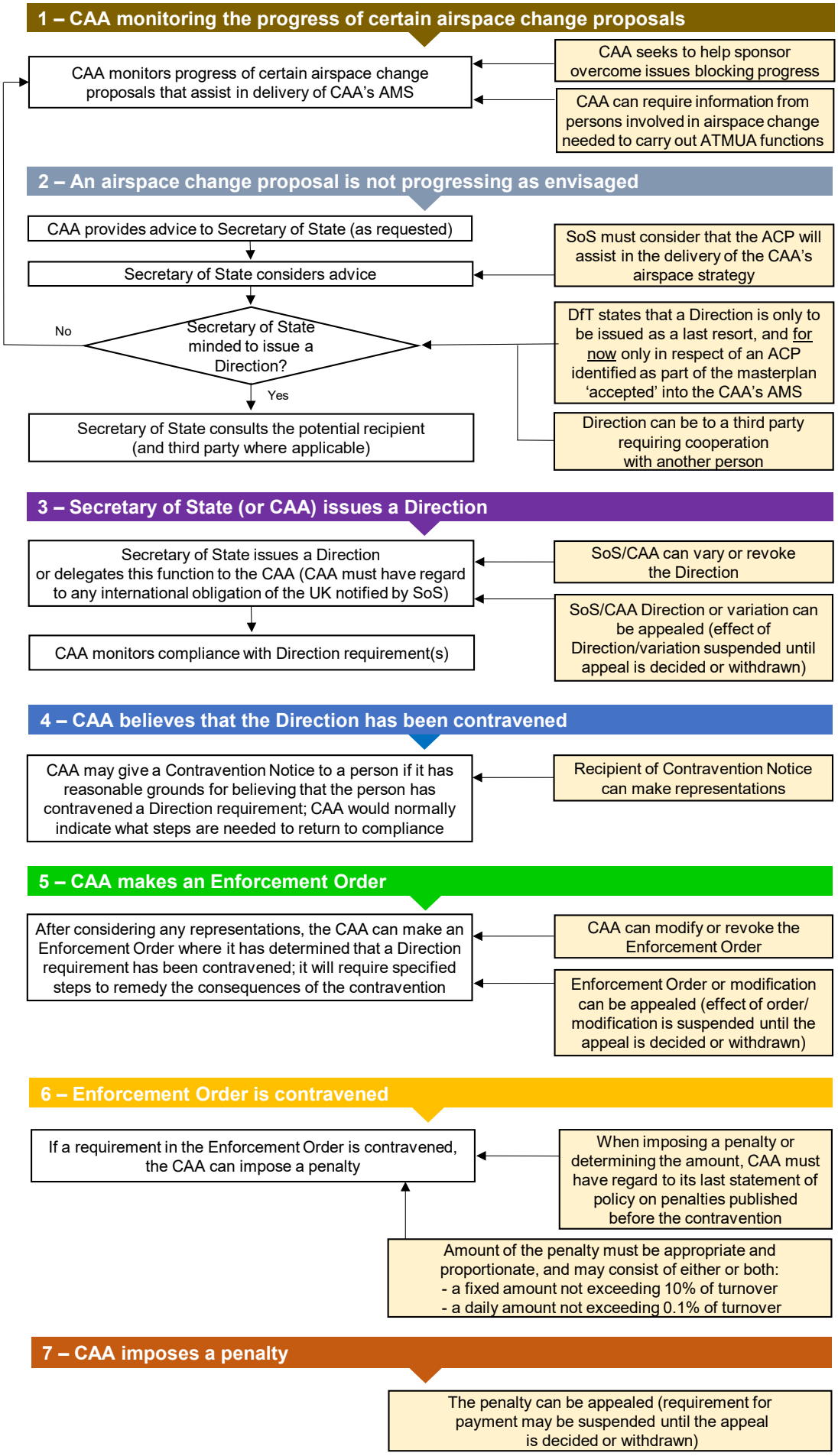Summary of the process prior to imposing a penalty, including roles and responsibilities