

American National Standards (ANS) Under Continuous Maintenance: Subsequent Consolidation, Record Keeping and National Activity Assessments (NAA)

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ANSI Billing of National Activity Assessment (NAA)

The ANSI National Activity Assessment (NAA) fee is the annual fee charged to all ANSI-Accredited Standards Developers (ASD). It is a sliding scale, based on the number of American National Standards (ANS) sponsored by each ASD. The NAA fee defrays ANSI's costs of maintaining the ANS infrastructure, including PINS, BSR-8 and approval processes, the ANSI Board of Standards Review (BSR), ANSI Executive Standards Council (ExSC) and ANSI Appeals Board, the accreditation and reaccreditation processes, a multi-tiered appeals process and the cost of the routine mandatory procedural audit, which is a condition of maintaining accreditation as a developer of ANS.

By way of background, each individual ANS, e.g., in the case of Continuous Maintenance, each separately approved addendum, is associated with a specific approval date. This ANS approval date is used to track compliance with public notice and maintenance requirements so it is important that it be preserved. Moreover, each ANS under Continuous Maintenance, i.e., the base document and each separately approved addendum, is subject to ANSI's audit and appeals/complaint processes. For example, the sample of ANS selected for audit counts each individually approved addendum as one ANS and audits it accordingly, because each addendum is processed in accordance with all of ANSI's procedural requirements regardless of the nature or length of the document. Similarly, the ANSI appeals processes may be invoked in relation to a particular approved addendum.

Each individual ANS associated with a specific approval date remains approved unless the developer notifies ANSI in writing that it is withdrawn or it expires.

Consolidation of Addenda for Publishing Purposes

ANSI-Accredited Standards Developers (ASDs) may choose to consolidate and publish multiple ANS or multiple addenda with various approval dates into a single document with a new designation. This is, of course, a publication decision that, on its own, does not require ANSI approval. That said, such a consolidated document is not automatically given a unique ANS approval date because there is no basis upon which to do so. This is because the individual parts may have been approved on different dates and unless the newly consolidated document is submitted for ANS approval separately, ANSI tracks the original approval dates. Similarly, the audit reviews compliance with all of the requirements that underpin each addendum's approval as an ANS.

An ASD is free to compile multiple addenda into one document and process it as an ANS, but in order for that new document to replace the addenda the ASD would have to approve the compiled document anew and as an ANS, subject to the ANS process and all that it entails. Otherwise, neither the addenda, nor the compiled document would be subject to ANSI's oversight, due process provisions and audit.

Maintenance Actions for ANS under Continuous Maintenance that Incorporate Consolidated Addenda

When a maintenance action (withdrawal, revision, reaffirmation) is subsequently submitted for a base document or an addendum that has been approved as an ANS, the records associated with that action need to be connected – again for oversight, compliance tracking and reconciliation purposes.

Thus, we ask that when a PINS, BSR-8/108, BSR-9/109 or BSR-11 is submitted to ANSI and the designation submitted is that of a consolidated document, the individual designations of the previously approved ANS (including any addenda) be identified. In response, ANSI will identify all of the records related to the consolidated (and differently designated) document and publish all subsequent actions using the consolidated designation, noting as well that the prior individual addenda are superseded by the consolidated document, i.e., the individual addenda associated with the action will no longer be considered approved and active ANS and may not be referred to or promoted as such. Until the action pending in connection with the consolidated document is approved, the individual parts will remain active and counted as active individual ANS. Once formally consolidated, *with a new ANS approval date*, the consolidated document will be considered, counted and audited as one ANS. The previously approved addenda will, as a result, be withdrawn as ANS.

ANS Approval Date is Overarching

Whether an ANS is maintained under Continuous Maintenance, Periodic Maintenance or Stabilized Maintenance, ANSI tracks each document (including addenda) by ANS approval date, which is also the only date that triggers the 5 year maintenance clock and serves as the basis for the set of documents that are subject to audit. So if 4 separately approved ANS are consolidated into 1 document with a new designation, unless that consolidated document is also submitted^[2] and approved as a distinct ANS and thus, has its own ANS approval date, the individual approval dates of the parts of the consolidated document remain. As well, each part is counted and treated as a separate ANS.

5 Year Maintenance Clock

The 5 year ANS maintenance requirement applies to all ANS under Continuous Maintenance and Periodic Maintenance. For standards under Continuous Maintenance, the 5 year clock only has an effect if no action has been taken to revise or reaffirm the ANS within 5 years, in which case, the ANS has to be moved to periodic maintenance. Otherwise, an active BSR-8 for a standard under Continuous Maintenance satisfies the maintenance requirement and avoids any withdrawal.

^[2] Although “submitted” is used, it is acknowledged that ASDs that also hold the status of ANSI Audited Designator, submit PINS and BSR-108s, but notify ANSI via a BSR-109 when a standard has been approved as an ANS. Regardless, ANSI’s records are maintained in the same way for all ASDs and ANSI’s core requirements, including maintenance requirements, apply as stated in the ANSI Essential Requirements.

Excerpts from the ANSI Essential Requirements: Maintenance of American National Standards (www.ansi.org/essentialrequirements)

4.7 Maintenance of American National Standards

American National Standards shall be kept current and relevant by means of timely revision, reaffirmation or action to stabilize. Obsolete standards shall be withdrawn. Except in the case of the national adoption of ISO and IEC standards as American National Standards, when the maintenance provisions contained in the *ANSI Procedures for the National Adoption of ISO or IEC Standards as American National Standards* shall apply, standards developers are permitted three options – periodic maintenance, continuous maintenance or stabilized maintenance – as outlined below.

4.7.1 Periodic maintenance of American National Standards

Periodic maintenance is defined as the maintenance of a standard by review of the entire document and action to revise or reaffirm it on a schedule not to exceed five years from the date of its approval as an American National Standard.

In the event that a PINS or BSR-8/108 has not been submitted for an American National Standard within five years after its approval, the standards developer may request an extension of time to reaffirm or revise the standard, or shall withdraw the standard. The request for an extension of time shall be submitted to ANSI within thirty days following five years after the approval date of the American National Standard. Requests for extensions shall provide the program and schedule of work that will lead to revision, reaffirmation, or withdrawal. The extension may be granted by the ExSC or its designee.

No extension of time beyond ten years from the date of approval shall be granted for action on a standard. In no case shall a standard maintained under the periodic maintenance option retain its status as a current American National Standard beyond ten years from the date of approval. Such approval automatically expires on the tenth anniversary date of approval as an American National Standard.

In the event that an American National Standard approved by a standards developer who has been granted authority to designate its standards as American National Standards is not reaffirmed, revised, or withdrawn within five years after its approval, the standards developer shall follow its own procedures to ensure that work is proceeding and shall notify the Institute and provide the estimated time of completion. In no case shall a standard maintained under the periodic maintenance option retain its status as a current American National Standard beyond ten years from the date of approval. Such approval automatically expires on the tenth anniversary date of approval as an American National Standard.

4.7.2 Continuous maintenance of American National Standards

Continuous maintenance is defined as the maintenance of a standard by consideration of recommended changes to any part of it according to a documented schedule for consideration and action by the consensus body. The standard shall be maintained by an accredited standards developer. A documented program for periodic publication of revisions shall be established by the standards developer. Processing of these revisions shall be in accordance with these procedures. The published standard shall include a clear statement of the intent to consider requests for change and information on the submittal of such requests. Procedures shall be established for timely, documented consensus action on each request for change and no portion of the standard shall be excluded from the revision process. In the event that no revisions are issued

for a period of four years, action to revise, reaffirm, or withdraw the standard shall be initiated in accordance with the procedures contained herein.

In the event that a BSR-8/108 has not been submitted for an American National Standard under continuous maintenance within five years of its approval, the standards developer may request an extension, but shall then maintain the ANS under periodic maintenance.

4.7.3 Stabilized maintenance of American National Standards

A standard that is maintained under the stabilized maintenance option shall satisfy the following eligibility criteria:

- a) the standard addresses mature technology or practices, and as a result, is not likely to require revision; and
- b) the standard is other than safety or health related; and
- c) the standard currently holds the status of American National Standard and has been reaffirmed at least once; and
- d) at least ten years have passed since the approval or last revision of the standard as an ANS; and
- e) the standard is required for use in connection with existing implementations or for reference purposes.

The due process and consensus requirements defined herein apply to the decision to maintain an ANS under the stabilized maintenance option. A developer who wishes to maintain one or more ANS under the stabilized maintenance option shall include a provision or notification to this effect in its accredited procedures

An ANS maintained under the stabilized maintenance option is not required to be revised or reaffirmed on a routine 5-year cycle; however, it shall be subject to review of such status by the sponsoring standards developer on a 10-year cycle. If it is determined in connection with this review that the standard shall continue to be maintained under the stabilized maintenance option and as such does not require revision or withdrawal, then this shall be communicated to ANSI by the standards developer and a related announcement shall be made in *Standards Action*. Notification to ANSI shall be accomplished via the submittal of an informational announcement if the standard will continue to be maintained under the stabilized maintenance option or will be withdrawn, or via a PINS, if the standard will be revised.

If a recommendation is made at any time by a materially affected and interested party that a standard maintained under the stabilized maintenance option requires revision or should be withdrawn, then that recommendation shall be considered in the same manner as a new proposal but within a maximum of 60 days from receipt. A recommendation should include rationale to begin a revision, and shall not be dismissed due to the fact that it does not necessarily suggest a specific revision. The submitter of such a recommendation shall be responded to in writing by the standards developer within 60 days of the receipt of the recommendation and advised of the decision relative to the maintenance status of the standard.

An ANS that is maintained under the stabilized maintenance option shall include a clear statement of the intent to consider requests for change and information on the submittal of such requests.

The decision to maintain an ANS under the stabilized maintenance option and the process by which it is maintained shall be subject to appeal to the standards developer. A subsequent appeal to ANSI may be made to the ANSI Executive Standards Council based on a claim of procedural non-compliance.