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The Evolution of School Operational Assistance (BOS) Fund Policies (2022–2026): A Comparative Analysis of Four Technical Guidelines Regulations

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ABSTRACT

The Indonesian government revised the technical guidelines for school operational assistance funds three times between 2023 and 2026. Schools must adjust to each revision while meeting reporting deadlines that stay the same. This study examines which provisions changed and which remained stable. It analyzes four ministerial regulations issued in 2022, 2023, 2025, and 2026 through comparative document analysis. It also reviews six recent empirical studies, including studies from East Java. The analysis uses three orders of policy change and the criteria of equity and responsiveness. The findings show a stable administrative core. Reporting schedules, penalties for late reports, spending prohibitions, and management principles remain almost identical across the four texts. Change concentrates in two areas. The performance-based component shifts its priorities in every regulation, and the 2026 regulation adds an affirmative fund for special regions. Spending ceilings also become more specific, especially for teacher honoraria. Recent studies show that schools document financial compliance more completely than learning outcomes, and that technical and staffing limits persist. The study concludes that schools bear a larger adaptation burden than the formal rules show. It recommends transition guidance, outcome indicators, and operator training that follows each revision.

ABSTRAK

Pemerintah merevisi petunjuk teknis dana bantuan operasional sekolah sebanyak tiga kali antara 2023 dan 2026. Sekolah harus menyesuaikan diri pada setiap revisi, sementara tenggat pelaporan tidak berubah. Penelitian ini menelaah ketentuan mana yang berubah dan mana yang bertahan. Penelitian ini menganalisis empat peraturan menteri yang terbit pada 2022, 2023, 2025, dan 2026 melalui analisis dokumen komparatif. Penelitian ini juga meninjau enam studi empiris terbaru, termasuk studi dari Jawa Timur. Analisis memakai tiga tingkat perubahan kebijakan serta kriteria pemerataan dan responsivitas. Hasil menunjukkan inti administratif yang stabil. Jadwal pelaporan, sanksi keterlambatan,

larangan penggunaan dana, dan prinsip pengelolaan nyaris sama di keempat naskah. Perubahan terpusat pada dua bidang. Komponen berbasis kinerja berganti prioritas pada setiap peraturan, dan peraturan 2026 menambahkan dana afirmasi untuk daerah khusus. Batas belanja juga makin rinci, terutama untuk honor guru. Studi terbaru menunjukkan sekolah mendokumentasikan kepatuhan keuangan lebih lengkap daripada hasil pembelajaran, dan keterbatasan teknis serta tenaga masih berlanjut. Penelitian ini menyimpulkan bahwa sekolah menanggung beban adaptasi yang lebih besar daripada yang tampak pada aturan formal. Penelitian ini merekomendasikan panduan masa transisi, indikator hasil, dan pelatihan operator setiap kali regulasi berubah.

INTRODUCTION

A special allocation fund for non-physical purposes, known as the Education Unit Operational Assistance Fund (Dana Bantuan Operasional Satuan Pendidikan or BOSP Fund), was established to support educational units in meeting their non-personnel operational costs (Ministry of Education, Culture, Research, and Technology [Kemendikbudristek], 2023). One component of the BOSP budget allocated to primary and secondary education is the School Operational Assistance Fund (Bantuan Operasional Sekolah or BOS Fund). The technical guidelines (juknis) regulate the eligibility criteria for fund recipients, allocation amounts, permissible expenditures, and school reporting procedures. Consequently, changes to these guidelines directly affect the responsibilities of school principals and treasurers.

In less than four years, the government issued four versions of the technical guidelines. Minister of Education, Culture, Research, and Technology Regulation No. 63 of 2022 established the initial framework (Kemendikbudristek, 2022). Regulation No. 63 of 2023 subsequently amended several of its provisions (Kemendikbudristek, 2023). Minister of Primary and Secondary Education Regulation No. 8 of 2025 revoked both previous regulations (Ministry of Primary and Secondary Education [Kemendikdasmen], 2025). Subsequently, Regulation No. 8 of 2026 revoked the 2025 regulation (Kemendikdasmen, 2026). Each regulatory transition requires schools to adjust their activity and budget plans, funding categories, and expenditure limits. Recent studies have documented the resulting impacts. Pertiwi et al. (2026) identified delays in information dissemination at the beginning of the fiscal year and difficulties in adapting to system updates. Waas et al. (2026) demonstrated that the 2024 allocations were based on the 2023 regulations, while subsequent arrangements changed under the 2025 regulations.

Previous studies have primarily examined fund effectiveness or the implementation of digital applications at the school level. Studies conducted in Surabaya, Tulungagung, and Sidoarjo have identified issues related to budget accuracy, data-entry workloads, and limited operator capacity (Mulya & Rahaju, 2021; Rizkiyah et al., 2026; Suwarno & Musafik, 2022). A systematic review of seven sources categorized the findings into three themes: learning quality, infrastructure, and governance (Theoline et al., 2025). Based on the authors' literature search, no previous article has systematically compared the texts of the 2022, 2023, 2025, and 2026 technical guidelines in chronological order. This research gap is significant because policymakers and schools still lack a clear overview of which regulatory provisions remain consistent and which have undergone changes.

This article addresses that gap through three main contributions. First, it systematically maps the changes across the four regulatory documents. Second, it classifies these changes using Hall's (1993) framework of policy change. Third, it connects the identified regulatory changes with implementation barriers reported in empirical studies. Three research questions guide this study: What substantive changes have occurred across the regulatory documents? Which provisions have remained stable and which have changed according to Hall's levels of policy change? How are these changes associated with implementation barriers reported in empirical studies conducted between 2021 and 2026?

LITERATURE REVIEW

Levels of Policy Change

Hall (1993) distinguishes three levels of policy change. First-order change involves adjustments to existing policy settings or instruments, such as modifying threshold values. Second-order change refers to the replacement of existing policy instruments or techniques. Third-order change involves a shift in policy objectives and the hierarchy of goals. Hall originally developed this framework to analyze British economic policy. This article applies it as a classification tool for administrative regulations. The framework helps distinguish technical adjustments from broader shifts in policy direction.

Evaluation and Implementation Criteria

Effectiveness, efficiency, adequacy, equity, responsiveness, and appropriateness are the six criteria proposed by Dunn (2018) for policy evaluation. This study uses

responsiveness and equity as its main reference points. These two aspects are reflected in several recent regulatory improvements, particularly those concerning the treatment of special regions and adjustments to accommodate school needs. Edwards III (1980) identifies four key components of successful policy implementation: bureaucratic structure, communication, resources, and implementer attitudes. Pertiwi et al. (2026) employed this model to evaluate the implementation of the BOS Fund in West Jakarta. This model is relevant because regulatory changes primarily test the effectiveness of communication and the availability of resources.

Empirical Studies on BOS Fund Management

Mulya and Rahaju (2021) evaluated BOS Fund management in primary schools in Surabaya using Dunn's evaluation criteria. They found that fund management had not fully met budgetary principles, particularly in terms of accuracy and transparency. In Tulungagung, Suwarno and Musafik (2022) reported difficulties in preparing detailed reports on fund utilization. Large data volumes resulted in inefficient use of time, inaccurate data, and human errors. Rizkiyah et al. (2026) examined the implementation of ARKAS (School Activity and Budget Planning Application) at SDN Pepelegi 2 in Sidoarjo. Through integration with Dapodik, the Education Report Card, and SIPLah, the application improved the effectiveness of data-driven planning and accelerated reporting processes. Nevertheless, technological constraints and limited operator capacity remained significant challenges.

Recent studies conducted outside East Java provide similar findings. Pertiwi et al. (2026) reported that most reporting activities complied with the procedures and timelines stipulated in the 2025 regulation; however, network disruptions and difficulties adapting to system updates hindered implementation. Waas et al. (2026) identified an imbalance between organizational capacity and data utilization capacity in two schools receiving BOS Performance Funding. Theoline et al. (2025) concluded that the BOS Fund contributes to learning processes and educational infrastructure, although regional disparities and weaknesses in reporting accountability remain evident. These studies did not systematically compare the regulatory documents in chronological order. This article complements the existing literature by addressing this aspect.

RESEARCH METHOD

This study employs a qualitative approach with a library research design. The design combines policy document analysis (Bowen, 2009) with a focused literature review. No primary data were collected directly from schools.

Research Objects and Data Sources

The research objects consist of four technical guideline documents, as presented in Table 1. The authors examined the primary regulatory documents obtained from official legal databases, namely peraturan.go.id and the Legal Documentation and Information Network (JDIH) of the Indonesian Audit Board (BPK). The authors also consulted regulatory status records in the BPK database to verify the sequence of regulatory revocations.

The second data source consists of journal articles. The authors searched Google Scholar and open-access journal portals using the keywords "BOS Fund", "BOSP", "BOS Performance Funding", "ARKAS", "RKAS", "technical guidelines", and "Minister of Primary and Secondary Education Regulation". The inclusion criteria covered articles published between 2021 and 2026, discussions on BOS Fund management or its applications, empirical findings or research syntheses, and studies conducted in East Java or referring to the 2023–2025 regulatory documents. Six studies met these criteria. This search was focused in nature and did not follow a systematic review protocol. Therefore, the findings do not represent the entire body of relevant literature.

Table 1

Corpus of BOSP Fund Technical Guidelines Analyzed

Regulatory Document	Date of Stipulation	Promulgation or Effective Date	Status
Minister of Education, Culture, Research, and Technology Regulation No. 63 of 2022 concerning Technical Guidelines for BOSP Fund Management	23 Des 2022	Promulgated on December 28, 2022; State Gazette 2022/1342	Revoked by Regulation No. 8 of 2025
Minister of Education, Culture, Research, and Technology Regulation No. 63 of 2023 (amendment to Regulation No. 63 of 2022)	27 Des 2023	Promulgated on December 28, 2023; State Gazette 2023/1045	Revoked together with Regulation No. 63 of 2022 by Regulation No. 8 of 2025
Minister of Primary and Secondary Education Regulation No. 8 of 2025 concerning Technical Guidelines for BOSP Fund Management	9 Mei 2025	Promulgated on May 14, 2025; State Gazette 2025/325	Revoked by Regulation No. 8 of 2026
Minister of Primary and Secondary Education Regulation No. 8 of 2026 concerning Technical Guidelines for BOSP Fund Management	5 Feb 2026	Effective February 6, 2026	In force

Source: primer script on peraturan.go.id and JDIH BPK.

Analytical Procedures

The analysis was conducted in four steps. First, the authors examined all four regulatory documents in their entirety, including accessible appendices. Second, the authors developed a comparative matrix covering eight dimensions: funding categories, Performance funding types and criteria, Performance funding components, expenditure limits, minimum funding thresholds, reporting and sanctions, management applications, and management teams. Third, each dimension was coded as unchanged, modified, added, or removed, and the identified changes were classified according to Hall's (1993) three levels of policy change. Fourth, findings from empirical studies were synthesized thematically and mapped against the results of the comparative matrix.

This study has one technical limitation. The appendix detailing the components of Regular BOS funding in Minister of Education, Culture, Research, and Technology Regulation No. 63/2022 was unreadable in the available copy. Consequently, the comparison of Regular BOS components was limited to the 2025 and 2026 regulatory documents.

RESULT AND DISCUSSION

Regulatory Timeline: 2022–2026

Figure 1 illustrates the chronological sequence of the four regulatory documents. Minister of Primary and Secondary Education Regulation No. 8 of 2025 was stipulated on May 9, 2025, and promulgated on May 14, 2025 (Kemendikdasmen, 2025). This regulation was issued more than four months after the fiscal year had begun. Schools that had prepared their initial budget plans for 2025 based on the previous regulation may therefore have been required to revise those plans. Minister of Primary and Secondary Education Regulation No. 8 of 2026 was stipulated on February 5, 2026, and came into effect on February 6, 2026 (Kemendikdasmen, 2026). This regulation was issued at the beginning of the fiscal year. Both new regulations also updated the legal basis for non-physical special allocation funds. The 2023 and 2025 regulations referred to Minister of Finance Regulation No. 204/PMK.07/2022 (Ministry of Finance, 2022), whereas the

2026 regulation refers to Minister of Finance Regulation No. 119 of 2025 (Ministry of Finance, 2025).

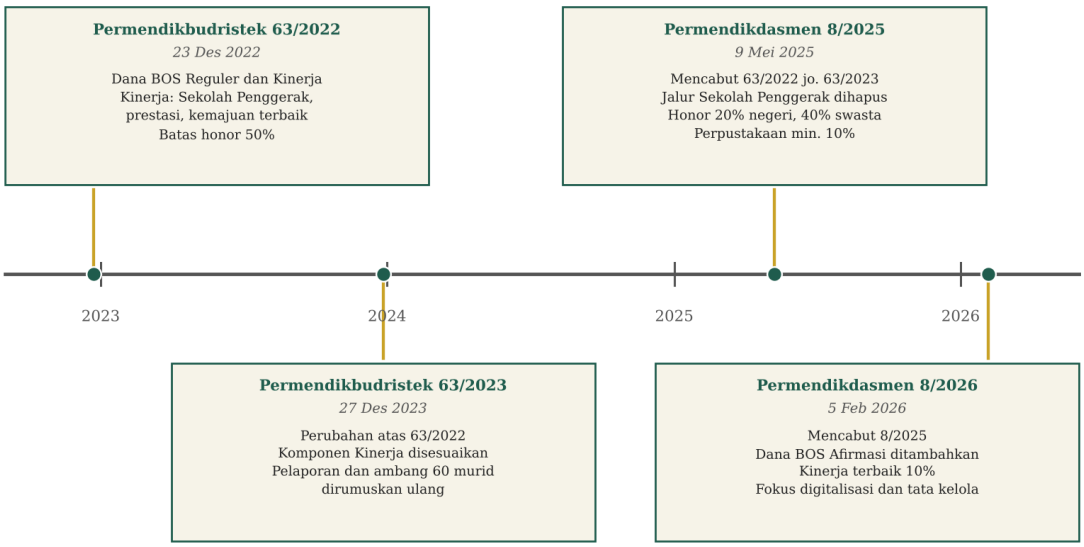


Fig 1. Regulatory Timeline of the BOSP Fund Technical Guidelines (2022–2026) and Their Major Changes
Source: Authors' analysis of the primary regulatory documents.

Stable Administrative Provisions

Table 2 shows that the administrative provisions have remained largely unchanged. First, the reporting deadlines have remained consistent. Phase I reports must be submitted no later than July 31, while complete reports must be submitted no later than January 31 of the following year. In addition, penalties for late submission remain in the form of payment reductions ranging from 2% to 4%. Schools that fail to submit their reports by the specified deadline are ineligible for subsequent fund disbursements. Third, fund management continues to operate through application systems provided by the Ministry. The main bodies of the three regulatory documents do not explicitly mention the names ARKAS or SIPLah. Fourth, management principles, the list of prohibited expenditures, and the composition of management teams remain unchanged. Fifth, the minimum funding eligibility threshold of 60 students has applied to special education schools (SLB), integrated schools, and educational units in special regions since 2023.

This stability provides a degree of certainty for school treasurers. However, it also means that the administrative reporting burden has not decreased despite changes in

expenditure components. Pertiwi et al. (2026) found that administrative workloads remain substantial and that technical constraints frequently hinder the reporting process.

Table 2

Substantive Comparison of BOS Fund Technical Guidelines Across Four Regulatory Documents

Dimension	63/2022	63/2023	8/2025	8/2026
BOS Funding Categories	Regular; Performance	Regular; Performance	Regular; Performance	Regular; Performance; Affirmative
Performance Funding Types	Sekolah Penggerak (School Transformation Program); achievement; greatest improvement	Same as 63/2022	Achievement; highest performance (Sekolah Penggerak pathway removed)	Achievement; highest performance
Threshold for Schools with the Greatest Improvement or Highest Performance	Top 15% based on the National Assessment	No change	Top 15% (National Assessment and/or participation in priority programs)	Top 10% (educational unit assessment)
Components of Highest-Performing Schools Funding	New educational paradigm learning; data-driven planning	Merdeka Curriculum learning; data-driven planning	Deep learning; coding and artificial intelligence	Literacy and numeracy; digitalization of learning; governance
Honorarium Expenditure Limit (Regular BOS)	Maximum 50%	No change	Maximum 20% for public schools; 40% for private schools	Maximum 20% for public schools; 40% for private schools
Library and Maintenance Expenditures	No percentage specified in the main body of the regulation	No change	Minimum 10% for libraries; maximum 20% for maintenance	Minimum 10% for libraries; maximum 20% for maintenance
Minimum Funding Threshold of 60 Students	Special education schools (SLB), including SDLB, SMPLB, and SMALB; integrated schools; special regions	Special education schools; integrated schools; special regions	Same as 63/2023	Same as 63/2023
Reporting and Sanctions	Deadlines: July 31 and January 31; disbursement reduction of 2–4%	Deadlines unchanged; the basis for Phase I and Phase II disbursements was reformulated	Same deadlines and sanctions	Same deadlines and sanctions

Source: Authors' analysis of the primary regulatory documents.

Areas of Regulatory Change

The first change concerns the funding structure and equity. The 2022, 2023, and 2025 regulations only covered Regular BOS and Performance BOS funding. The 2026 regulation introduced Affirmative BOS funding (BOS Afirmasi) for educational units in special regions (Kemendikdasmen, 2026). Affirmative BOS funding components include measures to improve educational access, such as utility and service subscriptions, transportation for students and teachers, and sanitation and clean water facilities. These components also include measures to improve educational quality, such as training, reading corner services, and learning activities. Based on Dunn's (2018) equity criterion, this change addresses the regional disparities reported by Theoline et al. (2025). However,

the authors' literature search found no empirical studies examining the implementation of Affirmative BOS funding under the 2026 regulation. Therefore, its effects cannot yet be evaluated.

The second change concerns Performance BOS funding. The priorities of this funding category have shifted across successive regulations. The 2022 regulation included funding pathways for Sekolah Penggerak (School Transformation Program), school achievements, and schools demonstrating the greatest improvement. The 2025 regulation eliminated the Sekolah Penggerak pathway and introduced a pathway based on participation in the Ministry's priority programs. The 2026 regulation lowered the threshold for the highest-performing schools from 15% to 10%. It also changed the basis of performance assessment from the national assessment to educational unit assessments. Eligible expenditure components have also changed. The 2022 and 2023 regulations emphasized learning under the new educational paradigm or the Merdeka Curriculum. The 2025 regulation prioritized deep learning, coding, and artificial intelligence. Meanwhile, the 2026 regulation emphasized literacy and numeracy, digitalization of learning, and strengthened governance. The achievement-based funding pathway has remained relatively stable.

The third change concerns expenditure limits (Figure 2). The 2022 regulation limited honorarium payments for non-civil servant teachers (non-ASN) to a maximum of 50% of Regular BOS funding, without distinguishing between public and private schools. The 2025 and 2026 regulations established maximum limits of 20% for public schools and 40% for private schools. Both regulations also require schools to allocate at least 10% of Regular BOS funding to libraries and book procurement, while limiting infrastructure maintenance expenditures to a maximum of 20%. The eligibility requirements for honorarium recipients remain unchanged. Eligible teachers must be non-ASN personnel, registered in Dapodik, possess a Unique Educator and Education Personnel Identification Number (NUPTK), and not receive professional teacher allowances. The differentiated expenditure limits for public and private schools acknowledge differences in their cost structures. Public schools that previously allocated more than 20% of their BOS funding to honorarium payments must identify alternative funding sources.

The fourth change is reflected in the regulatory appendices. Based on the lists of eligible activities examined by the authors, Appendix I of the 2026 regulation includes the procurement of digital learning platforms and training for the implementation of digitalized learning. The list of professional development activities in the 2025 regulation

included competency development in goods and services procurement, whereas the 2026 list no longer explicitly mentions this activity. The 2026 appendix also explicitly refers to students with special needs in several components, including data collection during new student admissions and learning activities. These changes increase the demand for digital competencies among school personnel. Recent studies indicate that the capacity of school operators remains limited (Pertiwi et al., 2026; Rizkiyah et al., 2026).

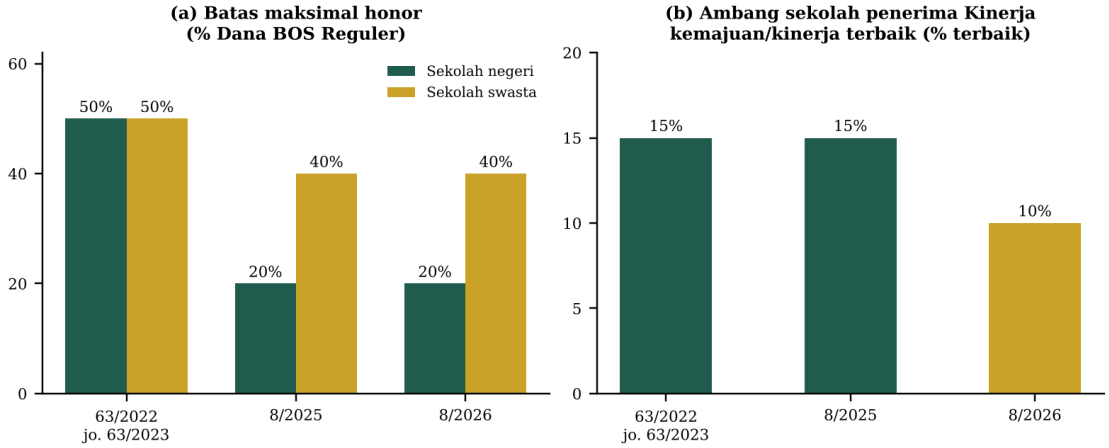


Fig 2. Changes in Two Policy Parameters: (a) Honorarium Expenditure Limits; (b) Highest-Performance Thresholds. Source: Authors' analysis of the primary regulatory documents. Regulation No. 63 of 2023 did not amend either parameter.

Classification of Policy Changes According to Hall

Table 3 shows that policy changes occurred at the first and second levels, while no third-order changes were identified. Article 2 of the 2022, 2025, and 2026 regulations contains the same management principles: flexibility, effectiveness, efficiency, accountability, and transparency. The considerations underlying the 2025 and 2026 regulations also provide similar justifications for replacing previous regulations, namely that the existing regulations no longer align with evolving developments and legal requirements. The 2026 regulation additionally introduces references to affirmative policies for special regions. Thus, the overall policy direction remains focused on access and quality, while the instruments used to achieve these objectives have changed.

Tabel 3
Klasifikasi Perubahan Juknis Menurut Tiga Tingkat Hall (1993)

Level	Form of Change	Regulatory Documents
First-order (Policy Settings)	The highest-performance threshold decreased from 15% to 10%; the honorarium expenditure limit changed from 50% to 20% for public schools and 40% for private schools; minimum library allocation and maximum maintenance expenditure limits were introduced.	8/2025; 8/2026
Second-order (Policy Instruments)	Removal of the Sekolah Penggerak (School Transformation Program) pathway; introduction of Affirmative BOS funding (BOS Afirmasi); replacement of the National Assessment with educational unit assessments as the basis for performance evaluation; changes to Performance funding components.	63/2023; 8/2025; 8/2026

Level	Form of Change	Regulatory Documents
Third-order (Policy Objectives)	No changes identified; management principles and the rationale for replacing previous regulations remained consistent.	2022-2026

Source: Authors' analysis using Hall's (1993) framework.

Regulatory Changes and Implementation Barriers

Table 4 summarizes the empirical studies analyzed in this research. Three patterns are related to the findings discussed above. The first pattern concerns communication of regulatory changes. Pertiwi et al. (2026) identified delays in information dissemination at the beginning of the fiscal year and differences in understanding among schools. Local education offices also acknowledged synchronization delays when central government technical guidelines were revised unexpectedly. With four regulatory documents issued in less than four years, this risk is likely to recur. The second pattern concerns operator capacity. Studies conducted in Sidoarjo and Tulungagung reported technical difficulties, data-entry workloads, and human errors (Rizkiyah et al., 2026; Suwarno & Musafik, 2022). Since the core reporting requirements remain unchanged, these challenges persist even when expenditure components are revised. The third pattern concerns outcome documentation. Waas et al. (2026) found that two schools documented expenditure realization and activity completion more systematically than changes in learning practices.

These patterns are consistent with the assumption that the programmatic layer changes more rapidly than the control layer. Each regulation revises Performance BOS priorities. However, schools remain subject to the same reporting obligation, namely submitting reports on fund utilization. Consequently, schools have clear incentives to maintain financial compliance but weaker incentives to document outcomes. This explanation is interpretative in nature. Existing studies have not empirically tested the causal relationship between regulatory changes and the quality of fund management.

The East Java context demonstrates similar patterns across three types of geographical settings: a major city (Surabaya), a peri-urban area (Sidoarjo), and a regency (Tulungagung). These studies did not specifically focus on the differences among the 2022, 2025, and 2026 regulatory documents. Therefore, the effects of the most recent regulatory changes on schools in East Java require further investigation.

Tabel 4
Synthesis of the Empirical Studies Analyzed

Study	Location and Research Design	Relevant Findings
Mulya & Rahaju (2021)	Surabaya; qualitative literature review using Dunn's policy evaluation criteria	Fund management has not fully met budgetary principles, particularly accuracy and transparency.
Suwarno & Musafik (2022)	Tulungagung, two schools; case study of the RKAS application	Large data volumes result in inefficient use of time, inaccurate data, and unintentional errors.
Rizkiyah et al. (2026)	Sidoarjo, SDN Pepelegi 2; ARKAS case study	Planning efficiency and reporting speed improved; however, technical constraints and limited operator capacity remain.
Pertiwi et al. (2026)	West Jakarta, Kalideres; qualitative case study involving six informant categories, May–August 2025	Most reporting activities complied with the 2025 regulations; however, information delays, network disruptions, and difficulties adapting to system updates hindered implementation.
Waas et al. (2026)	Ambon, two primary schools; multisite case study involving 10 informants	Expenditure realization was documented more systematically than changes in learning practices; organizational capacity and data utilization capacity were unbalanced.
Theoline et al. (2025)	Systematic review of seven sources covering 2015–2025	The BOS Fund contributes to learning processes and educational infrastructure; however, regional disparities and reporting accountability remain problematic.

Source: Compiled by the authors based on the respective studies.

Policy Implications

The findings lead to three policy implications. First, the Ministry could issue transitional guidelines explaining which provisions have changed and which remain unchanged. These guidelines would be particularly useful when regulations are issued after the fiscal year has already begun, as occurred in May 2025. Second, reporting requirements could incorporate simple outcome indicators for Performance BOS activities, ensuring that outcome documentation does not depend solely on individual school initiatives. Third, operator training should accompany every regulatory revision. Such training should include competencies in goods and services procurement, which are no longer explicitly listed as examples of eligible activities in Appendix I of the 2026 regulation.

CONCLUSION

This article analyzes changes in the technical guidelines for the School Operational Assistance Fund (BOS Fund) across four regulatory documents issued between 2022 and 2026. The findings address the three research questions. First, substantive changes are concentrated in the funding structure, Performance BOS criteria and components, and expenditure limits. The 2026 regulation introduced Affirmative BOS funding (BOS Afirmasi), lowered the threshold for the highest-performing schools to 10%, and shifted priorities toward literacy, numeracy, digitalization of learning, and governance. The 2025 regulation changed the honorarium expenditure limit from 50% to 20% for public schools

and 40% for private schools. Second, the core administrative provisions have remained stable. Reporting deadlines, penalties for late submission, management principles, and expenditure restrictions are nearly identical across the regulations. According to Hall's (1993) framework, the changes occurred at the first and second levels, while the overall policy objectives remained unchanged. Third, recent empirical studies indicate that challenges related to communication, operator capacity, and outcome documentation persist despite regulatory changes. Studies conducted in Surabaya, Sidoarjo, and Tulungagung reveal similar patterns.

The article's contribution lies in its comparative mapping of regulatory provisions, identifying which aspects have remained stable and which have undergone changes. This mapping helps schools and local education offices focus their dissemination efforts on provisions that have actually changed. This study has several limitations. The literature search was focused rather than systematic, the 2022 regulatory appendix was not fully accessible, and the interpretation did not establish causal relationships. Future research could examine the implementation of Affirmative BOS funding, assess the effects of the 2025 transition period on school budget preparation, and conduct a systematic review using an established protocol. Policymakers can follow up on these findings by providing transitional guidelines, incorporating outcome indicators into Performance BOS reporting, and ensuring that operator training accompanies every regulatory revision.

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