



Setting a New Standard

Board of Executive Protection Professionals

Executive Protection Standards Based on Experience

PROCEDURES FOR THE DEVELOPMENT OF AN AMERICAN NATIONAL STANDARD

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PROCEDURES FOR THE DEVELOPMENT OF AN AMERICAN NATIONAL STANDARD

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1. INTRODUCTION

This document defines the Operating Principles and Procedures that will be followed by the Board of Executive Protection Professionals (BEPP) to comply with the requirements and policies of the American National Standards Institute (ANSI) for American National Standards (ANS) Developers. These requirements are defined in **"ANSI Essential Requirements: Due process**

requirements for American National Standards." Where the BEPP Operating Principles and Procedures are silent on an issue, the ANSI Essential Requirements document referenced above shall serve as the precedent document.

When operating outside of the ANSI Essential Requirements Procedures, BEPP Meetings and Committees shall follow the Operating Procedures for BEPP Meetings and Committees.

2. ORGANIZATION

2.1 BEPP Board of Directors –

The BEPP Board of Directors (BoDs) is responsible for developing new or revised language for Standards developed by BEPP, as these standards fall within the scope of these procedures. Additionally, this BoDs will maintain and keep current the process, review, appeals, interpretations, compliance enforcement, on-site assessment materials, assessor training, self-assessment guidance and other training and education activities relevant to the ANSI submission and compliance process. The BEPP Technical Committee must also comply with the ANSI requirement for openness, balance and due process.

The BoDs, Committees, Working Groups and / or Subcommittees shall maintain balance with the defined interest categories as the following:

- a. **Producer:** Executive Protection Professional performing protection duties
- b. **User:** Security Business owner or executive level individuals who hires "Producers"
- c. **Specific Subject Matter Expert:** An individual whose specific experience, certifications and training is an asset to the Executive Protection standard.
- d. **General Interest:** Technical or other Specialist that work with "Users" and "Producers"

The BEPP BoDs shall be the approving authority for all Committees and Sub-Committees operating in accordance with these procedures.

The BoDs shall:

1. Organize the Committees.
2. Oversee compliance with these procedures, including periodic review as necessary.
3. Apply for accreditation by ANSI and maintain accreditation in accordance with ANSI requirements.
4. Maintain rosters of all Committees and Subcommittees.
5. Establish and maintain standards for Executive Protection Professionals.
6. Approve and discontinue all standards projects.

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7. Submit standards approved by the Committees with supporting documentation for ANSI review and approval as American National Standards.
8. Ensure adherence to periodic maintenance of BEPP standards.
9. Administer an accreditation process that encourages an applicant to bring its program into compliance with BEPP standards.
10. Oversee or conduct a process of self-assessment, documentation, and on-site assessment of an applicant's compliance with established standards.
11. Formally acknowledge compliance of a program by the issuance of a certificate of accreditation.
12. Accept fees, grants, gifts, bequests, and other contributions that support the purpose of the BoDs.
13. Develop and maintain close working relationships with national, regional, state, and local associations and agencies and agencies in the security and related fields for mutual growth and benefit.
14. Ensure that business affairs and the programs of the BoDs and its affiliates are conducted on a nondiscriminatory basis.
15. Promote the concept of voluntary self-regulation inherent in the accreditation process.
16. Cooperate with other private and public agencies in a manner that will lead to the improvement in the accreditation program and the delivery of Executive Protection services.

2.3 Records

Material associated with the development of a Standard (including reaffirmations, revisions, and withdrawals) shall be retained in the BEPP files until the completion of the next standards cycle, or five years from the date of withdrawal as an American National Standard, for accuracy and historical purposes. The BEPP BoDs will make the final decision on standards for publication and a historical file maintained at the BEPP headquarters (Las Vegas, NV) for all standards published.

2.4 Membership

Membership in BEPP is structured into **three main categories**: the BEPP Board of Directors, the Technical Committee, and Working Groups. The **BEPP Board of Directors** are appointed annually and operate under BEPP's bylaws and processes. Participation in both the **Technical Committee** and **Working Groups** is open to anyone directly and materially involved with Executive Protection or Personal Protection, provided they do not violate the termination offenses outlined in section 2.7.

2.4.1 BEPP Board of Directors (BoD)

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The BoD is composed of nine (9) Directors who have been carefully selected based on current/previous employers, years of experience, professional certifications, and peer review.

As an administrative feature of the BEPP BoD, an Executive Committee has been established, which is comprised of the BoD Chair, the Vice-Chair, and the Secretary-Treasurer. These individuals will be responsible for working with and addressing specific items relevant to BEPP staff, program expenses and the viability of topics, which may affect the use of BEPP policies, procedures, and standards before they are presented to the full BEPP BoD. The Executive Committee may also be called upon to make decisions on urgent matters when it is not feasible to convene the full BoD.

The BEPP BoD as a body may not vote on the approval of an American National Standard (ANS) - related action or override the vote of the consensus body on such an action. BEPP BoD members and Executive Committee members may be part of the BEPP Technical Committee and must adhere to the same rules as other Technical Committee members with no special favor.

2.4.2 Technical Committee

The Technical Committee, who is also the consensus body, will not be comprised of more than 1/3 of any interest category.

Representatives within Technical Committee, shall be sufficiently diverse to ensure reasonable balance without dominance by any single interest group, individual or organization. BEPP shall make a concerted effort to ensure that no interest category has a majority of members.

The Technical Committee is responsible for developing new or revised language for Standards developed by BEPP. This Committee will also maintain and keep current the process, review, appeals, interpretations, compliance enforcement, on-site assessment materials, assessor training, self-assessment guidance and other training and education activities relevant to the BEPP assessment and accreditation process.

As the consensus body the Technical Committee will follow the voting procedures as stated in section 8. The Technical Committee members are the votes that will be tallied on the final BSR-9 to ANSI. The Technical Committee will strictly adhere to ANSI's openness/balance/consensus requirements.

This Committee may be comprised of personnel from the following categories:

- 1) Board Certified Protection Professionals
- 2) Former U.S. Secret Service Agents
- 3) Former State Department Diplomatic Security Agents
- 4) Former Federal Bureau of Investigation Agents
- 5) Private Sector Security Business Owners

- 6) Executive Protection Practitioners
- 7) Former/Current local and federal law enforcement
- 8) Threat Management Professionals
- 9) Medical Industry Professionals
- 10) Cyber Security Professionals
- 11) Executive Protection Practitioner
- 12) Licensed Autonomous vehicle/drone operators

2.4.3 Working Group –

The Working Group is responsible for the continual review, update, and maintenance of Standard developed by BEPP. The Working Group makes recommendations to the full Technical Committee for final consideration, revision, and approval. In addition, the Working Group is responsible for enforcing and maintaining the policies set forth by the BEPP BoDs for a fair and consistent application of the BEPP standards through on-site peer assessments. The Working Group is not a consensus body however Technical Committee Members may be part of the Working Group.

2.5 Interest Categories

For purposes of developing an American National Standard, all members of the BEPP BoDs, Committees, Subcommittees and Work Groups shall be classified as Producer, User , Specific Subject Matter Expert or General Interest in accordance with the definitions below. An individual in professional practice or a consultant, retained under an agreement indefinitely continuing with an organization, shall be classified in accordance with the classification of the organization retaining the individual and shall be so identified.

2.5.1 Producer

An Individual who currently works in the Executive Protection industry. This person performs close protection for high-net-worth individuals, government officials, celebrities, business executives, foreign diplomats, and others who require specialized personal protection.

2.5.2 User

An individual who owns or works for an organization who supplies "producers" to their organizational clients or individuals themselves.

2.5.3 Specific Subject Matter Expert

An individual whose specific experience, certifications and training is an asset to the Executive Protection standard. These individuals generally have critical input when it comes to safety. Examples of specific subject matter experts and their field of expertise includes but is not limited to:

1. Cyber Security experts
2. Mail Security experts
3. Protective Intelligence experts
4. Safe and Secure Transportation experts
5. Autonomous vehicle/drone operator experts
6. Legal Counsel
7. Threat and Risk Management experts
8. Mental Health experts
9. Information Security experts
10. Business Operations experts
11. Insurance and Licensing experts

2.5.4 General Interest

Individuals who have special skill sets and or equipment that interact with "users" and "producers". Examples of general interest includes but not limited to:

1. Human resource professionals
2. Finance professionals
3. Legal professionals
4. Mental health professionals
5. Drone operators
6. Government agencies/departments

2.6 Membership Roster

The BEPP BoDs shall prepare and maintain a membership roster documenting the classification of each Committee, Subcommittee, and Workgroup member. These rosters shall be circulated to the relevant committee members annually.

2.7 Termination of Membership

The BEPP BoDs shall be authorized to terminate the membership of an individual of the Technical Committee or Working Group. A Committee or Group member shall be considered inactive for failure to attend or otherwise participate in at least one meeting for a calendar year.

After one year of inactivity, a Committee or Working Group member may be subject to review by the BEPP BoDs. The BoDs may then request a replacement, reassign the member to another committee or group, or remove their membership entirely. If a Technical Committee member is inactive or unresponsive to communication from the BEPP BoDs, they may be moved to a Working Group or have their membership terminated.

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Committee and Group members shall notify the BEPP BoDs of any changes in employment affecting representation and shall submit a new application if continued membership on a Committee is desired.

Termination of membership can also occur if an individual:

1. Fails to be truthful, or displays a lack of integrity
2. Fails to be diligent in discharging their membership duties
3. Maliciously harms a person's or organization's reputation
4. Provides false or misleading statements or information
5. Has a material conflict of interest
6. Violates any criminal or civil laws of any jurisdiction

The BoDs may vote to terminate the membership of a BoD member on the same basis. However, the BoD must reach a two thirds majority vote in the affirmative to remove an individual.

3. BEPP STANDARD SUBMISSION PROCESS

The BoDs will develop the initial document framework for the National Standard (ANS). Upon approval from ANSI to become a Standards Provider, BEPP will officially announce the proposed Standard following the ANSI announcement procedures.

3.1 Committee Selection

After the Standard announcement is made, an application process will begin to select members for both the Technical Committee and the Working Group. The BoD will make selection decisions based on experience, training, background and will ensure to maintain the consensus committee does not have more than 1/3 of any interest category.

3.2 Overall Process

Once the Technical Committee and the Working Group have been selected, the BEPP BoDs will submit its initial ANS document framework to the Technical Committee for review and comments. The Technical Committee will then submit the document to the Working Group along with a form to be used to record the Working Group members' comments or recommendations.

Working Group members will document their comments and submit them to the Technical Committee for review. The Technical Committee will then Accept or Reject the comments or recommendations made by individuals in the Working Group. If they accept a comment, the addition will be added to the proposed ANS documents. If the Technical Committee rejects a recommendation, the reason for rejection will be recorded and submitted back to the Working Group on a single master recommendation document.

Once the proposed ANS document is ready for a vote, the Technical Committee will vote according to the process in section 8.

4. MEETINGS

4.1 Frequency

The BEPP BoDs, Technical Committee, and Working Group shall meet as requested by either the Chair or Vice-Chair or by petition of at least one-third of the BoDs or Technical Committee members to conduct business, consider draft standards, and or consider negative comments from any source.

4.2 Notification

All meetings, including in-person, or virtual meetings and conference calls, should be announced via email and/or via BaseCamp no less than two (2) weeks prior to the meeting date. Notable exceptions for extraordinary circumstances may be made on an as-needed basis. When an exception for extraordinary circumstances is necessary, the BEPP BoDs will announce the meeting as soon as practicable. If and when necessary a draft agenda shall be prepared and distributed with the meeting notice.

4.3 Open Meetings

Meetings of the BEPP BoDs and Technical Committees are open for attendance by interested parties. Personnel attending may be subject to membership requirements and individual policies of each Committee (e.g., regarding registration, minimum attendance levels, etc.). Non-Committee members shall not have the right to vote. An Exception to the Open Meeting Policy shall be at a time when the BEPP BoDs is in an Executive Session. Once an Executive Session is called, only BEPP BoDs members and BEPP staff are allowed to attend. Scheduling of Executive Sessions shall be done in advance of regular BEPP BoDs meetings.

4.4 Quorum

A simple majority of the members of the BoDs or Committee shall constitute a quorum for conducting business at a meeting. Matters shall be deemed approved by the affirmative vote of a majority of the members present. If a quorum is not present, actions on agenda items may be taken but shall be subject to ratification by a letter ballot of the BEPP BoDs or Committee.

4.5 Parliamentary Procedures

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The meetings addressing procedural changes or updates of the BEPP BoD, Committees, and Subcommittees shall be conducted in accordance with Robert's Rules of Order. If such rules are contrary to any provisions of the Articles of Incorporation or Bylaws of the Corporation, the articles or bylaws will take precedent.

5. NOTIFICATION OF STANDARDS DEVELOPMENT

Notification of Standards activity shall be announced in suitable media as appropriate to demonstrate provision of opportunity for participation by all directly and materially affected persons. At the initiation of a project to develop or revise a Standard, notification shall be transmitted to ANSI using the Project Initiation Notification System (PINS) form, or its equivalent, for listing in the ANSI Standards Action. BEPP will address any comments received in response to the announcement of PINS in accordance with clause 2.5 of the ANSI Essential Requirements. A PINS form may be submitted, but is not required to reaffirm or withdraw a Standard at the initiation of a project.

6. PUBLIC REVIEW AND COMMENT

Proposals for new Standards shall be transmitted to ANSI for listing in the ANSI Standards Action (BSR-8) for comment. The BEPP BoDs shall determine whether the listing of proposed standards actions shall be submitted before, during, or after each consensus body ballot and whether announcement in other suitable media is appropriate. The Technical Committee shall consider all comments that are received. The commenter shall then be notified of the Committee's decision/response and reasons, therefore in accordance with Section 8.8 to comply with the ANSI Essential Requirements and within sixty (60) business days of the commenter's submission. Public Comments will be divided into three categories, General, Technical, and Editorial.

6.1 General Comments

- 6.1.1 **Scope:** These are broad observations about the document as a whole. They might address overall impressions, the document's purpose, target audience suitability, general readability, or a high-level assessment of its strengths and weaknesses.
- 6.1.2 **Focus:** They don't typically dive into specific errors or detailed suggestions for changes. Instead, they provide overarching feedback that can guide larger revisions or confirm the document is on the right track.

6.2 Technical Comments

- 6.2.1 **Scope:** These comments focus on the accuracy, completeness, and validity of the factual, scientific, or specialized information presented in the document. They come from subject matter experts (SMEs) who can verify the correctness of the content.

6.2.2 **Focus:** They address issues related to data, calculations, procedures, methodologies, specific terminology, compliance with industry standards, regulations, or established protocols. They ensure that the technical information is sound and reliable.

6.3 Editorial Comments

6.3.1 **Scope:** These comments pertain to the clarity, conciseness, grammar, spelling, punctuation, style, formatting, consistency, and overall presentation of the document. They aim to improve the document's readability and professional appearance.

6.3.2 **Focus:** They address the "how" of the writing, rather than the "what" (technical content). This includes sentence structure, word choice, tone, adherence to style guides (e.g., APA, Chicago, internal company style), consistency in headings, numbering, and visual elements.

Public comments will only be reviewed by the Technical Committee if they are submitted by the due date and fully completed, including the commenter's name, current contact email address, page and line numbers, comments, and proposed changes. Extensions may be approved on a case-by-case basis, at the BoD's discretion.

7.0 SUBSTANTIVE CHANGE

A substantive change in a Standard is one that directly and materially affects the use of the Standard. Examples of substantive changes are below:

- a. "shall" to "should" or "should" to "shall";
- b. the addition, deletion, or revision of requirements, regardless of the number of changes; or
- c. the addition of mandatory compliance with referenced standards.

8. VOTING PROCEDURES

8.1 Letter Ballots

Draft American National Standards will undergo the letter ballot process. In addition, substantive changes to and interpretations of all Standards shall be approved by letter ballot of the Technical Committee, which is the consensus body for the BEPP.

All new proposed American National Standards, substantive changes to, revisions to, and reaffirmations and interpretations, and withdrawals of all Standards shall be approved by letter ballot of the Technical Committee.

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Based on the BEPP Standards Process, the Technical Committee will complete a letter ballot after the following actions:

1. After the BEPP Working Group has submitted comments and recommendations on the proposed Standard for consideration by the Technical Committee.
2. After the Working Group comments and recommendations are accepted or rejected by the Technical Committee, and those accepted recommendations have been added to the proposed ANS.
3. After the Technical Committee reviews the document or sections for content and accuracy.
4. After public comment period has passed and all public comments have been addressed and responded to.

8.2 Voting

Each member of the Technical Committee shall vote in accordance with one of the following positions on letter ballots:

- a. Affirmative
- b. Affirmative with comment
- c. Negative with reasons
- d. Negative without comment
- e. Abstain

8.3 Proxies

Unless otherwise provided by the BEPP BoDs, votes of a BoDs may be cast by proxy issued to any other BoDs member, provided, however, such proxies will not be counted in determining whether a quorum of BoDs members is present at a meeting of the BoDs members. Notice of proxy shall be provided to the secretary-treasurer before or at the meeting for which the proxy is effective.

8.4 Voting Period

The closure date for letter ballots shall be at least thirty (30) business days from the date of the issuance of the ballots. A reminder notice shall be sent approximately ten (10) business days prior to the close of the ballot to those who have not returned their ballots. The BEPP BoDs shall be authorized to grant an extension of the voting period if deemed necessary.

8.5 Approved Actions

Approvals of, substantive changes to, revisions to, reaffirmations and interpretations, and withdrawals of all Standards shall be considered approved when all of the following conditions have been met:

1. A majority of the members have returned their letter ballot.
2. At least 75 percent of the votes cast, excluding abstentions and negatives without comments, are affirmative.

3. All opposing votes with comments have been addressed in accordance with Section 8.7

8.6 Reporting Votes

The results of each vote on all Standards shall be reported as follows:

1. Number of members and their interest category (Producer, User, or General Interest).
2. Number of members voting affirmatively.
3. Number of members voting negatively with comments.
4. Number of members voting negatively without comments.
5. Number of members abstaining.
6. Number of members not returning ballots.

8.7 Negative Votes

A negative vote shall be required to be accompanied by a comment (reason) and, if possible, should include specific wording or actions that would resolve the objection. A negative vote not supported by a comment or a negative vote accompanied by comments not related to the Standard are not required to be recirculated but are recorded as negative without comment on the ANSI Board of Standards Review (BSR) BSR-9 document during submittal to ANSI. The ballot shall be counted as returned for the purpose of establishing a quorum.

8.8 Consideration of Views and Objections

The Technical Committee shall use the following procedures in an attempt to resolve negative votes and public review comments:

1. All public review comments and negative votes with accompanying comments will be forwarded to the Technical Committee that drafted the proposed Standard for response and resolution. An effort shall be made to resolve all objections. Committee Officers (with other Committee members as necessary) will draft the response on behalf of the Committee. Negative votes may be judged as invalid if the comments are not related to the standard. All comments are to be given a written disposition with reasons, therefore in accordance with clause 2.6 of the *ANSI Essential Requirements*.
2. Each commenter shall be advised in writing (including electronic communications) of the disposition of the objection and the reasons for the disposition. In addition, each unresolved comment and attempt at resolution and any substantive change made in the proposed American National Standard shall be reported to the Technical Committee to allow all members of the Technical Committee to respond, reaffirm, or change their vote.
3. All substantive changes shall be submitted to ANSI via the BSR-8 document for further public review.

4. Voting members or public review participants who have unresolved negative votes (comments) shall be notified of their right to appeal and of the appeals process in writing.
5. All comments that have been determined to be unrelated to the standard, or the particular part of the standard under review, may be held as proposals for new work. The commenter shall be notified of this action.

9. INTERPRETATIONS

9.1 Processing Interpretations

Requests for interpretations of Standards shall be submitted in writing to the BEPP Secretary and shall be forwarded by the BEPP BoDs Executive Committee Officers. Any BEPP BoDs member may prepare proposed interpretations with expertise on the subject in question. All proposed interpretations shall be prepared in writing and shall be submitted to the BEPP Secretary for a letter ballot of the Technical Committee. Interpretations shall be approved in accordance with section 7.6

9.2 Notification of Interpretations

Notification of approved interpretations shall be sent in writing to the requester. Notification shall also be given to other users of the Standards via the appropriate BEPP Committee email list(s) and posted on the BEPP website, www.ep-board.org

10. PATENT POLICY

BEPP has adopted the ANSI Patent Policy, as outlined in section 3.1 of the ANSI Essential Requirements.

11. COMMERCIAL TERMS & CONDITIONS POLICY

The essential requirements for exclusion of commercial terms and conditions from all American National Standards are specified in section 3.2 of the ANSI Essential Requirements. BEPP agrees to comply with this ANSI Commercial Terms and Conditions Policy.

12. ANTITRUST POLICY

BEPP has adopted the ANSI Antitrust Policy, as outlined in section 3.3 of the ANSI Essential Requirements.

13. EVIDENCE OF COMPLIANCE

- 13.1 In accordance with section 3.4 sub section 3.4.1 periodic maintenance of the ANSI Essential Requirements, the BEPP shall retain all records for one complete standards cycle, or until the standard is revised.
- 13.2 In accordance with section 3.4 sub section 3.4.2 continuous maintenance of the ANSI Essential Requirements, the BEPP shall retain all records for a minimum of five (5) years or until approval of the subsequent revision or reaffirmation of the complete standard.

14. METRIC POLICY

In accordance with section 3.5 of the ANSI Essential Requirements, BEPP accepts ANSI's Metric Policy which states that, "Units of the International System of Units (SI), the modernized metric system, are the preferred units of measurement in American National Standards."

15. CORRESPONDENCE

15.1 Committee Correspondence

Correspondence from a Committee member to the entire membership of the Committee shall be forwarded to the BoDs for screening and distribution. All official Committee correspondence, including meeting notices, agendas, reports, and letter ballots, shall be distributed by the BoDs. Copies of all other correspondence between Committee members relating to the *Executive Protection Professional Standard* as well as other American National Standards developed by BEPP shall be forwarded to the BoDs.

14.2 External Correspondence

All official Committee correspondence to external parties must be approved by the Committee or its delegated representative and distributed by the BoDs. Inquiries relating to the Committee and Standards shall be directed to the BoDs. Committee members should advise individuals who contact them that the BoDs handles responses to all inquiries.

16. APPEALS

16.1 Complaint

Persons who have been or may be affected by any Committee action, inaction, or decision shall have the right to appeal such action, inaction or decision. The appellant shall file a written complaint with the BoDs within thirty (30) business days of receipt of written notice of the BEPP BoDs action or decision or at any time with respect to inaction. The appeal must be in writing and must specify the grounds on which the appeal is made, which must be either a procedural violation or substantive error by BEPP in its review of a Standard that is at issue, the action or inaction at issue, and the specific remedial action(s) that would satisfy the appellant's concerns. Previous efforts to resolve the objections and the outcome of each shall be noted.

16.2 Response

Within thirty (30) business days after the receipt of the complaint, the BEPP BoDs shall respond in writing to the appellant, specifically addressing each allegation in the complaint to the extent possible. The BEPP BoDs shall attempt to resolve, informally, the complaint of the appellant.

16.3 Appeals Panel and Hearing

Within thirty (30) business days after the receipt of the BEPP BoDs response, the appellant can file a formal appeal at which time the BEPP BoDs Executive Committee shall appoint an ad hoc appeal panel of three members and three alternates, from the Technical Committee none of whom will have had an affiliation with the initial complaint or BEPP response. BEPP will confirm the willingness and availability of the panel and alternates to serve and notify the appellant of the proposed date for appeal review.

The BoDs and the appellant will have the opportunity to review the names of prospective appeal panel members and to challenge them for due cause (e.g., conflict of interest, bias or other prejudicial infirmity). The BEPP BoDs will rule on such challenges.

16.4 Conduct of the Hearing

The appellant has the responsibility of demonstrating improper action or inaction, the adverse effects therefrom, and the efficacy of the requested remedial action. The BEPP BoDs has the responsibility to demonstrate that the Committee took all actions in question in compliance with these procedures.

16.5 Decision

The appeals panel shall render its decision in writing within thirty (30) business days of the hearing, based upon a preponderance of the evidence, stating its findings of fact and conclusions, with reasons, therefore and citing the evidence. The BEPP BoDs shall notify the appellant and the Committee of the decision of the appeals panel, which shall be binding and final on all concerned. Further appeal may be made directly to ANSI according to the appeal procedures in the *ANSI Essential Requirements*.

17. REVISIONS TO PROCEDURES

These Operating Procedures are maintained by BEPP. Proposed revisions to these Operating Procedures may be submitted in writing by any member, program, or committee member to the Executive Committee of the BoDs, along with a supporting rationale for the proposed change. The Executive Committee of the BoDs will present the proposed revisions to the BoDs for review and consideration. The revised procedures are then submitted to ANSI for public comment and ANSI review and approval. Any approved revisions to these Operating Procedures shall be effective upon publication.

The BoDs shall be responsible for the interpretation of these Operating Principles and Procedures.

End of Procedures