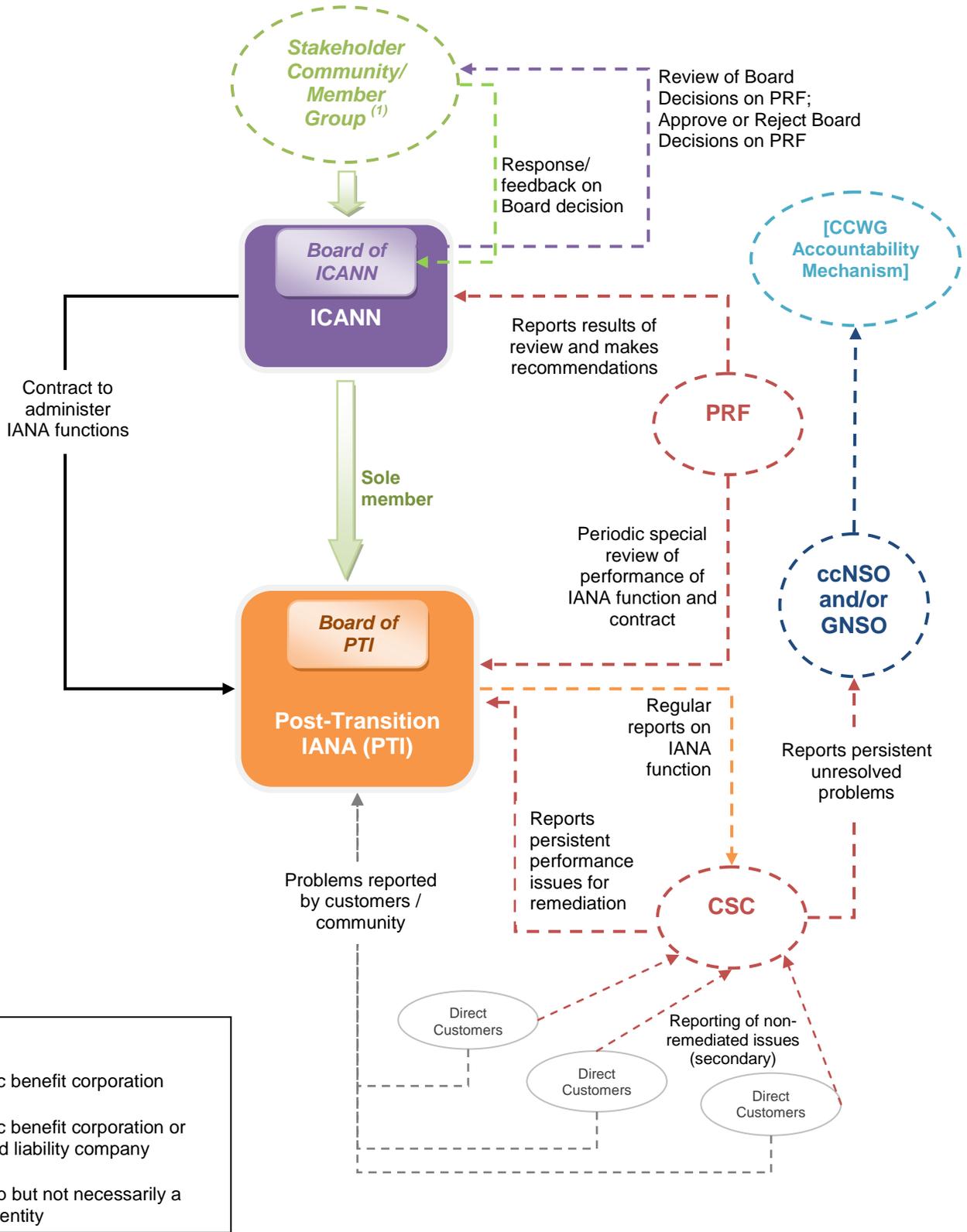


**INTERNAL ACCOUNTABILITY / HYBRID MODEL WITH LEGAL SEPARATION**



(1) The ultimate accountability mechanism is dependent on the work of the CCWG. For example, as an alternative to a Board Reconsideration mechanism, the model could contemplate other means of enforcing the decisions of the PRF, including an IRP or a Board recall process.