

# UC Office of the President

## Works from UC Libraries SILS Project

### **Title**

Phase 3 October Public Report. Summary of Work and recommendations

### **Permalink**

<https://escholarship.org/uc/item/0603s42m>

### **Author**

University of California Libraries

### **Publication Date**

2020-04-22



## Phase 3 October public report Summary of work and recommendations

To conclude [its phase 3 charge](#), the Systemwide Integrated Library System (SILS) Working Group shared this report with the University of California (UC) Direction and Oversight Committee (DOC) and Council of University Librarians (CoUL) on October 10th, 2019 for their review. **The CoUL vote on endorsement of this report and SILS Request for Proposal apparent awardee occurred at the November 6th council meeting; all recommendations put forth by the SILS Working Group, as outlined in the executive summary below, were unanimously endorsed by CoUL.** Confidential information has been struck from this public version of the SILS Phase 3 October report.

Executive summary and recommendations

Apparent awardee

SILS timeline for phases “3.5” and 4

Funding strategies (the MPI)

Cost avoidance & campus ILS renegotiation effort

SILS cost share model for vendor licensing fees

Shared governance

Operations management

In-kind FTE contributions for phase 4

Harmonization work

Appendices

Appendix A: SILS product manager job description

Appendix B: Guiding Principles for Designing a SILS Shared Governance Model

Appendix C: Harmonization pilot charges

Appendix D: Harmonization principles & guidelines

## Executive summary

Following the April 2019 midterm report to CoUL, the SILS project focused on managing the Request for Proposal (RFP) for a SILS solution. The report and recommendations that follow are the result of the dedication and effort of the project cohort, particularly the expertise group members responsible for RFP scoring and vendor engagement during the demonstrations, and campus liaisons who have played a key communication and coordination role.

The RFP identified Ex Libris as the apparent awardee and best solution at this time to meet the UC Libraries' needs and goals for a SILS.

Moving to a SILS and pursuing shared practices, policies and governance will bring about opportunities for technical and workflow-based innovation that benefit the libraries and their patrons. The act of coming together for the SILS project has already brought about change for the UC Libraries. Trust and relationship building - connecting those within the project, but also engaging the broader UC Libraries' community - have been, and will continue to be, core tenets of the SILS Project.

## Recommendations for CoUL endorsement:

1. Empower the SILS Working Group to pursue negotiations with apparent awardee Ex Libris for the SILS contract; before the contract is ratified, it will be shared with CoUL for endorsement.
2. Extend the SILS Working Group's current charge to cover phase 3.5, which will include the following activities to be carried out between November 2019 and March 2020:
  - a. Charge a Contract and Negotiation Task Force to develop a statement of work and negotiate a SILS implementation and operations contract with Ex Libris;
  - b. Extend and adapt the charges for existing phase 3 groups as needed for activities such as implementation and harmonization planning;
  - c. Plan phase 4 kickoff meetings; and
  - d. Submit a final report to CoUL in spring 2020, briefly outlining the work accomplished and further recommendations.
3. Authorize the California Digital Library to submit a revised MPI to the Office of the President, based on revised costs.
4. Empower the SILS Working group to charge and staff some phase 4 teams in advance of the actual start of phase 4 (March 2020); the working group will consult with DOC to populate these rosters.<sup>1</sup>
5. Affirm that the California Digital Library will serve as the systemwide operations center for the SILS.
6. Affirm that CoUL members and leadership teams consider the impact of the SILS migration effort on their local roadmaps and ensure local resource and project planning reflects the need to prioritize SILS work in FY19-20 and FY20-21.

---

<sup>1</sup> As described later on in this report, the Shared Governance Task Force finalized the phase 4 governance structure and charges during phase 3.5. CoUL had the opportunity to review and provide feedback on the proposed structure at the November 22 CoUL meeting. The finalized phase 4 governance structure and charges received CoUL endorsement in February 2020.

## Apparent awardee

Through the RFP process, Ex Libris was identified as the UC SILS RFP apparent awardee. The working group now seeks endorsement to pursue negotiations with the apparent awardee. Once an agreement with Ex Libris is finalized and ready for signature, the working group will re-engage CoUL to confirm that the negotiated terms and costs are acceptable and that the libraries can proceed. Given the SILS timeline and CoUL's schedule, the project co-chairs may engage the council and call for endorsement through the CoUL listserv.

**Recommendation #1:** Empower the SILS Working Group to pursue negotiations with apparent awardee Ex Libris for the SILS contract; before the contract is ratified, it will be shared with CoUL for endorsement.

### RFP result: initial and enhanced processes

According to the UC [Best Value](#) (BV) procurement process, qualitative requirements and quantitative cost analysis are separately calculated and then combined for a total BV score. The SILS Expertise Groups first scored the qualitative portion: analyzing and rating whether suppliers met UC's minimum RFP requirements. Then UC Procurement Services analyzed and refined the quantitative portion: working with suppliers to standardize bid pricing and carry out an "apples-to-apples" comparison.

Based on the qualitative scores, the Chairs Plus Group (CPG), representing the UC scoring cohort, recommended that only two respondents move forward as finalists and undergo the quantitative cost analysis: Ex Libris and the vendor that would ultimately become the runner-up.

In reviewing the finalists' total scores, the CPG, SILS Procurement subgroup (SILS-P) and co-chairs identified barriers to proceeding with either vendor. UC Procurement Services and SILS-P determined a need for, and then subsequently pursued, an "enhanced RFP" process to ascertain the viability of the two finalists. In a process designed by UC Procurement Services, both vendors were asked clarifying questions. Vendor responses were then analyzed by SILS-P and an ad-hoc group made up of working group and expertise group members with the necessary technical expertise.

Through the RFP and enhanced RFP processes, Ex Libris is UC SILS apparent awardee. In the event that UC is unable to secure a contract with Ex Libris, the runner-up's solution remains a viable option for the libraries.

At the time of this report, only the working group, CoUL, DOC and Shared Governance Task Force know who UC's apparent awardee is. If CoUL votes to proceed with the negotiation, some cohort members will be informed that Ex Libris is the apparent awardee so that they can assist with the development of the contractual statement of work and implementation planning. UC will otherwise not share the apparent awardee status and will only name the successful vendor when an agreement is reached and a contract is signed.

### Strategic Analysis of Ex Libris

While both Ex Libris and the runner-up meet the minimum requirements for SILS operational functionality, the RFP revealed that a migration to Ex Libris' Alma and Primo would result in:

- An all-in-one suite of services on a single vendor platform.

- Improved consortial resource sharing, collection development and management, and systemwide data analytics (and therefore better data-driven decision-making).
- A vibrant user community (as reported by current users), including like-consortia members.
- A consortial paradigm suited for the size and scale of the UC Libraries, where individual instances are federated through a “Network Zone.”
  - Campus individuality is reflected while furthering systemwide initiatives and efficiencies
  - Accommodation of non-member data (e.g. affiliated libraries) is available in the Network Zone

In the short term (i.e. 3-5 years), both Ex Libris and the runner-up represent a net gain in efficiencies and consortial consolidation just from migrating away from the current patchwork of independent systems.

### **Longer term considerations for the SILS**

To support the libraries’ near-term migration and harmonization objectives, and to meet the SILS August 2021 go-live deadline, the SILS scoring experts gave preference to solutions and systems already in production. Both the expertise groups and scoring members noted that other products, though not yet in production, projected impressive technical environments and consortial functionality. Given time and resources, those other products could become much more well-defined and at the forefront of innovation in academic libraries.

Expertise group members have recommended to the working group that the UC Libraries invest in library technology development opportunities.

### **SILS timeline for phases “3.5” and 4**

The current SILS timeline is structured around a projected go-live time frame of June-August 2021 (see Table 1) and was developed based on a number of factors: (1) summer is the least disruptive time of the academic year for a major systems change; (2) an examination of current ILS contracts shows a confluence of campuses with contract turnover points at this time; (3) apparent awardee Ex Libris recommends an 18-month implementation period (which is possible if a contract is signed in early March 2020), but can support a 16- or 17-month implementation; and (4) a summer 2021 go-live allows for sufficient migration preparation while aiming to reduce the risk of staff burnout and/or loss of staff engagement. The working group anticipates an additional period of approximately four months post-go-live to conclude project work and transition to ongoing shared governance.

Leading up to the go-live date, two major drivers inform the implementation timeline: the contract negotiations and Office of the President (OP) Major Projects & Initiatives (MPI) final approval for funding. The implementation process cannot begin in earnest until the implementation details have been agreed upon by both the UC Libraries and apparent awardee, and a contract has been signed. In turn, the contract cannot be signed without reasonable confidence that the funding is available.

While it might be possible to accelerate contract negotiations and execution to allow more time for implementation, recent UC implementation projects and interviews with similar consortia indicate the need for due care and deliberation in crafting a vendor agreement with a strong statement of work and requirements, and adequate protections in the event of insufficient vendor/system performance. If the MPI process causes delays that push contract signing past early March, it could jeopardize the timeline.

The SILS Working Group is exploring how to accelerate the SILS MPI approval process and time-to-contract without jeopardizing due diligence or negotiation leverage.

Table 1. Tentative phases 3.5 (negotiations and preparation for implementation) and 4 (implementation and go-live)

<b>SILS phase 3.5 (November 2019 - March 2020)</b>	
Oct	Prepare for negotiation with apparent awardee
Nov - Feb	Prepare shared governance and implementation models
Nov - Feb	Conduct contract negotiations
Nov - Feb	Continue ILS data clean-up activities
Nov - Feb	Continue harmonization preparation activities
Feb 1	Revised MPI receives final approval no later than Feb. 01, 2020
Feb - Mar	CoUL approval of finalized contract; sign contract
<b>SILS phase 4 (March 2020 - TBD, likely through December 2021)<sup>2</sup></b>	
Mar 2020	Kick-off phase 4 and implementation of the SILS
Mar 2020 - Aug 2021	Hire new SILS product manager Implementation, clean-up and harmonization will include: <ul style="list-style-type: none"> <li>- Data cleanup and preparation</li> <li>- Harmonization of high priority migration topics</li> <li>- Third-party system integrations preparation</li> <li>- Configuration of new SILS</li> <li>- Training</li> <li>- Communications, including stakeholder engagement</li> </ul>
Jun - Aug 2021	Final stage implementation of a production SILS will include: <ul style="list-style-type: none"> <li>- Early public services access to production SILS for revising instruction and outreach materials</li> <li>- Cutover from legacy systems</li> <li>- Go-live (by early August, in advance of the fall semester start at UCB and UCM)</li> </ul>
Sep - Dec 2021	Work immediately following the SILS go-live will include: <ul style="list-style-type: none"> <li>- Harmonization of post-go-live priority topics</li> <li>- Continued data cleanup</li> <li>- Finalize ongoing SILS shared Governance (i.e. UCLAS-integrated governance)</li> </ul>

As part of the proposed phase 3.5, the working group foresees the need for a Contract and Negotiation Task Force (CNTF). The CNTF will assist UC Procurement Services with negotiating and drafting the SILS contract, including the contractual statement of work to describe role assignment and timing for

<sup>2</sup> The Shared Governance Task Force (SGTF) is preparing phase 4 charges. Presumably, phase 4 will extend beyond the planned go-live date (August 2021).

implementation activities. A CNTF charge has been written with the support of UC Procurement Services and will run through spring 2020.

The working group also foresees the need to re-engage phase 3 teams, notably the expertise groups, who are aware that they might be called upon to assist with the development of the contractual statement of work as well as implementation and harmonization planning. The working group expects some member attrition and that rosters may need to be modified.

**Recommendation #2:** Extend the SILS Working Group’s current charge to cover phase 3.5, which will include the following activities to be carried out between November 2019 and March 2020:

- a) Charge a Contract and Negotiation Task Force to develop a statement of work and negotiate a SILS implementation and operations contract with Ex Libris;
- b) Extend and adapt the charges for existing phase 3 groups as needed for activities such as implementation and harmonization planning;
- c) Plan a phase 4 kickoff meeting; and
- d) Submit a final report to CoUL in spring 2020, briefly outlining the work carried out and further recommendations.

### **Funding strategies (the MPI)**

On behalf of the UC Libraries, CDL submitted an MPI funding proposal to OP in January 2019 to fund SILS implementation and operations costs that go beyond the UC Libraries current fund and FTE envelope.<sup>3</sup> The MPI request received presidential approval in its entirety in April and Regents approval in May. Once the vendor implementation and ongoing licensing costs are determined, CDL will have the necessary data to submit a finalized MPI budget to OP.

**Recommendation #3:** Authorize the California Digital Library to submit a revised MPI to the Office of the President, based on revised costs.

### **New ongoing funds (for initial, new staffing proposal)**

The approved MPI proposal included ongoing funds to cover two new FTEs at CDL to ensure the success of the SILS in the short and long term.<sup>4</sup> Funding for a SILS product manager is scheduled to begin in FY2020-21; this position will report to the CDL Discovery & Delivery director and manage SILS operations in coordination with campus representatives and SILS shared governance. The SILS product manager job description was reviewed and finalized in consultation with the working group in early Fall 2019 (see Appendix A). To ensure a July 2020 start date (or shortly thereafter), the position will be posted in January 2020. The hiring committee will include two campus representatives.

Funding for the second new position, a data analyst, is scheduled to begin in FY2021-22. Further planning for that position will take place in early FY2020-21.

<sup>3</sup> All 10 campus libraries and the CDL invest significant funds and FTE into maintaining the existing ILSs and connective systems; these funds and FTE are committed to SILS implementation and operations.

<sup>4</sup> The FTE, a product manager and data analyst, were proposed in the SILS Phase 2 Final Report.

## **New one-time funds**

In addition to the ongoing funds for two continuing FTEs at CDL, the approved MPI secured one-time funds spread out over five years, starting in FY19-20. Budgeted MPI expenses include vendor implementation, contingency funds, management of new and old systems in parallel for a limited period of time, a funding on-ramp for new systems, existing contract buy-outs where necessary and meeting support.

Based on the RFP bid price submitted by apparent awardee Ex Libris, the SILS co-chairs have determined that the libraries will be within the proposed MPI budget.

## **Cost avoidance & the campus ILS renegotiation effort**

In advance of issuing the RFP, the SILS procurement subgroup (SILS-P) and co-chairs worked with UC Procurement Services to renegotiate UC campus library ILS contract end dates to align with the SILS timeline. Campus production environments would ideally be available for 3 months after go-live under contract terms that provide pricing stability if the implementation is delayed. Further, the co-chairs felt that the request for funding from OP compelled the UC Libraries to pursue every reasonable measure to manage system migration costs regardless of UC's limited leverage.

UC Procurement Services initiated the effort by conducting a review of campus ILS agreements to inform development of a negotiation strategy. Each of the UC ILS vendors accepted procurement's invitation to open a dialog and expressed interest in cooperating with UC.

As part of the revised MPI, the libraries will re-calculate the parallel systems and on-ramp costs for the SILS implementation, both of which are covered by the MPI budget. While the MPI budget also covers contract buy-outs, the only contract that would require a buy-out is with Ex Libris, and so a consortial agreement will release the campus from that payment.

## **SILS cost share model for vendor licensing fees**

Following the June 2019 CoUL approval of the FTE+Equal Share model, CoUL reviewed and voted on the weighting of equal share and FTE parameters. The finalized SILS cost share model is:

- Equal share: 2% per campus for a total of 20%
- CDL share: approximately 15%<sup>5</sup>
- FTE cost share: 65% total, distributed by FTE at each campus

This funding model is governed by the same principles as UC's licensed content, including the principle that each campus must be able to fund their portion of the costs. As such CoUL affirms the need for campus support at senior administration levels to ensure that our investment in systemwide collaboration is sustained. At the September 2019 CoUL meeting, the council unanimously endorsed use of this funding model for the first three years of SILS vendor payments for ongoing services.<sup>6</sup>

---

<sup>5</sup> CDL's contribution, estimated at 15%, will be determined by calculating the funds made available through the elimination of systems replaced by the SILS. Once set, this funding level will be expressed as CDL's cost percentage such that future system cost increases or decreases can be addressed. The systems in CDL's response to the existing systems survey are: Discovery, ERMS, ILS, Link Resolver and potentially Resource Sharing (it is currently expected that Resource Sharing will not be replaced by SILS).

<sup>6</sup> This cost share model will not be applied to the vendor implementation fees. As outlined in the approved MPI funding proposal, implementation costs will be covered by OP.



This model results in the following draft distribution of costs, which will be adjusted once the final costs of the SILS are known (see Table 2).

Table 2. Estimated campus total shares under the new SILS cost shared model

Campus	Campus share (including equal share and FTE) %
Berkeley	11.65%
CDL	15.00%
Davis	10.87%
Irvine	10.03%
Los Angeles	12.73%
Merced	3.70%
Riverside	7.10%
San Diego	10.78%
San Francisco	4.24%
Santa Barbara	7.63%
Santa Cruz	6.28%
<b>Total</b>	<b>100.0%</b>

With support of MPI funding, 100% of the campus cost increase will be funded in year 1, 50% of the campus cost increase funded in year 2 and 25% of the campus cost increase funded in year 3. Prior to the finalization of campus costs for year 1, an updated survey of current campus costs will be completed to serve as a baseline to determine whether a cost increase has occurred, and CDL’s actual contribution amount must be calculated. With that information, a final cost distribution table will be generated as well as a three year projection of campus SILS costs. This information will support CoUL’s final signoff on the completed contract just prior to signature. At the end of year 2, a task force will be convened to review the model.

## Shared governance

The work of the SILS Shared Governance Task Force (SGTF) commenced in June 2019. To better allow the task force to incorporate recommendations from the working group, particularly around the outcome of the RFP and apparent awardee, the timeline for the task force’s deliverables does not align with the delivery of the working group’s phase 3 October report. Instead, SGTF will socialize potential governance models and decision-making mechanisms with the working group and CoUL in November 2019 for feedback, and will submit a final report, including recommendations and a phase 4 shared governance structure and charges, no later than the February 2020 CoUL meeting.

At the September 2019 CoUL meeting, the council approved the Guiding Principles for Designing a SILS Shared Governance Model (see Appendix B). These principles will guide the task force in developing the shared governance model for SILS implementation and ongoing management, and signal to UC Libraries’ employees what they can expect from SILS governance.

Following the November 2019 check-in with CoUL, sufficient work will likely have been made on the phase 4 shared governance model to allow the working group and SGTF to prioritize which charges are written so that some teams commence work in advance of the start of phase 4 (March 2020).

**Recommendation #4:** Empower the SILS Working Group to charge and staff some phase 4 teams in advance of the start of phase 4 (March 2020); the SILS Working Group will work with DOC to populate these rosters.

## Operations management

A necessary part of the contractual statement of work and implementation plan is to determine how the UC Libraries will organize SILS operations. The implicit assumption that CDL will be the systemwide operations center has informed much of the SILS Working Group's planning. The working group now asks CoUL to formally affirm that CDL will act as the systemwide operations center for the SILS and oversee service administration in collaboration with the campuses. The CDL Discovery & Delivery team already coordinates systemwide operations for Melvyl, resource sharing and UC-eLinks; it would similarly be responsible for SILS operations. The SILS Product Manager, which was part of the MPI funding request (see Funding Strategies), will also report to the CDL Discovery & Delivery director.

Ongoing SILS shared governance will be responsible for oversight and decision-making in regards to SILS policies and procedures. Systemwide operations for the SILS will be reflected in the shared governance model, likely through a representative UC Libraries group (i.e. campuses, RLFs and CDL) that discusses operational activities and needs, including new vendor releases and potential development requests. As noted in the Shared Governance section, the phase 4 governance model will be delivered to CoUL no later than February 2020.

**Recommendation #5:** Affirm that the California Digital Library will serve as the systemwide operations center for the SILS.

## In-kind FTE contributions for phase 4

With the original SILS MPI submission, OP requested a summary of current and projected SILS in-kind FTE costs for the libraries. For the upcoming submission of the finalized MPI, the in-kind FTE estimates<sup>7</sup> for phase 4 have been updated to reflect the continued commitment of FTE already engaged in the SILS project, as well as additional commitments that have previously been discussed with CoUL, such as FTE needed to carry out the migration and support necessary systemwide coordination. Once the SGTF has proposed a phase 4 governance model and charges, the libraries will have a better understanding of anticipated time commitments.

The phase 4 in-kind FTE estimates are for work carried out between March 2020 and September 2021 (one month post go-live). While it is assumed that much of the project cohort will continue working for a set period of time after go-live (before the ongoing shared governance transition occurs, likely closer to

---

<sup>7</sup> The phase 4 in-kind FTE costs are based on the average salary for current cohort members with a standard fringe benefit rate estimate and 3% annual inflation applied.

the end of 2021), there is not enough information at hand to provide an in-kind FTE estimate for October through December 2021.

The working group estimates that the SILS cohort will grow to include approximately 140 UC Libraries employees from across the system, collectively totalling 55 FTE across the first 19 months of phase 4. Most cohort members will contribute approximately 30% of their time to SILS work. Some cohort members will invest significantly more time than the average; two such cohort groups already evident to the working group are the local staff managing the campus implementation and staff carrying out local ILS data clean-up (see subsections below).

Advancement of the SILS project is already reflected in [the UC Libraries systemwide plans and priorities for 19/20](#). The working group asks that CoUL members confirm that the SILS is similarly prioritized in local roadmaps.

**Recommendation #6:** Affirm that CoUL members and leadership teams consider the impact of the SILS migration effort on their local roadmaps and ensure local resource and project planning reflects the need to prioritize SILS work in FY19-20 and FY20-21.

### **Campus project managers for implementation**

The phase 4 in-kind FTE estimate above (across the entire SILS cohort) includes the assumption that each campus will dedicate approximately one FTE to act as their local project manager. Activities assumed by this role will include managing the campus migration and SILS implementation, including local systems integration, and relaying key SILS communications. Further details about this role and the SILS organizational structure that will support this work is part of the shared governance phase 4 model that CoUL will initially review and provide feedback on at the November 22 meeting.

### **ILS data cleanup**

Work related to ILS data cleanup commenced in May 2019 with the ILS Data Cleanup (ILSDC) Task Force. The task force, which has campus, CDL and RLF representatives, was charged to:

- Identify data cleanup that can be done prior to knowing the SILS apparent awardee
- Identify if data cleanup projects require coordination beyond technical services; if so, identify which units
- Identify data cleanup activities that require harmonization decisions (to hold until phase 4)
- Once the apparent awardee is known, identify further data clean up activities (to be carried out in phase 4 and post go-live)

The task force successfully carried out all charged activities that can be done without knowledge of the SILS apparent awardee and members are proceeding with applicable local/campus-level work. The phase 4 in-kind FTE estimate above (across the entire SILS cohort) includes the assumption that ILS data cleanup activities will require a total systemwide investment of approximately 17.5 FTE (see Table 3). The ILSDC Task Force notes that data cleanup activities will continue post-go-live, though that work will likely be carried out with a smaller per campus FTE commitment.

Table 3. ILS Data Cleanup Task Force recommendation for FTE dedicated to ILS data clean-up in phase 4

	Estimated FTE per campus for ILS data cleanup	Total
Group A (UCSC, UCM)	1	2 FTE
Group B (UCI, UCD, UCR, UCSB, UCSF)	1.5	7.5 FTE
Group C (UCSD)	2	2 FTE
Group D (UCB and UCLA)	3	6 FTE
	<b>TOTAL</b>	<b>17.5 FTE</b>

For the ILS data cleanup FTE estimates outlined in Table 3, campuses were divided into groups based on their physical holdings (as reported to OP), recent ILS migration history (including recent migrations to Ex Libris' Alma/Primo) and ongoing metadata clean-up efforts.

## Harmonization work

The SILS Harmonization (SILS-H) subgroup was formed to focus on harmonization planning for workflows, practices and policies affecting the SILS. The subgroup has conducted two main activities since the April 2019 report to CoUL: planning and conducting the harmonization pilots, and working with the Shared Governance Task Force (SGTF) to recommend harmonization decision-making structures and processes.

Two pilots are currently in process: an access services pilot, focused on investigating the alignment of loan periods; and a cataloging and metadata pilot, focused on the alignment of 9XX MARC bibliographic fields (see Appendix C). These pilots serve two purposes. One, to provide proofs of concept for harmonization decision-making processes, which can then be included in the SGTF recommendations. Two, to tackle real issues in preparation for SILS migration. A final report with the outcome of the two pilots as well as pilot observations from the SILS-H team will be prepared in November 2019.

Additionally, SILS-H and the two pilot groups drafted a set of Harmonization Principles & Guidelines. The principles have been finalized (available as Appendix D) and the guidelines have been passed to the SGTF as material to consider for their recommendations.

## **Appendices**

**Appendix A: SILS product manager job description ([link](#))**

**Appendix B: Guiding Principles for Designing a SILS Shared Governance Model ([link](#))**

**Appendix C: Harmonization pilot charges ([cat/met](#) and [access services](#))**

**Appendix D: Harmonization principles & guidelines ([link](#))**