Commenter	subject	Comment
GNSO-BC	Overall Comment	The working group could additionally consider recommending some positive incentives, such as mechanisms to provide recognition staff members that go above and beyond duty in their service to the community on an ongoing basis. Recognition could also feed into a community-selected community recognition award for staff, similar to the ICANN multi-stakeholder ethos awards.
GNSO-BC	Overall Comment	If the working group intends further review of staff accountability, please consider looking at: staff empowerment, including whether staff feel meaningfully engaged in their work and have the resources and decisional latitude to effectively carry out their roles; and the relationship between community needs and staff growth and distribution.
GNSO-BC	Overall Comment	We support the reasoned approach taken by the Working Group in addressing staff accountability in terms of broad concerns and service delivery and organizational and departmental accountability objectives, without scrutinizing individual personnel or specific incidents. We believe that the recommendations adopted as part of this work track must be similarly balanced to provide the ICANN community with reasonable accountability and transparency improvements, while allowing ICANN to operate efficiently as an organization and its staff to perform their roles comfortably and
ICANN Board	Overall Comment	The ICANN Board appreciates the opportunity to provide input to the CCWG WS2 report on recommendations to improve ICANN's Staff Accountability. We are providing these inputs to the Staff Accountability public comments for the further deliberations by the Subgroup and CCWG-Accountability. One general observation before some specific comments that factor into these comments are the considerations of the recommendations in relation to ICANN's resources and ability to serve the global community. As ICANN operates within a specific budget based on limited funding, recommendations that add costs to ICANN's operations result in the organization needing to make trade-offs with other items, such as implementation of new policies, or innovation of existing programs or services to the global community. They might also establish a situation where the organization is unable to effectively meet community expectations with either the new recommendations or existing obligations. The CCWG-Accountability should consider these factors when providing guidance on the extent to which these recommendations should be
ICANN Board	Overall Comment	With regards to the recommendations on staff accountability, there are many useful ideas presented, and a number of actionable and implementable recommendations. There are some recommendations where further clarification would serve to avoid misinterpretation or unintended consequences for ICANN. There are also some recommendations where there are resource implications and the community needs to assess how these are prioritized against other resources. This input is intended to provide observations and information to further the Subgroup

Kris Seeburn	Overall Comment	From ALAC - AFRALO Perspective
		I just wanted to add something important to the whole list. Describing all these annexes and so on is great but the most important things is and also personal view. I would like to see ICANN accountability is a very clear cut way. I am unsure where these will fit but i would really like to ensure that not everything either is board or staff or community. It is a shared responsibility. So i'd let staff see best fit on this.
		"How do I get people/staff to be more accountable for results?"
		Accountability is not simply taking the blame when something goes wrong. It's not a confession. Accountability is about delivering on a commitment. It's responsibility to an outcome, not just a set of tasks. It's taking initiative with thoughtful, strategic follow-through.
		And it's necessary at all levels of the hierarchy. Executives high on the org chart can't really be accountable unless the people who report to them also follow through on their commitments. Getting angry with people when they fall short is not a productive process for holding people accountable. It almost always reduces motivation and performance.
		So what can we do to foster accountability in the people around us? We need to aim for clarity in five areas:
		Clear expectations. The first step is to be crystal clear about what to expect (if in doubt clear doubts - there should be no ambiguity at all before starting work or else). This means being clear about the outcome you're looking for, how you'll measure success, and how people should go about achieving the objective. It doesn't all have to come from you. In fact, the more skilled your people are, the more ideas and strategies should be coming from them. Have a genuinely two-way conversation, and before it's over, ask the other person to summarize the important pieces — the outcome they're going for, how they are going to achieve it, and how they'll know whether they're successful — to make sure you're ending up on the same page. Writing out a summary is a good idea but doesn't replace saying it out loud.
		Clear capability. What skills does the person need to meet the expectations? What resources will they need? If the person does not have what's necessary, can they acquire what's missing? If so, what's the plan? If not, you'll need to delegate to someone else. Otherwise you're setting them up for failure.
		Clear measurement. Nothing frustrates leaders more than being surprised by failure. Sometimes this surprise is because the person who should be delivering is afraid to ask for help. Sometimes it comes from premature optimism on both sides. Either way, it's completely avoidable. During the expectations conversation, you should agree on weekly milestones with clear, measurable, objective targets. If any of these targets slip, jump on it immediately. Brainstorm a solution, identify a fix, redesign the schedule, or respond in some other way that gets the person back on track.
		Clear feedback. Honest, open, ongoing feedback is critical. People should know where they stand. If you have clear expectations, capability, and
RrSG	Overall Comment	It is vital not to conflate the proliferation of accountability mechanisms with increasing accountability effectively. The tendency and temptation of all exercises in holding people accountable is to add to the number of mechanisms and thereby blur lines of authority. The incentives apply to both groups involved in this exercise: ICANN staff and the stakeholder groups. The people who are being held accountable, in this case ICANN staff, have incentives to add to the number of managers, institutions, and mechanisms to whom and by which they report, or at least not to resist them too hard. Why? Because the multiplication of interests, managers and mechanisms creates blurred accountability, which engenders a loss of clarity as to who is responsible to whom and for what. The temptation of stakeholder groups may also be to think that increasing the number and kind of accountability mechanisms will actually increase accountability. The result is budget bloat and a lack of effectiveness. With that caution in mind, the RrSG makes the following observations.

RrSG	Overall Comment	(Observation) The RrSG notes the contradiction between the elaborate mechanisms already in place and the apparent reluctance of people to use them (as the Study Group avers in its Issues section on page 6). It might be asked why, if the mechanisms are in place, and they are considered "formal" and "alarmist", the addition of more mechanisms and procedures would improve accountability. The answer may be that the specific recommendations of the CCWG may lessen confusion, and increase the general understanding of members of stakeholder groups and of ICANN staff of what they may reasonably expect from one another.
RrSG	Overall Comment	(Observation) The staff of the ICANN Organization are responsible to the chief executive officer, and the CEO is in turn responsible to the Board. The ICANN organization acts as a supplier of services to the constituencies or stakeholder groups. Accordingly, the relationship of the ICANN Organization and ICANN Board to its Community is one of supplier to customers. This relationship came into being when ICANN severed its
RrSG	Overall Comment	(Observation) Measures to increase or make more effective the accountability relationship of ICANN organization staff to the Stakeholder Groups need to be considered in the light of the customer-supplier relationship. Stakeholder groups must be able to know what they may reasonably expect from staff, and what the limits are of their respective roles.
ALAC	Recommendation 1 - Provide transparency into existing Staff	We support.
GNSO-BC	Recommendation 1 - Provide transparency into existing Staff	We strongly support the recommendations made to improve transparency regarding staff expectations and existing accountability mechanisms, particularly with respect to organizational and departmental goal setting and service level targets for regular processes and interactions with the
GNSO-IPC	Recommendation 1 - Provide transparency into existing Staff	We support.
ICANN Board	Recommendation 1 - Provide transparency into existing Staff Accountability mechanisms.	Much of the first recommendation, focused on transparency and accessibility of information that the CCWG-Accountability has identified as important components of staff accountability, are easily implemented. While there are different uses of the term "accountability mechanisms" within ICANN, we understand the following elements to be important regarding the relationship between the ICANN Community, Organization and Board: - ICANN organization/staff goals and assessments: Information on how individual goals are set to align with ICANN's strategic goals, and information on the process of how staff member performance is assessed against those goals; - Publication of key employee policies; - Information on Roles and Responsibilities; - Information on processes within ICANN, such as handling of correspondence; - Information on where to raise concerns about staff accountability, with more information about the differing roles of the Complaints Officer and the Ombudsman. Making this information accessible from a single page seems to be a practical and implementable recommendation, as is the consideration of how else this information can be communicated or available. A lot of this information is already available, but in various places. ICANN organization may also need to develop some additional documentation regarding the performance
ICANN Board	Recommendation 1 - Provide transparency into existing Staff	The reference to "expectations and guidelines regarding the development of staff reports for Public Comment" is an area where the report could benefit from more specific problem statements. It is not clear what is being requested here.
RrSG	Recommendation 1 - Provide transparency into existing Staff	The RrSG considers these ideas virtuous and to a degree desirable but not likely to be significant.

GNSO-BC	Recommendation 2.a - enhance existing accountability mechanisms .	Service to the community is an integral part of many public-facing ICANN-staff roles and accordingly should be accounted for in performance evaluations for these staff. However, new feedback mechanisms that affect individual staff members must also be implemented with care. ICANN staff members are often in the position of having to reconcile diverging views within the community. Staff in these roles must feel free to carry out their roles independently and comfortably without fearing that they will be unfairly punished for engagement in divisive work, or feeling swayed to
GNSO-IPC	Recommendation 2.a - enhance existing accountability mechanisms .	We support enhance existing accountability mechanisms to include collection of data from the community (surveys, focus groups, etc.). ICANN should consider recognizing staff for exemplary service to the community based on input collected from the community through these
ICANN Board	Recommendation 2.a - enhance existing accountability mechanisms .	In the second recommendation, the overarching goal that ICANN should continue to support and evolve ways to understand and measure accountability concerns between community members and staff members is useful. As the report notes, there are already many new efforts underway to measure this, such as the regular reporting of the Complaints Office and satisfaction surveys for those using the Global Support Center or Contractual Compliance department. Additionally, the regular CEO reports provide regular updates to the community on ICANN organization activities. ICANN organization agrees that a focus on the effectiveness of existing tools should be considered prior to developing new or potentially duplicative processes. Further expansion of information acquisition mechanisms will incur new ongoing resource requirements, which carry prioritization and funding considerations. The second recommendation also aligns with the Board's FY18 priorities as announced prior to ICANN60. As part of the Board's priority of improving interaction with the community, the Board specified: 5.2 – Service Satisfaction – The Board will review the findings of community surveys https://www.icann.org/search/#!/?searchText=survey conducted over the past three years to understand whether ICANN (Board and ICANN Org) activities actually lead to overall improvement of service satisfaction within the community. https://www.icann.org/news/blog/about-the-fy18-board-activities-priorities In relation to interactions with the ICANN community, the ICANN Board intends to use the outcomes of its review to work with the President and CEO to identify where improvements need to be made, including issues of staff accountability.
RrSG	Recommendation 2.a - enhance existing accountability mechanisms .	The RrSG considers this recommendation 2a to be without merit. It consists of needless complexity, and implies that accountability is achieved by mechanisms, and if one does not work, let's add another.
Valideus	Recommendation 2.a - enhance existing accountability mechanisms .	The proposed "regular information acquisition mechanism" may be helpful. There is a natural tendency to recollect and report on a bad experience far more readily than a good one. Consideration should be given as to how an information acquisition mechanism can be developed in a way to encourage the capture of the positive and not just the negative. This would ensure that ICANN Organization is aware of what is working
ICANN Board	Recommendation 2.b - standardize and publish guidelines for response to community requests.	On the standardization and publication of guidelines on timeframes for acknowledgement and resolution of requests, ICANN already maintains some timeframes for certain groups of the community it serves, such as the contracted parties. There are multiple ways that requests can come into ICANN, and different purposes behind those requests that might require differing timeframes. To the extent that this recommendation is focusing on service being delivered in predictable (and published) timeframes, that goal should be upheld. However, as some timeframes are very targeted, ICANN organization would benefit from additional information on the differing "requests" about which the CCWG- Accountability is seeking information. It is also important to understand how this differs from the fourth recommendation on service level guidelines. Additionally, the Board expects that issues such as responsiveness to requests would be raised through the surveys identified above. It is likely that one of the ways to address areas of community dissatisfaction evidenced through those surveys would be to set up some key performance indicators and other goals, such as those that are already being reported on through ICANN's Accountability Indicators dashboard. In addition, ICANN organization has already started setting expectations on responsiveness, such as making sure that correspondence coming into ICANN is acknowledged, and for those requiring response, delivering responses within 30 days.

RrSG	Recommendation 2.b - standardize and publish guidelines for response to	The registrars consider this recommendations to have real merit. Recommendation 2b is consistent with the idea that ICANN serves a clientele, which is composed of stakeholder groups, and that obligations are owed to the customers.
GNSO-RYSG	Recommendation 2c - seek community input on organization's twice-annual performance reviews.	The RySG believes that seeking such input twice yearly would not be achievable in practice, but seeking input on an annual basis would be appropriate. The RySG is mindful that there are potential risks to ICANN staff associated with seeking input from community members about their performance. To that end, the input sought should specifically relate to performance against previously agreed goals and should only be sought from community members that have a direct relationship with the staff member in the performance of their duties. It may be appropriate to restrict this recommendation to apply to certain staff positions, for example Vice Presidents of the Policy Department or the GDD.
ICANN Board	Recommendation 2c - seek community input on organization's twice-annual performance reviews.	On solicitation of inputs from "appropriate community members" as part of ICANN's performance review process, more consideration will have to be made about whether and how it is feasible to solicit and incorporate such input. The feasibility concerns include how to solicit and receive inputs in a timely fashion, ensure fairness in how these inputs are considered, and how the inputs would impact the individual reviews. Performance reviews are internal management issues. However, community feedback on staff performance can already be given via a number of mechanisms. For example, if there is positive or negative feedback regarding performance, that feedback can be provided to any of ICANN's executives, to the head of the relevant project or process, or to those overseeing the staff person's work. The Complaints Officer is also available to receive complaints or reports of concerns from the ICANN community. These inputs can then be factored into the performance review process.
RrSG	Recommendation 2c - seek community input on organization's twice-annual	The registrars consider this recommendations to have real merit. Recommendation 2c would have the effect of allowing ICANN management to measure the effectiveness of community-facing personnel by their relationships to the people they are supposed to serve. This is a radically

Valideus	Recommendation 2c - seek community input on organization's twice-annual performance reviews.	We have concerns about this recommendation, which would encourage "people managers of community-facing staff [to] seek input from the appropriate community members during the organization's twice-annual performance reviews". Absent great care in the development of such an input process, and in the treatment and weight given to such community input, this has the risk of serious unintended consequences. We note that this recommendation to seek input into individual staff performance reviews does not align with the focus of the subgroup, as set out in paragraph 3 of the Introduction, as being to "assess "staff accountability" and performance at the service delivery, departmental, or organizational level, and not at the individual, personnel level" (emphasis added). Given that individual performance reviews are frequently conducted to coincide with assessments on pay increases and bonuses, and that they can be expected to also be taken into account in relation to promotion prospects and disciplinary proceedings, this gives rise to a number of considerations, concerns and risks, including the following: (i) ICANN staff are not employed by the community, but rather by ICANN Organization. It is the ICANN Organization, therefore, which sets individual priorities, team staffing levels, and allocates resources. Whilst there should be organizational accountability for this, members of the community, sitting outside of that structure, may not be in a position to know if a perceived failure by a staff member is a personal failure of theirs, or whether it is due to the systems and processes that they are obliged to work with. This was presumably the reasoning behind the subgroup's stated focus as not being at the individual, personnel level. Nevertheless, the feedback would form part of an individual's personnel record and impact on them personally. (ii) Any system of community input would need to build in robust mechanisms for investigating the veracity and fairness of the feedback. If claims from the community are not investigated, then there is the risk that employees will not have a fair hearing. Feedback provided by 2 community members could arise out of an individual personal issue, difference of opinion, or, at worst, malice. In the worst case, this could leave a community input process open to abuse by community members, including the potential for bullying of staff, and could have the effect of deterring staff from acting in a neutral manner because they are concerned about the feedback that they will receive. (iii) Given the importance of all parties being able to present their version of events to ensure fairness, this may not be a process which is best suited to the timing of a formal biannual, or even annual, performance review. Performance reviews tend to be conducted at set times of year, and usually under fairly inflexible timelines. This may not be the best opportunity to properly investigate an issue of concern. (iv) It is also noted that other mechanisms already exist for the community to raise concerns within ICANN, including speaking to a staff member's manager, either informally or formally, or raising the matter with the Complaints Office and Ombudsman. While Issue B identifies the need for "less formal or alarmist" reporting mechanisms and a desire for a "safe forum for expressing concerns", it is unclear how having the community input into the formal performance review of a staff member would satisfy this.
ALAC	Recommendation 3 - explore creation of four person ad-hoc panel	The ALAC also commends the development of a "cross-community" panel, involving the Ombudsman and the Complaints Officer as well as representatives of the Empowered Community and the ICANN Board, to deal more holistically with any contentious staff accountability issues.
GNSO-IPC	Recommendation 3 - explore creation of four person ad-hoc panel	The IPC supports the proposed creation of a mechanism for an ad-hoc four-member panel to review concerns or issues raised by the community, the Ombudsman, ICANN staff or the ICANN board that at least two panel members agree requires further effort.
GNSO-RYSG	Recommendation 3 - explore creation of four person ad-hoc panel	the RySG appreciates that this is a recommendation to investigate at this point, and we note that much more work would be required to make this a proposal for formal consideration.

ICANN Board	Recommendation 3 - explore creation of four person ad-hoc panel	The third recommendation, calling for the creation of an informal ad-hoc four- member panel to deal with complex situations, does not seem to be appropriate at this time and raises questions of fairness. It is not clear what issues this recommendation is seeking to solve that are not dealt with under the mechanisms and roles and responsibilities currently in place such as the complaints officer, Ombudsman, CEO and management, and the Board. Additionally, this ecommendation raises some concerns in its view of the Empowered Community. The Empowered Community, developed in WS1 of the CCWG-Accountability and brought into the Bylaws as part of the transition process, has limited and defined powers. The Empowered Community has a specific range of actions that it may challenge and raise, and concerns of fairness (individually or collectively) are not one of those enumerated powers, nor is the power to make selections to an ad-hoc review committee. Even if this recommendation is limited to focus on the use of an informal ad-hoc panel for issues that "repeat regularly and are not susceptible to redress by any one of the accountability mechanisms", there are still issues about scope, function and implementation. It would be very helpful to have some examples of what the CCWG-Accountability could see being addressed through this ad-hoc panel in order to better understand the intended purpose and usage. For any new group formed, we must consider how such group would be held accountable, and to whom. What would this panel do, if it has no powers? Alternatively, if powers were to be assigned, what limits should there be? What if the Complaints Officer or Ombudsman (or Board) had already reviewed this issue to the dissatisfaction of the complainant – would they be appropriate to be part of this panel? We understand the concern that there may important issues that can arise that are systemic in nature, and for which no current process exists. For those, ICANN organization commits to remaining open to discussion about how to best address and solve those issues as they arise. However, empowering an informal ad-
RrSG	Recommendation 3 - explore creation of four person ad-hoc panel	The RrSG considers this recommendation to be more a symptom of the problem besetting ICANN's institutional style than its solution. The problem is the proliferation of processes, groups, subgroups, mechanisms and bureaucratic busy-ness, all of which raise costs, increase the opacity of the organization and reward insider knowledge. Surely with all the talent available someone or some people can pick up a phone and sort out a problem informally. Providing for every corner-case is unwise.
ICANN Board	Recommendation 4 - creation of service level definitions and guidelines.	Regarding the fourth recommendation, the development of service level guidelines, the Board is uncomfortable moving towards this type of relationship with the community. As it is currently written the recommendation's scope is expansive, and could present challenges including how this is separate from the outcomes the Board is expecting from its oversight work discussed above. As noted in discussion of the second recommendation, more information is needed to address this recommendation, what it is seeking to achieve, and to understand if different outcomes are intended. Further guidance, or inclusion of additional examples for specific areas of service activity and expectation, would be needed to help ensure resources are appropriately applied. We would further note that the ICANN organization posed several questions to the subgroup on expected forms of engagement by the community with the ICANN organization and staff. We've not received specific feedback on these, but would encourage the community as part of its ongoing work to factor these into their work and continued community accountability and transparency mechanisms, including in the SO and AC

RrSG	Recommendation 4 - creation of service level definitions and guidelines.	The Registrars consider these two ideas to be the best in the whole report. Our reasons are as follows: • They are consistent with the customer – supplier arrangement that now characterizes ICANN's relationship to its stakeholders; • They require no new organizations; • They establish clearer expectations of everyone in ICANN; • They are practical; • They cause a focus by management and staff on what needs to happen between ICANN and its stakeholders-customers; • They shift attention away from a preoccupation with procedural fairness issues, which dominate too much of the internal workings of the organization • The SLAs are the accountability mechanisms. The idea behind service level agreements provides the criteria by which to evaluate the other recommendations of this report. The various mechanisms discussed in the Staff Accountability document make sense or not insofar as they re-inforce the idea of a service relationship between stakeholders and ICANN staff. The ones that the RrSG considers to be ineffective, or largely beside the point, were predicated on vagueness as to the accountability of ICANN to its customers. Working out the details of the service level agreements will cause a salutary improvement in organizational focus and delivery of services, and implementing them will cause even more improvement. The report under discussion reflects the changes in approach between the old ICANN and the new one: the old being focused on procedural fairness, with its quasi-judicial overtones, and multiplicity of mechanism and offices, and the new one on rational expectations for defined services
GNSO-BC	Recommendation 4 - creation of service level definitions or guidelines.	To ensure they are not counterproductive, the establishment of service level targets must be focused on delivery of outcomes to the community and should not be padded with additional process or opportunity for delay. For example, timelines for responding to community correspondence should not be taken to refer to an interim template acknowledgement of the correspondence, but rather a substantive response that takes into account the concerns raised by the particular constituency or stakeholder group.
GNSO-BC	Recommendation 4 - creation of service level definitions or guidelines.	Care must also be exercised so that service level targets are not set in such a way that diminishes the quality of important work being carried out by ICANN staff. For example, public comment summaries vary greatly both in terms of breadth and quality of analysis and timeline for delivery, which generally have a target date of two weeks from the close of the comment period. These published deadlines have occasionally been noted as a reason for the perceived decline in quality of some comment summaries. In many cases the value of high-quality summaries outweighs that
GNSO-BC	Recommendation 4 - creation of service level definitions or guidelines.	Similarly, if ICANN's compliance service level targets solely on ticket volume and timeline of closure, staff members might be incentivized to focus only on the simplest issues that could easily be resolved by deadline and ignore more complex issues that required longer resolution time, but for which resolution may be more beneficial to the community. An approach that provides some flexibility so that issues that are the most complex or controversial can still be addressed on a reasonable timeframe, provided reasonable transparency about the modified targets and their rationale, may help ensure that timeliness and quality are appropriately balanced against each other in service delivery.
GNSO-IPC	Recommendation 4 - creation of service level definitions or guidelines.	The IPC supports ICANN setting service level definitions and guidelines for members of the community. We urge ICANN to set goals for staff that balance a transparent and predictable process with the flexibility to accomplish meaningful outcomes.
GNSO-RYSG	Recommendation 4 - creation of service level definitions or guidelines.	The RySG welcomes recommendation #4 and expects that such service level guidelines and definitions will contribute to creating clear expectations and as such will be helpful for contracted parties as well as for individual staff members.
ICANN Board	Regarding Assessment of issues	The ICANN organization appreciates the challenges involved with broaching this topic, and acknowledges the challenge in gathering data of individual instances of concern and synthesizing that information into broader themes that accurately reflect issues at the service delivery or departmental level. As noted before, however, greater detail of the evidence collected is necessary to support the conclusions of the Subgroup and CCWG-Accountability.

ICANN Board	Regarding Description of Roles and Responsibilities	The descriptions laid out in this section are concise and straightforward. Following from the work that lead to ICANN's Delegation of Authority Guidelines, the CCWG- Accountability's work in providing clear roles and descriptions for how the three parts of ICANN work together provide a basis for understanding and evaluating how these roles and responsibilities are conducted. The role and responsibilities of ICANN's President and CEO as it relates to the broader accountability of the ICANN organization is a key consideration when viewing these recommendations. All members of the ICANN organization are ultimately accountable to the ICANN President and CEO in the performance of their work. The President and CEO is then accountable to the Board for performance of the organization, including how service is delivered to the community.