



Impartiality Policy

American Board of First Responder Behavioral Healthcare

GOVERNANCE INSTRUMENT · DRAFT FOR BOARD ADOPTION

Instrument	Impartiality Policy
Organization	American Board of First Responder Behavioral Healthcare Corp. (FRBH)
Status	Approved
Adopted	July 2026
Adopting action	Resolution 5 (Adoption of Governance Instruments)
Custodian	Secretary of the Corporation

This instrument is subordinate to the Articles of Incorporation and the Bylaws, which govern in the event of any conflict. Nothing in it creates any power, office, committee, quorum requirement or voting requirement that the Bylaws do not establish.

1. PURPOSE AND SCOPE

FRBH develops and publishes a national standard. It does not assess, certify or accredit any organization against that standard, operates no such program, and has authorized, licensed, approved, recognized or listed no provider.

This Policy is therefore about the impartiality of a standards developer, not the impartiality of an assessment body. The question it answers is not whether FRBH judges fairly between applicants. It is whether the content of the Standard, and the guidance FRBH gives about it, are free of influence from anyone with something to gain.

Individual conflicts of interest are handled under the Conflict of Interest Policy. This Policy deals with pressures on the institution.

2. THE COMMITMENT

FRBH develops the Standard in the public interest. No contribution, relationship, commercial interest or personal position determines what the Standard requires. FRBH does not sell anything that conformity to the Standard depends on, and does not judge who meets it.

3. RISKS TO IMPARTIALITY, STATED PLAINLY

FRBH identifies the following pressures. Naming them is a condition of managing them.

3.1 Influence on the content of the Standard

A person or organization that would benefit from a particular requirement, or from the absence of one, may seek to shape the text.

3.2 Funding and contributions

FRBH is funded by contributions. A contributor may expect influence, or may be perceived to have it, whether or not any was sought.

3.3 Balance of participation

Development has drawn on occupational safety, industrial and systems engineering, emergency medical services, public health, public safety communications, corrections, the fire service and law enforcement. Organized labor has not been at the table. That is the most significant gap in the balance of participation and FRBH states it rather than leaving it to be discovered. It bears directly on at least one question the Standard leaves open, concerning what happens when an organization fails to act.



3.4 Commercial interests of participants

People who contribute to a standard often work in the field it governs. Some sell services into it. Contribution is valuable and is not disqualifying; undisclosed commercial interest is corrosive.

3.5 The boundary between free support and paid services

FRBH provides implementation guidance at no charge. Commercial implementation services exist in the same market, including services offered by entities connected to FRBH's founder. The boundary between general public-interest support and commercial advice has to be held explicitly.

3.6 Proprietary dependency

The Standard originated from an earlier framework that remains separately owned. A standard that can only be met by licensing a product owned by a connected party would not be a public standard at all.

4. SAFEGUARDS

4.1 Content

- The Board approves the text of the Standard. No individual, including the founder, may direct its content or hold any right of approval or veto over it.
- Anyone participating in development discloses interests under the Conflict of Interest Policy, and a person with an interest in a particular provision does not take part in deciding it.
- Comments on the Standard are received from any source at no charge and are considered on their merits, without regard to who submits them.

4.2 Funding

- No contribution influences the content of the Standard, confers any role in its development, or bears on any determination.
- No contribution is accepted that is conditioned on any provision of the Standard, on any position FRBH takes, or on any outcome.
- Contributions from organizations that participate commercially in the market the Standard affects are disclosed above the threshold published in the Revenue, Licensing and Mark Use Policy.
- FRBH monitors the composition of its support so that no single source is in a position to determine whether the organization continues.

4.3 Participation

- FRBH publishes the disciplines represented in development, and the gaps.
- Where a perspective is absent, FRBH says so in the Standard itself rather than presenting the result as fully balanced, and holds open the questions that perspective would answer rather than settling them without it.

4.4 The free-support boundary

- Technical assistance is general. FRBH does not evaluate an individual organization's conformity, does not advise an organization on its own program, and does not provide implementation consulting.
- FRBH neither endorses nor recommends any commercial provider of implementation services.
- Guidance issued by FRBH is not an authoritative interpretation of the Standard. No procedure for issuing interpretations exists, and FRBH says so rather than allowing guidance to acquire an authority it was never given.

4.5 Proprietary dependency

- Conformity to the Standard requires no purchase, license, subscription, instrument, training or service from FRBH or from anyone else.



- Before approving the Standard or any revision, the Board certifies in writing that full conformity can be achieved without licensing proprietary material owned by the founder, a director, an officer or an entity connected to any of them. Any person with such an interest is absent for that certification.
- Any dependency that emerges in practice is a matter for the Board to identify and remove.

4.6 Personnel

- The founder is permanently barred from any role in assessing, certifying or determining the conformity of any organization, and from any body that makes such determinations.
- Whether an entity in which the founder, a director or an officer holds an interest may ever hold a license, status or authorization under an FRBH scheme is governed by section 7.3 of the Revenue, Licensing and Mark Use Policy.

5. SEPARATION OF THE STANDARD FROM SUSTAINED FUNCTIONAL RESILIENCE

The Standard originated conceptually from Sustained Functional Resilience, an earlier framework owned by Wigfall Holdings, LLC, an entity connected to FRBH's founder. FRBH owns, maintains and publishes the Standard.

Sustained Functional Resilience, together with its instruments, measurement systems, parameter sets, curricula, credentialing and marks, is separately owned, is not owned by FRBH, is not part of the Standard, and is not required in order to conform to the Standard. Nothing in the Standard requires an organization to obtain, license or purchase any such material.

This separation is the single most important thing in this Policy. It is what makes the free standard actually free.

6. CONFORMITY AND ASSESSMENT

Conformity is determined by the organization implementing the Standard. Any organization may state that it conforms, at no cost, without a license and without permission from FRBH.

The Standard sets out requirements that a conformity assessment body would have to meet, including independent accreditation, competence, freedom from outcome-contingent fees, and independence from anyone connected to FRBH. FRBH publishes those requirements and has authorized no body. Publishing them before a market exists is deliberate: requirements written after a market has formed are written under pressure from the parties they govern.

FRBH makes no determination about any organization and adjudicates no dispute between an organization and any assessment body.

If FRBH authorizes assessment bodies in future

FRBH may in future authorize independent conformity assessment bodies to assess organizations against the Standard, subject to the requirements the Standard sets and to independent accreditation, and may charge those bodies for access to the scheme and for the right to use FRBH's marks. Nothing of the kind has commenced and no body has been authorized. This is stated here so that the position is on the record in advance rather than announced when there is money attached to it.

Four limits apply to anything of that kind, and they are the reason it can be done without compromising the Standard:

- No fee ever attaches to conformity. Any organization may conform to the Standard and state that it conforms at no cost, without a license and without permission. What could be charged for is the seal and third-party accredited status, which are additional to conformity and not a substitute for it.
- No public safety organization is charged by FRBH. Any fee is paid by the licensed body. An organization seeking assessment contracts with that body directly at that body's price, and FRBH takes no share of it.
- No fee is contingent on any outcome, no license is withdrawn because of a determination a licensed body has made, and fees are published on the same terms for every licensee with no negotiated rates.



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- FRBH takes no part in any individual determination and makes no finding about any assessed organization.

Whether an entity connected to the founder, a director or an officer may ever hold such a license, status or authorization is governed by section 7.3 of the Revenue, Licensing and Mark Use Policy.

7. FREE ACCESS

The text of the Standard is available at no charge, and free access is protected by the Articles of Incorporation. Stating conformity is free. No public safety organization is charged by FRBH for access to the Standard, for conformity, for self-declaration or for technical assistance. Anything published free remains free in the edition in which it was published.

8. DISCLOSURE

FRBH publishes the governance and financial information listed in the Governance Policy, discloses the intellectual property position of the Standard in the Standard itself, discloses the development status of the Standard including what has not yet been done, and discloses the interests of the founder in the governance materials and on its website.

9. CONCERNS ABOUT IMPARTIALITY

A concern that FRBH has not acted impartially may be raised with the Board through the Secretary, or under the Whistleblower Policy where the person raising it prefers. The Board considers the concern with any interested person absent, records the outcome, and responds to the person who raised it.

This applies to FRBH's own conduct. FRBH does not adjudicate complaints between other organizations.

10. REVIEW

The Board reviews this Policy when it reviews the Bylaws and at any time on the motion of a director, and reconsiders it before FRBH first grants any license, status or authorization under an FRBH scheme.