

CDM-2022ALY7-INFO

**Seventh annual analysis report to the CDM
Executive Board on the results of DOE
performance monitoring**

Version 01.0

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1. Introduction

1. The Executive Board of the clean development mechanism (CDM) (hereinafter referred to as the Board), at its fifty-eighth meeting (EB 58), adopted the “Procedure on performance monitoring of designated operational entities” (hereinafter referred to as the DOE performance monitoring procedure)” and subsequently revised it three times, with the latest revision 04.0 being adopted at EB 106. The DOE performance monitoring procedure requires that the Board be provided on an annual basis with a report on the performance of DOEs, along with proposals for potential system-wide improvement.
2. The present report is the seventh of such reports.¹ It summarizes and analyses the findings arising from the fourteenth to the sixteenth monitoring periods (MPs), which ran as follows:
 - (a) MP 14, from 1 May 2020 to 31 August 2020 (accounting for data and submissions finalized on 28 February 2021);
 - (b) MP 15, from 1 September 2020 to 31 December 2020 (accounting for data and submissions finalized on 30 June 2021);
 - (c) MP 16, from 1 January 2021 to 30 April 2021 (accounting for data and submissions finalized on 31 October 2021).
3. This report provides:
 - (a) Information, trends and analysis of the long-term performance of DOEs;
 - (b) Analysis of the issues arising from DOE performance;
 - (c) Potential broad proposals for system-wide improvement through the identification of issues where guidance or requirements lack clarity or are non-existent.
4. An overview of the performance of DOEs is provided following the trends observed through an analysis of the issues raised in: requests for reviews (RfRs) or requests for clarifications (RfCs) and rejected requests from DOEs and areas of potential improvements for requests for registration and issuance for both project activities and programmes of activities (PoAs); requests for renewal of crediting period of project activities; requests for renewal of PoA period; requests for approval of post-registration changes (PRCs) of both project activities and PoAs under the prior-approval track; and notifications of changes to component project activities (CPAs). A more detailed analysis is provided for indicators I_1 , I_2 and I_3 in sections 2, 3 and 4, respectively. The areas for potential system-wide improvement are provided in section 5.

¹ The sixth analysis report to the CDM Executive Board on the results of DOE performance monitoring was the last report published before the DOE performance monitoring procedure (version 03.1) was put on hold at EB 87; therefore, the present report is the first report under the revised DOE performance monitoring procedure and is considered as being for the seventh analysis report.

5. The definitions of indicators I_1 , I_2 and I_3 are as follows:
- (a) Indicator I_1 includes the following two sub-indicators:
 - (i) Indicator $I_{1,CC}$: Rate of incomplete submissions at the stage of completeness check (CC);²
 - (ii) Indicator $I_{1,IRC}$: Rate of incomplete submissions at the stage of information and reporting check (IRC);³
 - (b) Indicator I_2 includes the following two sub-indicators:
 - (i) Indicator $I_{2,REG}$: Risk priority number (RPN) value at the stage of review of requests for registration;⁴
 - (ii) Indicator $I_{2,ISS}$: RPN value at the stage of review of requests for issuance;⁵
 - (c) Indicator I_3 calculates RPN value at the stage of clarification and rejection of requests for prior approval of PRCs and notifications of changes to CPAs.⁶

2. Analysis of indicator I_1

2.1. Overview of performance of DOEs

1. A total of 972 requests were submitted by 25 DOEs, with the average finalization rate of 96.6 per cent in these three monitoring periods, out of which 25 and 109 submissions were deemed incomplete at CC and IRC, respectively.⁷ Table 1 provides an overview of performance of DOEs through indicator I_1 .

² Indicator $I_{1,CC}$ is to monitor incomplete submissions at the CC stage of requests for registration and issuance for both project activities and PoAs, requests for renewal of crediting period of project activities, requests for renewal of PoA period, requests for approval of PRCs to both project activities and PoAs under the prior-approval track, and notifications of changes to CPAs.

³ Indicator $I_{1,IRC}$ is to monitor incomplete submissions at the stage IRC of requests for registration and issuance for both project activities and PoAs, requests for renewal of crediting period of project activities, and requests for renewal of PoA period.

⁴ Indicator $I_{2,REG}$ is to monitor requests for review raised for requests for registration for both project activities and PoAs, requests for renewal of crediting period of project activities, and requests for renewal of PoA period.

⁵ Indicator $I_{2,ISS}$ is to monitor requests for review raised for requests for issuance for both project activities and PoAs.

⁶ Indicator I_3 is to monitor clarification and rejection of requests for approval of PRCs to both project activities and PoAs under the prior-approval track, and notifications of changes to CPAs.

⁷ The DOE performance monitoring procedure, paragraph 15(a), provides a definition of the indicator I_1 , which includes two sub-indicators $I_{1,CC}$ and $I_{1,IRC}$. The DOE performance monitoring procedure, paragraph 24, requires that the DOE be considered to be in the indicator I_1 red zone, if its indicator $I_{1,CC}$ or $I_{1,IRC}$ is more than the respective thresholds.

Table 1. Overview of performance of DOEs

MP	No. of requests submitted ^(a)	No. of DOEs	No. of submissions finalized having CC incompleteness raised	No. of submissions finalized having IRC incompleteness raised	Finalization rate	No. of DOEs in I ₁ red zone
MP 14	341	23	2	42	97%	8
MP 15	372	21	19	45	96%	7
MP 16	259	20	4	22	97%	7

^(a) The requests cover requests for registration for both project activities and PoAs, requests for renewal of crediting period of project activities, requests for renewal of PoA period, requests for issuance for both project activities and PoAs, requests for approval of PRCs to both project activities and PoAs under the prior-approval track, and notifications of changes to CPAs.

2.2. Evolution of performance of DOEs

- Figure 1 shows the evolving trend of average value and threshold value of indicators I_{1,CC} and I_{1,IRC}, respectively.⁸

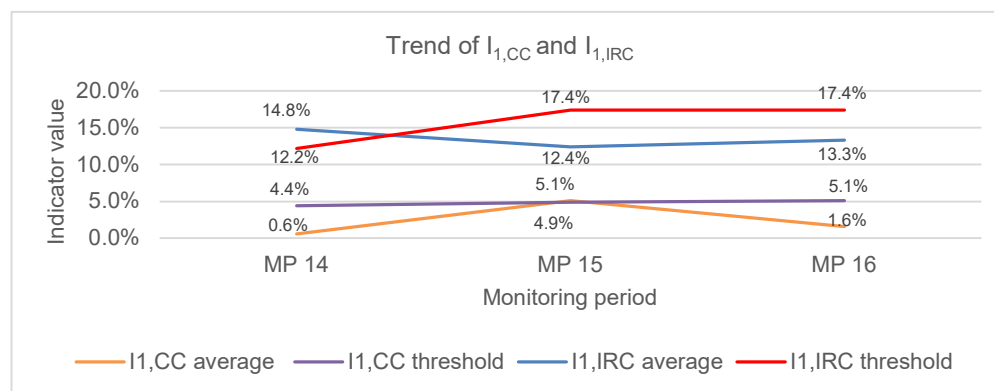


Figure 1. Evolving trend of indicators I_{1,CC} and I_{1,IRC}

- Figures 2 and 3 show the evolving trend of the number of DOEs within indicators I_{1,CC} and I_{1,IRC}, respectively.

⁸ Indicator I_{1,CC} average value is the average value among all DOEs in a given monitoring period. The I_{1,CC} threshold value is calculated based on paragraph 21 of the DOE performance monitoring procedure.

Figure 2. Evolving trend of the number of DOEs in indicator $I_{1,CC}$

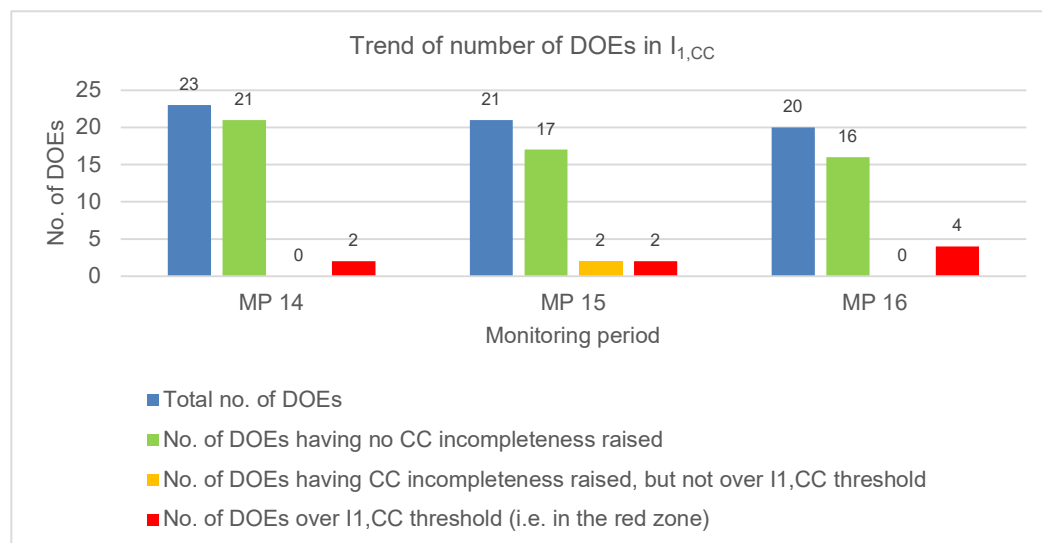
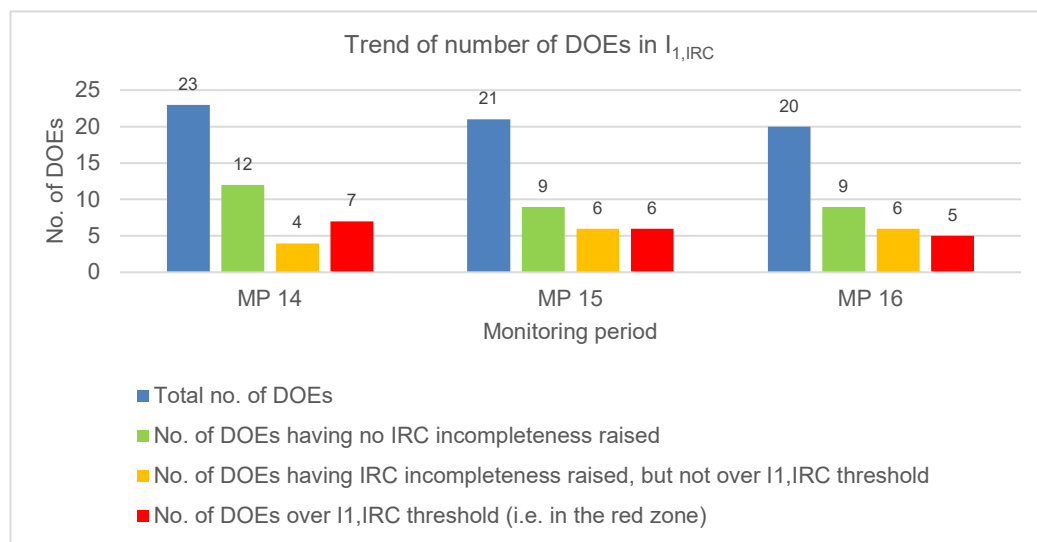
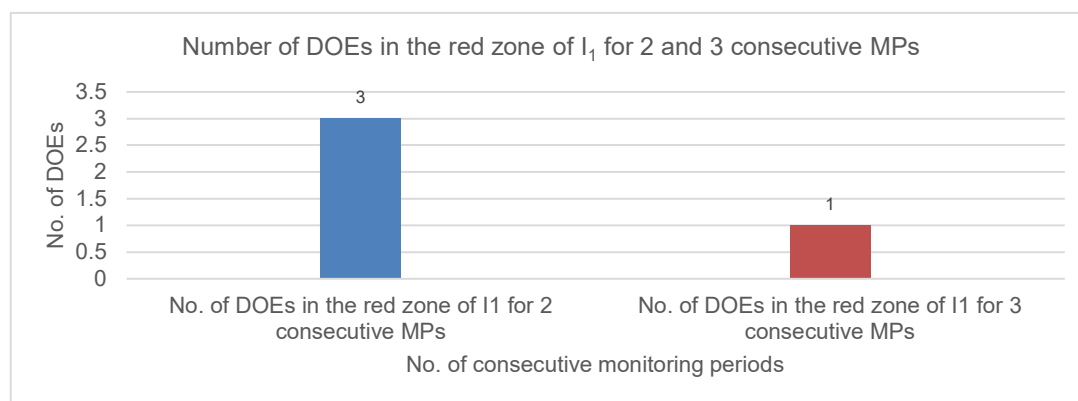


Figure 3. Evolving trend of the number of DOEs in indicator $I_{1,IRC}$



- From the data presented in figures 2 and 3 above, figure 4 represents the numerical breakdown of the number of DOEs which are in the red zone for indicator I_1 for at least two consecutive monitoring periods.

Figure 4. Number of DOEs in the red zone for indicator I₁

2.3. Analysis of results of indicator I₁

5. As seen from table 1, the respective finalization rates were all higher than 95 per cent at the time of the final version of monitoring reports, and the trend of the number of DOEs in the red zone for indicator I₁ was constant.
6. As seen from figures 2 and 3, an increasing number of DOEs in the red zone for indicator I_{1,CC} is observed, while a decreasing number of DOEs in the red zone for indicator I_{1,IRC} is observed; therefore, while it can be concluded that the DOEs' performance in indicator I_{1,IRC} was improving, the DOEs' performance in indicator I_{1,CC} was deteriorating.
7. As seen from figures 2 and 3, the respective ranges of the DOEs in the red zone for indicators I_{1,CC} and I_{1,IRC} are 9–20 per cent and 25–30 per cent, respectively. This is within the range of the system design, i.e. not more than 20–30 per cent.⁹ Therefore, the monitoring outcome based on the factors defaulted as per the procedure, appendix 4, paragraph 1 to be read in conjunction with the footnote 1, while re-activating the procedure at EB 106, meets the performance monitoring system established before the procedure which was put on hold at EB 87.
8. As seen from figure 4, the number of DOEs in the red zone for two consecutive monitoring periods decreases, since only one DOE was in the red zone for the indicator I₁ for three consecutive monitoring periods. Therefore, it can be concluded that the actions undertaken by the DOEs enhanced the continuous improvement of the DOEs' quality management systems.¹⁰

⁹ Please refer to concept note CDM-EB102-AA-AB-CONF.

¹⁰ The DOE performance monitoring procedure, paragraph 34, has the provision that if any of the DOE performance monitoring reports show a DOE in the indicator I₁ red zone, the DOE shall undertake a root-cause analysis to identify the causes of the deficiencies in its system and implement corrective and/or preventative actions to improve its performance.

3. Analysis of indicator I₂

3.1. Overview of performance of DOEs

9. A total of 741 requests were submitted by 25 DOEs in these three monitoring periods, out of which 11 RfRs were raised; consequently, there are in total 25 RfR issues identified.¹¹ Table 2 provides an overview of the performance of DOEs through the indicator I₂.

Table 2. Overview of performance of DOEs

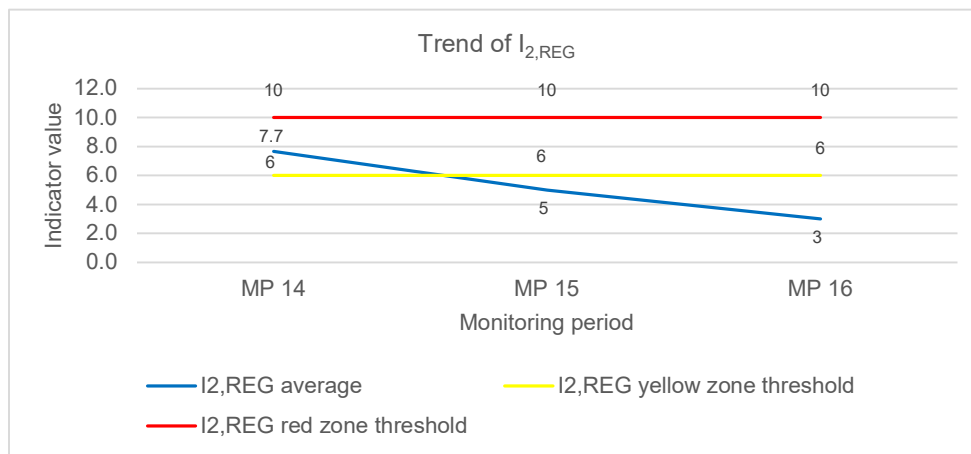
MP	No. of requests submitted ^(a)	No. of DOEs	No. of RfRs raised	No. of DOEs having RfRs raised	No. of RfRs issues raised
MP 14	251	23	5	4	7
MP 15	336	21	3	2	9
MP 16	154	20	3	2	9

^(a) The requests cover requests for registration for both project activities and PoAs, requests for renewal of crediting period of project activities, requests for renewal of PoA period, and requests for issuance for both project activities and PoAs.

3.2. Evolution of performance of DOEs

10. Figure 5 shows the evolving trend of average value and threshold value of indicator I_{2,REG}. Figure 6 shows the evolving trend of the number of DOEs in indicator I_{2,REG}.^{12,13}

Figure 5. Evolving trend of indicator I_{2,REG}

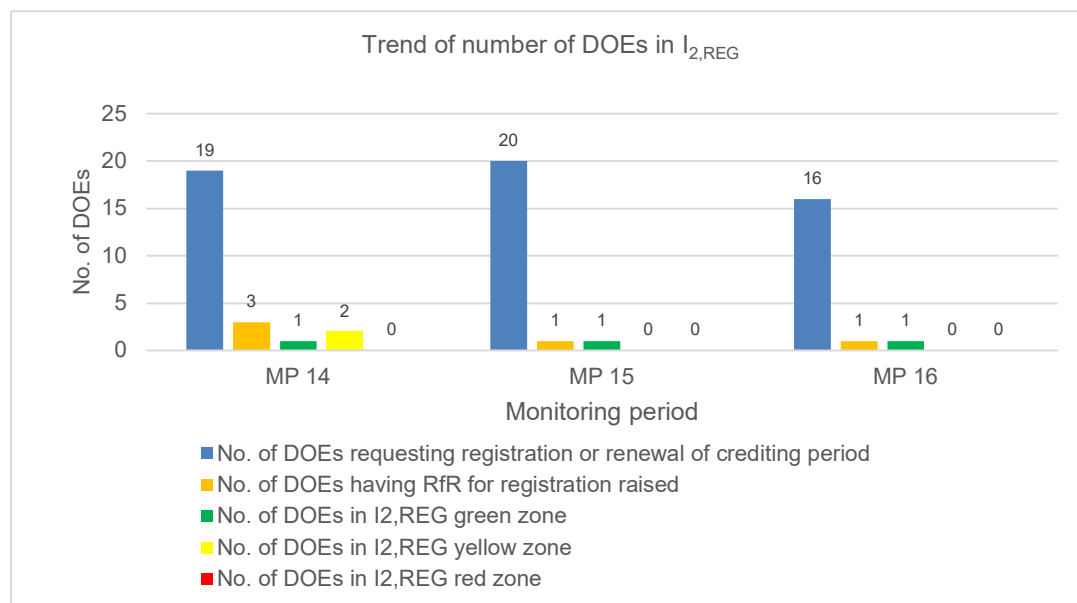


¹¹ The DOE performance monitoring procedure, paragraph 15(b), provides the definition of the indicator I₂, which includes two sub-indicators I_{2,REG} and I_{2,ISS}. The DOE performance monitoring procedure, paragraph 25, provides the provisions on how to categorize the DOEs which are considered to be in the green zone, yellow zone or red zone.

¹² The number of RfRs raised for registration per DOE in each of these three monitoring periods is less than three; therefore, the DOE performance monitoring procedure, paragraphs 15(b)(i)aii and 25(b), are applied.

¹³ There is no DOE in the red zone of indicator I_{2,REG} for these three monitoring periods; therefore, the values of the legend “DOEs in I_{2,REG} red zone” shown in figure 6 are zero for MP 14, MP 15 and MP 16, respectively.

Figure 6. Evolving trend of the number of DOEs in indicator I_{2,REG}



11. Figure 7 shows the evolving trend of average value and threshold value of indicator I_{2,ISS}. Figure 8 shows the evolving trend of the number of DOEs in indicator I_{2,ISS}.^{14,15}

¹⁴ The number of RfRs raised for issuance per DOE in each of these three monitoring periods is less than three; therefore, the DOE performance monitoring procedure, paragraphs 15(b)(ii)aii and 25(b), are applied.

¹⁵ There is no DOE that was allocated in the red zone of indicator I_{2,ISS} for these three monitoring periods; therefore, the values of the legend “DOEs in I_{2,ISS} red zone” shown in figure 8 are zero for MP 14, MP 15 and MP 16, respectively.

Figure 7. Evolving trend of indicator $I_{2,ISS}$

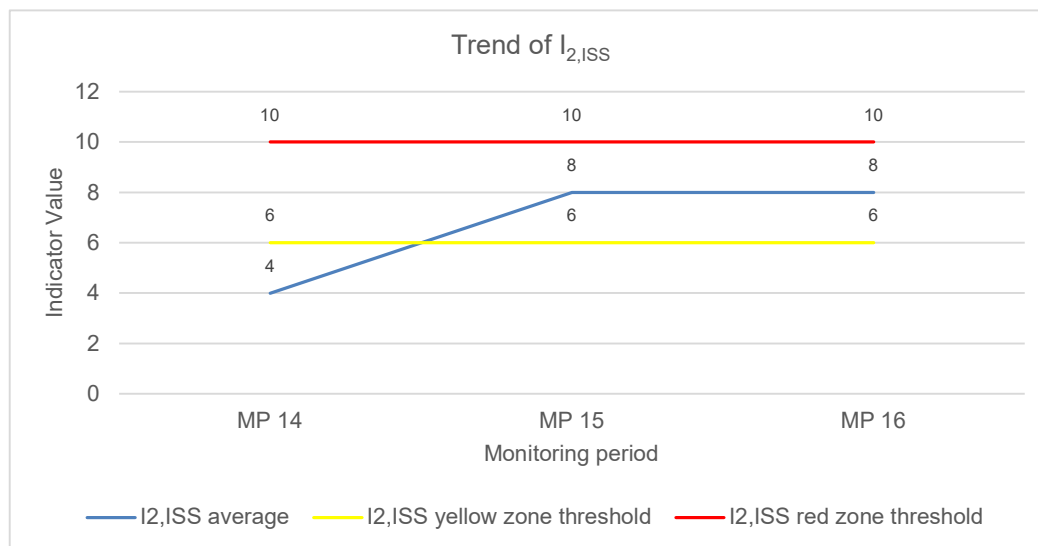
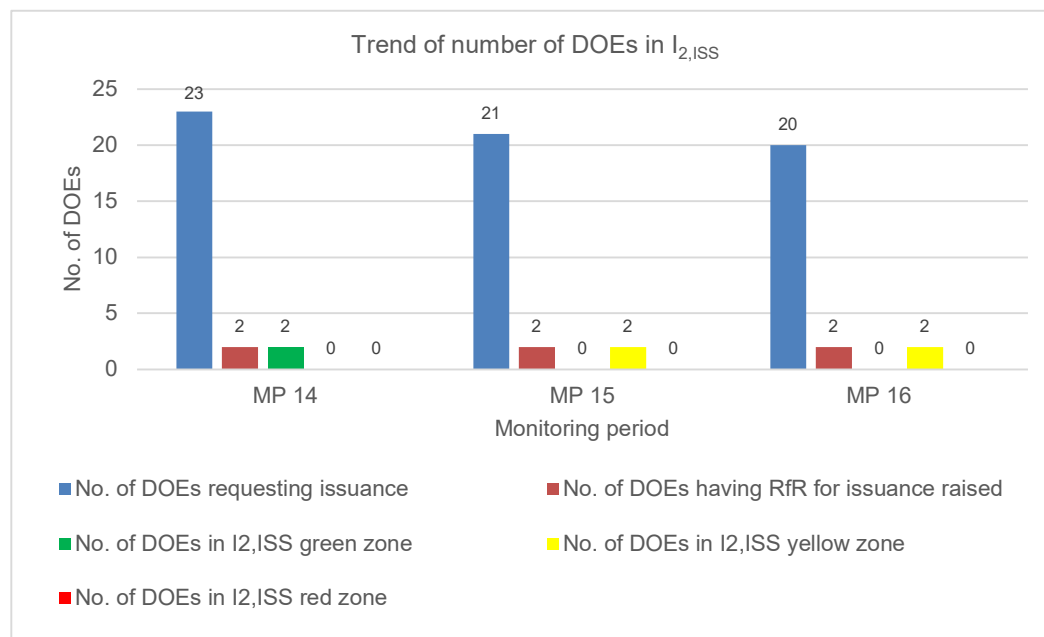


Figure 8. Evolving trend of the number of DOEs in indicator $I_{2,ISS}$



12. From the data presented in table 2, figures 9 and 10 show the breakdown and trend of the number of RfRs raised and the number of RfR issues criteria on indicators $I_{2,REG}$ and $I_{2,ISS}$, respectively.¹⁶

¹⁶ The DOE performance monitoring procedure, annexes 1 and 2, provides the categorization and criteria of non-compliance issues for indicators $I_{2,REG}$ and $I_{1,ISS}$, respectively.

Figure 9. Trend of the number of RfRs raised and RfR issues criteria in indicator I_{2,REG}

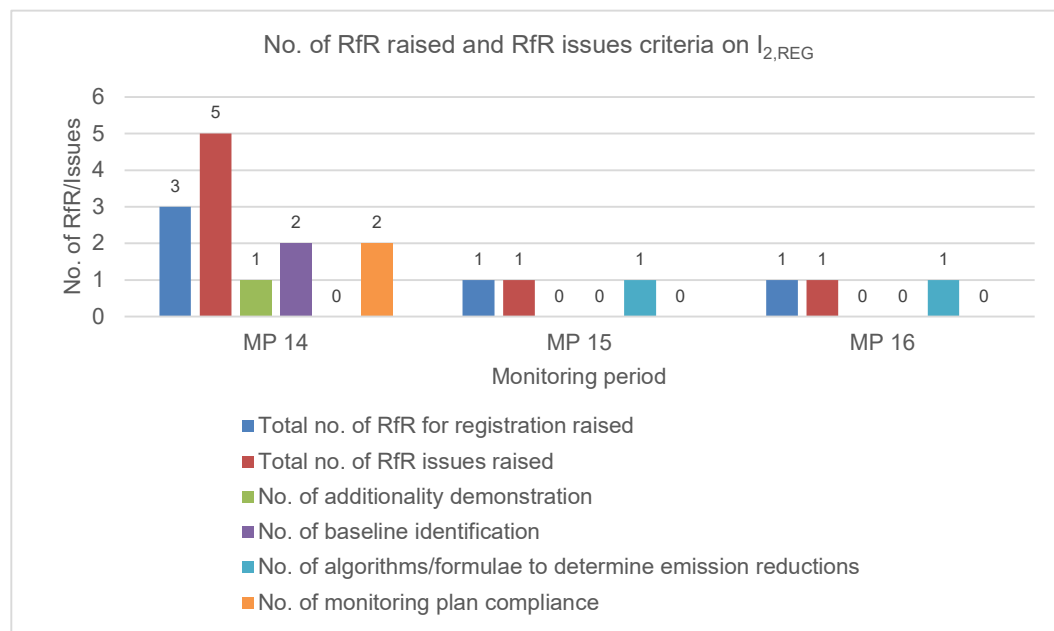
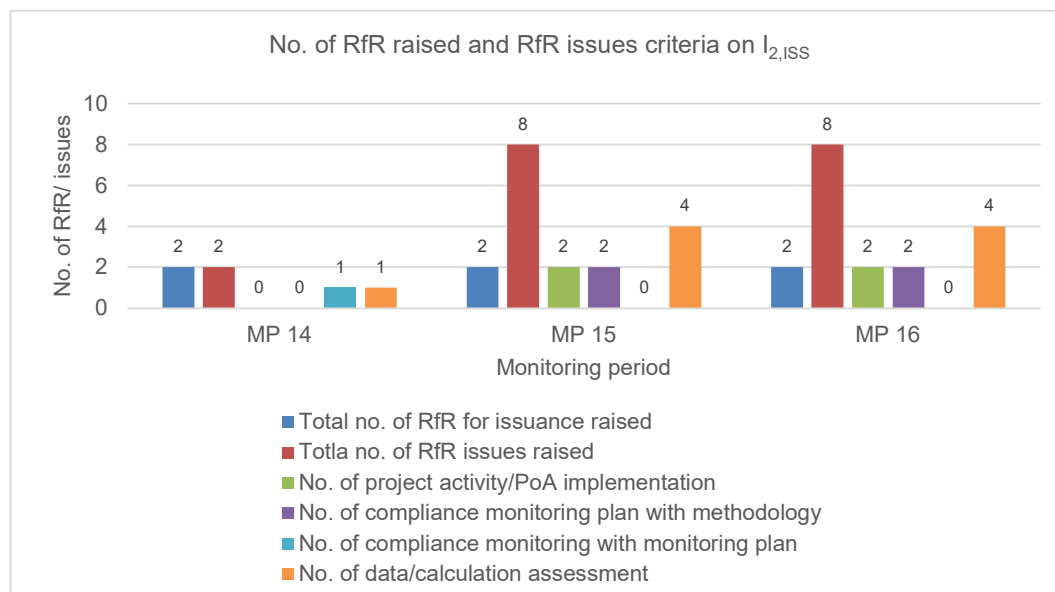


Figure 10. Trend of the number of RfRs raised and RfR issue criteria in indicator I_{2,ISS}



3.3. Analysis of results of indicator I₂

13. As seen from figures 5, 6 and 9, for indicator I_{2,REG} it is observed that:

- (a) The average value of indicator I_{2,REG} was decreasing;

- (b) The number of DOEs in the yellow zone was decreasing, whereas the number of DOEs in the green zone remained at the same level. Therefore, it can be concluded that DOEs' performance in the indicator $I_{2,REG}$ was improving;
 - (c) The number of issues identified in each RfR of indicator $I_{2,REG}$ remained at the same level;
 - (d) Issues identified in RfRs of indicator $I_{2,REG}$ were categorized under the criteria of "Additionality demonstration", "Baseline identification", "Monitoring plan compliance" and/or "Algorithms/formulae to determine emission reductions". The number of issues identified under the criteria "Additionality demonstration", "Baseline identification" and "Monitoring plan compliance" was decreasing, whereas the number of issues identified under the criterion of "Algorithms/formulae to determine emission reductions" was increasing.
14. As seen from figures 7, 8 and 10, for indicator $I_{2,ISS}$ it is observed that:
- (a) The average value of indicator $I_{2,ISS}$ was increasing;
 - (b) The number of DOEs in the yellow zone was increasing, whereas the number of DOEs in the green zone was decreasing. Therefore, it can be concluded that DOEs' performance in indicator $I_{2,ISS}$ was deteriorating;
 - (c) The number of issues identified in each RfR of indicator $I_{2,ISS}$ was increasing;
 - (d) Issues identified in RfRs of indicator $I_{2,ISS}$ were categorized under the criteria of "Project activity/PoA implementation", "Compliance monitoring plan with methodology", "Data/calculation assessment" and "Compliance monitoring with monitoring plan". The number of issues identified under the criterion of "Compliance monitoring with monitoring plan" was decreasing, whereas the number of issues raised under the criteria of "Project activity/PoA implementation", "Compliance monitoring plan with methodology" and "Data/calculation assessment" was increasing.
15. There were no DOEs in the red zone and yellow zone for indicator I_2 in the three consecutive monitoring periods. Therefore, there was no spot-check initiated as well as no additional performance assessment added.¹⁷

4. Analysis of indicator I_3

4.1. Overview of performance of DOEs

16. A total of 231 requests were submitted by 10 DOEs in these three monitoring periods, out of which 126 requests having RfCs raised were identified and consequently there are in total 228 issues identified.¹⁸ Table 3 provides an overview of performance of DOEs through the indicator I_3 .

¹⁷ The DOE performance monitoring procedure, paragraphs 41 and 44, have the provisions for the initiation of a spot-check and an additional performance assessment to the number of planned performance assessments.

¹⁸ The DOE performance monitoring procedure, paragraph 15(c), provides a definition of indicator I_3 .

Table 3. Overview performance of DOEs

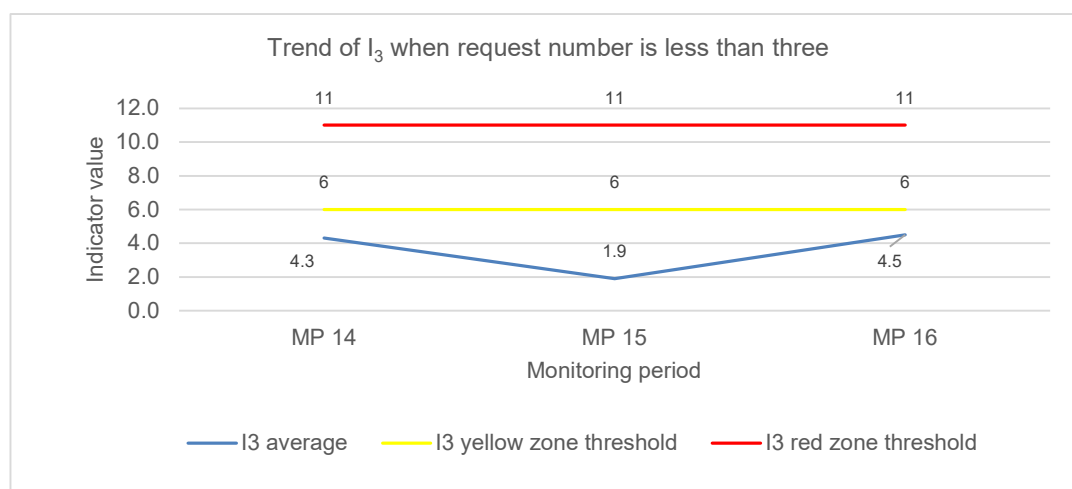
MP	No. of requests submitted ^(a)	No. of DOEs requesting PRC/notification of change	No. of requests having RfC/rejection raised	No. of DOEs having RfC/rejection raised	No. of issues raised
MP 14	90	8	73	5	139
MP 15	36	8	24	7	46
MP 16	105	10	29	6	43

^(a) The requests cover requests for approval of PRCs to both project activities and PoAs under the prior-approval track and notifications of changes to CPAs.

4.2. Evolution of performance of DOEs

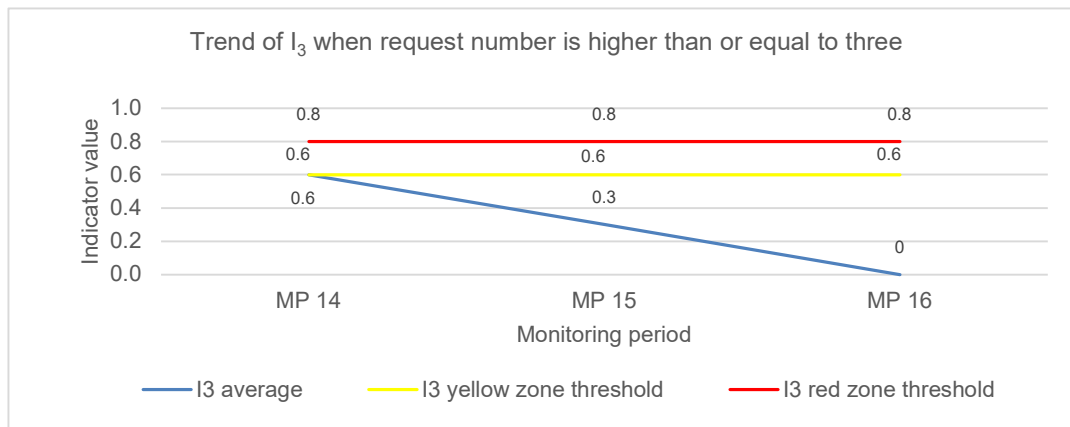
17. Figures 11 and 12 provide the trend of indicator I_3 with respect to the average value and the threshold value, respectively.¹⁹

Figure 11. Evolving trend of indicator I_3 for those requests where the number of RfCs and rejected requests during a given monitoring period is less than three



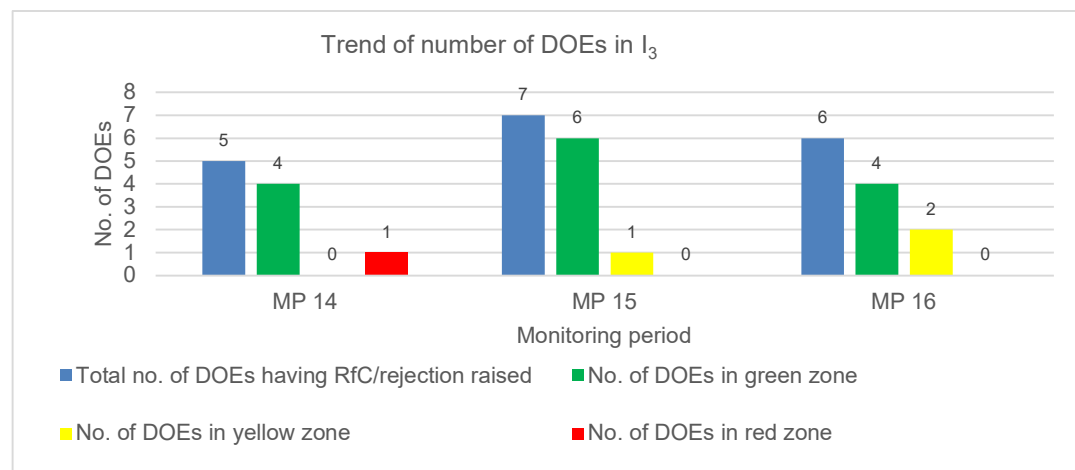
¹⁹ The DOE performance monitoring procedure, paragraph 15(c)(i), has the provisions on how to calculate indicator I_3 based on the situations when the number of RfCs and rejected requests raised during a given monitoring period is higher than or equal to three, and when the number is less than three.

Figure 12. Evolving trend of indicator I_3 for those requests where the number of RfCs and rejected requests during a given monitoring period is higher than or equal to three



18. Figure 13 provides the evolving trend of the number of DOEs in indicator I_3 .²⁰

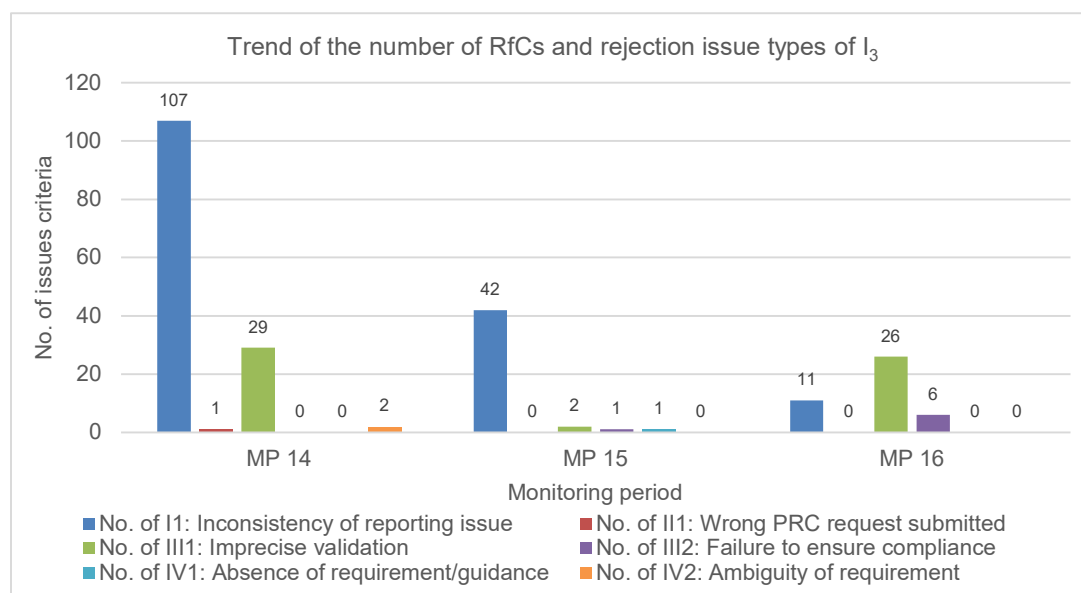
Figure 13. Evolving trend of the number of DOEs in indicator I_3



19. Figure 14 shows the evolving trend of the number of RfCs and rejection issue types of indicator I_3 .²¹

²⁰ The DOE performance monitoring procedure, paragraph 26, provides the provisions on how to categorize the DOEs in the green zone, yellow zone and red zone.

²¹ The DOE performance monitoring procedure, appendix 3, provides the categorization and criteria of non-compliance issues for indicators I_3 . There is one rejection issue raised in this one-year analysis period.

Figure 14. Trend of indicator I₃ RfCs and rejection issue types

4.3. Analysis of results of indicator I₃

20. As seen from figures 11 and 12, it is observed that the average value of indicator I₃ was increasing for those requests where the number of RfCs and rejected requests during a given monitoring period is less than three, which demonstrates a deteriorating performance of DOEs. On the other hand, for those requests where the number of RfCs and rejected requests during a given monitoring period is higher than or equal to three, the average value of indicator I₃ was decreasing, which shows an improved performance.
21. As seen from table 3 and figure 13, it is observed that:
- A high number of RfCs and rejection requests were raised in MP 14 (i.e. 73 requests), whereas the trend went down in both MP 15 (i.e. 24 requests) and MP 16 (29 requests);
 - Most of DOEs that submitted PRCs or notifications of change of CPAs had received RfCs and rejection requests (i.e. 5 of the 8 DOEs in MP 14; 7 of the 8 DOEs in MP 15; and 6 of the 10 DOEs in MP 16);
 - A relatively high number of DOEs were in the green zone (i.e. 4 of the 5 DOEs in MP 14; 6 of the 7 DOEs in MP 15; and 4 of the 6 DOEs in MP 16), whereas the number of DOEs in the yellow zone went up (i.e. 0 of the 5 DOEs in MP 14; 1 of the 7 DOEs in MP 15; and 2 of the 6 DOEs in MP 16);
 - One DOE was in the red zone in MP 14, whereas no DOE was in the red zone for the subsequent MP 15 and MP 16.
22. As seen from table 3 and figure 14, with regard to the number of issues raised and types of issues in the RfCs and rejection requests, it is observed that:
- There were a high number of issues raised among these three monitoring periods (i.e. 139 issues raised among 73 requests in MP 14; 46 issues raised among 24

requests in MP 15; and 43 issues raised among 29 requests in MP 16). This corresponds to around two issues per RfCs and rejection requests;

- (b) The number of issues under the issue type I1 “Inconsistency of reporting issue” was decreasing (i.e. from 107 issues in MP 14 to 11 issues in MP 16), whereas the number of issues under the issue type III1 “Imprecise validation” remained at a similar level (i.e. from 29 issues in MP 14 to 26 issues in MP 16);
- (c) Two issues under the issue type “Ambiguity of requirements” and one issue under the issue type “Absence of requirement/guidance” were raised during MP 14 and MP 15, respectively.

5. Areas for system-wide improvement

- 23. Taking into consideration the data gathered from these three MPs and the analysis above, this section is to identify areas of improvement.

5.1. Improvement area 1 with regard to indicator I₁

- 24. The DOE performance monitoring procedure requires the application of historical data for the calculation of indicators I₂ and I₃.²² For indicators I_{1,CC} and I_{1,IRC}, the procedure makes no mention of the application of historical data in the calculation of thresholds; However, this concept had already been applied in the analysis while presenting the proposed revision of the DOE performance monitoring procedure at EB 106, since such revision of the DOE performance monitoring procedure focused on mentioning the values of M (i.e. M times replications) and α (i.e. threshold interval) without specifically mentioning the application of historical data. Therefore, the secretariat has already been applying historical data in preparing DOE performance monitoring reports and it is proposed that a new subparagraph be added to clarify such application to indicators I_{1,CC} and I_{1,IRC} in the DOE performance monitoring procedure, appendix 4, paragraph 1(g)(iv).

5.2. Improvement area 2 with regard to the calculation of indicator I₃

- 25. The current DOE performance monitoring procedure requires that the average value from multiple attempts of clarification by DOEs be used to calculate indicator I₃.²³ However, during the implementation of this provision, it was observed that using the average RPN value of multiple attempts of clarification does not reflect the actual performance of the DOE in question, as it does not take into account the fact that receiving multiple requests for clarification shows bad performance of the DOE. Further, taking the average value underestimates the overall weight from the issues raised.²⁴ Therefore, it is proposed that the total weight of the issues raised throughout the multiple attempts of clarifications be

²² The DOE performance monitoring procedure (version 04.0), appendix 4, paragraph 2(a), defines the historical period applied for indicators I₂ and I₃.

²³ The DOE performance monitoring procedure (version 04.0), appendix 4, paragraph 2(c)(iv)b, has the provision on the situation if multiple attempts of clarification were requested for the same request for clarification. The multiple attempts mean that if the secretariat, during the stage of preparing the summary note, identifies issues that require clarifications from the DOE, project participants or coordinating/managing entity, the DOE may wish to submit revised documents and/or clarifications to address the issues through several rounds of iterations as per the CDM project cycle procedure for project activities (version 03.0), paragraph 145, and the CDM project cycle procedure for PoAs (version 03.0), paragraphs 156 and 182.

²⁴ For example, one request submitted in two attempts and respective RPN values of two attempts being 3 and 3. The DOE will be in the green zone as per the current provision (i.e. taking average value as 3), whereas the DOE would be in the yellow zone if the revised provision is applied (i.e. taking the total value as 6).

used as the RPN values, by modifying the provision in the DOE performance monitoring procedure, appendix 4, paragraph 2(c)(iv)b.

5.3. Improvement area 3 with regard to the ambiguity of requirements under indicator I₃

26. Further to paragraph 27 (c), two issues under the issue type “Ambiguity of interpretation of requirements of methodology/guidance” were identified at the MP 14 as described below:

- (a) The “Standard: Sampling and surveys for CDM project activities and programmes of activities” (version 08.0) has the provision allowing emission reduction estimates to be discounted by taking the lower bound of the applied interval, but such provision is only eligible for the application to the survey undertaken during the first two years of the crediting period of the project activity. However, the applied methodology AMS-II.G. (version 11.1) allows the lower bound of the applied interval to be chosen without specifying any eligible condition such as only for the first two years of the crediting period. This issue was recognized and considered by the CDM Methodologies Panel at its eighty-eighth meeting, which revised the methodology AMS-II.G., to be considered by the Board at its 115th meeting, to ensure the consistency across the CDM regulatory documents;
- (b) There is lack of clarity on the level of details to be explicitly mentioned in the PoA design document (PoA-DD) to demonstrate the penetration of proposed technology/measure as per the “Tool 19: Demonstration of additionality of microscale project activities”. Since this lack of clarity on the CDM requirements was found only once during this one-year analysis period, it is proposed that any recurrences be continuously observed during subsequent monitoring periods. If similar situations are identified in the future, it is proposed that the relevant CDM regulatory documents be improved.

5.4. Improvement area 4 with regard to the absence of requirements under indicator I₃

27. Further to paragraph 27 (c), one issue under the issue type “Absence of requirement/guidance by the Board” was identified in the MP 15. This issue was raised due to that one of the “request for clarification” issues, which is ideally to be identified within the scope of verification of the request for issuance as per the CDM validation and verification standard for project activities (VVS-PA), version 3.0, section 9.2; however, it was raised within the scope of validation of the PRC as per the VVS-PA, version 3.0, section 8.3. Since there is no provision in the current CDM regulatory documents on how to handle such a situation (i.e. when an issue within the scope of verification of requests for issuance is found while assessing a PRC request), it is proposed that any recurrences during subsequent monitoring periods be continuously observed. If similar situations are identified in the future, it is proposed that relevant provisions be established in the CDM regulatory documents.

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Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	8 September 2022	Initial publication.

Decision Class: Operational
Document Type: Information note
Business Function: Accreditation, Governance
Keywords: DOE, data collection and analysis, evaluation research, performance monitoring
