In Partnership with

ASU Sandra Day O’Connor College of Law
Arizona State University
Center for Law, Science and Innovation
Executive Summary

The Center for Industry Self-Regulation (CISR), the 501(c)(3) foundation of BBB National Programs, plays a pivotal role in harnessing the potential of soft law to empower business accountability and promote consumer trust. CISR’s primary mission is promoting education and research supporting responsible business leaders in developing fair, future-proof best practices. It also educates the public about the prerequisites for effective industry self-regulation.

In pursuit of these objectives, CISR joined forces with Arizona State University’s Sandra Day O’Connor College of Law to hold the Soft Law Summit on October 17, 2023, at the University of Virginia Darden School of Business in Arlington, VA.

The Soft Law Summit: Activating Industry Self-Regulation convened academics steeped in the study of soft law (or industry self-regulation), companies and industry experts rooted in its practical application, and regulators and policy makers interested in learning more about its potential.

The Summit was CISR’s follow-up event to its Research Roundtable on Industry Self-Regulation held in June 2022, at George Mason University Antonin Scalia Law School, which dissected how the challenges and opportunities for America’s business sectors have been and can be addressed through soft law models.

The Summit explored soft law’s role in highly regulated industries, examined the relationship between soft law and the First Amendment, and examined challenges in the application of soft law to emerging technologies, including artificial intelligence (AI). Expert speakers discussed and evaluated scenarios in which co-regulation and soft law have been successfully implemented, as well as instances in which it has not had success.

While industry organizations have engaged in active self-regulation throughout history – using consensus standards, codes of ethics, codes of conduct, certification programs, and private dispute resolution – the academic study of industry self-regulation, particularly with respect to programs that include robust accountability mechanisms, is nascent and under-studied. As a result, the potential for self-regulatory solutions to advance policy goals and business success is under-appreciated and these solutions are under-utilized.

The goal of the Summit was to explore the potential for soft law, or industry self-regulation, to address business and social problems and discuss the factors that enable its success through an examination of both academic research and actual industry practice.

Additional academic research from a wide range of academic disciplines would be helpful to the thoughtful development of soft law. In addition, developing curricula for law schools and post-secondary programs in business, marketing, communications, and advertising can provide future business leaders with the knowledge necessary to develop and deploy industry self-regulation frameworks in support of a dynamic, free market economy. This approach would provide future policymakers with knowledge about the role industry self-regulation can play in addressing business and social problems, such as when it can work alongside governmental regulation, inform sensible government regulation, or be a substitute for government regulation.
Background on Industry Self-Regulation

Industry self-regulation is a process where members of an industry, trade, or sector of the economy monitor their members’ adherence to legal, ethical, or safety standards, sometimes creating and implementing these standards, and often using an independent third party as an accountability agent or watchdog. The process is meant not just for one company, but for an entire industry, or cross-section of an industry, thereby ameliorating worry of competitive advantage if rules are not followed.

Successful industry self-regulation systems create, deploy, and update dynamic industry standards to reflect the rapidly evolving market landscape. The standards deployed reflect consumer, industry, and public policy concerns and provide a tailored response to the values embodied in the underlying legal, regulatory, and constitutional frameworks.

Meaningful, lasting industry self-regulation is sufficiently independent of control by industry members, driven by the adoption of agreed-upon standards with a mechanism established for monitoring compliance, such as through a third-party accountability agent. In other words, industry self-regulation involves meaningful guidelines with “teeth.” Often the teeth come from the ability to refer instances of non-compliance to a government agency, such as the Federal Trade Commission (FTC).

This adjacency to the government, whether through a backstop or through collaboration in standard-setting, is one of the less-recognized but important aspects of successful independent industry self-regulation. Meaningful industry self-regulation does not occur in a vacuum; instead, independent programs develop policies and procedures that take account of and work together with existing laws and applicable regulatory frameworks.

Key Takeaways from the Soft Law Summit

» Soft law, or industry self-regulation, is agile and flexible, with successful models available that can be easily adapted to a variety of industries and needs.

» Transparency, independent accountability, and enforcement are key elements to historically successful self-regulatory programs.

» The government, including agencies such as the FTC, must work closely with industry stakeholders and self-regulatory organizations.

» Soft law allows industries to keep current with evolving practices, standards, and new technologies due to its ability to adapt quickly to changing circumstances. This nimbleness is especially important in the technology industry, where legislation cannot keep up with emerging and fast-changing regulatory needs.

» Striking the right balance between necessary government regulation and fostering innovation through limited regulation is crucial.

» Businesses can demonstrate leadership and develop meaningful yet practical solutions to help address many societal challenges without being limited by government action or inaction.

» Developing curricula for law schools and post-secondary programs in business, marketing, communications, and advertising can provide future business leaders with the knowledge necessary to develop and deploy industry self-regulation solutions in support of a dynamic, free market economy, and provide future policymakers with knowledge about the role industry self-regulation can play in addressing business and social problems.

» Additional academic research from a wide range of academic disciplines would be helpful for the thoughtful development of soft law. CISR should consider creating additional vehicles such as the Soft Law Summit for such research to be discussed and debated.
About the Event
The 2023 Soft Law Summit commenced with introductory remarks delivered by Eric D. Reicin, President and Chief Executive Officer of BBB National Programs and of the Center for Industry Self-Regulation; Mary K. Engle, Executive Vice President, Policy, BBB National Programs; and Gary Marchant, Executive Director and Regent’s Professor of Law, Sandra Day O’Connor College of Law, Arizona State University.

In his welcome remarks, Reicin emphasized the prevailing “crisis of trust” in our nation and underscored the potential of industry self-regulation to restore trust by businesses holding themselves accountable.

Andrew Wheeler, former Administrator of the EPA and now Director, Virginia Office of Regulatory Management, provided morning comments, stating that this discussion “could not come at a more pivotal time in our nation’s history.” Wheeler emphasized the need for businesses and regulatory agencies to collaborate in determining necessary regulations, while also preserving innovation and the ability to provide valuable services to customers.

Session 1
AI & Emerging Tech: The Case for Soft Law

Professor Gary Marchant moderated the first panel of the day, which featured distinguished experts discussing the challenges posed by new and emerging technologies, such as AI, and delineating the role of both formal government regulation and soft law in addressing the challenges presented.

Professor Cary Coglianese of the University of Pennsylvania School of Law emphasized the complexity of regulating AI, stressing that AI is not amenable to a single, uniform regulatory framework.
Panelists provided insights on the need for limited AI regulation and context-specific approaches. Ryan Hagemann of the IBM Policy Lab echoed this by emphasizing the need for focused regulation on specific applications and their associated risks. For example, regulating a chatbot should differ significantly from regulating an autonomous vehicle.

Panelists agreed that AI's wide array of applications necessitates narrowly tailored, context-specific approaches to establishing rules of the road. Adam Thierer of the R Street Institute pointed to the need to address fundamental questions before implementing AI regulation. These include identifying the applicable agencies with regard to AI regulation, reaching a consensus among stakeholders, designating a trusted intermediary for implementation, and the need for building public trust in AI technologies and governance mechanisms.

Martin Stanley of the National Institute for Standards and Technology (NIST) underlined the necessity for clear and well-defined terminology before policy makers embark on regulation. For instance, the term “safety” can have widely varying interpretations depending on the relevant industry context, making consensus and precision in regulation difficult to achieve, something essential to ensure an effective legal and regulatory environment.

Panelists noted that although regulation of AI is undoubtedly tempting, it currently remains unlikely to result in the passage of any actual law soon, as evidenced by the challenges faced in passing legislation on necessary and popular matters such as a comprehensive privacy bill or social media regulation. Thierer remarked that “if you are going to talk about AI governance, you have to have a backup plan when hard law fails.” This is where the concept of “soft law” becomes useful. Soft law implemented through meaningful independent industry self-regulation can fill the regulatory gaps and address issues that Congress may struggle to tackle comprehensively.

Session 2
Advertising Industry Self-Regulation: How It Works

This session explored a long-lasting and successful example of industry self-regulation by the advertising industry through the National Advertising Division (NAD) and its appellate body, the National Advertising Review Board (NARB), and the Children’s Food & Beverage Advertising Initiative (CFBAI), all of which operate under the umbrella of BBB National Programs.

The U.S. advertising industry founded the National Advertising Division and

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1 Cary Coglianese, Edward B. Shils Professor of Law and Professor of Political Science, and Director, Penn Program on Regulation, is the author of numerous books and articles examining the efficacy and impact of regulations, algorithmic decision-making, and considerations of soft law and self-regulation, including “Regulatory Abdication in Practice” (2020), available at: http://works.bepress.com/cary-coglianese/59/.
the National Advertising Review Board in 1971, as a system of independent industry self-regulation to build consumer trust in advertising and support fair competition in the marketplace. The National Advertising Division holds national advertising across all media types to high standards of truth and accuracy by reviewing truth-in-advertising challenges from businesses, trade associations, consumers, or on its own initiative. Through its work, thousands of misleading advertising claims have been removed from the marketplace, and the National Advertising Division’s case decisions represent the single largest body of advertising decisions in the country.

Laura Brett, Vice President, National Advertising Division, BBB National Programs explained that the National Advertising Division enforces the truth-in-advertising standards established by the FTC rather than creating new standards. Acknowledging the paramount importance of transparency in successful self-regulation, the National Advertising Division upholds such transparency by making its decisions public.

Drawing from Verizon’s extensive experience as a frequent user of the National Advertising Division, David Hubbard, Deputy General Counsel, Verizon and Board Chair, BBB National Programs, underscored the myriad benefits of this self-regulatory approach. He elaborated on how it not only resulted in cost savings and spared the company from potential unnecessary publicity, but that it also cultivated a culture of accountability and enhanced credibility with its customer base. Hubbard emphasized that “effectiveness and efficiency” are the primary motivators for Verizon to choose the National Advertising Division for dispute resolution rather than resorting to litigation.

Ithaca College Professor Scott Hamula, who has served as a panel pool member of the National Advertising Review Board, highlighted the value of the National Advertising Review Board’s appellate role, which adds a layer of scrutiny by a panel of advertising peers, an important component of the credibility of the self-regulation process.

The discussion also included a sister program of the National Advertising Division, also part of BBB National Programs, the Children’s Advertising Review Unit (CARU), which was created in 1974 to be an expert body focused on addressing misleading and inappropriate advertising targeted to children. The success of this program also served as a model for the creation of BBB National Programs’ Children’s Food and Beverage Advertising Initiative, a voluntary pledge program aimed at improving the nutritional landscape of food advertising directed to children by establishing strict nutrition criteria for foods advertised to children.

Professor Young Hou of the University of Virginia Darden School of Business, an expert in self-regulation with over a decade of study, summarized the findings of his academic study of the ready-to-eat cereal industry, highlighting the remarkable compliance levels achieved within the food and beverage industry through voluntary participation in the Children’s Food and
Beverage Initiative. He emphasized that businesses actively engage in self-regulation to preempt potential inquiries by the FTC and to ward off future regulatory measures.

Serena Viswanathan of the FTC offered insights from a regulatory standpoint, underscored Hou’s point that participation can prevent FTC inquiries and stated that she encourages competitors to engage in the self-regulation process. She further explained that this form of regulation is not only beneficial to participants but also regulators like the FTC. The FTC’s primary “interest is in getting problematic, deceptive, or misleading advertising taken down faster, and, if that happens, it’s a benefit to consumers as a whole.”

Session 3
Soft Law & the First Amendment

In this session, panelists discussed the intersection of soft law and the First Amendment, a conversation led by Mary Engle of BBB National Programs.

The panelists highlighted that a noteworthy advantage of self-regulation is its capacity to mitigate inappropriate speech in ways that government regulation cannot achieve, primarily due to the constraints on government action imposed by the First Amendment. Engle underscored the complexity arising from the extensive protection afforded by the First Amendment to both commercial and non-commercial speech, making it exceedingly challenging for the government to directly regulate truthful and non-misleading advertising, thus creating an opportunity for industry self-regulation.

For example, a substantial swath of speech is problematic due to its offensive and/or harmful nature but is nonetheless protected by the First Amendment; thus, the only feasible avenue for its restriction is through self-regulation.

Chris Swonger, CEO of DISCUS, elucidated this point by offering a concrete example of industry self-regulation from the distilled spirits industry. He explained that the industry’s Code of Responsible Practice prohibits images of impaired individuals in distilled spirits advertising. Due to the First Amendment protection of truthful and non-misleading commercial speech, the FTC cannot mandate such restrictions and thus industry self-regulation is able to achieve pro-social ends that the government cannot.

Swonger acknowledged the subjectivity inherent in making many determinations under its Code, recognizing that what one
person may find offensive, another may not. Nevertheless, according to Swonger, with the guidance of the FTC and adherence to the DISCUS Code of Responsible Practices, the distilled spirits industry promotes its products in a responsible manner and takes appropriate action against those companies whose advertisements fall short of the Code.

Dr. Nicol Turner-Lee of the Brookings Institution elaborated on how well-established and heavily regulated industries, such as the alcohol industry, have set a precedent by effectively implementing self-regulation. This, in turn, has paved the way for newer industries such as social media and emerging technologies to pursue industry self-regulation.

The panel raised the important question: How does one secure a strong level of industry participation in and a solid commitment to self-regulatory principles? The discussion made clear that widespread participation and commitment are two important pre-conditions to the success of an industry self-regulatory program.

Patricia Vance of ESRB shared a compelling example of a very high level of industry buy-in and support for self-regulation within the video game industry. The need for it was prompted by the attention garnered by a specific game, Mortal Kombat, in 1993, leading to US Senate hearings on video game violence. The intense scrutiny shed light on the video game industry’s lack of any comprehensive regulation along with the inability of the government to address the problem, again due to the First Amendment’s protection of free speech.

Faced with the threat posed by Congress targeting their industry, all of the leading companies in the video game space united to form a trade association and ratings board, the ESRB. This led to the establishment of a robust ratings system and a comprehensive enforcement mechanism, which includes fines for non-compliance.

One result of this effort was the substantial reduction in the accessibility of Mature-Rated (M-Rated) games to minors, as evidenced by the FTC’s mystery shop audit. The audit revealed a decline from 85% to 15% of instances where unaccompanied minors could purchase M-Rated games. Ultimately, the market demanded uniform standards that served to safeguard not only industry stakeholders’ own interest but also the well-being of their customers. This example serves as a persuasive illustration of a genuine win-win scenario of industry self-regulation benefiting industry and consumers.

Afternoon Keynote

The afternoon keynote speaker, Hon. Maureen K. Ohlhausen, a partner at Baker Botts and Board member of BBB National Programs, who has been a strong supporter of self-regulation since her days as a Commissioner and then as Acting Chairman of the FTC, remarked on the elements of a successful industry self-regulatory program.
Ms. Ohlhausen noted that an “effective self-regulation [program] really benefits everybody. It benefits the business, it benefits the government by preserving resources, [and] it certainly benefits consumers, as well.” First, she noted, an effective self-regulatory framework must be adequately funded and maintain sufficient independence from industry members. Second, an effective framework produces clear, meaningful, and fair principles. Also, the framework must employ effective enforcement mechanisms to back up these principles. Finally, Ms. Ohlhausen remarked that “consumers are best served when the FTC and self-regulators work closely to share concerns and priorities, as well as to identify emerging problems in the market that may harm consumers.”

Session 4
The Role of Trade Associations

In this session, panelists discussed the critical role trade associations play in industry self-regulation. This session was moderated by an expert in trade association self-regulation, Peter Marinello, who leads BBB National Programs’ Direct Selling Self-Regulatory Council (DSSRC). DSSRC is the self-regulatory watchdog for the Direct Selling Association (DSA), providing impartial monitoring, enforcement, and dispute resolution regarding product or income claims disseminated by direct selling companies and their salesforce members.

While DSA already had an established commitment to self-regulation through adherence to its internal code of ethics, its fast-changing marketplace prompted the need for an independent oversight body and led to the creation of DSSRC. Brian Bennett of the DSA noted that DSA’s collaboration with DSSRC has played a vital role in fostering trust and transparency within the direct selling industry. He emphasized that DSA members not only recognize the importance of DSSRC but view it as an integral and mandatory aspect of their membership.

Dan Roczniak of the American Chemistry Council (ACC) and Angus Crane of the North American Insulation Manufacturers Association (NAIMA) further weighed in on the crucial role self-regulation plays within their respective industries. Roczniak talked about the 30+ year success of the ACC Responsible Care Program, a mandatory self-regulatory program for ACC members that requires them to comply with commitments to the health and safety of their employees and the communities in which they operate.

Crane spoke to NAIMA’s Health and Safety Partnership Program created in conjunction with the Occupational Safety and Health
Administration (OSHA). Crane noted that, initially, there was “vehement opposition” from NAIMA members due to the distrust of OSHA and the industry’s sense that nothing would ever satisfy OSHA. Similarly, at the beginning of the negotiations to create the program, OSHA was likewise distrustful of the insulation industry and its commitment to installer safety and well-being. Over time, NAIMA successfully implemented a program that led to the improvement of work practices among insulation installers, a program that OSHA could not have created on its own due to a lack of resources.

Lois Greisman of the FTC opined that the efficacy of these self-regulatory initiatives is attributed to a trade association’s ability to marshal resources and cultivate shared values, ultimately resulting in strong collective performance consistent with the public policy goals behind the programs. Additionally, she acknowledged that engaging in self-regulation can be driven by “mixed motives.” It is fine for businesses to have motives that are distinct from the government’s goals in supporting the attempt at industry self-regulation, so long as the ultimate outcome aligns sufficiently with the desired public policy goals. Greisman also emphasized the importance of transparency, strong reporting, and a good ongoing relationship between the self-regulatory initiative and the applicable government regulator.

Session 5
Self-Regulation in Highly Regulated Industries

Moderated by CISR’s Executive Director, Justin Connor, panelists in this session examined the role of self-regulation in areas where the government has already enacted extensive formal regulation, discussing how to gain buy-in into soft law by companies in these heavily regulated industries. Catherine Bate of Ad Standards Canada highlighted the challenges posed by the slow and cumbersome process of updating formal regulations, which can result in outdated practices and standards, noting that soft law, in contrast, offers a dynamic solution that can adapt to the evolving landscape of a particular industry and pinpoint areas in need of updates.

For instance, there is no “hard law” that regulates influencer advertising practices and their obligation to disclose advertisements. Consequently, self-regulatory bodies such as Ad Standards Canada play an essential role by offering practical guidance and educational support in these circumstances. Robert Colby, General Counsel, FINRA highlighted the strengths of self-regulation such as flexibility and responsiveness to changing conditions and informed relations with
members, which in turn allows flexible funding by its members. Lea Borkenhagen of the Environmental Defense Fund shared from her perspective of having worked for decades with leading consumer brands the variety of motivations that inspire their participation and leadership in industry self-regulatory efforts relating to challenges such as managing supply chain risk, minimizing environmental impact, and improving packaging.

The panelists further emphasized that transparency and accountability are key parts of the recipe for a successful self-regulatory process, a sentiment expressed consistently by panelists throughout the Summit. As Bate stated succinctly, “accountability and transparency are the ticket for admission.”

Session 6
Artificial Intelligence in Healthcare

Speakers in this session answered the question: Is there a role for soft law to create rules of the road and accountability mechanisms to allow the use of AI to improve health outcomes while also preventing inadvertent harms?

Examining the intersection of AI and healthcare requires understanding of the current regulatory framework. Duke Law School Professor Arti Rai noted research she had conducted at the Duke Law Center for Innovation Policy in conjunction with the Duke-Margolis Center for Health Policy, and explained that the Food & Drug Administration (FDA) is responsible for regulating certain types of software or AI-enabled clinical decision support tools deployed in a healthcare context. However, as the prior panel discussed, soft law can complement heavily regulated industries by addressing regulatory gaps. One way in which soft law can do this is by working directly with the FDA to create a framework of best practices for tools that are not regulated.

In the words of Dr. Brian Miller of John Hopkins, “there are a variety of tools we can use to make the world better without Congress creating new laws.”

Dr. Miller highlighted the diverse applications of AI in the healthcare sector, each carrying distinct and varying risk levels, necessitating tailored regulatory approaches, such as establishing a dedicated voluntary alternative pathway for integrated devices, to bring the FDA’s review processes in line with contemporary technical developments while also allowing for greater flexibility in meeting regulatory requirements for both

manufacturers and regulators. 4 John Verdi of the Future of Privacy Forum emphasized the importance of a cautious approach to strike a balance among efficacy, safety, and data privacy protection. While concerns prevail that AI may influence decisions regarding healthcare costs and access to care and appropriate regulation may have a place in addressing these concerns, it is equally important not to impede innovation. Verdi noted the need to strike a balance between harnessing the potential of technologies that can enhance research while avoiding unintended consequences that may undermine privacy protections.

Moderator Adam Thierer concluded the discussion with insights drawn from his upcoming paper, Exploring Soft Law Governance Mechanisms’ Application to AI Governance in the United States Healthcare Industry, highlighting the value of an agile, iterative soft law approach that allows flexibility in how to achieve desired outcomes and outputs, in contrast to the traditional healthcare approach that tightly regulates inputs and processes.

Session 7
Soft Law or Hard Law: Autonomous Vehicles & Drones

Jeff Gurney, partner, Nelson Mullins noted that the autonomous vehicles industry has always been regulated by soft law due to the lack of hard law in this area at the federal level and in most states. Gurney pointed out that regulators such as the National Highway Traffic Safety Administration (NHTSA) have removed barriers that likely would have prohibited the invention of autonomous vehicles. As it stands, no law explicitly prohibits a manufacturer from putting an autonomous vehicle on the road, but the industry has a vested interest in coordinating with regulators before doing so to address safety concerns. Gurney and fellow panelist Helen Gould of Tech Strategizers LLC pointed to their research on this issue in an upcoming paper, Soft Law’s Application to AI for Safely Deploying Automated Driving Systems.

Professor Tracy Pearl of the University of Oklahoma College of Law emphasized this point by drawing a comparison between autonomous vehicles and amusement park rides, highlighting the success of self-regulation in the amusement park

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industry, as she has described in her upcoming paper, *Cooperative Control: Autonomous Vehicles, Industry Accreditation, and Soft Law Regulatory Regimes*. In the United States, fixed site amusement park rides are regulated by individual states, and many states have minimal or no regulation. Despite this, due to the strong interest of the industry in ensuring a safe ride experience for all participants, the amusement park industry has achieved remarkable safety records by collaboratively developing and implementing its own safety standards regardless of any state regulation, or lack thereof. Pearl further remarked that the autonomous vehicle industry should follow this model and is already effectively doing so in many cases, which can proactively safeguard their reputation and ensure public safety.

While the Federal Aviation Administration (FAA) also recently eased regulations that allow autonomous aerial vehicle (i.e., drone) operations beyond visual line of sight, it is important to note that the FAA and NHTSA have differing priorities. The FAA historically has had a pristine safety record that it aims to uphold through an extraordinary level of safety in air travel. In contrast, NHTSA is focused on leveraging autonomous vehicles to enhance overall motor vehicle safety, making them more invested in this technology’s development as a potential mechanism to help reduce the current level of almost 42,000 motor vehicle deaths per year on America’s roads.

**Closing Remarks**

The day-long summit concluded with closing remarks from co-chairs Mary Engle and Professor Gary Marchant, who highlighted the numerous compelling examples of self-regulation presented in the various sessions. Marchant remarked that self-regulation is a “win-win” when it proves advantageous for both the industry and the public.

**Speakers**

Mary K. Engle  
Executive Vice President, Policy  
BBB National Programs

Gary Marchant  
Executive Director and Regent’s Professor of Law  
Arizona State University  
Sandra Day O’Connor College of Law
Conclusion

Through the exploration — and potential widespread adoption — of independent industry self-regulation, an industry can address its own problems and play a meaningful and leading role in finding solutions to relevant public policy issues.

The scope and scale of societal challenges has accelerated over the last few decades. All eyes have been directed toward government to address these challenges. Yet no one source can be the solution to all problems. Businesses have the human talent and financial resources to help address some of the challenges we face. Government intervention can be a helpful impetus to address these challenges, but it is not the only tool available to make progress.

Businesses can demonstrate leadership and develop meaningful yet practical solutions to help address many societal challenges without being limited by government action or inaction. Industry self-regulation provides a blueprint for building trust by doing “the right thing.” It requires establishing a clear definition of “the right thing” in any given circumstance, being transparent about how business is doing “the right thing,” and being accountable through independent, third-party mechanisms to engender trust.

However, given the limited knowledge and understanding of industry self-regulation across all elements of society — academia, business, and government — additional academic research in several disciplines as well as a robust postsecondary curriculum focused on the principles of effective industry self-regulation is needed. The 2023 Soft Law Summit showcased the fundamentals that must underpin any viable framework for industry self-regulation.
About the Center for Industry Self-Regulation

The Center for Industry Self-Regulation (CISR), BBB National Programs' 501(c)(3) non-profit foundation, was created to harness the power of independent, industry self-regulation to address marketplace trust challenges businesses face today. CISR is dedicated to education and research that supports responsible business leaders developing fair, future-proof best practices, and to the education of the general public on the conditions necessary for industry self-regulation. Armed with the expertise and experience needed to incubate new initiatives, CISR is the place for industries to turn to build the foundation for new self-regulation programs that are tailored to enhance consumer trust without the need for top-down regulation. The Center for Industry Self-Regulation (CISR) is a 501(c)3 non-profit organization (FEIN: 84-5021924) and is a DBA of BBB National Programs Charitable Foundation. To learn more, visit industryselfregulation.org

About BBB National Programs

BBB National Programs, a non-profit organization, is the home of U.S. independent industry self-regulation, currently operating more than a dozen globally recognized programs that have been helping enhance consumer trust in business for more than 50 years. These programs provide third-party accountability and dispute resolution services that address existing and emerging industry issues, create a fairer playing field for businesses, and a better experience for consumers. BBB National Programs continues to evolve its work and grow its impact by providing business guidance and fostering best practices in arenas such as advertising, child-and-teen-directed marketing, data privacy, dispute resolution, automobile warranty, technology, and emerging areas. To learn more, visit bbbprograms.org.