



ICC APPEAL HEARINGS | September 14, 2020

# Impact of Online Voting / Cost Impact / Voting Guides Voter Eligibility / Validation Process

Presented by: Leading Builders of America (LBA)

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LEADING  
BUILDERS  
*of* AMERICA

# 2021 IECC

## 2019 GROUP B PROPOSALS

**PROTECTING THE CODE  
DEVELOPMENT PROCESS**

<https://www.youtube.com/watch?v=hQw4YBNOIso&feature=youtu.be>



While the mission of Leading Builders of America (LBA) is to protect home affordability, it is the ***material and significant irregularity of process and procedure*** which occurred during the 2019 Group B Code Development Cycle that LBA seeks to have its appeal sustained.

### Key Issues:

1. Proprietary, “for profit” interests unfairly manipulated the process to ensure the final action results favor the use of their products.
2. Other Stakeholders including LBA were denied due process.

# The Consequences



The 2021 IECC and IRC will become egregiously cost ineffective codes.



Adoption of the 2021 IECC will be negatively impacted.



ICC will lose all creditability as a fair and balanced code development organization.



Code development participation by code officials will further diminish.



Codes will be completely written by proprietary interests in the future.



Other codes will become vulnerable to this manipulation.

# Cost Impact

Although cost is not grounds for sustaining an appeal, the negative impact to home affordability and the home-building industry due to the ***violation of process*** that took place cannot be overstated.

If corrective action is not taken, the 2021 IECC has the ability to ***eliminate close to 1.8 million new homebuyers*** from the market, while adding exorbitant cost and an unbalanced benefit to remaining homebuyers.



People Helping People Build a Safer World®

# ICC CODE DEVELOPMENT PROCESS

An Introduction to the Development of the International Codes® (I-Codes®)

## The Foundation

### Governmental Consensus

Similar to the development of laws, the ICC code development follows a governmental consensus process that includes open forums of debate and refinement. It is an open, inclusive, and balanced consensus process with built-in safeguards designed to prevent domination by a single vested interest. The system ensures fairness in the process, controls against conflicts of interest, and prevents vested economic interests from determining the outcome of all code change proposals. This system of code development has provided the citizens of the U.S. the highest level of building safety in the world for more than 80 years. The ICC governmental consensus process meets the principles defined by the U.S. Standards Strategy of 2005; the OMB Circular A-119, Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities (1998), codified by Public Law 104-113, National Technology Transfer and Advancement Act of 1995. The key mechanisms that govern the ICC governmental consensus process include:

# Due process is a guarantee under these core principles and rules of CP#28.

- ✓ It is open, inclusive and a balanced consensus process
- ✓ Has built-in safeguards to prevent domination by a single vested interest
- ✓ Ensures fairness
- ✓ Controls against conflicts of interests from determining the outcome of code change proposals.

# CP#28-05

## 1.2 Objectives: The ICC Code Development Process has the following objectives:

- 1.2.1 The timely evaluation and recognition of technological developments pertaining to construction regulations.

- 1.2.2 The open discussion of code change proposals by all parties desiring to participate.

- 1.2.3 The final determination of Code text by public officials actively engaged in the administration, formulation or enforcement of laws, ordinances, rules or regulations relating to the public health, safety and welfare and by honorary members.
- 1.2.4 The increased participation of all parties desiring to participate through an online submittal and voting process that includes opportunities for online collaboration.

# CP#28-05

## 1.4 PROCESS MAINTENANCE:

The review and maintenance of the Code Development Process and these Rules of Procedure shall be by the ICC Board. **The manner in which Codes are developed embodies core principles of the organization.** One of those principles is that the final content of the Codes is determined by a majority vote of the governmental and honorary members. It is the policy of the ICC Board that there shall be no change to this principle without the affirmation of two-thirds of the governmental and honorary members responding.

# 2019 IECC Code Cycle



**January 1<sup>st</sup> – March 29<sup>th</sup>**  
Registration of  
Governmental Members  
with ICC

**March 29<sup>th</sup> – September 23<sup>rd</sup>**  
Voters for each Governmental  
Member ID'd by Primary  
Representative

**November**  
Voting Guide in advance  
2-Wk Online Voting Window  
Tentative: Nov 13 - 27

MAPC website “Validating Voters Webinar” 8-20-2019 posted to YouTube 8/26/2019  
<https://www.youtube.com/watch?v=u8yFj87MJuk&feature=youtu.be>

## APPENDIX D VOTER VALIDATION TIMELINE

For the 2019 Group B cycle, more than 3,100 GMVR applications were submitted and vetted. The International Code Council has strict application submission deadlines to allow staff to process and vet these applications in advance of the code development hearings. The two application deadlines for 2019 were:

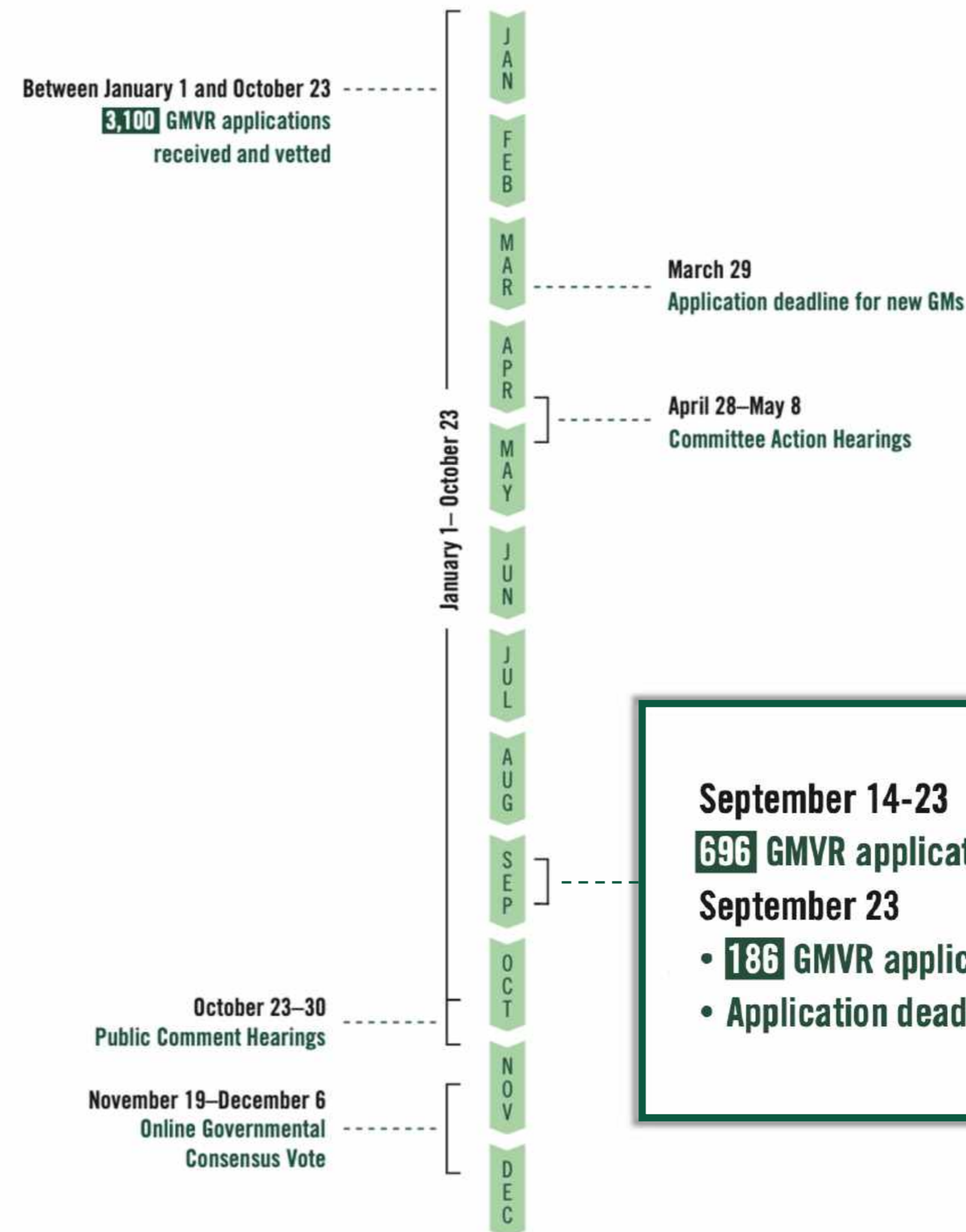
- March 29, 2019: Application deadline for new GMs
- September 23, 2019: Application deadline for GMVRs

In the last ten days before the September 23 deadline, 696 GMVR applications were submitted to staff. On September 23 alone, 186 applications were submitted. The Code Council tracks the application receipt date on each account to ensure the user's voting credentials are recognized as having met all deadlines.

In total, more than 8,000 GMVRs had voting credentials for the 2019 cycle. Note that GMVRs previously confirmed for the 2018 cycle were not required to re-apply in 2019.

Code Council staff carefully reviewed all GMVR applications. On occasion, staff rejected individuals put forth by the governmental member if they did not meet the bylaws definitions.

All eligible GMVRs were validated prior to the start of the Public Comment Hearings on October 23. Once staff completed the validation of a GMVR, the information was automatically populated on the public members lookup webpage.



123 NEW GMs are validated by March 2019. But not posted to the ICC website until November.

696 new GMVRs entered the process in a 10-day period in September.

# Proprietary Interests

Proprietary interests led by the Energy Efficient Code Coalition (EECC) unfairly manipulated the ICC code development process to deny due process to other stakeholders including LBA.

## EECC Supporters

### Government

National Association of State Energy Officials  
ICLEI

### Broad-Based Energy Efficiency Groups

The Alliance to Save Energy  
American Council for an Energy Efficient Economy (ACEEE)  
United Nations Foundation  
Institute for Market Transformation

### Regional Energy Alliances

Midwest Energy Efficiency Alliance (MEEA)  
Northeast Energy Efficiency Partnerships (NEEP)  
Northwest Energy Codes Group (NEEA)  
South-central Partnership for Energy Efficiency as a Resource (SPEER)  
Southeast Energy Efficiency Alliance (SEEA)  
Southwest Energy Efficiency Project (SWEPP)

### Academia/Think Tanks

American College and University Presidents Climate Commitment  
Center for Resource Solutions  
New Building Institute

### Affordable Housing Advocates

Enterprise Community Partners  
Global Green USA  
Housing Assistance Council  
LISC – Local Initiatives Support Corporation  
National Housing Institute  
National Low Income Housing Coalition

### Architecture

American Institute of Architects  
Ed Mazria, Architecture 2030

### Energy Consumers

Consumers Federation of America  
Energy Outreach Colorado  
Public Citizen

### Faith-Based Groups

American Values Network

### Energy Efficient Construction Organizations

New Buildings Institute  
RESNET

### Labor

Apollo Alliance  
Blue Green Alliance

### Business and Insurance

American Chemistry Council  
Business Council for Sustainable Energy  
Current Energy  
Environmental Business Council – New England  
Extruded Polystyrene Foam Association (XPSA)  
Fireman's Fund  
Green Chamber of Commerce  
North American Insulation Manufacturers Association (NAIMA)  
Northwest Environmental Business Council  
Polyisocyanurate Insulation Manufacturers Association (PIMA)  
Structural Insulated Panel Association (SIPA)

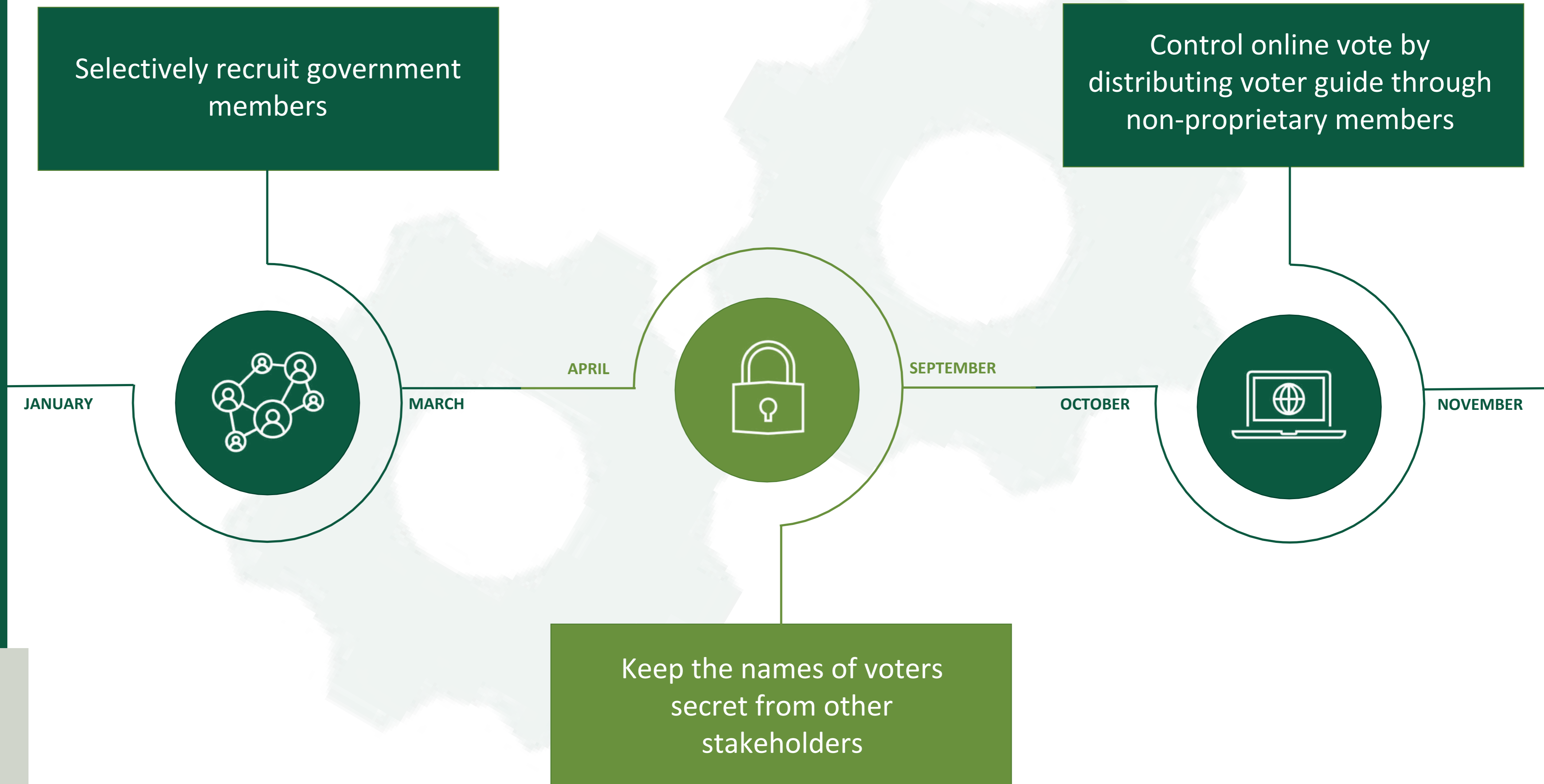
### Environmental Groups

Center for Environment, Commerce & Energy  
Climate Crisis Coalition  
Community Environmental Council  
Environment America  
Environmental Law and Policy Center  
National Wildlife Federation  
Natural Resources Defense Council (NRDC)  
Sierra Club  
2020 Vision

### Utilities

American Public Power Association  
Edison Electric Institute  
National Rural Electric Cooperative Association

# Blueprint for Manipulation



# EECC Supporter Webinars

EECC participated on recruitment/coaching webinars hosted by their governmental members and their surrogate groups to selectively curate new sympathetic voters into the process.

- Coached New Governmental Members on how to register their voters to maximize the vote during the OGCV
- Lobbied GMs on how to vote during the OGCV



# Key Non-Proprietary Supporters of EECC

## IECC Partners



Energy Efficient Codes Coalition



# How to Fill Up Your Roster of Voters on the 2021 IECC



3:33 of video speaker says:

*“Just a reminder that we want to be maximizing the number of votes in each department to ensure the most efficient code possible.”*

IECC Voter Validation Tutorial:

<https://www.youtube.com/watch?v=Xa1jBRwO54U&feature=youtu.be>

**William Fay**  
**bfay@ase.org**



36 minutes in Bill Fay with EECC begins speaking on the webinar.

Fay states that there are potentially more than 100,000 governmental voters out there.

MAPC website “Validating Voters Webinar” 8-20-2019 posted to YouTube 8/26/2019  
<https://www.youtube.com/watch?v=u8yFj87MJuk&feature=youtu.be>



**MA Cities and Towns:  
Finalizing Your IECC Voter Roster**  
*MAPC's Codes for Climate Webinar Series  
and Zero to 101 Initiative*

August 20, 2019

 **MAPC**  
METROPOLITAN AREA PLANNING COUNCIL

MAPC website “Validating Voters Webinar” 8-20-2019 posted to YouTube 8/26/2019  
<https://www.youtube.com/watch?v=u8yFj87MJuk&feature=youtu.be>

# Agenda

- 1 Local Codes Update
- 2 Registration Results and Next Steps
- 3 How To: Completing Voter Validation
- 4 Nationwide Efforts and Expected Code Proposals
- 5 Q & A

MAPC website “Validating Voters Webinar” 8-20-2019 posted to YouTube 8/26/2019  
<https://www.youtube.com/watch?v=u8yFj87MJuk&feature=youtu.be>

## Results of MAPC Registration Efforts

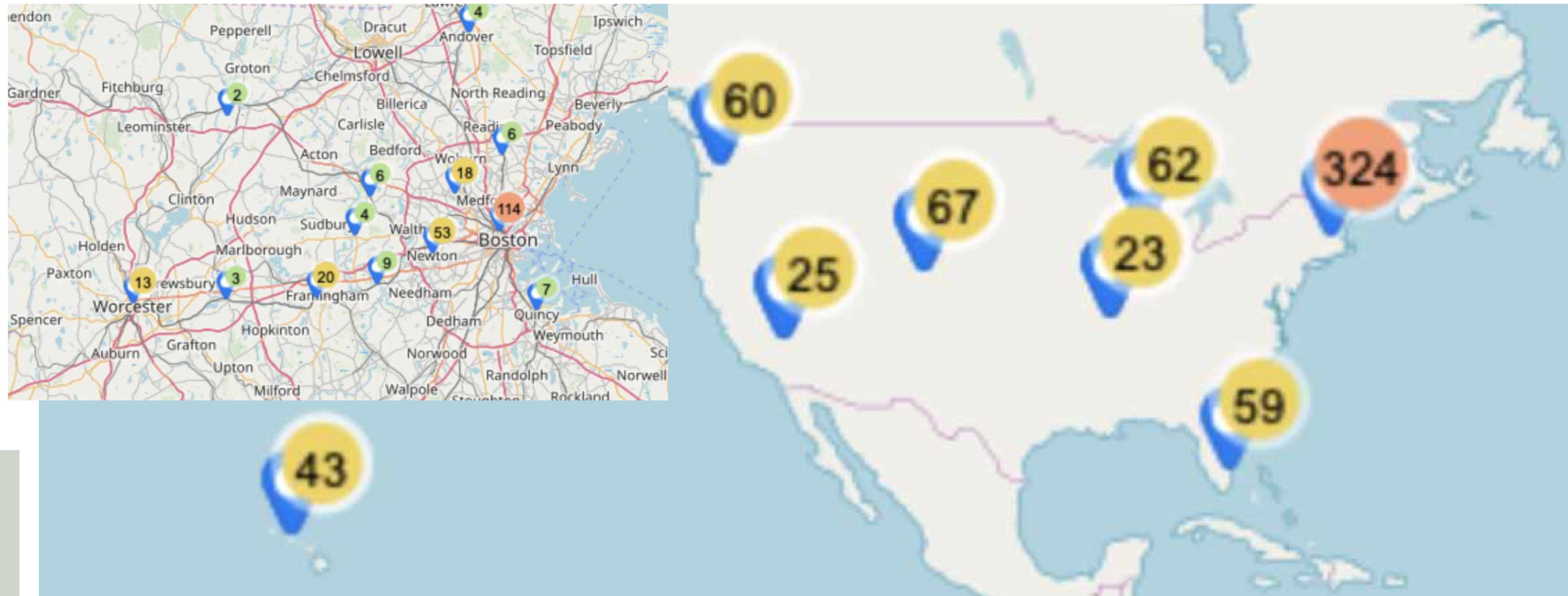


**82 Govt Members**



MAPC website "Validating Voters Webinar" 8-20-2019 posted to YouTube 8/26/2019

<https://www.youtube.com/watch?v=u8yFj87MJuk&feature=youtu.be>



<https://www.youtube.com/watch?v=Xa1jBRwO54U>



IECC Voter Validation Tutorial

61 views

1 like 0 dislikes SHARE SAVE ...



Massachusetts Climate Action Network  
Published on Jun 27, 2019

SUBSCRIBE

Join our easy tutorial on how you can fill up your full roster of voters to improve the 2021 International Energy Conservation Code, featuring special guest Boston City Councilor Matt O'Malley!

SHOW MORE

MAPC website “Validating Voters Webinar” 8-20-2019 posted to YouTube 8/26/2019  
<https://www.youtube.com/watch?v=u8yFj87MJuk&feature=youtu.be>

## Voter Validation

- 1 To start, go to: <http://www.iccsafe.org/> and log in using the email and password you created. If you don't have this, look for your membership confirmation email from the ICC.
- 2 Navigate to **My ICC** in the top right hand corner of the site.
- 3 Select **Voter Validation** within the My ICC portal (left hand column). Scroll down and click **add representative**
- 4 Enter a voter's contact information, and how they meet ICC eligibility (from dropdown menus), and click save. Do this for each voter, up to 4, 8, or 12. **Don't forget to include yourself if you plan to vote!**

## The webinar speaker proceeds to explain step by step how to login into ICC website and add GMVRs

**Question 1:** The ICC Bylaws require that all voters “shall be employees or officials of the Governmental Member or departments of the Governmental Member, provided that each of the designated voting representatives shall be an employee or a public official actively engages either full or part time, in the administration, formulation, implementation or enforcement of laws, ordinances, rules, or regulations relating to the public health, safety and welfare.” Please choose the description that best describes the voter’s duties.

Please Select

Administers the laws, ordinances, rules or regulations of this Governmental Member.

Formulates the laws, ordinances, rules or regulations of this Governmental Member.

Implements the laws, ordinances, rules or regulations of this Governmental Member.

Enforces the laws, ordinances, rules or regulations of this Governmental Member.

▶ ▶▶ 🔊 32:41 / 1:07:54



MAPC website “ Validating Voters Webinar” 8-20-2019 posted to YouTube 8/26/2019

<https://www.youtube.com/watch?v=u8yFj87MJuk&feature=youtu.be>

**Question 2:** This voter is a(n):

Please Select

Paid Employee of this Governmental Member.

Third-Party Contractor of this Governmental Member.

Elected official of this Governmental Member.

Other – (Please specify)

I hereby affirm that the information I have provided is true and accurate in all respects. I understand that ICC membership and voting status is subject at any time to review by ICC. I also understand that choosing the “Save” button is equivalent to my signature and confers on me the responsibility as to the accuracy of all statements herein.

Save

Cancel

▶ ▶▶ 🔊 33:04 / 1:07:54

CC ⚙️ 🖱️ 🖱️ 🖱️

MAPC website “Validating Voters Webinar” 8-20-2019 posted to YouTube 8/26/2019

<https://www.youtube.com/watch?v=u8yFj87MJuk&feature=youtu.be>

At 34:33 of the video, the speaker says

*“Don’t lose sleep over which one of these you’re selecting, we talked about eligibility before and if you have questions over who should qualify to either of these questions, just let us know and we can help walk you through it. But there is no wrong answer between these options.”*

# Timing of Webinars was Geared to Deny Due Process to Stakeholders

The timing of the recruitment effort was deliberate and purposeful as well.

Webinars were held just weeks prior to the application deadline to ensure ICC was flooded with a surge of new voters to validate.



New voting members were not posted to the ICC member directory, in many cases until weeks after the Online Governmental Consensus Vote (OGCV) was well underway, effectively making them secret to all other stakeholders.



All the while, EECC had *exclusive and unfettered access* to lobby these voters and advance its agenda.

# EECC's Voting Guide

EECC developed a voting guide which included 23 proposals related to insulation.

The voting guide also included all of the “double disapproved” proposals.

Using its unique non-proprietary supporters, EECC was able to funnel its voting guide to governmental members to follow during the OGCV.

# You will need:

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- Your email, password, & PIN to log on
- Voting guide on 2021 IECC

Questions about MA? [rebecca@massclimateaction.net](mailto:rebecca@massclimateaction.net)

Questions about the national level? [mellingson@ase.org](mailto:mellingson@ase.org)



MAPC website “Validating Voters Webinar” 8-20-2019 posted to YouTube 8/26/2019  
<https://www.youtube.com/watch?v=u8yFj87MJuk&feature=youtu.be>

## What You Need To Vote



- A computer with internet connection
- 40 to 60 minutes to sit down and vote
- IECC's voter guide
- A username, password and PIN to CDP Access

Energy-Efficient Codes Coalition				Summary of IECC RE (Residential) Proposals and Online Voting Recommendations	
Detailed Online Voting Recommendations Final Public Review November 9, 2019				<p>The IECC is the nation's model building energy code and is revised every three years. Before voting for the International Building Code (IBC) International Building Code (IBC) voting representatives will determine the content of the new version of the IECC. To vote on these proposals, go to <a href="https://www.iecc.org">www.iecc.org</a> and vote between residential and commercial.</p> <p>This guide has been prepared by the IECC to provide a clear outline of the IECC proposals for residential buildings and IECC's voting recommendations for IECC International Building Code (IBC) voting representatives for the purpose of the IECC's voting process. The IECC's voting process is designed to ensure that all of the proposals are considered in a fair and equitable manner. The IECC's voting process is designed to ensure that all of the proposals are considered in a fair and equitable manner. The IECC's voting process is designed to ensure that all of the proposals are considered in a fair and equitable manner.</p> <p>The IECC's voting process is designed to ensure that all of the proposals are considered in a fair and equitable manner. The IECC's voting process is designed to ensure that all of the proposals are considered in a fair and equitable manner. The IECC's voting process is designed to ensure that all of the proposals are considered in a fair and equitable manner.</p>	
				<p>The IECC's voting process is designed to ensure that all of the proposals are considered in a fair and equitable manner. The IECC's voting process is designed to ensure that all of the proposals are considered in a fair and equitable manner. The IECC's voting process is designed to ensure that all of the proposals are considered in a fair and equitable manner.</p>	
Prop. #	Current IECC	Prop. #	IECC's Voting Recommendation	Proposed Summary	IECC's Voting Recommendation and Notes
IECC	IECC	IECC	IECC	Proposed Summary	IECC's Voting Recommendation and Notes
IECC	IECC	IECC	IECC	Proposed Summary	IECC's Voting Recommendation and Notes
IECC	IECC	IECC	IECC	Proposed Summary	IECC's Voting Recommendation and Notes
IECC	IECC	IECC	IECC	Proposed Summary	IECC's Voting Recommendation and Notes
IECC	IECC	IECC	IECC	Proposed Summary	IECC's Voting Recommendation and Notes

Voting Tutorial from ICC: <https://www.youtube.com/playlist?list=PL9kEmc8-zghr041qNacZjk6eRV120ENYx>  
11:54 / 1:16:58

### How to Vote on the 2021 IECC A Codes for Climate Webinar

38 views • Nov 18, 2019


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Nicole Sanches Maria Ellingson James Robertson Ed Lang peter lowitt



**How to Vote on the 2021 IECC**  
*MAPC's Codes for Climate Webinar Series  
and Zero to 101 Initiative*

November 13, 2019



+15

How to Vote on the 2021 IECC A Codes for Climate Webinar  
<https://www.youtube.com/watch?v=2RQO83ut4YI&feature=youtu.be>



Energy-Efficient Codes Coalition 2021 IECC Voters Guide

Thank you for doing your part to significantly strengthen the 2021 International Energy Conservation Code! This document outlines the most important energy efficiency and climate proposals—those that have the greatest potential to reduce energy use and carbon emissions in residential and commercial buildings by at least 10%.

We think all of these are important for your vote. If your time is limited, please focus on the priority proposals in the rows that are **bold and highlighted**. A **GREEN PROPOSAL NUMBER** indicates a vote to approve the proposal under consideration, which might be As Submitted (AS), As Modified by Committee (AM) or As Modified by Public Comment (AMPC). A **RED PROPOSAL NUMBER** indicates a vote to disapprove the proposal.

Code Change		Brief Residential Proposal Description
OGCV	Proposal and Vote	
AMPC1	<input type="checkbox"/> <b>RE7</b> <b>AMPC1</b>	<b>Increases lighting efficiency</b>
D	<input type="checkbox"/> <b>RE10</b> <b>D</b>	Adds definition for sampling
AMPC1	<input type="checkbox"/> <b>RE20</b> <b>AMPC1</b>	Provides more information about code edition and compliance path
AS	<input type="checkbox"/> <b>RE21</b> <b>AS</b>	Requires certificates include heating, cooling equipment sizing and Energy Rating Index scores
AS	<input type="checkbox"/> <b>RE29</b> <b>AS</b>	<b>Improves wall insulation in Climate Zones 4 and 5</b>
AS	<input type="checkbox"/> <b>RE32</b> <b>AS</b>	<b>Adds slab insulation in Climate Zones 3, improves performance in Climate Zones 4 and 5</b>
AS	<input type="checkbox"/> <b>RE33</b> <b>AS</b>	<b>Improves ceiling insulation in Climate Zones 2 and 3</b>
AM	<input type="checkbox"/> <b>RE34</b> <b>AM</b>	<b>Eliminates floor insulation loophole in Climate Zones 5, 6, 7, and 8</b>
AMPC1	<input type="checkbox"/> <b>RE35</b> <b>AMPC1</b>	<b>Improves window efficiency in Climate Zones 3 and 4</b>
AS	<input type="checkbox"/> <b>RE36</b> <b>AS</b>	<b>Improves ceiling insulation in Climate Zones 4 - 8</b>
AS	<input type="checkbox"/> <b>RE37</b> <b>AS</b>	<b>Improves window thermal performance in Climate Zone 5</b>
D	<input type="checkbox"/> <b>RE40</b> <b>D</b>	<b>Weakens wall insulation based on framing factor</b>
D	<input type="checkbox"/> <b>RE43</b> <b>D</b>	Adds sampling for testing and inspections
D	<input type="checkbox"/> <b>RE95</b> <b>D</b>	Adds sampling for air leakage testing
D	<input type="checkbox"/> <b>RE102</b> <b>D</b>	Creates a loophole for multifamily leakage testing
D	<input type="checkbox"/> <b>RE110</b> <b>D</b>	Removes duct sealing requirements
AS	<input type="checkbox"/> <b>RE112</b> <b>AS</b>	<b>Requires duct testing</b>
D	<input type="checkbox"/> <b>RE116</b> <b>D</b>	Changes requirements and adds exemption for duct testing
D	<input type="checkbox"/> <b>RE117</b> <b>D</b>	Changes requirements and adds exemption for duct testing
D	<input type="checkbox"/> <b>RE119</b> <b>D</b>	<b>Changes duct testing conditions, may increase air leakage</b>
D	<input type="checkbox"/> <b>RE121</b> <b>D</b>	Adds sampling for duct testing
AS	<input type="checkbox"/> <b>RE126</b> <b>AS</b>	Encourages higher efficiency water heating sources
AS	<input type="checkbox"/> <b>RE139</b> <b>AS</b>	<b>Requires balanced heat recovery or energy recovery ventilation in Climate Zones 7 and 8</b>
AS	<input type="checkbox"/> <b>RE145</b> <b>AS</b>	Requires dimmers on some lighting fixtures
AS	<input type="checkbox"/> <b>RE147</b> <b>AS</b>	<b>Requires electric circuits and receptacles near gas- and propane- equipment</b>
AMPC1,2	<input type="checkbox"/> <b>RE148</b> <b>AMPC1</b>	<b>Closes loophole for exterior lighting in multifamily</b>

OGCV reversals include 20 “Double Disapproved” Proposals:  
  
CE12, CE49, CE56, CE217, CE262, RE21, RE29, RE32, RE33, RE36, RE37, RE126, RE145, RE147, RE151, RE182, RE184, RE192, RE204, RE209

# Voting Patterns of the OGCV

- The vote count for Group B proposals ranged between 147-550, except for 108 IECC/IRC-E proposals.
- The vote count range for these 108 IECC/IRC-E proposals was between 626-1,105 votes.
- The EECC Voting Guide included all 108 IECC/IRC-E proposals.
- The OGCV results followed the EECC voting guide with a variation of less than 3% (105 out of 108).
- There was an influx of 696 new GMVRs in a 10-day period in September 2019.
- **These "last-minute" GMVRs were material to the reversal of 26 IECC/IRC-E outcomes, (including the 20 double-disapproved proposals) resulting from the OGCV.**

# Violations of CP#28-05

- EECC recruited new Governmental Members and assisted them in getting their representatives validated just before the deadline for registration so they could participate during the OGCV. Why? To ensure the identity of the voters remained secret to all other stakeholders except EECC. Thereby ensuring EECC had exclusive access to these voters. And all the while, EECC was lobbying these GMs to follow the its voting guide.
  - While voting guides have been widely used and are not disallowed by CP#28, the almost perfect adherence between the OGCV results and the EECC voting guide provides virtually indisputable proof that EECC curated “last-minute” voters to ensure they had access to them to the exclusion of all other interested parties, including LBA. This enabled EECC to secure the outcomes it desired on the proposals identified in its voting guide during the OGCV.
  - YouTube and EECC partner website videos and emails further confirm this fact.
- EECC’s exclusive access to new Governmental Members they recruited, coupled with the fact that these new voters were not posted to the ICC Member Directory for nearly the entire code cycle is a violation of 1.2.2 of CP#28. All parties desiring to participate in the process were not afforded the right to an OPEN discussion of code change proposals because they did not have access to these voters.

# Double Disapproved Proposals

Virtually all the over-turned double disapproved proposals never received a substantive debate during the Public Comment Hearing because their disapprovals were never over-turned. Therefore, there was ***no discussion*** of Public Comments or full debate on “As Submitted”.

As a result, voters during the OGCV never had the ability to fully vet these proposals. This too was a *violation* of Council Policy 28 Section 1.2.2 because there was not an open discussion for approval of these code change proposals.

# Remedy

The violations of 1.2.2 and 1.4 of CP#28 constitutes a material and significant irregularity of process or procedure as described in 6.3.8 of CP#01-03 - Appeals.

For this reason, LBA's appeal should be sustained and the Appeals Board should take the following actions:

- 1.Reverse the actions taken during the OGCV on IECC/IRC-E proposals.
- 2.Uphold actions taken during the PCH.

# Recommendations for Strengthening the Process for the 2021/2022 Cycle and Beyond



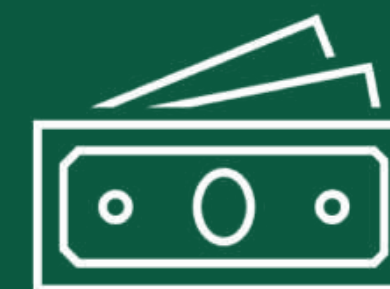
1. Strengthen ICC's bylaws and CP#28 so that the violations that occurred in this cycle, can never happen again



2. ICC's validation process needs to better ensure on-line voters truly comply with eligibility criteria.
  - Ask GMs and GMVRs to not just check a box but to describe how their job responsibilities comply with eligibility criteria.



3. Double disapproved proposals should not be permitted to move onto the OGCV



4. Make the FULL disclosure of financial interests a mandatory part of code change proposal submittals.