

1 Healthcare Sector Coordinating Council  
2 Cybersecurity Working Group  
3 Charter  
4 (Revised January 2021)  
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6 1. MISSION

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7 a. **Statement.** The Healthcare and Public Health Sector Coordinating Council (HSCC) Cybersecurity  
8 Working Group (CWG) is a standing working group. The CWG was established by the HSCC with the  
9 recognition that cyber threats to the healthcare and public health sector (sector) are becoming more  
10 numerous, frequent, and severe, requiring coordinated mitigation, response, and resilience efforts  
11 across the Sector. The mission of the CWG is to develop and disseminate Sector-wide  
12 recommendations and guidance to help facilitate sector-wide mitigation, response, and resilience to  
13 cybersecurity threats.

14 2. AUTHORITY

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15 a. **Foundation.** The HSCC is a private-sector organized and managed council created within the  
16 framework set forth in Executive Order 13636 (2013) and Presidential Policy Directive 21 (PPD-21).  
17 This framework establishes a process to coordinate improvements to the security of critical  
18 infrastructure, and requires the Secretary of the Department of Homeland Security (DHS) to "engage  
19 and consider the advice ... of the Critical Infrastructure Partnership Advisory Council; Sector  
20 Coordinating Councils; critical infrastructure owners and operators; Sector-Specific Agencies; other  
21 relevant agencies; independent regulatory agencies; state, local, territorial, and tribal governments;  
22 universities; and outside experts."  
23

24 b. **Protection of Information.** The Sector Specific Agency (SSA) for the sector is the Department of  
25 Health and Human Services (HHS). When the HSCC and the SSA engage for the purpose of planning,  
26 collaboration and decision-making, such engagement is designated by DHS as a Critical Infrastructure  
27 Partnership Advisory Council (CIPAC), which exempts information exchanged between sector  
28 coordinating councils (SCCs) and their SSAs from public disclosure requirements that otherwise  
29 would apply under the Federal Advisory Committee Act. In addition, the designation of CIPAC and  
30 the Protected Critical Infrastructure Information (PCII) exemptions under the Homeland Security Act  
31 of 2002 reduce risk of federal regulatory action when voluntary coordination and decision-making  
32 with the government concerns sensitive and protected critical infrastructure information.  
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- 35 c. **HSCC CWG Authorities under the SSP and NIPP.** The sector’s Sector Specific Plan (SSP) – jointly  
36 developed and updated every 3-4 years by government and sector stakeholders - describes threats  
37 and vulnerabilities facing the sector and lays out strategies and objectives for strengthening the  
38 security and resiliency of the sector’s delivery of services and assets essential for the health of the  
39 nation’s citizens. Accordingly, the HSCC and its working groups are expected to align short- and  
40 longer-term objectives to those recommended in the SSP, as well as to any new or emerging  
41 priorities identified by the CWG. The SSP in turn is aligned with guidance provided in the National  
42 Infrastructure Protection Plan (NIPP), which outlines how government and private sector participants  
43 across the critical infrastructure community work together to manage risks and achieve security and  
44 resilience outcomes.  
45
- 46 d. **Voluntary Collaboration.** The HSCC CWG is a voluntary collaboration organization that does not  
47 charge dues or other financial costs on its members. CWG recommendations and work products that  
48 offer guidance for changes in policy or operations are non-binding on its members. As a condition  
49 for maintaining status as members in good standing, CWG Members agree to abide by the  
50 operational, decision-making and ethics provisions in this charter.  
51
- 52 e. **Delegation of responsibility to CWG.** The SSP identifies cybersecurity as a sector-wide threat and  
53 lays out broad objectives to help facilitate sector-wide mitigation, response, and resilience against  
54 cybersecurity threats. Accordingly, the HSCC delegates responsibility to CWG to help facilitate  
55 sector-wide cyber threat mitigation, response, and resilience and, as appropriate, with other  
56 applicable critical infrastructure sectors.  
57
- 58 f. **CWG authorities under CSA.** The HSCC CWG’s responsibility to help facilitate Sector-wide cyber  
59 threat mitigation, response, and resilience was reinforced by the enactment of Section 405 of the  
60 Cybersecurity Act of 2015 (CSA). Section 405(c) of CSA established the Health Care Industry  
61 Cybersecurity Task Force, which issued recommendations for improving the sector’s cybersecurity  
62 risk management. Section 405(d) of CSA called for a consultative process to develop “voluntary,  
63 consensus-based and industry-led guidelines, best practices, methodologies, procedures and  
64 processes” for cybersecurity risk management across the Sector.

### 65 3. MEMBERSHIP

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- 66 a. **Regular Membership.** HSCC CWG regular membership is open to the following subsector  
67 stakeholders who are covered entities and business associates and that meet the definition of critical  
68 infrastructure owners and operators under CIPAC<sup>1</sup>, and their representative professional  
69 associations: (1) direct patient care, including healthcare systems, medical facilities, public health  
70 agencies and entities, and emergency medical services, (2) owners, operators and manufacturers of  
71 health information technology, (3) government (state, local, tribal, territorial, and, federal) agencies  
72 and entities, (4) health plans and payers, including health insurance companies and plans, local and

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<sup>1</sup> Critical infrastructure owners and operators are those entities that own and invest in infrastructure assets, in the systems and processes to secure them, and that are held responsible by the public for their operations and response and recovery when their infrastructures or key resources are disrupted.

73 state health departments, and state emergency health organizations, (5) mass fatality management  
74 services, including coroners, medical examiners, forensic examiners, and psychological support  
75 personnel, (6) medical materials, including those involved in medical equipment and supply  
76 manufacturing and distribution, and (7) laboratories, blood, and pharmaceuticals, including  
77 pharmaceutical manufacturers, drug store chains, and blood banks (hereinafter, Regular  
78 Membership). In addition, any other entities that develop and manufacture healthcare equipment or  
79 technology that is regulated by the U.S. Food and Drug Administration are eligible for voting  
80 membership. Regular members are identified for CIPAC purposes as institutions, companies and  
81 associations - rather than named employees or affiliates – that meet the foregoing eligibility  
82 requirements. Regular Members have both voting rights for all business matters and leadership  
83 eligibility.

- 84
- 85 b. **Voting Privileges.** Regular members are apportioned one vote per organization, whether the  
86 Member is a single company or institution, or industry association or professional society, or  
87 representing multiple companies or industry associations.
- 88
- 89 c. **Advisors.** Vendors, consultants, and others who do not meet the CWG regular membership criteria  
90 (hereinafter, Advisors) as set forth in Section 3(a) (“Regular Membership”) may, at the sole discretion  
91 and invitation of CWG Leadership (defined in Section 4(k) (“CWG Operations and Management”)),  
92 serve in a non-voting advisory capacity to the CWG. Advisors will not have Regular Membership  
93 status in the CWG. Advisors may participate in one or more Task Groups (TGs) (as set forth in Section  
94 4(n) (“Eligible Members of TGs”)) at the invitation of any Task Group leads or Cybersecurity Working  
95 Group Officers, but will not have voting or leadership privileges accorded to regular members.

96

97 The total number of Advisor organizations in the CWG membership shall not exceed 15% of the total  
98 number of industry organizations in the Regular Member category. Advisors are expected to join at  
99 least one established task group and participate in at least 50% of the meetings and working sessions  
100 of the task group(s) they have joined. This is intended to encourage as much contribution as  
101 possible. In consultation with CWG leadership, the Executive Director will conduct an annual review  
102 of Advisor participation to encourage maximum contribution and minimize static membership.

#### 103 4. GOVERNANCE

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- 104 a. **Chair and Vice Chair.** The Chair and Vice Chair shall be Regular Members and either a company  
105 executive representing any of the subsectors (as set forth in Section 3(a)) or an executive from a  
106 national-level association, desirably representing a different subsector, but shall not be both. As  
107 used herein, the term “executive” shall mean senior management of a company or national-level  
108 association. Notwithstanding the foregoing, the Chair and Vice Chair must have served at least one  
109 year as Regular Members of the CWG, and preferably will have served in a task group leadership  
110 capacity, prior to any such election.
- 111
- 112 b. **Nomination of Chair and Vice Chair Candidates.** Any Regular Member or Member of the Executive  
113 Committee may self-nominate or nominate any Regular Member in good standing as a candidate for  
114 Chair or Vice Chair at least 60 prior to the expiration of the incumbent’s seat.

- 116 c. **Election of Chair and Vice Chair.** The Chair and Vice Chair will be elected by majority vote of the  
117 Executive Committee, either by email or other reliable electronic means, or by majority vote of  
118 Executive Committee members in attendance at a specially-called or regularly scheduled in-person  
119 meeting of the CWG, provided that a quorum of the Executive Committee is in attendance at such  
120 meeting.  
121
- 122 d. **Terms of Chair and Vice Chair.** The Chair and Vice Chair will each hold their seats for a two-year  
123 term, renewable once for a 1-year term, staggered between them as practicable to maintain  
124 continuity through leadership transition. The Vice Chair upon commencement of his or her second  
125 term shall be in line for succession to Chair and carry out their term, unless the Executive Committee  
126 votes for a change of leadership.
- 127 e. **Executive Committee.** An Executive Committee shall be slated by the Regular Members, as defined  
128 in Section 4(f). The Executive Committee shall consist of at least 7 and no more than 9  
129 representatives of Regular Membership and must have served at least one year as Regular Members  
130 of the CWG prior to any such election.
- 131 f. **Election of Executive Committee.** Any voting Member in good standing may nominate at most 1  
132 individual within their TG for the seat on the Executive Committee and, in considering TG nominees  
133 and other Regular-Member volunteers for an Executive Committee slate, the CWG Leadership shall  
134 endeavor to ensure a balanced representation across subsectors. An election will ensue with the  
135 Executive Committee membership to be elected by majority vote of Regular Membership, either by  
136 email or other reliable electronic means, or by majority vote of Regular Member organizations in  
137 attendance at a specially-called or regularly scheduled in-person meeting of the CWG, provided that  
138 a quorum of the entire CWG Regular Member organizations is in attendance at such meeting.  
139
- 140 g. **Term of Executive Committee.** Executive Committee members shall serve a three-year term. The  
141 inaugural Executive Committee terms will be staggered into three groups, a one-year term, two-year  
142 term and three-year term. This will be determined by dividing the number of seats up for election by  
143 3 and equally dispersing into the corresponding groups. The terms will be determined by popular  
144 vote, whereby the nominee with most votes will serve a three-year term and the nominee with  
145 fewest votes will serve a one-year term.
- 146 h. **Executive Committee Reelection.** Executive Committee members completing their terms may run  
147 for reelection for one additional 1- or 2-year term at the discretion of the executive committee  
148 member, to be elected by the general membership, with or without competing candidates for the  
149 same seat. Nominated competing candidates shall be nominated according to the procedures set  
150 forth in Section 4.e.  
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- 152 i. **Executive Committee Out-of-Cycle Replacements.** Executive Committee members completing their  
153 terms may run for reelection for one additional 1- or 2-year term at the discretion of the executive  
154 committee member, to be elected by the general membership, with or without competing  
155 candidates for the same seat. Nominated competing candidates shall be nominated according to the  
156 procedures set forth in Section 4.e.  
157
- 158 j. **Executive Director.** CWG Leadership shall appoint an executive director to support CWG Leadership  
159 and Membership to: 1) ensure repeatable and transparent business operations and governance

- 160 processes; 2) provide strategic guidance for policy and operational effectiveness of the CWG; 3)  
161 manage day-to-day administration, operations, logistics and membership lists of the CWG; 4) track  
162 TG progress and project management; 5) document and archive proceedings and decisions; 6)  
163 ensure continuity through leadership transitions; and 7) as delegated by CWG Leadership, serve as  
164 spokesperson and liaison to stakeholder partners.  
165
- 166 k. **CWG Operations and Management.** The Chairs, Executive Committee and Executive Director  
167 (collectively, CWG Leadership) shall determine the meeting schedules, agendas, processes and  
168 procedures (including regular and special meetings) and make other strategic, administrative and  
169 logistical decisions relating to the CWG (collectively, Decisions). For joint HSCC and Government  
170 Coordinating Council (GCC) meetings, CWG Leadership shall work with the U.S. Department of Health  
171 and Human Services (HHS) on such decisions, consistent with the rules of CIPAC.  
172
- 173 l. **Task Groups (TGs).** Notwithstanding the foregoing, CWG Leadership shall determine a process by  
174 which CWG objectives and priorities, and accordingly, new implementing task groups, are identified  
175 and approved by the Regular Membership. As appropriate, such approved CWG objectives and  
176 priorities shall be carried out by TGs appointed by the CWG. Any objectives and priorities of the TGs  
177 shall be consistent with the approved CWG objectives.  
178
- 179 m. **Task Group Leadership.** Each TG shall be led by up to two TG Co-Chairs (“TG Leadership”) who are  
180 Regular Members of the CWG. Each TG Co-Chair shall have equal responsibility and oversight over  
181 the TG. TG Leadership shall determine a process by which the TG shall carry out the objectives and  
182 priorities identified and approved by CWG membership for that TG. TG Leadership will work with TG  
183 members on TG related initiatives and tasks, including deliverables, timing for completion, meeting  
184 schedules, development process and content of deliverables, approval process for deliverables, and  
185 other administrative and logistical items relating to the TG.  
186
- 187 n. **Eligible Members of Task Groups.** Regular Members of the CWG shall be eligible to participate in  
188 one or more TGs, provided that such individuals are in good standing with the CWG. Advisors may  
189 participate at the invitation of the TG leadership.  
190
- 191 o. **Member Attendance.** Members of Task Groups are expected to participate in a minimum of 50% of  
192 regularly-scheduled (weekly, bi-weekly, monthly) task group meetings over a one-year period. Task  
193 Group leaders have the discretion to ask non-participating members to increase their participation or  
194 drop from the task group. Members are likewise expected to attend – either in person or virtually -  
195 at least one of the two All-Hands meetings conducted in April and October of each year.  
196
- 197 p. **Voting within Task Groups.** TG leadership will determine work product approval procedures, to  
198 include consensus or voting as necessary. Voting members of TGs shall be those that have Regular  
199 Membership. Advisors will not have voting rights.  
200
- 201 q. **Election of Task Group Leadership.** Candidates for TG Co-Chairs shall be determined by self-  
202 nomination or third-party nomination and shall be appointed by the CWG Chair and Vice Chair.  
203

- 204 r. **Term of Task Group Leadership.** TG Leadership shall serve two-year, once-renewable terms,  
205 provided a TG remains in existence over such period. TGs may dissolve when their objectives are  
206 accomplished, unless it is determined by the CWG that another related priority is appropriate to  
207 pursue within that TG.  
208
- 209 s. **Task Group Deliverables.** A TG deliverable is one that has been approved for publication or release  
210 according to procedures determined by TG Leadership as set forth in Section 4(l). Once a TG  
211 deliverable has been approved, it is deemed to be a TG Work Product. Such TG Work Product shall  
212 be submitted to CWG Leadership for review, consideration, and approval by the Regular Member  
213 organizations of the entire CWG, according to procedures agreed to by CWG Chair and Vice Chair as  
214 set forth in Section 4(u)(“CWG Approval Procedures”).  
215
- 216 t. **Sector-wide Use.** TG deliverables are intended to serve the widest possible cross section of the  
217 healthcare sector and shall not be designed or promoted to confer commercial benefit to any  
218 one member or group of members.  
219
- 220 u. **Vote by Entire CWG Membership.** A vote by the entire CWG membership shall include Regular  
221 Members only. Advisors shall not have voting rights. Further, decisions that may come before the  
222 entire CWG membership may include: 1) the publication or release of TG Work Product by the CWG,  
223 2) a Sector-wide statement or position or any other branded communication, inclusive of the CWG,  
224 TG, HSCC, as applicable, and 3) any other matter determined to be necessary to be voted on by CWG  
225 Leadership.  
226
- 227 v. **CWG Approval Procedures.** The CWG Chair and Vice Chair will determine approval procedures on a  
228 case by case basis as appropriate for any decision under consideration. Initial efforts shall be made  
229 to achieve consensus among the general membership. In the event the Chair and Vice Chair  
230 determine that a given decision attracts sufficient disagreement such that consensus approval is not  
231 achieved, or not likely to be achieved, the Chair and Vice Chair may call for a vote of the full Regular  
232 Membership, either by electronic means or during a normally scheduled meeting of the full CWG  
233 membership, provided a quorum of the Regular Member organizations are present, or voting in  
234 proxy. The Chair and Vice Chair may determine whether a simple majority approval is sufficient or a  
235 super 2/3 majority is necessary.  
236
- 237 w. **Procedures for Dissension.** One or more Regular Member organizations that voted in the minority  
238 on a CWG-approved statement of position or recommendation may petition the CWG Leadership to  
239 include a dissenting opinion or other qualifying statement in the approved document for public or  
240 government consumption. The Leadership shall decide whether such qualification is warranted, but  
241 in general should make every effort to ensure transparency, clarity and reputation of CWG  
242 recommendations as sector-wide points of view. If leadership determine that such qualification is  
243 appropriate, they shall work with the dissenting Members and the leadership of the TG that  
244 produced the statement or recommendation to add appropriate qualifying language to the  
245 document. If the leadership determine that such qualifying language is not necessary or appropriate,  
246 they will inform the petitioning members as soon as possible.  
247

- 248 x. **CWG Recommendations for full HSCC Consideration.** In order for CWG decisions to be presented  
249 and promoted as full HSCC recommendations, decisions approved by the CWG may be submitted by  
250 CWG leadership to HSCC leadership for consideration and approval according to the procedures as  
251 set forth in the full HSCC charter.  
252
- 253 y. **Sanctions for Violating Ethics Guidelines.** A violation of the ethics guidelines (as set forth in Section  
254 7 (“Ethics Guidelines”) by any CWG participant may result in a warning, removal from participation in  
255 CWG, or another consequence as deemed to be appropriate by CWG Leadership. Violations of ethics  
256 guidelines shall be reviewed by CWG Leadership on a case-by-case-basis. The CWG Leadership has  
257 the right to revoke Regular Membership of both the individual, and the organization they represent,  
258 based on the severity of the violation.

## 259 5. CHARTER APPROVAL AND RENEWAL

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- 260 a. **Approval of Charter.** At the discretion of the CWG Leadership, this charter will be approved either  
261 by consensus – there being no objection when put to the membership – or by majority vote of  
262 Regular Membership, either by email or other reliable electronic means, or by majority vote of  
263 Regular Members in attendance at a specially-called or regularly scheduled in-person meeting of the  
264 CWG. In the event of a vote, a quorum of the entire CWG membership must be in attendance at  
265 such meeting.  
266
- 267 b. **Effective Date of Charter.** This charter will be effective within thirty (30) days of the date of approval  
268 by Regular Membership. This charter will remain in effect until modification or termination, as set  
269 forth in Section 5(c) (“Modification or Termination of Charter”).  
270
- 271 c. **Modification or Termination of Charter.** Any Regular Member, who is in good standing with the  
272 CWG, or any member of the CWG Leadership, may propose that the charter be modified or  
273 terminated. Notwithstanding the foregoing, any proposal to modify or terminate the charter shall be  
274 approved or rejected by CWG Leadership at its sole discretion.  
275
- 276 If CWG Leadership approves the proposal to modify or terminate the charter, then such proposal  
277 may be put before Regular Membership for consensus ratification, or a vote. As applicable, if the  
278 majority of Regular Membership and CWG Leadership approves of the proposed modification or  
279 termination of the charter, then any such modification or termination shall go into effect within  
280 thirty (30) days of the date of said approval to modify or terminate said charter.

## 281 6. FUNDING

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- 282 a. **Remuneration.** HSCC shall not charge nor accept dues or other payment by members for  
283 participation in the council. Notwithstanding the foregoing, HSCC may accept in-kind support, such  
284 as, but not limited to, financing meeting lunches, networking receptions, special projects, or member  
285 organization employees seconded to full or part-time support of HSCC activities (e.g., executive  
286 director and other managerial and administrative support).

288 7. ETHICS GUIDELINES

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289 a. **General Statement about Conduct.** Commitment to doing business honestly,  
 290 ethically, and with respect for each other is critical to the public-private  
 291 partnership. This partnership depends on an environment of open communication,  
 292 empowerment, inclusion, integrity, and trust. These values remain at the forefront  
 293 of our culture and our business decisions. We must maintain our commitment to  
 294 these values and continue building a culture that understands what is acceptable  
 295 and what is not. We should never compromise on issues of integrity.

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297 When we are faced with an ethical dilemma, we all have a responsibility to take  
 298 appropriate action. Regardless of the situation, we must exercise total honesty and  
 299 integrity in everything we do. As members of public-private partnership, we are  
 300 responsible for complying with all applicable laws and regulations. Our  
 301 commitment to doing the right thing will strengthen the partnership and its  
 302 reputation as a model of public-private cooperation.

303

304 b. **HSCC Ethics Guidelines.** In order to be deemed in good standing with the HSCC, Full  
 305 CWG Membership and CWG Leadership shall comply with the following guidelines:

- 306 i. Participate in CWG activities and initiatives with honesty, good ethics, and with respect and  
 307 integrity;
- 308 ii. Comply fully with all applicable statutes, laws, and regulations;
- 309 iii. Be familiar with the source of the information they maintain access to, to respect the  
 310 sensitivities and potential harm associated with the compromise of that information;
- 311 iv. Handle and distribute sensitive information only in the manner permitted by or otherwise  
 312 consistent with federal policy, protocols, laws, regulations, and guidelines, as applicable (but,  
 313 when in doubt, ask CWG Leadership for clarification and guidance);
- 314 v. Do not use the HSCC for personal or non-public gain, commercial benefit, and avoid the  
 315 appearance of impropriety;
- 316 vi. Do not influence or seek to influence public decisions for non-public benefit or commercial  
 317 gain;
- 318 vii. Do not induce or seek to induce any federal official to violate the law and shall avoid the  
 319 appearance of inducing a federal official to violate the law;
- 320 viii. Comply with antitrust guidelines;
- 321 ix. Do not make commitments, obligations, or representations improperly binding the United  
 322 States Government, the HSCC, or any associated individual or component;
- 323 x. Do not solicit other HSCC members for business development purposes; and
- 324 xi. Do not use any HSCC information in connection with any product or service offering or as  
 325 confidential information, proprietary information, intellectual property, industrial property, or



326 in any other intangible or tangible asset, unless specifically authorized in writing by CWG  
327 Leadership. Such HSCC information may not be used by any individual, company, or entity in a  
328 manner not authorized by CWG Leadership.

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330 c. **Recourse for complaints about conduct.** If, collectively, at least three Regular Members in good  
331 standing have reason to believe that another Regular Member or Advisor, either at the individual  
332 or institutional level, may have violated any HSCC Ethics Guidelines (as set forth in Section 7(b) or  
333 the general statement about conduct (as set forth in Section 7(a)), then a complaint may be filed  
334 with CWG Leadership (Complaint).

335  
336 In its sole discretion, CWG Leadership may review the Complaint and determine if such Complaint  
337 has merit. If CWG Leadership decides to take further action on such Complaint, CWG Leadership  
338 may, in its sole discretion, do the following:

- 339 i. in the case of an individual violating the HSCC Ethics Guidelines: issue a warning to said Regular  
340 Member or Advisor and/or to the management of said Regular Member or Advisor in an effort  
341 to remediate the violation, or
- 342 ii. in the case of an institution violating the HSCC Ethics Guidelines or a second or subsequent  
343 violation of the HSCC Ethics Guidelines at the individual or institutional level: terminate the  
344 Regular Membership or Advisor status in the CWG and cease any and all affiliation with CWG, in  
345 regard to the Regular Member or Advisor, individually or institutionally, found to be in violation  
346 of said HSCC Ethics Guidelines.

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## 349 8. Acronym Definitions

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- 351 **CIPAC** – Critical Infrastructure Protection Advisory Council
- 352 **CSA** – Cybersecurity Act of 2015
- 353 **CWG** – Cybersecurity Working Group
- 354 **DHS** – U.S. Department of Homeland Security
- 355 **GCC** – Government Coordinating Council
- 356 **HSCC** – Health Sector Coordinating Council
- 357 **HHS** – U.S. Department of Health and Human Services
- 358 **NIPP** – National Infrastructure Protection Plan
- 359 **PCII** – Protected Critical Infrastructure Information
- 360 **SSA** – Sector Specific Agency
- 361 **SSP** – Sector Specific Plan
- 362 **TG** – Task Group
- 363 **TGs** – Task Groups

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368 9. **DISCLAIMER**

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- 370 a. Nothing in this document may be construed as a contract obligating any individual, company, entity,  
371 association, or others, to specific performance. Additionally, individuals, companies, entities,  
372 associations, or others may unilaterally or with others act on their own accord on any issue or  
373 subject, including, but not limited to, communication with any Federal, State, or local agency or  
374 others. Moreover, nothing in this document or by virtue of participation in the CWG binds any  
375 individual, company, entity, association, or others in any manner, including, but not limited to,  
376 continued participation in the CWG.

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