficiency in the consensus policy implementation process.

II. **Working Principles:**

A. ICANN org's implementation of GNSO consensus policy recommendations must be transparent throughout the project lifecycle.[1] ICANN org's communications regarding the status of an implementation—including to the Implementation Review Team (IRT) and the GNSO Council—are a central component of the implementation lifecycle from beginning to end.

B. ICANN org strives to follow the letter and the intent of GNSO consensus policy recommendations when implementing them. ICANN org is accountable to the GNSO Council (or its agent, such as an IRT) for ensuring that the implementation of policy recommendations is consistent with their letter and intent as outlined in a Policy Development Process (PDP) Working Group's Final Report as adopted by the Board. Where there is uncertainty surrounding the intent underlying a policy recommendation, ICANN org's Global Domains Division (GDD) staff will consult with the IRT to clarify that intent.

C. ICANN org will use the CPIF as a guide when implementing consensus policy recommendations. GDD will follow the Framework, outlined in detail below, to ensure that all necessary steps are followed during each implementation phase before contracted parties must implement a consensus policy.

D. The implementation process must ensure that the integrity of consensus policy recommendation(s) is maintained as these are transformed into implementable processes, systems, and standards. The implementation process must enable GDD to plan and manage the capacity and resources required to package, build, test, and deploy a release into production and establish the service(s) and support structure.

E. ICANN org will transition the implementation project to relevant internal teams as the policy recommendations move from development to implementation to enforcement (i.e. GNSO Policy Team to GDD, GDD to Contractual Compliance).

F. Policy implementation activities should follow a life cycle according to the standardized implementation phases described below. To support contracted parties' implementation efforts, the policy implementation activities should be coordinated as much as possible according to deployment cycles and implementation deadlines, taking into account factors such as other related activities or events with conflicting or simultaneous timelines.[2]

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[1] More information about the GNSO Policy Development Process is available at http://gnso.icann.org/en/basics/consensus-policy/pdp

[2] See *GDD Policy Change Calendar* (May 2015), https://www.icann.org/en/system/files/files/gdd-policy-change-calendar-13may15-en.pdf

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G. Any change or release that is required due to immediate security and stability issues will be deployed in an expedited manner, per Consensus Policies and temporary policies specifications within the Registry Agreements and the Registrar Accreditation Agreement. In such cases, ICANN org will collaborate with the community and consider throttling back on other implementations in the pipeline to ease the burdens of emergency changes.

H. ICANN org will continually review the Framework and related materials to encapsulate additional best-practices or to adjust the steps as a result of lessons learned with previous consensus policy implementation projects. GDD will initiate a review of the Framework at least once every 5 years, and propose any amendments to it for the consideration of the GNSO Council. However, either GDD or the GNSO Council may propose changes to the Framework inside this timeframe if need arises. In any case, GDD will administer the CPIF review process according to the steps detailed in Section VII below. The current version of this Framework is available on ICANN org's implementation status webpage at www.icann.org/policy/implementation.

I. Once a consensus policy has been implemented, ICANN org will manage and support the post-implementation review process detailed in Section VI below to assist the GNSO and community in measuring and assessing a policy's effectiveness.

III. **Roles and Responsibilities**

A. GNSO Council: The GNSO is responsible for developing substantive policies relating to generic top-level domains. GNSO Council, as the manager of the overall policy development process, provides oversight of the overall policy development activities. Once policy recommendations are approved by the GNSO Council and adopted by the Board, the GNSO Council (or through its liaison to the IRT) serves as a resource for GDD staff who have questions about the background or intent of the policy recommendations during its implementation. The GNSO Council may continue to provide input on the implementation of a policy recommendation, for example, if the GNSO Council believes that the implementation is inconsistent with the policy recommendation. Following implementation of a consensus policy recommendation, the Council is also responsible for reviewing the Post-Implementation Policy Status Report and determining next steps providing any follow-up guidance based on its results (see Section VI below). The GNSO Council will appoint a Council liaison to the IRT.

B. ICANN Organization ("ICANN org"): ICANN org focuses staff and resources on: policy development support, event management, registrar and registry support, community support, contractual compliance, IANA functions, outreach and capacity building, external services for the broader community, and internal staff services. ICANN org implements the community-developed policy recommendations at the direction of the Board and under the supervision of the CEO.

C. GNSO Policy Staff: The Policy staff support the GNSO in its policy development activities and the GNSO Council in its oversight role. As such, the Policy staff are responsible for handing off GNSO policy recommendations for implementation to the GDD staff once the policy recommendations are approved by the Board. Policy staff can also serve as a resource for GDD staff should questions arise surrounding the intent or history of a policy recommendation, and support reviews of implemented consensus policies as detailed in Section VI below.

D. Global Domains Division (GDD): GDD is responsible for the entire implementation lifecycle, from creating an implementation plan, engaging the IRT, consulting with relevant ICANN org staff and any outside parties that are required, and conducting outreach

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surrounding the implementation, including communicating with the public and relevant stakeholders regarding the progress of implementation.

E. **Implementation Review Team (IRT):** The Implementation Review Team, if recommended to be convened by the GNSO Council, serves as a resource to GDD on policy and technical questions that may arise during implementation of GNSO consensus policy recommendations. An IRT will typically consist of, but will not be limited to, volunteers who were also involved in the development of the policy recommendations. As such, the IRT is expected to serve as a resource to GDD on the background and rationale of the policy recommendations and return to the GNSO Council through the GNSO Council liaison appointed to the IRT for additional guidance as required. Where relevant, the IRT should also include technical or subject-matter experts and contracted parties who can assist staff in the planning for the technical implementation of a new policy change. GDD initiates the IRT recruitment process in coordination with Policy staff and works to ensure that its composition provides requisite expertise and, to the extent possible, includes representation from all affected stakeholders.[3]

F. **ICANN Board:** The ICANN Board is ICANN org's oversight body. It exercises its authority through majority votes by its members present during annual, regular, or special meetings. Insofar as implementation of consensus policy recommendations is concerned, the ICANN Board is responsible for evaluating such recommendations from the GNSO Council and, if approved, directing ICANN org to implement the recommendations as a defined, legally-binding, and enforceable policy.[4] Once a consensus policy has been implemented, the Board may also recommend the policy be reviewed (see Section VI below).

G. **ICANN Supporting Organizations and Advisory Committees (SO/ACs):** SO/ACs may serve as a resource to ICANN org during implementation as specific projects require.

H. **General Counsel's Office:** Legal staff will review all proposed policy language to ensure it is legally sound and will not create issues under any existing consensus policies or the Registry Agreements and the Registrar Accreditation Agreement.

I. **Contractual Compliance:** Contractual Compliance staff is involved in the implementation lifecycle to ensure that a new Consensus Policy or changes to an existing Consensus Policy are implemented in a manner that creates clear and enforceable obligations on contracted parties, Contractual Compliance enforces implemented Consensus Policies, as well as provides metrics and reports to enable post-implementation reviews of a policy's effectiveness.

J. **Enterprise Risk Management:** Enterprise Risk Management will assist as needed in facilitating a review of policies and new services to evaluate risks and mitigation.

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[3] See "GNSO Council Procedures: IRT Principles and Guidelines." https://gnso.icann.org/en/council/procedures, Section II.C: "IRTs are…open to all interested parties, but may not necessarily be representative of the ICANN community, as actual participation may depend on interest and relevance of the topic under discussion".

[4] See "Bylaws for Internet Corporation for Assigned Names and Numbers: 'Implementation of Approved Policies,'" https://www.icann.org/resources/pages/governance/bylaws-en/#annexA, Annex A, Section 10: "Upon a final decision of the Board adopting the policy, the Board shall, as appropriate, give authorization or direction to ICANN staff to work with the GNSO Council to create an implementation plan based upon the implementation recommendations identified in the Final Report, and to implement the policy."

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K.   <u>Third-Party Service Providers</u>: Contractors may carry out, offer, and/or support a service at ICANN org's direction. These contractors may be expected to provide recommendations on the feasibility of certain approaches or assist with proposed solutions to issues raised during implementation.

IV. Consensus Policy Implementation Framework
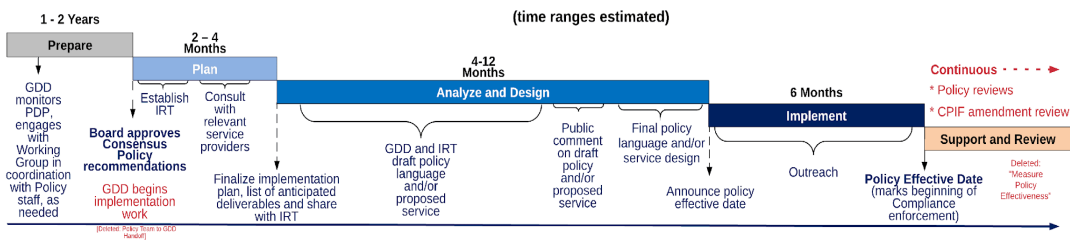
1. **Prepare:** A dedicated GDD staff member—hereafter the "Implementation Liaison"—will follow policy development activities to engage on implementation-related matters, as appropriate. Consideration and feedback to policy work products and consensus policy recommendations as it relates to implementation will occur through the various phases of the GNSO Policy Development Process. The Board's approval of consensus policy recommendations marks the formal endpoint of this phase.

2. **Plan:** This phase begins when Policy staff hands off the project to GDD for implementation. In consultation with Policy staff, GDD arranges for the recruitment of the IRT and organizes the activities required to implement consensus policy recommendations. This includes making initial contacts with any relevant service providers and the IRT. This phase is complete when a project plan with a complete work breakdown structure and draft requirements document are published.

3. **Analyze and Design:** GDD will work with the IRT during this phase to develop and complete new consensus policy language (if required) and any new service that may be needed. Public comments regarding the implementation will also be solicited. This phase is complete when the policy effective date is announced.

4. **Implement:** GDD will announce final implementation details to the community and conduct targeted outreach to contracted parties. This phase is complete when the consensus policy goes into effect and Compliance begins its policy enforcement activities and reporting.

5. **Support and Review:** GDD may serve as an internal resource as well as a resource for contracted parties in matters related to the implementation and interpretation of an implemented consensus policy. GDD also supports reviews of consensus policies in collaboration with Policy and Contractual Compliance staff, the GNSO Council, and community (see Section VI below).

V. Implementation Process and Milestones

Phase	Step	Responsible	Requirements
PREPARE	Provide input on staff Preliminary Issue Reports	GDD	A designated GDD staff member will monitor Policy staff's creation of Issue Reports and provide input on behalf of the team(s) as appropriate. This "Implementation Liaison" will monitor and coordinate GDD input on PDP work products, and will serve as the formal point of contact between PDP Working Groups and GDD staff.
	Follow policy development projects with an eye toward implementation	GDD	The Implementation Liaison will monitor PDP activities with an eye toward implementation issues. The Liaison shall participate in PDP discussions as required to share an implementation perspective.
	Provide input on GNSO PDP Initial Report	GDD	The Implementation Liaison will coordinate the teams' input on the GNSO PDP initial report, as needed.
	Provide input on GNSO PDP draft Final Report	GDD	The Implementation Liaison will coordinate the teams' input on the GNSO PDP draft Final Report, as needed.
	Provide input and prepare materials for Board consideration	GDD	The Implementation Liaison will coordinate GDD input on materials to prepare the ICANN Board for their consideration of the consensus policy recommendations and other SO/AC advice, where necessary.
PLAN	Recruit Implementation Review Team	GDD, GNSO Policy staff	GDD, in consultation with Policy staff, will issue a call for IRT volunteers and create a listserv for the IRT.[5] The call for volunteers will be forwarded to members of the relevant PDP Working Group as well as the chairs of relevant SO/ACs with a request to provide subject-matter experts from their groups to work on the IRT. Once recruited, GDD will consult with the IRT regarding a meetings schedule and convene one or two

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[5] For a description of the IRT recruitment process, see "GNSO Council Procedures: IRT Principles and Guidelines," https://gnso.icann.org/en/council/procedures, Section I

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			ad-hoc sessions to establish agreement on the rules of engagement and deliverables of the IRT.
			During this phase, the GDD project leader will organize all administrative activities pertaining to working with the IRT, including: ● Establishment of a community wiki ● Recruitment of staff-only Implementation Project Team (IPT) to assist in project planning and policy drafting ● Secretariat services including meeting transcription, attendance, and note-taking ● Collection of Statements of Interest from IRT members ● Recruitment of GNSO Council liaison ● Establishment of a group charter During initial call(s) with the IRT, the GDD project leader will review the IRT's role and operating principles. At a minimum, this review will cover: ● The Consensus Policy Implementation Framework ● IRT Principles and Guidelines[6] ● Standard Methodology for Making Decisions[7] ● GNSO Policy and Implementation Working Group Final Recommendations Report[8] ● GNSO Operating Procedures, including a review of the GNSO Input, Guidance, and Expedited Policy Development Process procedures[9]
	Conduct GNSO Policy staff to GDD implementation team transition	GNSO Policy staff, GDD	Once the Board passes a resolution, GDD will designate a staff member to lead the implementation project. This GDD staff member will coordinate with GNSO Policy staff to transition the project from policy development support to implementation. After this

[6] Ibid.
[7] *GNSO Operating Procedures v3*.4 (18 June 2018), https://gnso.icann.org/en/council/annex-1-gnso-wg-guidelines-07apr11-en.pdf, Annex I, Section 3.6 of the GNSO's Working Group Guidelines
[8] *GNSO Policy and Implementation Working Group's Final Recommendations Report* (2015), https://gnso.icann.org/en/drafts/policy-implementation-recommendations-01jun15-en.pdf
[9] "GNSO Council Procedures," https://gnso.icann.org/en/council/procedures

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			transition. GDD assumes responsibility for reporting and communicating on project status.
Create draft implementation plan	GDD		GDD staff will define the project deliverables and will create a draft implementation plan—including milestones, target dates, and descriptions of issues to be addressed—to present to the IRT, starting with a project plan template and making modifications as needed to accommodate the project.[10]
Create draft consensus policy language (if applicable) and service requirements (if applicable)	GDD, General Counsel's Office, Contractual Compliance		When the implementation of GNSO consensus policy recommendations require changes to an existing consensus policy or the creation of a new consensus policy, GDD staff will create a draft consensus policy language proposal to kick off implementation discussions with the IRT. When policy recommendations require the creation of a new service or changes to an existing service, GDD staff will also create draft requirements for systems and third party engagement for new/changed services. GDD will coordinate with affected ICANN org teams to prepare for operational readiness, as needed.

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[10] See "Bylaws for Internet Corporation for Assigned Names and Numbers: 'Implementation of Approved Policies,'" https://www.icann.org/resources/pages/governance/bylaws-en/#annexA, Annex A, Section 10: "Upon a final decision of the Board adopting the policy, the Board shall, as appropriate, give authorization or direction to ICANN staff to work with the GNSO Council to create an implementation plan based upon the implementation recommendations identified in the Final Report, and to implement the policy."

	Engage Implementation Review Team	GDD, GNSO Policy staff, in consultation with IRT	Draft consensus policy language should be distributed to the IRT and call(s) should be held to clarify or improve the language consistent with the intent of the policy recommendations. If the IRT concludes that the planned implementation of consensus policy recommendations is inconsistent with the stated intent of those recommendations, the IRT may consult with the GNSO Council via its liaison to the IRT as outlined in the IRT Principles and Guidelines.[11]
ANALYZE AND DESIGN	Engage additional third parties as may be needed for implementation (service providers, technical experts, etc)	GDD, in consultation with IRT	If the implementation will require changes to existing services or the building of a new service, the implementation lead should consult service providers and tech experts as early as possible to ensure that these viewpoints are included from the outset of the implementation. This may include issuing a Request for Information (RFI) or Request for Proposal (RFP).
	Solicit public comment on proposed policy language and implementation plan (if applicable)	GDD, in consultation with IRT	GDD, in consultation with the IRT, will determine whether the proposed implementation should be posted for public comment (there is a strong presumption that items will be posted for public comment). If so, the proposed consensus policy language and/or details of the new service as well as the implementation plan will be posted for public comment
	Draft final policy language (if applicable)	GDD, in consultation with IRT	GDD will adjust the proposed policy language based on public comments, in consultation with the IRT.
	Complete new proposed service (if applicable)	GDD, in consultation with IRT	GDD will complete all required elements of new proposed service based on public comments, in consultation with the IRT and after consulting any service providers.
	Consult with IRT and relevant staff	GDD, in consultation with IRT	GDD will consult with relevant staff (as needed) and the IRT (or GNSO Council in cases where there is not an IRT) on final policy language and/or service(s).

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[11] "GNSO Council Procedures: IRT Principles and Guidelines," https://gnso.icann.org/en/council/procedures

regarding draft final policy language and/or new proposed service		
Solicit additional public comments, if required	GDD	If the final policy language and/or proposed service is materially changed following the initial public comment period, GDD will seek public comments on the updated language/service before it is implemented.
Complete policy language and/or new service	GDD, in consultation with IRT	Once all relevant staff, service providers and the IRT have reviewed the final policy language/service, the final product should be announced to the public and to relevant stakeholders. Translations of the final policy should be posted on ICANN website at this point or earlier.
Establish Policy Effective Date	GDD, in consultation with IRT	GDD, in consultation with the IRT, will determine a reasonable date by which contracted parties can implement changes to become compliant with the requirements of a consensus policy.

IMPLEMENT	Announce Policy Effective Date	GDD	A proposed policy effective date should already have been scheduled/published, but this marks the formal milestone. Formal legal notice, as required under the Registry Agreements and the Registrar Accreditation Agreement, should be provided to contracted parties. Notice should be emailed to the contracted parties and posted on the ICANN website in the "Consensus Policies" section at https://www.icann.org/resources/pages/registrars/consensus-policies-en.
	Develop education and outreach materials	GDD	GDD will coordinate with Communications and Compliance to create any materials needed for communicating the policy changes across the contracted parties and general internet community. This may include webinars, FAQs, online documentation, face-to-face presentations to the community, or other types of materials.
	Conduct outreach	GDD	GDD will disseminate information and conduct outreach events to educate affected stakeholders on the pending policy changes (if needed). GDD staff also works with relevant parties to handle any unforeseen issues that may arise during the implementation of the policy.
	Send reminder notices	GDD	Reminder notices about the upcoming policy effective date should be sent to contracted parties 30 days before the effective date and on the effective date.
	Deploy consensus policy change	GDD	This milestone marks the end of GDD's implementation work. The consensus policy goes into effect and Compliance becomes responsible for policy monitoring and enforcement.

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SUPPORT AND REVIEW	Continuous improvement and measure of policy effectiveness	GDD, GNSO Policy staff, Compliance, contracted and third-parties as appropriate to data collection needs	Measurement of consensus policy effectiveness is important to understand if the policy changes met the objectives defined by the GNSO. To this end, a series of metrics should be defined and collected to measure the policy across ICANN services as soon as the policy becomes effective. Any relevant data and metrics should be included in the Compliance Annual Report and other reporting sources, and made available for the Post-Implementation Policy Status Report and any subsequent policy review.
	Formal review (if applicable)	GDD, GNSO Policy staff	If a consensus policy has a scheduled formal staff review following its effective date, or if the GNSO Council or ICANN Board calls for a formal review, GDD and/or Policy staff will initiate this review process and carry it out according the post-implementation review process detailed in Section VI below.
	Post-implementation consensus policy review: Policy Status Report	GDD, Compliance, GNSO Policy Staff	The first step in the post-implementation policy review process (see Section VI below) is to draft a Policy Status Report (PSR). After there has been adequate time to generate data and metrics to evaluate implemented policy recommendations, GDD, Compliance and GNSO Policy Staff should provide a PSR to the GNSO Council with sufficient data and metrics to assess the impact of the policy. Unless a data collection and reporting timeframe is specifically recommended by a Policy Development Process Working Group, generally the PSR should be provided within 3 to 5 years from the policy's effective date. The PSR may serve as the basis for further review and/or revisions to the policy recommendations if deemed appropriate.
	Policy Status Report follow-up: public comment	GDD, Compliance, GNSO Policy staff, GNSO Council, ICANN Community	GDD will post the PSR for public comment. In addition, GDD may solicit input on a policy from the Council and community via surveys, presentations, in-person and email discussions, webinars, and/or other forms of consultation. Any relevant input received via these mechanisms will be included in a "Staff Report of Public Comments" and added to a revised PSR. The revised PSR represents the final version to be reviewed by the GNSO Council.
	Policy Status Report follow-up: GNSO Council review and advice	GNSO Council, GDD, Policy staff	Once the Council has adequate time to review the PSR, it may request that ICANN org further review the policy based on Council and community input. It may also consider the PSR as sufficient for the purposes of a policy review, and take steps to initiate new policy work, take no further action, or provide other forms of input.[12]

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[12] This may include initiating a GNSO Input Process (GIP), GNSO Guidance Process (GGP) or Expedited Policy Development Process (EPDP) as appropriate to the issue at hand. For details on these processes, see "GNSO Council Procedures," https://gnso.icann.org/en/council/procedures

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VI. Post-Implementation Consensus Policy Review Process [NEW MATERIAL PROPOSED FOR ADDITION TO CPIF]

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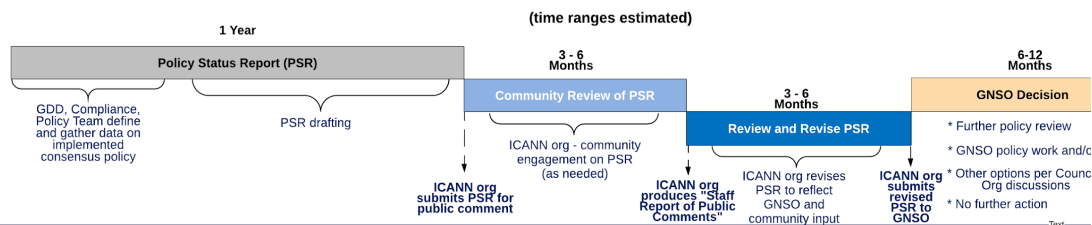
I. **Goals and Objectives:** ICANN org's post-implementation policy review process details the execution of the policy review process described in the "Support and Review" phase of the Consensus Policy Implementation Framework.

II. **Working Principles:**
  A. If a PDP Working Group sets out explicit policy objectives in its Final Report, any review of the policy will be premised on measuring the effectiveness of the policy in terms of achieving those objectives. If the objectives are not explicit, the language contained in a Working Group's Final Report will serve as a guide for any review process.
  B. Generally, the "Support and Review" phase of the CPIF provides sufficient mandate for ICANN org to produce a Policy Status Report within 3 to 5 years from a policy's effective date and begin the policy review process. However, review of a consensus policy may also be recommended by the GNSO Council, ICANN Board, or a Policy Development Process Working Group in its Final Report. In such cases, GDD would follow the policy review process according to any review timelines set in those recommendations.
  C. The Board and GNSO Council may request a policy review by following the same process for requesting an Issue Report detailed in the ICANN Bylaws.[13] In the event the Board or Council makes a request for a policy review, they should provide a mechanism by which they can consult with ICANN org to provide information on the scope, timing, and priority of the request.

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[13] "Bylaws for Internet Corporation for Assigned Names and Numbers: 'Requesting an Issue Report,'" https://www.icann.org/resources/pages/governance/bylaws-en/#annexA, Annex A, Section 3

Phase	Step	Responsible	Requirements
POLICY STATUS REPORT (PSR)	Draft initial PSR	GDD, in consultation with Compliance, Policy, and Legal teams	Unless a review timeframe is specifically recommended by a PDP Working Group in its Final Report, or a review is requested by the GNSO Council and/or ICANN Board, the policy review process begins every 3 to 5 years following the policy's implementation with ICANN org—in particular its Global Domains Division (GDD), Compliance, and Policy teams—producing a post-implementation Policy Status Report with metrics and analysis to assess a policy's effectiveness for the consideration of the GNSO Council. After Council's review, GDD staff will incorporate any feedback from the Council and post the initial PSR will be posted for public comment.
	Submit initial PSR for public comment	GDD	This phase is complete when GDD submits the initial PSR for public comment. GDD may leverage the public comment process to solicit additional forms of input from the community through mechanisms such as surveys, interviews, and requests for data.
PSR REVIEW	Disseminate PSR to relevant stakeholders	GNSO Council and Community	During the public comment process, the community will review the initial Policy Status Report with an aim to provide feedback on the report's data, methods, and analysis, as well as any suggestions for additional data and/or interpretations of existing data. Feedback may also be provided via any input mechanisms provided during the public comment process (e.g. surveys or requests for data).
	Staff Report of Public Comments	GDD	Once the public comment process is over and all forms of feedback have been received, GDD will analyze the materials to produce a "Staff Report of Public Comments." This phase is complete when GDD publishes the Staff Report.
PSR REVISION	Revise PSR	GDD	Once the Staff Report has been published, GDD will commence revising the initial PSR to incorporate relevant feedback received during the public comment process.
	ICANN org – GNSO engagement	GDD, GNSO Council	GDD will engage with the GNSO Council and community to discuss and/or clarify any new information provided during the public comment process.
	Submit revised PSR for GNSO consideration	GDD	This phase is complete when GDD sends the revised PSR to the GNSO Council with a request to provide guidance on next steps.
GNSO DECISION	Determine next steps	GNSO Council, GDD	After reviewing the revised PSR, the GNSO Council determines the next steps of the policy review process, which may include: 1) no further action; 2) new policy work or

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			Council input to ICANN org; 3) further policy review; 4) and/or other options, the details of which will be determined through ICANN org – GNSO Council discussions.[14]

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[14] Phase 5 of the CPIF, "Support and Review," states: "If a Consensus Policy has a scheduled formal staff review following its effective date, or if the GNSO Council or ICANN Board calls for a formal review, GDD and/or Policy staff will initiate this process."

VII. **Consensus Policy Implementation Framework Amendment Process [NEW MATERIAL PROPOSED FOR ADDITION TO CPIF]**
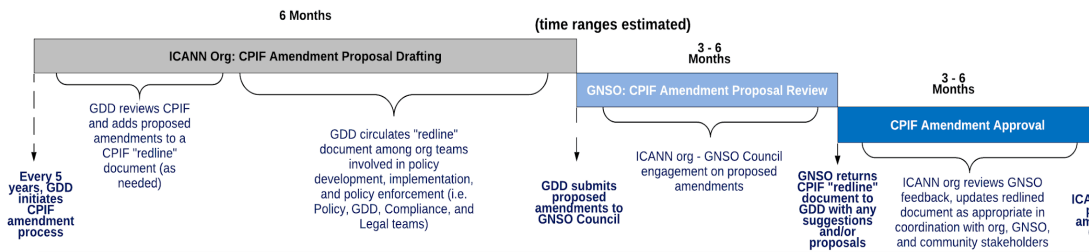
I. **Goals and Objectives:** Point H of the Consensus Policy Implementation Framework states: "ICANN org will continually review the implementation framework and related materials to encapsulate additional best-practices or to adjust the steps as a result of lessons learned with previous Consensus Policy projects." The CPIF amendment process is designed to accommodate this mandate, providing a predictable and standard procedure for proposing, reviewing, and approving amendments to the CPIF.

II. **Working Principles:**

    A.   GDD will initiate a review of the CPIF once every 5 years unless circumstances require updates within this timeframe (i.e. to reflect any new processes, terminology, and/or procedures). This will begin with discussions within the org on where an amendment to the CPIF may be merited. Once ICANN org reviews the CPIF internally for potential amendments, a redlined version of the CPIF will be sent to the GNSO Council for consideration and additional suggestions for amendment.

    B.   If GDD does not identify any areas for amendment, none will be proposed to the GNSO Council.

    C.   The GNSO Council may also initiate the CPIF amendment process with a formal request to GDD. Such a request should include guidance on which aspects of the CPIF that GDD should review. Upon receipt of the request, GDD will commence with the CPIF amendment process by drafting a redlined CPIF document for the Council's review and input.

    D.   The CPIF should reflect the current state of working practices and be updated when changes to such practices are made.

    E.   For minor amendments (e.g. a word change), changes may be proposed and consent assumed if no objection is received from the GNSO Council after 2 months of GNSO Council's review. For major amendments (e.g. adding paragraphs, new obligations, and/or processes), GNSO Council's consent for amendment must be received following discussion with Council members and participants.

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Amendments should be kept as simple and succinct as possible to mitigate the risk of adding overly complex language that may raise unforeseen or unnecessary issues.

F.   When proposing amendments, every effort must be made to adhere to the original spirit and letter of the CPIF process. The key function of the GNSO Council in this process is to ensure that any proposed amendments meet this requirement.

Phase	Step	Responsible	Requirements
CPIF AMENDMENT PROPOSAL DRAFTING	Initiate CPIF Amendment Process	GDD	Every 5 years—or upon formal request from the GNSO Council—GDD will review the CPIF and may propose amendments to it in a redlined version of the CPIF document. However, GDD and/or the GNSO Council may propose amendments inside this timeframe to reflect any new processes, terminology, and/or procedures that may affect implementation of consensus policy recommendations.
	ICANN org CPIF review	GDD, in consultation with Compliance, Policy, and Legal teams	GDD will circulate the redlined CPIF document to relevant org teams for input. Once all input has been received and amendment proposals finalized, GDD will send the redlined version to the GNSO Council. This marks the end of the first phase of the CPIF amendment process.
CPIF AMENDMENT PROPOSAL REVIEW	Review CPIF amendment proposals	GNSO Council and Community	During this phase, the GNSO Council and relevant community stakeholders review ICANN org's CPIF amendment proposals and provide input. In addition, they may add amendment proposals to the redlined document.
	Discuss and refine CPIF amendment proposals	GDD and relevant ICANN org teams, GNSO Council and relevant community stakeholders	GDD and ICANN org will engage with the GNSO Council and community to refine any proposed amendments. The phase is complete when the Council sends their final input to GDD. This input may take the form of redlines and/or comments provided in the CPIF redline document and/or direct emails to GDD detailing proposed amendments and rationales (any such email correspondence must cc the Council).

		GDD, in consultation with Compliance, Policy, and Legal teams; GNSO Council and community stakeholders (as needed)	GDD and relevant ICANN org teams will review the final CPIF amendment proposals to ensure they do not conflict with any existing contractual and/or procedural obligations. Any issues that arise from this org review will be discussed with the GNSO Council and relevant community stakeholders. Once these issues have been addressed and any modifications to the CPIF amendment proposals have been made, GDD will post the updated version of the CPIF to ICANN org's implementation page at https://www.icann.org/policy/implementation. This marks the end of the CPIF amendment process.
CPIF AMENDMENT APPROVAL	Finalize and publish updated CPIF		

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Rationale for change: to clarify the IRT recruitment process based on the "IRT Principles and Guidelines".

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Rationale for change: to sync the IRT – GNSO Council communication process with established guidelines in the referenced "IRT Principles and Guidelines" document.

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Rationale for change: to spell out first-use acronyms in document.

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Rationale for change: to clarify the types of communication materials that may be sent as result of a forthcoming policy implementation.

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Rationale for change: to be more general about the types of outreach that may be carried out (webinars are not the only form of outreach).

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Rationale for change: the referenced documents in the deleted sentence are produced during the "Plan" and "Analyze and Design" phases.

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Seems like an odd place to put this, with impl plan at end? Using same word for diff things

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Implementation notes or guidance? Rationale: misplaced? Implementation complete by this point.