



ICANN



# Review of Reviews Initial Draft Report

Review of Reviews Cross Community Group

4 June 2026

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# Preface

The Initial Draft Report prepared by the Review of Reviews Cross Community Group (CCG) builds on input received throughout the first three phases of work.

The Initial Draft Report aims to further advance discussions on designing “a refreshed system of reviews that meets current and future needs”. Refer to [Appendix A - Background](#) for more information.

The intent of this Initial Draft Report is to solicit feedback from the community and other stakeholders at ICANN86 in order to further refine and strengthen the proposed framework to ensure the draft report that is put out for public comment is informed by a broad range of perspectives and accurately reflects the feedback, concerns, and recommendations raised throughout the consultation process.

## I - Reviews CCG Process

### 1 - About the CCG

The Review of Reviews was [chartered](#) to “manage a fundamental evaluation of the following reviews set out in the ICANN Bylaws, as a whole system, including their implementation, and propose a refreshed system of reviews”<sup>1</sup>.

A total of 20 [members](#) participate in the Reviews CCG:

- 2 members from each ICANN Supporting Organization (SO) and Advisory Committee (AC)
- 2 members from ICANN Board
- 2 members from ICANN org
- 2 [Expert Advisors](#) identified by the Reviews CCG.

The Reviews CCG welcomes **XX** active [observers](#) who contribute to discussions and drafting.

### 2 - Methodology

Per the charter, the Reviews CCG operates on a consensus-based decision-making methodology, with members acting in their individual capacity. Deliberations are facilitated by three Co-Chairs, selected from within the CCG membership, who are responsible for presiding over discussions and ensuring that the process remains bottom-up, consensus-driven, and supports balanced participation. While the final endorsement of any proposals remains with the ICANN Supporting Organizations and Advisory Committees (SO/ACs), the CCG is expected to develop outputs through consensus among its members.

Members of the Reviews CCG [agreed](#) to formally commence activities on 16 September 2025, adopting a cadence of weekly plenary calls. Meeting times rotated across a set of time slots to accommodate participants in different time zones. Since the initiation of activities, the group convened a total of **XX** plenary calls. In addition to plenary sessions, several time-limited subgroups and small groups were established to advance specific workstreams.

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<sup>1</sup> <https://icann-community.atlassian.net/wiki/spaces/CDOR/pages/454459443/Charter>

A small number of volunteers were requested to join each subgroup, and observers were welcome to attend.

The work of the Reviews CCG is supported by ICANN staff.

### 3 - Working through Charter Phases

The charter articulates four phases of work. In adherence to the charter, in the first phase of its work, the Reviews CCG focused on gathering facts, facilitating dialogue, and reporting the results of those conversations. The main community engagement from this phase took place at ICANN84 with a [Draft Purpose of Reviews](#) for the public to consider.

In the second phase of its work, the CCG built on the feedback received to develop a refreshed system of reviews designed to meet both current and future needs. This initial design included proposals regarding the purpose, need, scope, and frequency of future reviews, and aimed to ensure that the overall review system, and the implementation of Board-approved recommendations, would be effective, efficient, and trusted. This preliminary design for the future reviews system was shared with the community at ICANN85 in the format of a [Draft Proposal Outline](#) to support further dialogue.

The Reviews CCG is currently in Phase 3 of its work and, as part of this phase, shared the [Refined Outline](#) with the Nominating Groups to solicit feedback and assess whether the work was progressing in the appropriate direction.

The feedback received on the Refined Outline informed the development of this Initial Draft Report. The Reviews CCG expects to conduct outreach at ICANN86 that will continue to shape the Draft Report scheduled for release and public comment in June.

### 4 - Subgroups

To support efficient progress and ensure focused deliberations, the team organized its work through a set of six dedicated subgroups, each tasked with advancing specific areas of the project. This approach enabled parallel workstreams, facilitated deeper subject-matter discussions, and improved the overall efficiency and effectiveness of the team's efforts. Consistent with the commitment to transparency and accountability, all subgroup activities, discussions, and outputs were fully documented, recorded, and made publicly available.

- Subgroup on **Strategic Plan** - The [subgroup](#) on Strategic Plan was established to perform mapping against the ICANN Strategic Plan and the ICANN Annual Report. A total of 4 CCG members volunteered to participate, and the subgroup met 5 times between 9 December 2025 and 27 January 2026.
- Subgroup on **Accountability and Transparency Review** (previously called the Scoping and Prioritization Process for Bucket A Review) - The [subgroup](#) was established to define the process for scoping and prioritization for the Accountability and Transparency Review, including safeguards to limit the duration of the scoping exercise and defining its purpose. A total of 7 CCG members volunteered to participate, and the subgroup met 4 times between 31 March 2026 and 9 April 2026.
- Subgroup on **Structural Review** - The [subgroup](#) on Structural Review was established to define triggers and thresholds for initiating or concluding a Structural Review, with a focus on simplification; to define the impact and authority of recommendations, including procedures for their consideration, adoption, and

implementation as appropriate; to assess how the Continuous Improvement Program (CIP) feeds into the Structural Review; and to define its overall purpose. A total of 5 CCG members volunteered to participate, and the subgroup met 3 times between 1 April 2026 and 13 April 2026.

- Subgroup on **On-Demand Review** - The [subgroup](#) on On-Demand Review was established to elaborate the processes for requesting and convening an on-demand review and to define its purpose. A total of 7 CCG members volunteered to participate, and the subgroup met twice on 2 and 9 April 2026.
- Small Group on **Definitional Work** - The [small group](#) on definitional work was established to define key terms such as “policy” in the context of on-demand review and “public interest”; to clarify expectations regarding the use of “rationale” throughout the proposal; and to address any additional definitional issues required to remove ambiguity. A total of 6 CCG members volunteered to participate as well as observers. The group collaborated on the [draft document](#) via the mailing list.
- Small Group on **Review Timing** - The [small group](#) to elaborate on review timing was established to define principles for the periodicity of reviews while ensuring sufficient flexibility; to define conditions under which accountability and transparency reviews may be deferred; and to recommend intervals for initiating reviews on specific topics. A total of five CCG members volunteered to participate as observers. The group met once on 29 April 2026 and also collaborated on the [draft document](#) via the mailing list.

## 5 - Engagement

As part of its fact-finding and community input process, the Review of Reviews CCG gathered feedback through a series of structured engagement opportunities held during Prep Week and ICANN meetings, as well as through standalone webinars, blogs, and liaison work with Nominating Groups.

- On 14 October 2025, the Reviews CCG released the [Shaping the Future of ICANN Reviews: Join the Conversation at ICANN84](#) blog to give visibility to its plans for ICANN84, and during [ICANN84 Prep Week](#), on 15 October 2025, [introduced](#) its planned activities and outlined upcoming opportunities for community engagement, which set the stage for deeper discussions.
- At ICANN84, the CCG held two plenary sessions ([27](#) and [30](#) October 2025) that served as interactive forums to collect community perspectives on a [draft purpose of reviews statement](#), key focus areas, and potential improvements. The Reviews CCG used the collaboration tool *Menti* in the first session to support interactive engagement and dialogue. In addition to these plenaries, the CCG participated in various community sessions to discuss its work and gather additional feedback.
- To continue engagement beyond the ICANN84 meeting, and further inform its fact-finding, the CCG hosted two [webinars](#) on 18 November 2025, inviting participants to reflect on the successes and challenges of past reviews and to share ideas for a more effective, transparent, and accountable review system.
- The Reviews CCG released a [Reviews CCG Progress/Status Update](#) blog on 18 December 2025 reporting on the buckets of reviews the Reviews CCG is envisioning for the system.

- During [Prep Week of ICANN85](#), the Reviews CCG delivered an update on the status of its work on 23 February 2025, setting out the envisioned buckets, and on 3 March 2026 released the [Draft Proposal Outline](#) with an accompanying [explanatory note](#).
- At ICANN85, the Reviews CCG hosted an [outreach session](#) on 12 March 2026 and participated in various community sessions to discuss its work and gather additional feedback. This session, along with additional meetings with community groups during ICANN85, provided further opportunities for iterative feedback. Participants were able to ask questions, comment on specific elements of the proposal, and provide input on both the substance and the overall process.
- To support the request for input the Refined Outline that was released on 18 April 2026 with a request for input from Nominating Groups, the Reviews CCG hosted [two webinar sessions](#) on 5 May 2026.
- The engagement activities are complemented by an open door policy, where anyone interested in the Reviews CCG work may sign to [become an observer](#).
- [Written feedback](#) on work may also be provided to the Reviews CCG at any point in time through the [inputonreviews@icann.org](mailto:inputonreviews@icann.org) email address. There is a standing item on the Reviews CCG agenda that offers an opportunity for contributors to take the Reviews CCG through their comment(s), as needed.
- The Reviews CCG has a standing item on its agenda for members to report on liaison work with their Nominating Groups and any input they may have.

## II - Fact-Finding

The feedback from the ICANN84 Reviews CCG plenary sessions and related webinars highlights several key themes and findings regarding the purpose and future design of ICANN's review system. A central theme that emerged was the need to clearly redefine the purpose of reviews, while maintaining rigor in ICANN's accountability framework. Participants emphasized that the system should be grounded in ICANN's Bylaws and mission, in compliance with its commitments and core values.

Reviews should also ensure accountability and transparency through bottom-up oversight, and there should be commitment to continuous improvement. There was a call for a clearer, shared understanding of why reviews are conducted, alongside a more forward looking and less procedural approach that emphasizes meaningful outcomes.

Another major theme is the complexity of the current review system. Feedback points to an overly complex and fragmented reviews system, contributing to inefficiency, delays, backlog and significant community burden. Participants called for simplification and balance through more tightly scoped, focused, review efforts that are adaptable to the current environment and needs, with fewer recommendations as well as adequate resourcing and clearer prioritization of issues.

Accountability and transparency also remain central to the discussion on reviews. Reviews are seen as essential to ICANN's accountability framework, but participants stressed the need for increased transparency in both how reviews are conducted and in terms of outcomes. At the same time, there is concern that reviews should not bypass established ICANN processes or become parallel governance mechanisms.

Themes around scope, timing, and participation emerged strongly. Participants highlighted the need for better defined scope setting, more predictable and time bound reviews, and improved coordination to reduce overlapping workloads. There was also emphasis on strengthening inclusiveness, particularly by engaging newcomers and improving diversity in the composition of cross community groups, supported by clearer outreach and communication.

The discussion at ICANN85 reflected broad agreement on the need for a simpler, more practical, and sustainable reviews system. Participants emphasized that reviews should avoid unnecessary complexity and instead focus on clear objectives, lessons learned, and being a meaningful tool for the evolution of ICANN. Ensuring that the system remains manageable in terms of workload and resource requirements was seen as critical.

Participants also highlighted the need for mechanisms to ensure that review outputs are implemented. At the same time, the system should remain flexible in terms of timing, while incorporating appropriate safeguards to ensure processes are used in good faith and to prevent capture, alongside separate requirements for strong accountability and transparency structures.

Clarity and structure were seen as essential to an effective reviews system. Each review should have a clearly defined and distinct purpose, with narrow scoping to avoid overlap and inefficiency. Participants noted that a one size fits all approach would not work given organizational diversity, and that reviews need to be adaptable to different contexts. Strong accountability and transparency mechanisms, particularly for SO/AC leadership, were highlighted, alongside the inclusion of relevant technical and external expertise. A longer-term, predictable cadence, especially for structural reviews, was also noted.

From a design perspective, participants emphasized the need for a system that is easy to understand, including for external audiences. Clear articulation of the purpose of each review type was seen as important to avoid duplication or overlaps, with support for automatic triggers rather than reliance on requests.

Conflict of interest provisions were considered essential, and routine reporting was suggested to lighten the review workload.

In relation to scoping, there was support for community involvement, alongside relevant expertise (depending on the type of review) and safeguards to mitigate the risk of bias toward the status quo. Participation from both the Board and the organization was seen as important.

Across review categories, themes included reducing delays and review overlap, strengthening safeguards in the self-evaluation processes, focusing structural reviews on significant issues with clear indicators, and that the Review of Reviews could review one subset of reviews rather than all of them.

For On-Demand reviews, there should be strict triggering criteria, such as analysis of evidence, justification of urgency, and non-duplication certification, along with capacity and workload checks.

## III - Proposed Definition of Purpose of Reviews

Significant consideration and deliberation have gone into the development of the proposed definition, supported by multiple opportunities for community input and discussion throughout the process. While the Reviews CCG carefully evaluated a range of perspectives and approaches, there was agreement to maintain a clear and streamlined overarching definition and structure with the necessary specificity and detail grounded within the individual reviews being recommended, allowing each review to remain appropriately tailored to its particular purpose, scope, and objectives.

“The purpose of reviews is to assess whether ICANN is fulfilling its Mission, Commitments, and Core Values, as set out in the ICANN Articles and Bylaws, in a transparent and accountable manner.”

## IV - Reviews Scoping Committee (RSC)

### 1 - Rationale

To support a more strategic, sustainable, and efficient review process overall in the future, the Reviews CCG recommends the establishment of a standing committee (here titled Reviews Scoping Committee, or RSC) to serve as a central coordination mechanism across the refreshed ICANN Reviews framework.

### 2 - Focus

The standing committee would function as a clearinghouse for review scoping activities across the refreshed ICANN Reviews framework, screening review topics against established criteria, assessing dependencies, overlapping initiatives and ongoing work.

In addition to coordinating review scoping activities, the RSC would assess resource availability and timing considerations, ensuring effective prioritization across the broader review landscape. The RSC would play a key role in identifying situations where deferrals of cadenced reviews may be justified under the applicable framework and criteria or necessary in order to maintain operational feasibility.

The RSC would be responsible for screening requests for on-demand reviews that meet applicable thresholds and for confirming readiness for review initiation through established threshold and feasibility processes. The RSC would also be responsible for determining whether a Consequential Effects Review is needed in the event of an individual structural review conducted by a SO or AC.

The RSC would act as a liaison among the community, ICANN org, and the ICANN Board on matters related to review planning and scoping, including coordination with ICANN org regarding feasibility, operational, timing, and resource assessments.

The RSC would be the body that confirms whether applicable community support thresholds and procedural requirements have been satisfied. It would submit scoped review topics,

supporting rationale, and proposed charters to the ICANN Board for consideration and action.

Through this coordination role, the RSC would be responsible for the effective management and coordination of resources associated with the review process.

The Reviews CCG recommends the elaboration of a charter for this committee, which is expected to conduct its work through open and transparent deliberations and to maintain transparency with respect to meetings, documentation, timelines, rationale, and outputs, consistent with ICANN's Mission, Bylaws, and transparency obligations set out in Article 3.1.

### 3 - Composition

The RSC is envisioned to comprise:

- leadership representatives or designees from each Supporting Organization (“SO”) and Advisory Committee (“AC”);
- representation from the ICANN Board;
- representation from ICANN org; and
- leadership from the immediately preceding relevant review effort for the Accountability and Transparency Reviews.

## V - Proposed Refreshed Reviews System

The Reviews CCG devoted significant time during its first phase to assessing what had proven effective and ineffective in prior occurrences of Specific and Organizational Reviews, while also incorporating lessons learned from those experiences. This work further leveraged on the conclusions of the Third Accountability and Transparency Review (ATR3), which had already identified a clear need for change in the reviews.

Building on this foundation, as well as the extensive input received during the community dialogue regarding the characteristics of an effective review process, the Reviews CCG aligned on a set of guiding principles that underpin its proposed framework:

- Reviews should be simple, clear, focused on core issues.
- Reviews should be responsive, adaptable, and proportionate to the current environment and circumstances.
- Reviews should be tightly scoped, targeted, and manageable through efficient prioritization.
- Reviews should be time-bound with a meaningful cadence.
- Reviews should aim to facilitate change, produce tangible and practical results with clear outcomes.

Drawing on the findings and input collected throughout the engagement during the phases of work, the Reviews CCG recommends a three-pillar framework for ICANN Reviews that includes two cadenced reviews - the Accountability and Transparency Review and a Structural Reviews - complemented by an On-Demand Framework. Additionally, the Reviews CCG recommends a one-time review related to the Continuous Improvement Program<sup>2</sup>.

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<sup>2</sup> ICANN's Continuous Improvement Program (CIP) is a community-led framework that is being run as a pilot. It is intended to replace periodic external Organizational Reviews with continuous, internally managed assessments of ICANN structures, including Supporting Organizations (SOs), Advisory

# Section 1 - Cadenced ICANN Reviews

## 1. Accountability and Transparency Review

### 1.1 Rationale

The findings demonstrate a clear and continuing need to retain a dedicated review mechanism focused on accountability and transparency, recognizing these principles as fundamental pillars of ICANN's multistakeholder model. Such reviews play a critical role in strengthening community trust, ensuring effective oversight, and promoting continuous improvement across the organization and its processes. Maintaining a robust accountability and transparency review framework is therefore essential to preserving confidence in ICANN, supporting informed participation by the community, and ensuring that ICANN remains responsive, transparent, and accountable in carrying out its mission.

### 1.2 Focus

The Accountability and Transparency Review scope is variable, within set boundaries. The Accountability and Transparency Review focuses on assessing how ICANN has executed its Mission in accordance with the Articles of Incorporation, its Bylaws, its Commitments and Core Values and its transparency obligations set out in Article 3.1 of the ICANN Bylaws. For avoidance of doubt, the scope of this review may include those issues listed as Accountability and Transparency Review assessment areas in Article 4.6 (b)(ii) of the ICANN Bylaws.

This review is achieved by examining specifically scoped, community-prioritized existing procedures and processes, assessing the outcomes and progress achieved in respect to goals set out in planning documentation, recommending improvements where necessary, and identifying key development areas that may strengthen ICANN's effectiveness in support of its Mission.

The review is intended to address completed efforts or procedures and cannot be used as a vehicle for mitigating, relitigating or influencing ongoing processes.

This review originates from the existing Accountability and Transparency Specific Review (ATR)<sup>3</sup>. The refreshed Accountability and Transparency Review benefits from a focused scoping exercise designed to structure the review. This approach promotes clarity, community buy-in, and alignment on the review's objectives and scope prior to its launch. While the review remains anchored in ICANN's Mission, Commitments, and Core Values, it no longer includes an assessment of the reviews system itself, as this function is now addressed through Special Topics under the On-Demand Reviews framework.

### 1.3 Cadence

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Committees (ACs), and the Nominating Committee (NomCom). The CIP was recommended by the Third Accountability and Transparency Review Team (ATRT3).

<sup>3</sup> The essence of the existing Specific Reviews (Registration Directory Service Review, Competition, Consumer Trust and Consumer Choice, and Security, Stability and Resiliency of the DNS) is built into, and reflected in ICANN's mission, commitments, and core values. These areas also benefit from a Special Topics designation within the on-demand framework that entails a cadenced prompt.

The Accountability & Transparency Review is a **cadenced** review conducted once every **five** years with the option to defer if necessary. The Accountability and Transparency review is intended to be woven into the Strategic Planning progress, to inform the subsequent strategic plan.

## 1.5 Scoping Process

The scoping process is conducted as follows:

### 1. **Slate of topics**

- Upon the RSC's signal, leadership of SO/ACs and Board representatives reach out to its groups requesting suggestions of topics.
- Each SO or AC can use their own process to solicit topics (e.g. SO could set up an ATR topic working group). Adequate lead time should be factored into planning to allow for ample time to conduct consultations.
- Each SO or AC leadership settles on a slate of topics they believe have consensus in their SO or AC, using the designated template that features built-in limits of **3 topics** with associated rankings. Any suggested topic should be documented with a rationale.

### 2. **Opportunity for input and refinements**

- Duly completed templates are posted on a public work space page. Each SO and AC should work with their appointees on the Scoping Group to review all slates, potentially fine tune their own slate, and identify areas of overlap with other slates submitted by other SO/ACs. Any refinements should be underpinned by rationale.

### 3. **Scoping Group discussions**

- RSC members representing SO/ACs and Board bring their slates.
- Using open and transparent deliberations, and assisted by Staff, the RSC meets to review and rationalize the topics to create an initial shortlist. Overlapping topics are streamlined. The analysis of implementation of prior Accountability and Transparency review outputs and the effectiveness of deployed solutions is a standing scope item.
- Topics are tested against the following criteria:
  - i. In scope of ICANN's Articles, Mission, Commitments, Core Values, and its transparency obligations set out in Article 3.1, of the ICANN Bylaws
  - ii. No duplication of existing work or initiative
  - iii. Relates to completed efforts or procedures
  - iv. Not a topic for policy development
  - v. Topic specified with enough precision to define what would be reviewed
  - vi. In the public interest as defined in the [Global Public Interest Framework](#).

### 4. **Feasibility and resource assessment of initial shortlist**

- The RSC, working with Staff, assesses the feasibility of reviewing the shortlisted topics including the level of effort required, necessary data collection, dependencies, expertise or skills that would be desirable for each, the need for professional services, budget and timing constraints and produces a shortlist for comment. Depending on **resourcing parameters**, the set of topics could be affected.
- The RSC considers whether deferral is needed. Should there be a need for deferral, the process to defer, as outlined below, is activated.

#### 5. Consultation on shortlisted topics

- The RSC releases the shortlist<sup>4</sup> for a 40-day public comment proceeding. The set of shortlisted topics, and accompanying rationale, including the associated resourcing ramifications are included in the proceeding.

#### 6. Alignment on topics and drafting of charter

- The RSC agrees on the final set of topics and drafts the charter accordingly with support from ICANN org.

#### 7. Send to Board

- The RSC submits the charter, along with supporting materials, to the **Board** for action.

## 1.6 Process to Defer

In the event the RSC recommends deferral of the Accountability and Transparency Review, the recommendation for deferral must be clearly justified and time-bound.

The RSC would be expected to provide a structured recommendation to the community that includes:

- A clear rationale. The rationale should explain based on scoping criteria why the ATR is being deferred, including considerations such as budget constraints, competing or ongoing work, or timing conflicts with other reviews;
- A proposed deferral period;
- A future start date or window, reflecting the idea that if a review is not happening now, it should be clear when it will happen instead (“if not now, then when”).

The recommendation is then submitted to the SO/AC community for agreement. Agreement for the deferral would need to be reached across SO/ACs, reflecting a community-based decision.

A graduated threshold approach may be applied for successive deferrals to make repeated deferrals progressively more difficult. For example:

- First deferral: requires agreement from five SO/ACs
- Second deferral: requires agreement from six SO/ACs

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<sup>4</sup> Topics that are not included in the shortlist could be potentially considered for an On-Demand Review in so far as a given topic meets the criteria and thresholds articulated in the process to convene an On-Demand Review.

While deferral is permitted when necessary, safeguards ensure that it cannot be postponed indefinitely:

- A maximum of two deferrals can be accommodated
- A maximum duration of up to 18 months per deferral<sup>5</sup>
- Deferrals should be long enough to resolve the underlying issue, reducing the need for repeated deferrals

## 1.7 Review Effort

The review is foreseen to be conducted by a Cross Community Review Team, with the option to be assisted by experts, with conclusions and recommended actions, if any, to be provided to the ICANN Board.

The Cross Community Review Team would consist of three representatives from each ICANN SO and AC, three representatives from the ICANN Board, and three representatives from ICANN org. Representation would be fixed on this basis, with no "gap filling" permitted. Accordingly, if a participating SO/AC, Board, or ICANN org group appoints fewer than its allotted representatives, the unfilled seats would remain vacant and could not be reassigned or used to increase representation from any other group.

## 2. Structural Review

### 2.1 Rationale

Although structural review discussions have previously taken place, and community groups have ways to evolve their structures, the Reviews CCG believes there remains a lack of a regular, structured mechanism for assessing the ICANN construct to identify potential gaps and areas for enhancement.

### 2.2 Focus

The Structural Review focuses on the structure of ICANN, as a whole, and is carried out in three phases<sup>6</sup>. The timeline estimates are illustrative only. The CCG expects these to be further refined and defined during the implementation phase.

#### **Phase 1 - External Landscape Assessment (6 months)**

During this phase, an assessment of the external landscape<sup>7</sup> is undertaken to identify, research and evaluate external factors that may have an impact on the structure of ICANN

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<sup>5</sup> Depending on the length of the delay and environment change, the scoping process may need to be repeated.

<sup>6</sup> Depending on the success of the pilot Continuous Improvement Program (CIP), outcomes arising from the groups' continuous improvement efforts may help inform this work.

<sup>7</sup> The Reviews CCG suggests that incorporating an external landscape assessment into the strategic planning cycle may be useful, and could inform the Structural Review effort.

as a whole including its architecture **with** individual bottom-up SOs and ACs with their predefined roles and responsibilities.

## **Phase 2 - Internal Landscape Assessment (15 months)**

Informed by the External Landscape Assessment, the intent of Phase 2 is to investigate any existing or longstanding issues, and to determine whether:

- a) the ICANN structure of SO/ACs and the NC is fit for purpose for ICANN to achieve its mission;
- b) each SO, AC and the NC continue to have a purpose in the ICANN structure as they are currently constituted or if any changes in structures and operations are desirable to improve the overall effectiveness of ICANN in support of ICANN's Mission;
- c) new structures are required;
- d) any existing structures need to be phased out, merged or transformed; and
- e) communication and interactions between all parts of ICANN are **effective**.

Any recommendations for changes to an existing SO or AC structure made in Phase 2 will be categorized as advisory and are sent to that SO or AC for **consideration**.

The SO or AC will consider the relevant advisory recommendations and indicate within a set period of time, whether it accepts or rejects any or all of them. A rationale for their decision should be provided accordingly.

Based on the recommendations from Phase 2 and the SO and AC responses to the advisory recommendations, a proposed new ICANN SO, AC and NC structure is drawn up.

## **Phase 3 - Implications of the Proposed New Changes (12 months)**

Informed by the outcomes from Phase 2, an assessment of the overall ICANN structure including the Board<sup>8</sup> to determine:

- a) if changes are desirable to improve the overall effectiveness of ICANN; and
- b) whether changes are required to accommodate the proposed new ICANN SO, AC and NC structure.

The final outcome of this phase will be subject to comment and submission to the Board as a recommendation. The Board decision of the recommendations will be open to all Bylaws defined accountability measures.

## **2.3 Cadence**

The cadence for Structural Reviews is set to every 15 years, starting from the Board consideration of the Final Report. This review is deferrable subject to a SO/AC threshold.

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<sup>8</sup> The Reviews CCG is discussing whether the staff (ICANN organization) should be a component of the Structural Review.

For issues requiring immediate attention, a targeted review of a structural nature may be scoped and initiated under the on-demand framework, subject to the relevant thresholds being met. Where significant changes are implemented, sufficient time should be allowed for those changes to be embedded.

## 2.4 Review Effort

Phase 1 will be conducted by external experts, working together with a community liaison working group, while phases 2 and 3 will be conducted by a cross-community working group. Conclusions and recommended actions, if any, are provided to the ICANN Board and/or community groups.

## 2.5 Process to Defer

The completion of the External Landscape Assessment (Phase 1) is required before any deferral decision is considered. Any consideration of deferral should be based on the outcome of Phase 1 and the extent to which it indicates whether continuing into Phase 2 is timely or whether deferral is warranted.

Following the External Landscape Assessment, the RSC may assess whether there are reasons to recommend deferral. If so, it would submit a recommendation to the community the includes:

- A clear rationale. The rationale should explain why the review is being proposed for deferral, including considerations such as budget constraints, competing or ongoing work, or timing conflicts with other reviews;
- A proposed deferral period along with a suggested future start window.

The recommendation is then submitted to the SO/AC community for agreement. Agreement for the deferral would need to be reached across SO/ACs, using a high-threshold agreement model.

While deferral is permitted when necessary, it must be time-bound and justified. The Structural Review cannot be postponed indefinitely, or be open-ended. Deferrals, however should be long enough to resolve the underlying issue, reducing the need for repeated deferrals

A graduated threshold approach may be applied for successive deferrals to make repeated deferrals progressively more difficult. For example:

- First deferral: requires agreement from five SO/ACs
- Second deferral: requires agreement from six SO/ACs

While deferral is permitted when necessary, safeguards ensure that it cannot be postponed indefinitely:

- A maximum of two deferrals can be accommodated

- A maximum duration of up to 18 months per deferral<sup>9</sup>
- Deferrals should be long enough to resolve the underlying issue, reducing the need for repeated deferrals

The external landscape may change during a deferral period. If a Structural Review is delayed for a significant period (for example, one to **two years**), there may be a need to revisit or update the landscape assessment, particularly if the original rationale for deferral was based on conditions that have evolved.

## Section 2 - On-Demand Review Framework

### Rationale

Establishing an on-demand review framework provides the system with the flexibility to direct attention and resources toward the matters of greatest importance and urgency as circumstances evolve.

## 1. Emerging Topic

### 1.1 Rationale

A mechanism should exist for reviews to be convened on an on-demand basis to address emerging topics and issues as they arise, while remaining distinct from the formal development of policy.

### 1.2 Focus

The emerging topic meets the criteria for a review, specifically one that does not involve policy development, and cannot be adequately addressed through Bylaws-mandated processes. The review could identify policy considerations.

It may also be a topic raised during **scoping** of the Accountability and Transparency **scoping** process, emerge from an Accountability and Transparency Review process as a recommendation, or emerge from the Structural Review.

### 1.3 Cadence

While there is no cadence associated with on-demand reviews of emerging topics, there is a process to follow that includes a determination from the RSC based on a set of criteria.

### 1.4 Process

The emerging topic can be requested by the **community** or ICANN Board.

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<sup>9</sup> Depending on the length of the delay and environment change, the scoping process may need to be repeated.

The process requires a minimum of two SO and/or ACs raising a suggested On-Demand topic, in the format of a charter using a designated template, that contains a clear narrow scope for the review.

If supported by a minimum of five SO and/or ACs after due consultation, the suggested topic is submitted to the RSC for consideration.

The RSC conducts the following screening:

- no duplication of existing work or initiative;
- Not a topic for policy development;
- Topic specified with enough precision;
- In the public interest as defined in the [Global Public Interest Framework](#);
- When the topic was last reviewed/assessed to ensure meaningful timing;
- Confirmation that the suggested topic or issue has not already been covered by the ATR within the ongoing five-year cycle, and is not part of the recommendations under current consideration or implementation.

The RSC works with Staff to assess the feasibility of work set out in the charter, including the level of effort required, necessary data collection, prioritization, dependencies, expertise or skills that would be desirable for each, the need for professional services, budget and timing constraints.

The RSC liaises with its respective groups to confirm interest in proceeding.

The RSC confirms whether the threshold of five SO and/or ACs is satisfied. Should the threshold be satisfied, the RSC sends the charter to the ICANN Board for approval.

## 1.5 Review Effort

The On-Demand Review of Emerging Topics is undertaken by a Cross Community Working Group.

## 2. Special Topics

### 2.1 Rationale

Recognizing the historical importance of some specific issues, the Reviews CCG recommends creating a category of review of special status.

### 2.2 Focus

Special topics include:

- Review of Reviews - intended to audit the review system to assess whether it is performing as intended and is still fit for the purpose of enhancing accountability and transparency. This function was a component of the existing accountability and transparency review;

- Security, Stability and Resiliency of DNS<sup>10</sup>;
- Aspects of gTLD Round (e.g. competition, consumer trust, consumer choice)<sup>11</sup>;
- Registration Directory Service<sup>12</sup>.

## 2.3 Cadence

At an interval to be designated, [ICANN org](#) will reach out to the SO/AC Leadership to ask whether there are any issues under the Special Topics headings that the community believes warrant an on-demand review.

## 2.4 Process

If two or more SO/ACs request a review under a Special Topic, a charter, using a designated template, is assembled. A clear narrow scope for the review is required.

If supported by a minimum of five SO and/or ACs after due consultation, the suggested topic is submitted to the RSC for consideration.

The RSC conducts the following screening:

- no duplication of existing work or initiative;
- Not a topic for policy development;
- Topic specified with enough precision;
- In the public interest as defined in the [Global Public Interest Framework](#);
- When the topic was last reviewed/assessed to ensure meaningful timing;
- Confirmation that the suggested topic or issue has not already been covered by the ATR within the ongoing five-year cycle, and is not part of the recommendations under current consideration or implementation.

The RSC works with Staff to assess the feasibility of work set out in the charter, including the level of effort required, necessary data collection, prioritization, dependencies, expertise or skills that would be desirable for each, the need for professional services, budget and timing constraints.

The RSC liaises with its respective groups to confirm interest in proceeding.

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<sup>10</sup> This Security, Stability and Resiliency of the DNS review effort is a current Specific Review which the ATRT3 recommended suspending for the subsequent Accountability and Transparency (ATRT4) to decide if the SSR review “should be terminated, amended, or kept as is”. Matters related to SSR could be reviewed as On-Demand but may also arise as topics for review under the Accountability and Transparency Review recommended in this proposed reviews framework.

<sup>11</sup> Aspects of the gTLD Round are intended to reflect the Competition, Consumer Choice, Consumer Trust review for which the ATRT3 recommended that there “should be one additional and clearly scoped CCT Review”. Matters related to Competition and Consumer Trust could be reviewed as On-Demand but may also arise as topics for review under the Accountability and Transparency Review recommended in this proposed reviews framework.

<sup>12</sup> The Registration Directory Service (RDS) Review is a current Specific Review which the ATRT3 recommended suspending until the ATRT4 “can consider the future of RDS Reviews in light of the final EPDP report recommendations, the results of the Board’s consideration of these, as well as any other developments which affect Directory Services. Matters related to RDS could be reviewed as On-Demand but may also arise as topics for review under the Accountability and Transparency Review recommended in this proposed reviews framework.

The RSC confirms whether the threshold of five SO and/or ACs is satisfied. Should the threshold be satisfied, the RSC sends the charter to the ICANN Board for approval.

## 2.5 Review Effort

The On-Demand Review of Emerging Topics is undertaken by a Cross Community Working Group.

# 3. Consequential Effects Review

## 3.1 Rationale

SO/ACs may independently consider restructuring at any time, independently of the [Structural Review](#). Such change, however, cannot unilaterally change the relationship with the rest of the community. The Consequential Effects Review is a safeguard to ensure that changes to interdependent relationships are not made single-handedly and are not made without broader community agreement. While analogous to Phase 3 of the Structural Review, this review offers an opportunity to conduct the assessment in a timely fashion, without having to wait until the next scheduled Structural Review.

## 3.2 Focus

The Consequential Effects Review, if applicable, follows on, as an On-Demand Review, from either: (a) an On-Demand Review of an SO or AC or (b) internal structural changes undertaken by an SO or AC.

This review provides a mechanism for the ICANN community to transparently consider the impacts of structural changes on the broader ICANN system and make recommendations for how affected mechanisms should be adjusted (including for example, Board composition, Empowered Community composition and processes, Nominating Committee processes).

## 3.3 Cadence

This is a non-cadenced review that is made available when a specific need arises.

## 3.4 Process

Approval of proposed changes to an SO or AC through the relevant process automatically tasks the RSC to determine whether a Consequential Effects Review is [needed](#).

Where a Consequential Effects Review is determined to be necessary, this review will be scheduled based on existing bandwidth and timeframes of other review work. For example, if an SO or AC has completed a restructuring effort and a Consequential Effects Review is needed, the RSC could recommend that the Consequential Effects Review begin once any existing active review work is complete.

## 3.5 Review Effort

The Consequential Effects Review is undertaken by a Cross Community Working Group using the process and methodology used in Phase 3 of the Structural Review.

The final outcome of this Review will be subject to comment and submission to the Board as a recommendation. The Board decision on the recommendations will be open to all Bylaws defined accountability measures.

## Section 3 - One-Time Review

### Rationale

The Review CCG had initially foreseen the inclusion of a review intended to assess the results of SO, AC, and NomCom's CIP as they relate to each SO/AC/NC and to each other:

- to confirm CIPs were completed in adherence to Framework:
- test CIP outputs to ensure conclusions are supported
- compare CIP outputs to identify good practices that may be beneficial to groups or serve to enhance collaboration
- ensure actions are followed through on as intended

Recognizing that the CIP remains a pilot initiative, the Reviews CCG concluded that it would be premature to develop a reviews framework predicated on its long-term success or to presume successful outcomes in advance.

Instead, the Reviews CCG recommends conducting a one-time assessment of the pilot Continuous Improvement Program to evaluate its effectiveness and to determine whether the initiative should continue, and how the results of future CIPs could be integrated into the broader reviews framework as appropriate in the future.

### Focus

The Reviews CCG recommends<sup>13</sup> a one-time review of the Continuous Improvement Program (CIP) pilot, at the conclusion of the first cycle, to inform whether the CIP initiative should be continued, discontinued, or refined. At that point in time, a determination could then be made on how the CIP results should be used and reviewed in the future, as appropriate.

## VI - Implementation of Review Outcomes

To streamline and strengthen the implementation of review outcomes going forward, the Reviews CCG recommends the use of Implementation Review Teams (IRTs), similar to the approach used in the policy development context, to support oversight and continuity throughout the implementation phase. This approach would enable continued community

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<sup>13</sup> The one-time review supersedes the "CIP assessment" previously proposed by the Reviews CCG. The Reviews CCG decided against developing a system reliant on a programme that remains in pilot phase.

engagement and provide a mechanism for individuals with subject-matter expertise to remain actively involved following completion of the review.

Additionally, the cross community group itself would remain active in an appropriate capacity to help ensure continuity, preserve context, and support accountability throughout implementation activities.

The recommendation does not alter the existing expectations regarding reporting and transparency; rather, the same level of reporting, tracking, and public accountability would continue to apply.

Implementation efforts would also be strengthened through the oversight and coordination role of the Reviews Scoping Committee, which would monitor progress, dependencies, resource considerations, and overall implementation planning across the review framework.

## **VII - Implementation of Refreshed Reviews System**

The Reviews CCG anticipates that an Implementation Review Team (IRT) will be required to support the implementation of the proposed refreshed reviews system. It is also expected that amendments to the Bylaws will be necessary to reflect the updated framework.

Charters will need to be developed for the Accountability and Transparency Reviews and the On-Demand Reviews that align with scope.

Operating standards governing the functioning of cross-community working groups and liaison groups will also need to be established. The Reviews CCG notes that a set of draft updated operating standards for conducting Specific Reviews may be leveraged to support this work.

# Appendix A - Background

Building on years of discussion<sup>14</sup> on finding ways to streamline ICANN reviews to make them more sustainable, the ICANN Board, after consultation with the community at ICANN82, [directed](#) ICANN Staff, on 19 May 2025, to begin work to design a review program that better serves the community's needs and is fit for purpose. As a first step, the ICANN Board called for a community dialogue to develop a shared understanding of the areas and issues that would enhance ICANN's accountability, transparency, and effectiveness.

To address this, leaders of ICANN's SO/ACs convened to develop a [charter](#) that was formally signed off on in August 2025, and subsequently [approved](#) by the ICANN Board on 5 September 2025.

The Reviews Cross Community Group (Reviews CCG) brings together [members](#) from ICANN's SO/ACs, ICANN Board, ICANN Staff, two [expert advisors](#) selected by the Reviews CCG, as well as [observers](#). The Reviews CCG is tasked to perform "a fundamental evaluation" of reviews set out in the ICANN Bylaws, "as a whole system, including their implementation, and propose a refreshed system of reviews". Areas of focus include:

- Periodic review of ICANN structure and operations (section 4.4);
- Annual Review (section 4.5);
- Specific Reviews (section 4.6);
- Previously conducted Reviews; and
- Reviews that have previously been formally recommended.

As noted in the charter, the Reviews CCG is not evaluating the pilot [Continuous Improvement Program](#) itself, but is to "take account of its work and consider how it can best contribute to the broader system of reviews".

The Reviews CCG work is informed by [data received from ICANN](#) Staff on Specific Reviews and Organizational Reviews, as well as considerations, research, and conclusions of the [Third Accountability and Transparency review](#), which it considers a point of reference in its work.

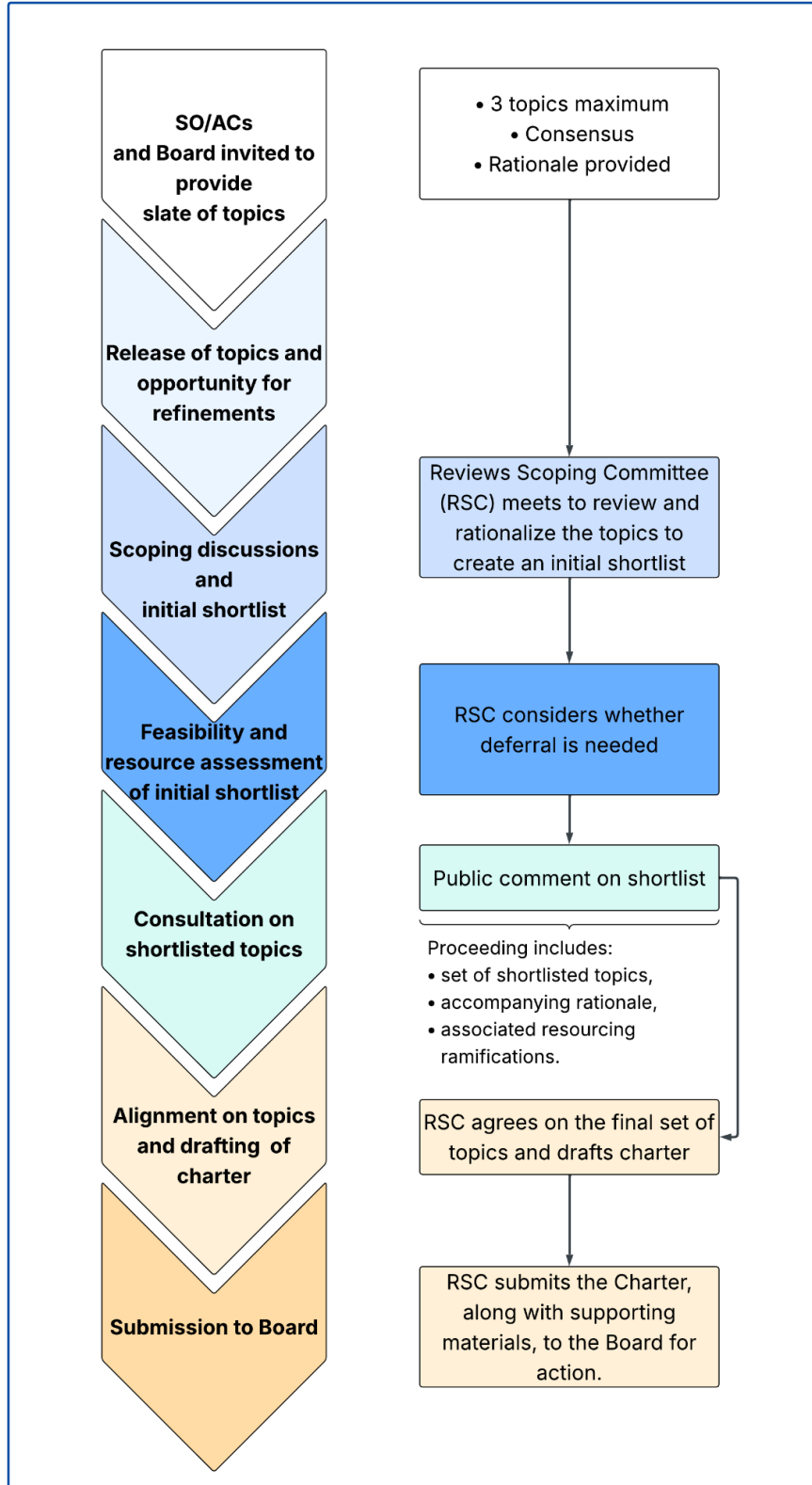
The Reviews CCG conducts its work in a transparent fashion and welcomes observers to contribute to plenary call and subgroup discussions, as directed by Co-Chairs. Additionally, it has an open email address any interested individual can use to [provide input](#) on the work. The Reviews CCG also conducts outreach sessions at ICANN meetings, organizes webinars and issues status updates on its [work space](#) to keep the public apprised of progress and collect feedback.

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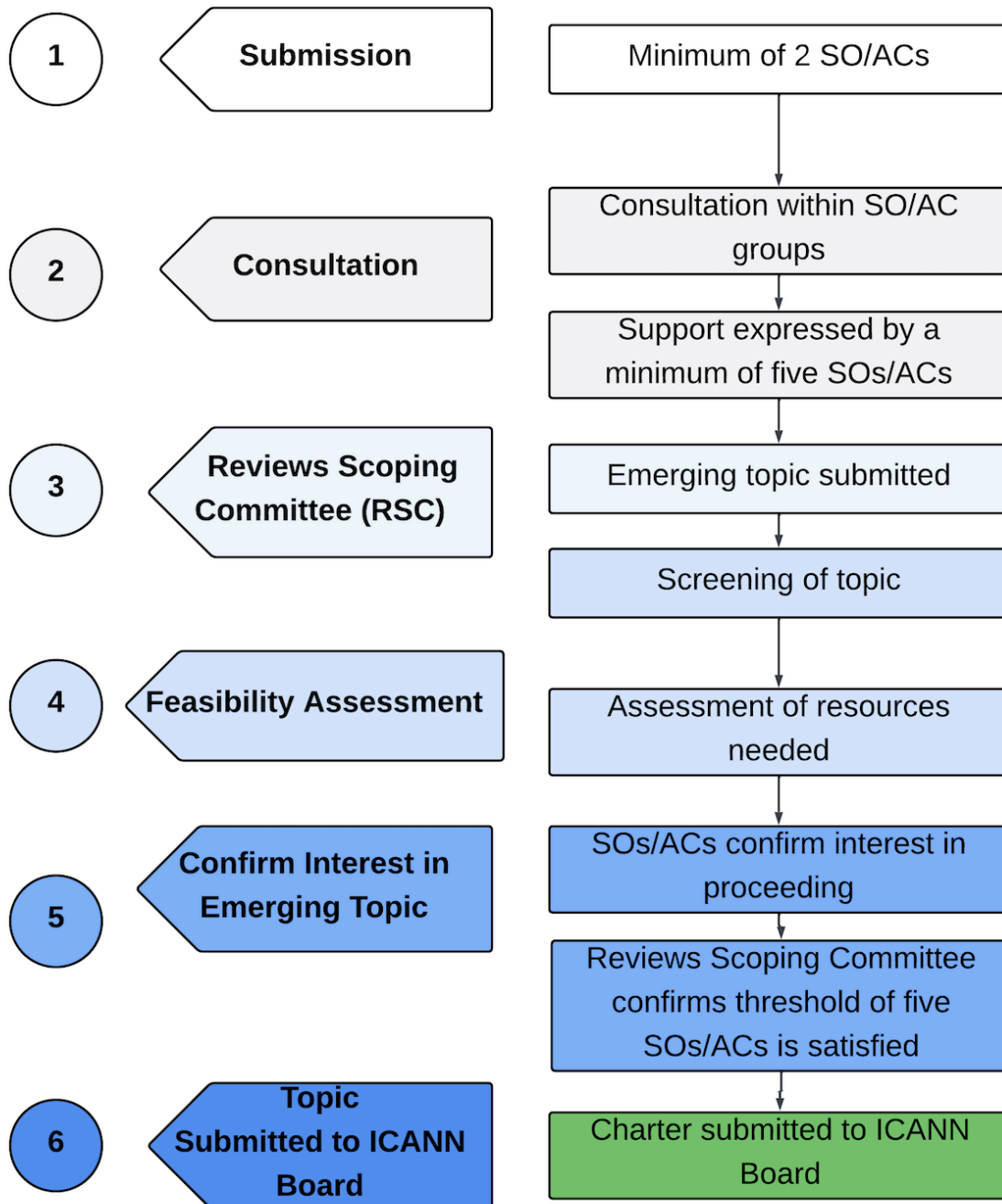
<sup>14</sup> Refer to Sections 2 of the *Information on ICANN Specific Reviews V3* and *Information on ICANN Organizational Reviews V2*. See background materials page on the Reviews CCG work space.

# Appendix B Charts

## Accountability and Transparency Scoping Process



## On Demand Scoping Process for Emerging Topics





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