



<b>SOP TITLE:</b>	<b>NEFAP Standard Interpretation SOP</b>
<b>SOP NO.:</b>	<b>5-106</b>  <b>Numerical Designator:</b> 1 = Administrative and General Procedures 2 = Consensus Standards Development Program (CSDP) 3 = National Environmental Laboratory Accreditation Program (NELAP) 4 = Proficiency Testing Program (PTP) 5 = National Environmental Field Activities Program (NEFAP)
<b>REVISION NO:</b>	<b>1</b>

<b>Committee:</b>	NEFAP Executive Committee	<b>Approved Date:</b>	1-12-15
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## 1.0 Purpose and Applicability

- 1.1 This SOP describes the process to follow for the interpretation and explanation of the TNI Field Sampling and Measurement Organization (FSMO) Sector Standards. It applies only to inquiries concerning the 2007 FSMO Standards and any approved FSMO standards in the future.
- 1.2 Interpretations shall be considered and explanation provided only on TNI FSMO Standards specific language, interpretation requests on ISO/IEC 17025 language and ISO/IEC 17011 language shall not be considered.
- 1.3 Any disputes between a Field Sampling and Measurement Organization (FSMO) and their NEFAP Accreditation Body (AB) regarding accreditation must be handled through the appropriate appeals process established by the AB. The interpretation process is not intended to interfere with an AB's authority to grant, deny, suspend, or revoke accreditation, nor is this SOP designed or intended to deal with such issues.
- 1.4 The NEFAP Executive Committee (NEFAP EC) Chair and the NEFAP Program Administrator will direct inquiries to TNI committees who have the expertise to respond to the question being asked.
- 1.5 This SOP is not applicable to questions related to how to perform or interpret specific sampling or measurement methodologies or other "how to" questions. The procedures in this SOP are applicable to particular, specific section(s) of the Standard(s), not to an entire Standard.
- 1.6 The interpretation process is not intended to be an exhaustive or comprehensive review of all TNI policies, procedures or entire Standard(s) but only the section identified in the Standard Interpretation Request (SIR) submission.

## 2.0 Summary

This SOP provides a procedure for the resolution of standard interpretation questions. A "Standard Interpretation Request (SIR)" form on the TNI website is electronically submitted. A confirmation receipt is sent to the inquirer and the request is automatically e-mailed to the NEFAP EC Chair and the NEFAP Program Administrator for review. A consensus of these two individuals determines which committee will oversee the response to the question. Timelines are defined to ensure a timely response to the question. All final responses are sent to the NEFAP EC for agreement and confirmation that the ABs have implemented or will implement the standard as described in the interpretation. A final response is provided to the inquirer and a copy of the request and response is posted on the TNI website.

## 3.0 Related Documents

SOP 5-102 – "Voting Procedure for General Business and Field Activities Accreditation Matters"

## 4.0 Definitions

- 4.1 FSMO: Field Sampling and Measurement Organization.
- 4.2 Standard: The current approved TNI Field Sampling and Measurement Organization Sector Standard.

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## 5.0 Procedure

### 5.1 Standards Interpretation Request (SIR) Submission

An individual requesting an interpretation of the Standard must:

- 5.1.1 Submit a request for interpretation electronically by filling out the “Standards Interpretation Request” form located on the TNI website ([www.nelac-institute.org](http://www.nelac-institute.org)). This request shall include:
  - 5.1.1.1 The name of the inquirer.
  - 5.1.1.2 The name of the organization(s) (if applicable).
  - 5.1.1.3 A contact address, telephone number, and e-mail address.
  - 5.1.1.4 Contact information for anyone else who should receive a copy of the response.
  - 5.1.1.5 Specific identification of the interpretation relative to the Standard (standard, module, section, and paragraph.). This section must be completed or the request will be sent back to the inquirer.
  - 5.1.1.6 A detailed description of the issue.

### 5.2 Processing the Request

- 5.2.1 The request is received and reviewed by the NEFAP EC Chair and the NEFAP Program Administrator.
- 5.2.2 The NEFAP EC Chair and the NEFAP Program Administrator determine by agreement how to respond to the inquiry. The NEFAP EC Chair e-mails the Program Administrator with his/her recommendation on whether the question is a SIR and if appropriate, which committee should respond to the question. If there is agreement between the Chair and the Program Administrator, the SIR is processed. If there is not agreement there is email correspondence or a conference call between the Chair and the Program Administrator to determine an agreed upon process.
- 5.2.3 If it is determined that the question is not an issue of interpretation of the Standard, the Program Administrator notifies the inquirer in writing and may, as appropriate, offer suggestions to the inquirer for alternate means to help answer the question. The request is then closed by the Program Administrator.
- 5.2.4 If it is determined that the question is the result of an accreditation dispute with an AB, the Program Administrator notifies the inquirer that the process cannot be used in instances where there is a dispute with an AB and a recommendation is made to contact the AB. The request is then closed by the Program Administrator.
- 5.2.5 If it is determined that the question is a standards interpretation inquiry, the Program Administrator forwards it to the appropriate committee (without including the identification of the inquirer) for a response and emails a letter to the inquirer. The letter includes:
  - 5.2.5.1 The SIR log-in number.
  - 5.2.5.2 A summary of the process for answering inquiries.
  - 5.2.5.3 Identification of the committee that will be working on the response.

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- 5.2.5.4 A time frame for a response. This time frame is usually 3 months given committee meeting schedules. Should the time frame for a response be delayed, the Program Administrator will send a status update to the inquirer.
- 5.2.6 The committee should formulate a response within 60 days or must provide reasons as to why the response cannot be completed in that timeline along with an anticipated date for completion to the Program Administrator. The final response is reviewed by the committee for accuracy with the committee discussion or for editorial changes. The response is then e-mailed to the Program Administrator.
  - 5.2.6.1 When a SIR is discussed in expert committee, the committee's discussion is not the official interpretation response.
  - 5.2.6.2 If the response is formulated and/or reviewed during a committee meeting, a summary of the discussion must be included in the meeting minutes.
  - 5.2.6.3 Committee discussions via electronic communication must be documented in meeting minutes.
  - 5.2.6.4 Official responses are reviewed and the NEFAP EC votes on the SIR to show agreement with the response..
- 5.2.7 The Program Administrator forwards the question and response to the NEFAP Executive Committee for review and agreement. The NEFAP EC follows their voting procedures as they relate to field activities accreditation (SOP 5-102). The NEFAP EC is expected to complete the voting process within 30 days. Section 5.3 includes items for consideration during voting.
  - 5.2.7.1 If a 2/3 vote in favor of the SIR cannot be reached by the NEFAP EC, a written response to the originating committee is prepared and the originating committee is asked to reconsider their response. If an agreement cannot be reached, the dispute is forwarded to the Consensus Standards Development Executive Committee for further consideration.
- 5.3 Preparation of an Interpretation

The committee preparing the response and the NEFAP EC must take the following into consideration:

  - 5.3.1 The interpretation must only answer the question posed by the inquirer under the scope of this SOP.
  - 5.3.2 The interpretation must provide a sound and well-reasoned interpretation that is consistent with the Standards.
  - 5.3.3 The interpretation must be within the boundaries and scope of the Standard, that is, an interpretation is neither a new standard nor an addition to the current standard.
- 5.4 Finalization of the Response

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Once the interpretation is finalized, the Program Administrator forwards the question and interpretation to the inquirer and TNI webmaster for posting to the Standards Interpretation section of the TNI website. The interpretation must be implemented by assessors, the recognized AB's, and accredited FSMOs. The interpretation is in effect until such a time as the Standard is changed or another interpretation has been issued.

5.5 Document Control

A record of the original request as well as the final resolution must be recorded on the TNI website and meet the requirements of the TNI SOP for control of documents.

5.5.1 Discussions surrounding the SIRs are maintained in committee meeting minutes.

5.5.2 Votes are maintained in meeting minutes.

5.5.3 The Program Administrator maintains an Excel table to track all SIRs and their status.

6 References

6.1 SOP 1-104, Control of TNI Documents

6.2 SOP 5-102, TNI NEFAP Voting Procedure for General Business and Field Activities Accreditation Matters

7 SOP Approved Changes

Prev. SOP No.	New SOP No.	Date of Change	Description of Change
N/A	5-106 Rev 0	8-6-12	New Document.
Rev 0	5-106 Rev 1	1-13-15	Expanded on purpose, how discussion should be recorded, and clarify what should be submitted.