SELF-EVALUATION REPORT ON IMF CODE OF GOOD PRACTICES ON TRANSPARENCY IN MONETARY AND FINANCIAL POLICIES

I. CLARITY OF ROLES, RESPONSIBILITIES, AND OBJECTIVES OF CENTRAL BANKS FOR MONETARY POLICY

1.1 The ultimate objective(s) and institutional framework of monetary policy should be clearly defined in relevant legislation or regulation, including, where appropriate, a central bank law.

The ultimate objectives for U.S. monetary policy are clearly defined in central bank law (the Federal Reserve Act, as amended). All U.S. laws are published.

The institutional responsibilities of the Board of Governors, the Federal Open Market Committee, and the Federal Reserve Banks, and their respective rights to use the various tools of monetary policy, are spelled out in the Federal Reserve Act, as amended.

The procedures for appointment and the terms of office for members of the Board are specified in legislation. By law, the President of the United States may remove members of the Board, but only "for cause." The appointment process for directors and presidents of Federal Reserve Banks is also specified in the Federal Reserve Act.

The monetary policy decisions of the Federal Reserve are not subject to override by other agencies of the government absent a change in the law.

The Federal Reserve Act, as amended, requires semiannual reports by the Board of Governors and testimony by its Chairman on the Federal Reserve's conduct of monetary policy.

Institutional responsibility for U.S. exchange rate policy is specified in legislation, regulation, and other documents. Decisions on foreign exchange intervention generally are the responsibility of the executive branch. In reaching such decisions, the Treasury traditionally has consulted with the Federal Reserve. Foreign exchange intervention is publicly disclosed through written reports to Congress and government documents.

1.2 The institutional relationship between monetary and fiscal operations should be clearly defined.

The institutional responsibilities for monetary and fiscal operations are defined and publicly disclosed in legislation.

The Federal Reserve Act gives the Federal Reserve responsibility for conducting monetary policy. By law, the Federal Reserve's budget is not subject to Congressional appropriations. The disposition of its earnings and the manner in which central bank capital is maintained are publicly disclosed. The Federal Reserve does not have statutory authority to extend credit to the government. The Federal Reserve is not permitted to participate in the primary markets for government securities, except to roll over existing holdings. Its authority to conduct operations in the secondary market for government securities is specified in law, and such operations are publicly disclosed.

Fiscal policy is clearly the province of the Congress and the President, since according to the U.S. Constitution no federal expenditures may be made or revenues raised in the absence of a law passed by the Congress and signed by the President.

1.3 Agency roles performed by the central bank on behalf of the government should be clearly defined.

Agency roles performed by the Federal Reserve Banks on behalf of the government are clearly defined in the Federal Reserve Act.

The Federal Reserve System has no significant formal responsibilities as advisor to the government. However, Board members have regular contact with members of the executive branch and members of the Congress on matters of economic and financial policy.

II. OPEN PROCESS FOR FORMULATING AND REPORTING MONETARY POLICY DECISIONS

2.1 The framework, instruments, and any targets that are used to pursue the objectives of monetary policy should be publicly disclosed and explained.

The institutional framework for monetary policy is established in the Federal Reserve Act. The instruments and targets used to pursue monetary policy objectives are publicly disclosed in Federal Reserve documents, including written reports to Congress, and through public appearances by officials before Congress.

Eligibility for discount window credit is specified in the Federal Reserve Act. The Federal Reserve Act requires that transactions in U.S. Government securities, which currently are the principal means of implementing U.S. monetary policy, take place in the open market. Public documents specify the requirements that must be met to qualify as counterparties in open market operations, and the list of those counterparties ("primary dealers") is publicly disclosed.

2.2 Where a permanent monetary policymaking body meets to assess underlying economic developments, monitor progress toward achieving its monetary policy objective(s), and formulate policy for the period ahead, information on the composition, structure, and functions of that body should be publicly disclosed.	By statute, the Federal Open Market Committee (FOMC) is responsible for overseeing open market operations, the principal means of implementing monetary policy. The Federal Reserve Act establishes the composition of the FOMC. By law, the FOMC must meet at least four times each year. By recent practice, the FOMC meets eight times a year, at intervals of five to eight weeks. Late each year, a schedule is prepared for FOMC meetings in the upcoming year and released to the public. The Board of Governors has separate monetary policy responsibilities—setting reserve requirements and reviewing and
	determining recommendations for discount rate changes made by the Reserve Banks. These responsibilities are set out in law, and the use of these tools is described in detail in separate Federal Reserve documents, including official regulations that are published in the Federal Register. In addition to the publication of the Federal Reserve Act, which
	establishes these bodies, their composition, structure, and
2.3 Changes in the setting of monetary policy instruments (other than fine-tuning measures) should be publicly announced and explained in a timely manner.	functions are described in detail in Federal Reserve publications. Following each regularly scheduled FOMC meeting, the stance of monetary policy is announced immediately through a press release, which is also made available on the web site. The announcement also provides a brief discussion of the main considerations that led to the policy decision and indicates how the Committee assesses the risks of heightened inflation pressures or economic weakness in the foreseeable future. A detailed summary of the discussions at FOMC meetings is contained in the meeting minutes, which are released shortly after the following meeting. Monetary policy decisions are also explained in the semiannual Monetary Policy Reports to the Congress. Transcripts of meetings are released to the public after five years.
2.4 The central bank should issue periodic public statements on progress toward achieving its monetary policy objective(s) as well as prospects for achieving them. The arrangements could differ depending on the monetary policy framework, including the exchange rate regime.	By law, the Federal Reserve must provide a semiannual report and accompanying testimony to the Congress on monetary policy.
2.5 For proposed substantive technical changes to the structure of monetary regulations, there should be a presumption in favor of public consultations, within an appropriate period.	The Administrative Procedures Act calls for a public comment period of no less than thirty days on proposed substantive changes to regulations, with no less than thirty days before new regulations take effect.
2.6. The regulations on data reporting by financial institutions to the central bank for monetary policy purposes should be publicly disclosed.	Requirements for data reporting by financial institutions are provided to the Federal Government's Office of Management and Budget, which in turn submits them to the Congress. Reporting forms are contained on the Board's public web site.
III. PUBLIC AVAILABILIT	Y OF INFORMATION ON MONETARY POLICY

3.1. Presentations and releases of central bank data should meet the standards related to coverage, periodicity, timeliness of data and access by the public that are consistent with the International Monetary Fund's data dissemination standards.	Presentations of central bank data are consistent with the International Monetary Fund's Special Data Dissemination Standards and General Data Dissemination Standards.
3.2. The central bank should publicly disclose its balance sheet on a preannounced schedule and, after a predetermined interval, publicly disclose selected information on its aggregate market transactions.	The Board of Governors is required by law to publish once each week a balance sheet for each Reserve Bank and a consolidated balance sheet for all twelve Reserve Banks. More detailed Federal Reserve balance sheets are publicly disclosed on an annual basis. For many private sector-like transactions, the Federal Reserve adheres to Generally Accepted Accounting Principles (GAAP). The Federal Reserve's accounting standards for central bank-unique transactions are based on the GAAP concept of providing useful and relevant information to the users of financial statements. The Federal Reserve publicly discloses information on its aggregate market transactions. Data on open market transactions, by type, maturity, and month are published in the monthly Federal Reserve Bulletin and the Board of Governors' Annual Report. Data on the volume of open market operations are released to wire services on a daily basis. Foreign exchange
	interventions during a calendar quarter are reported during the following quarter. Aggregate information on routine credit extensions at the discount window, as well as any emergency support, is available each week from the Federal Reserve's balance sheet.
3.3 The central bank should establish and maintain public information services.	The Federal Reserve maintains an active public information service. By law, it must publish an Annual Report. It also publishes a monthly Bulletin, maintains an extensive web site, and publishes numerous staff studies and statistical releases. Policymakers frequently give speeches and testimonies in which they explain their views on the economic situation and monetary policy. Policymakers and staff, including those in public affairs offices, respond to inquiries from the press and the public.
3.4 Texts of regulations issued by the central bank should be readily available to the public.	Texts of regulations issued by the Federal Reserve are readily available to the public. Copies of individual regulations are available, free of charge, from the Board's Publications Services Section, and online from the Government Printing Office. The Board also publishes the Federal Reserve Regulatory Service (FRRS), which contains all Board regulations as well as authorizing statutes, policy statements, interpretations, and staff commentaries and opinions. FRRS is updated monthly, and available in loose-leaf volumes or on CD-ROM, by subscription. The four parts of FRRS are also published separately as
IV. ACCOUNTABILITY AND ASS	handbooks and are also available monthly. SURANCES OF INTEGRITY BY THE CENTRAL BANK

4.1 Officials of the central bank should be available to appear before a designated public authority to report on the conduct of monetary policy, explain the policy objective(s) of their institution, describe their performance in achieving their objective(s), and, as appropriate, exchange views on the state of the economy and the financial system.

The Chairman of the Federal Reserve Board testifies before the Congress when presenting the semiannual monetary policy report. The Chairman and other officials frequently testify before the Congress on other matters.

4.2 The central bank should publicly disclose audited financial statements of its operations on a preannounced schedule.

The Federal Reserve publishes audited financial statements in its annual report. In addition, the Board's office of Inspector General produces internal audit reports, which are delivered to the Congress and then made public. Other aspects of internal governance procedures, such as ethics rules, are public as well.

4.3 Information on the expenses and revenues in operating the central bank should be publicly disclosed annually.

Information on the expenses and revenues in operating the Federal Reserve are publicly disclosed on an annual basis through written reports submitted to Congress and documents that are available upon request from the Federal Reserve.

4.4 Standards for the conduct of personal financial affairs of officials and staff of the central bank and rules to prevent exploitation of conflicts of interest, including any general fiduciary obligation, should be publicly disclosed.

Federal law and regulation, as well as Federal Reserve policies, establish standards for the conduct of personal financial affairs of officials and staff of the Federal Reserve as well as rules to prevent conflicts of interest.

V. CLARITY OF ROLES, RESPONSIBILITIES, AND OBJECTIVES OF FINANCIAL AGENCIES RESPONSIBLE FOR FINANCIAL POLICIES

5.1 The broad objective(s) and institutional framework of financial agencies should be clearly defined, preferably in relevant legislation or regulation.

The broad objectives, responsibilities and modalities for accountability for each of the five financial agencies are defined in federal legislation, and in the agencies' regulations. The relevant legislation and regulations also specify procedures for appointment, term of office, and in most cases, general criteria for removal of heads and members of the governing bodies. Since the objectives, roles, and responsibilities are written into federal legislation, they are disclosed to the public in the *United States Code*. Regulations are published in the *Federal Register* upon adoption, and subsequently codified in the *Code of Federal Regulations*. Accountability is further enhanced by Congressional oversight, audit by the Government Accounting Office (GAO), and statutorily mandated Inspector General (IG) offices. Agencies provide written reports and oral testimony to Congressional committees as appropriate.

The financial agencies make information broadly available to the public by maintaining websites, which contain information on the operation, history, mandate and objectives and other information relevant to the public and the institutions they regulate. Financial agencies are also governed by federal legislation that seeks to promote transparency and accountability throughout the U.S. government, including the Administrative Procedure Act, the Government in the Sunshine Act, and the Freedom of Information Act, which contribute to making the conduct of U.S. financial agencies among the most transparent in the world.

5.2 The relationship between financial agencies should be publicly disclosed.	The relationship among financial agencies is codified in both federal legislation and regulations, and is publicly disclosed as noted in 5.1 above. In some cases applicable legislation specifically requires cooperation with other financial regulators and other parts of the government (e.g., the Commodity Exchange Act). Additionally, agencies enter Memoranda of Understanding (MOU) to clarify overlapping areas of responsibility. Financial agencies share responsibility among themselves and with relevant state agencies for bank supervision and regulation and for deposit insurance regulation. Agencies coordinate formally through their practice of acting jointly in preparing regulations and statements of policy implementing common statutory mandates or addressing common supervisory concerns. The existence, composition and output of coordinating groups such as the President's Working Group on Financial Markets is also public.
5.3 The role of oversight agencies with regard	The Federal Reserve Board is the agency generally responsible
to payments systems should be publicly disclosed.	for oversight of payment and settlement systems. Its role, responsibilities, objectives, and modalities of accountability are defined in legislation, regulation, and policy statements and publicly disclosed as noted in 5.1 above. The general policy principles (including risk management policies) that relate to the stability of payment systems are also publicly disclosed via the same channels, including written reports to and public appearances before Congress, publications in the <i>Federal Register</i> , the <i>Federal Reserve Bulletin</i> and the Board's <i>Annual Report</i> , promulgation of international standards, and via the Federal Reserve Board website. The U.S. antitrust authorities generally have responsibility for competition issues in private sector payment systems.
5.4 Where financial agencies have oversight responsibilities for self-regulatory organizations (e.g. payment systems), the relationship between them should be publicly disclosed.	The SEC and the CFTC have oversight responsibility for self-regulating securities exchanges and markets and futures associations, respectively. The relationships between these agencies and the self-regulating organizations they oversee are defined in federal legislation and regulation and disclosed as in 5.1 above.

5.5 Where self-regulatory organizations are authorized to perform part of the regulatory and supervisory process, they should be guided by the same good transparency practices specified for financial agencies.

Self-regulatory organizations are subject to transparent rulemaking policies and processes, defined in legislation and regulations developed internally and in concert with the financial oversight agencies. For example, an exchange that wishes to register as a national securities exchange under Section 6 of the Securities Exchange Act must meet several demanding terms and conditions, including some that enhance transparency. An association of brokers and dealers (e.g. the National Association of Securities Dealers) that wishes to register as a national securities association under Section 15A of the Exchange Act must also meet demanding terms and conditions, including some which enhance transparency. These provisions require that the rules of an SRO assure, among other things, fair representation of its members, equitable allocation of reasonable dues and fees, and a fair procedure for disciplining members. Similar requirements apply to the authorization and oversight of markets with selfregulatory responsibilities and the futures associations that address oversight of industry professionals that are generally subject to the oversight of the CFTC. Its oversight reports are also public.

VI. OPEN PROCESS FOR FORMULATING AND REPORTING OF FINANCIAL POLICIES

6.1 The conduct of policies by financial agencies should be transparent, compatible with confidentiality considerations and the need to preserve the effectiveness of actions by regulatory and oversight agencies.

The conduct of policies of financial agencies is publicly disclosed and explained through a variety of media. Information that is publicly available includes the regulatory framework governing: the conduct of financial policies, financial reporting, operations of organized financial markets, the fee structure that agencies charge to financial institutions, and procedures for information sharing and consultation between financial agencies. Most of this information is publicly available on the websites of the various financial agencies. Where the regulatory framework is set out under federal statute or in federal regulations, information is made publicly accessible in the *United States Code* and the *Federal Register*. Additional information is also disclosed via written reports to or public appearances before Congress, and publication of official bulletins and other releases.

6.2 Significant changes in financial policies should be publicly announced and explained in a timely manner.

Financial agencies publicly announce significant changes in financial policies immediately in most cases. In many cases, prior public consultation is sought as in 6.4 infra. Changes are typically announced via press release which are subsequently posted on agencies' websites. Changes in policy that require a change in a federal statute or regulation are published in the *United States Code* or the *Federal Register*. Regulatory changes typically have an effective data of 30 days after publication in the Federal Register, although earlier effective dates may occur for good cause. Agencies occasionally provide for delayed effective dates. Information on changes may also be published in official agency publications, or described in public appearances before Congress.

6.3 Financial agencies should issue periodic public reports on how their overall policy objectives are being pursued.

Each of the financial agencies issues an annual report that is publicly available on the agencies' website. Most agencies issue a press release along with the annual report, and in some cases they are required to submit annual reports to Congress. For example, the Federal Reserve Board is required by law to make a full report of its operations to Congress annually, and the FDIC publishes a statutorily mandated Annual Report.

6.4 For proposed substantive technical changes to the structure of financial regulations, there should be a presumption in favor of public consultations, within an appropriate period.

Each agency provides for a period of public notice and comment before proposed substantive technical changes take place. Typically the length of the comment period is between one and three months. For more complex or controversial rule proposals the comment period may be extended one or more times. Regulations usually take effect from one to three months after the agency adopts a final rule.

VII. PUBLIC AVAILABILITY OF INFORMATION ON FINANCIAL POLICIES

7.1 Financial agencies should issue a periodic public report on the major developments of the sector(s) of the financial system for which they carry designated responsibility.

Each financial agency publishes an annual report, which includes information on the major developments of the sector(s) of the financial system for which they carry designated responsibility. These reports are made available on the agencies' websites. In addition, agencies issue reports more frequently. For example:

- the CFTC publishes reports on economic and regulatory issues or market events that are of interest to regulators and the public (e.g. competitiveness studies and specific data on emerging markets and over-the-counter markets);
- the FDIC publishes six separate periodic reports on major developments of various sectors of the financial system, current issues of which are all available on the FDIC website;
- the Federal Reserve Board publishes the *Federal Reserve Bulletin* monthly, which includes new data and reports and analyses on economic and financial developments;
- the SEC regularly comments on major developments in the securities markets in the context of rule releases, special studies, Congressionally-mandated reports, and the examination of such SEC-registered entities as broker-dealers and exchanges; and
- the OCC publishes a quarterly report on the condition and performance of commercial banks which highlights key performance trends.

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7.2 Financial agencies should seek to ensure that, consistent with confidentiality requirements, there is public reporting of aggregate data related to their jurisdictional responsibilities on a timely and regular basis.

Each financial agency engages in public reporting of aggregate data related to its jurisdictional responsibility. In each case such data is available on the agency's website, and in some cases information is released to the public through other written reports to the public or to the legislature. Specific examples of such data released are as follows:

- the CFTC publishes on its website the capital, segregation and secured amount requirements for the most active brokers;
- the FDIC, as noted above, publishes numerous periodic reports containing aggregate data on various sectors of the financial system;
- the Federal Reserve provides aggregate data on assets, liabilities and profitability of commercial banks, and aggregate data on government securities dealers, finance companies, and mortgage markets;
- the OCC's *Quarterly Journal*, available on the agency's website, contains the above-noted condition report as well as other data on the financial performance of national banks; and
- the SEC annual reports contain information regarding key data related to its jurisdictional responsibilities, including the number of enforcement actions the SEC has instituted. The SEC also provides data to Congress as part of the appropriations process, and twice a year publishes a status report on the SEC's administrative proceeding caseload.

7.3 Where applicable, financial agencies should publicly disclose their balance sheets on a preannounced schedule and, after a predetermined interval, publicly disclose information on aggregate market transactions.

Where applicable, agencies publicly disclose their balance sheets on a preannounced schedule, and, after a predetermined interval, publicly disclose information on aggregate market transactions. The periodicity of such reports varies. For example, the Federal Reserve discloses its balance sheet weekly, the FDIC quarterly, and the OCC and SEC annually. The Federal Reserve releases data on the volume of open market operations each day to wire services, and publishes comprehensive statistics on a monthly basis. Wednesday levels and weekly averages of adjustment, seasonal, and extended credit (discount window borrowings) are published, as is the Wednesday level of total borrowing by Federal Reserve District. The FDIC presents data on the funds received by the Bank Insurance Fund and the Savings Association Insurance Fund (which are not obtained in open market transactions) through the "Executive Management Report and Unaudited Results of the FDIC" and the FDIC's Annual Report. The CFTC publishes a "commitments of traders" report showing the volume and open interest data on the positions of "large" traders (i.e., traders controlling positions which exceed a certain minimum level) in commodity futures and commodity options approximately every two weeks.

The Federal Reserve and FDIC publicly disclose aggregate information on emergency financial support. The Federal Reserve does so weekly in Federal Reserve Bank balance sheets. When the FDIC provides financial support to insured depositors of closed institutions or in the rare cases that it has provided emergency financial support to operating institutions suffering financial difficulties, it discloses the payment of such support immediately, either at the time the public is informed of the closing of a depository institution, or at the time payment is made to an operating institution.

7.4 Financial agencies should establish and maintain public information services.

All financial agencies maintain public information services whose function is to disseminate: policy decisions and policy announcements, information on the operating framework, targets, and objectives, texts of speeches by senior officials, data, research by staff, and to maintain contact with media representatives. In addition each agency maintains a website that includes the above-referenced information as well as other information specific to that individual agency.

All agencies publish a periodic report on their principal activities, typically annually and typically 3-9 months after the end of the relevant reporting period. In most cases, the agencies are required to do so by law. These reports are made available free of charge. Each agency also has a publications program which covers, in most cases, the agency's annual report, an official bulletin or review, research publications, speeches of officials, non-technical descriptions of the role and functions of the agency, and other material specific to the agencies. Cost of the publications varies.

Senior officials from each agency explain their institution's objective(s) and performance to the public through public appearances before Congress, public speeches, and media interviews. The texts of such comments are typically released to the media via press release and published on the agency's website.

7.5 Texts of regulations and any other generally applicable directives and guidelines issued by financial agencies should be readily available to the public.

Texts of regulations and other applicable directives and guidelines issued by financial agencies are generally published in the *Federal Register* when proposed, and upon adoption and thereafter, in the *Code of Federal Regulations*. Texts are also generally available on agencies' websites.

7.6 Where there are deposit insurance guarantees, policy-holder guarantees, and any other client asset protection schemes, information on the nature and form of such protections, on the operating procedures, on how the guarantee is financed, and on the performance of the arrangement, should be publicly disclosed.

There are two types of guarantees: the deposit insurance system administered by the FDIC, and the program to protect customer funds held by broker-dealers in the event of liquidation, which is administered by the Securities Investor Protection Corporation (SIPC). The FDIC publicly discloses information on the nature and form, operating procedures, financing, and performance of the deposit insurance system through a variety of media. These include: written reports to and public appearances before Congress, published reports, and the FDIC website. Consumer brochures are also distributed to and available in insured depository institution offices, and the FDIC provides telephone or e-mail service for case-specific or general advice.

SIPC administers the federal program designed to protect the funds of customers of broker-dealers in the event of liquidation, under the oversight of the SEC. Information on the nature and form, operating procedures, financing, and performance of this type of protection can be found through the SEC's and SIPC's publicly available information.

7.7 Where financial agencies oversee consumer protection arrangements (such as dispute settlement processes), information on such arrangements should be publicly disclosed.

All of the financial agencies oversee consumer protection arrangements, and publicly disclose information on these arrangements through a variety of media, including written reports to and public appearances before Congress, official publications, and their websites.

VIII. ACCOUNTABILITY AND ASSURANCES OF INTEGRITY BY FINANCIAL AGENCIES

8.1 Officials of financial agencies should be available to appear before a designated public authority to report on the conduct of financial policies, explain the policy objective(s) of their institution, describe their performance in pursuing their objective(s), and, as appropriate, exchange views on the state of the financial system.

Officials of certain financial agencies are required by law to appear before Congress, and officials of all financial agencies make themselves available to appear before Congress. The purposes of such appearances are to report on the conduct of financial policies, explain the policy objectives of their institutions, describe their performance in pursuing these objectives, and to exchange views on the state of the financial system. The Chairman of the Federal Reserve Board makes appearances before Congress semi-annually and additionally at the request of Congress. Federal Reserve Governors, staff of the Board, and officials of other financial agencies appear at the request of Congress but not according to a pre-determined schedule. The CFTC is a sunset agency and its authorizing statute and related authorities must be periodically renewed by Congress. The CFTC is also required to report certain specified agency actions to Congress and on the effect of its margin policies to the Federal Reserve.

8.2 Where applicable, financial agencies should publicly disclose audited financial statements of their operations on a preannounced schedule.

All financial agencies publish audited financial statements each year, and submit them to Congress. In most cases, the financial statements are included in agencies' annual reports and are made available on agencies' websites. Financial statements are typically disclosed within six months of the end of the period covered, and are audited by an independent auditor. In some cases auditors are employed by the Comptroller General of the United States; in others the auditor is a member of a private firm. The information that agencies publicly disclose also includes information on accounting policies and any qualification to the statements, as well as information on internal governance procedures that are in place to ensure the integrity of operations, including internal audit arrangements.

8.3 Where applicable, information on the operating expenses and revenues of financial agencies should be publicly disclosed annually.

All financial agencies publicly disclose information on the operating expenses and revenues of financial agencies. In most cases this information is disclosed annually; because the Federal Reserve is on a biannual budget cycle, it discloses such information every other year. All agencies disclose such information in written reports to Congress, and in most cases they make such information available on their websites.

8.4 Standards for the conduct of personal financial affairs of officials and staff of financial agencies and rules to prevent exploitation of conflicts of interest, including any general fiduciary obligation, should be publicly disclosed.

All employees of the executive branch of government are covered by the Government-wide Standards of Ethical Conduct for Employees of the Executive Branch, 5 C.F.R. 2635. In addition, each financial agency maintains its own agency-wide code of conduct. Such regulations are published in the *Code of Federal Regulations*. There are also legal protections for officials and staff of financial agencies in the conduct of their official duties. These legal protections are generally either statutory or developed through federal court decisions.