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1.0 Purpose and Applicability

These procedures provide the framework to ensure the development of consensus standards in accordance with the requirements of the federal Office of Management and Budget (OMB) Circular A-119.

OMB Circular A-119 defines a voluntary consensus standards body as one having the following attributes: (i) openness; (ii) balance of interest; (iii) due process; (iv) an appeals process; and (v) consensus, which is *“general agreement, but not necessarily unanimity, and includes a process for attempting to resolve objections by interested parties, as long as all comments have been fairly considered, each objector is advised of the disposition of his or her objection(s) and the reason(s) why, and the consensus body members are given an opportunity to change their votes after reviewing the comments.”*

2.0 Summary

This document describes the procedures used by the Consensus Standards Development Program (CSDP) in the establishment and operation of Expert Committees in developing Standards, which serve as consensus standard development bodies. The procedures also provide criteria for ensuring openness, lack of dominance, a balance of interest, and conduct of business, and provide detailed requirements for the consideration of all comments.

3.0 Related Documents

- SOP 1-104 Control of TNI Documents
- SOP 2-102 Procedure for Addressing Conflict of Interest
- SOP 3-103 NELAP Accreditation Bodies Standards Review and Acceptance
- SOP 3-106 Review of Accreditation Standards for Suitability
- SOP 4-109 PT Program Standards Review and Adoption
- SOP 5-108 NEFAP Standards Review and Adoption
- POL 1-128 Non-Discrimination and Non-Harassment in TNI Programs and Activities
- POL 1-129 Expected Conduct of Participants in TNI Activities
- TNI Bylaws

4.0 Definitions

Term	Definition
Accreditation Body (AB)	Authoritative body that performs accreditation.
Affiliate Committee Member	A person who is not a TNI member but has technical expertise needed by a specific committee, is invited to join the committee, and has full voting privileges.
Associate Committee Member	A TNI member who may participate in a committee, but who does not have voting privileges.
Committee Member	All Elected, Associate, and Affiliate members.
Consensus	A participatory process by which a group deliberates as it attempts to make a decision where consensus is not synonymous with unanimity.
Consensus Body	A group whose membership meets the requirements of balance and lack of dominance. The group maintains: (i) openness; (ii) balance of interest; (iii) due process; (iv) an appeals process; and (v) a process to achieve consensus.
Consensus Standard Development Program (CSDP)	A core TNI Program whose purpose is to develop consensus standards for use in TNI's programs.
Consensus Standard Development Program	The committee within TNI that has responsibility for the Consensus Standard Development Program. This executive

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Executive Committee (CSDP EC)	committee provides oversight to Expert Committees in the development of standards.
Content Management System	TNI's process for document control and archival, which combines both hard copy and Cloud-based applications.
Dominance	A position or exercise of dominant authority, leadership, or influence, by reason of superior leverage, strength, or representation, to the exclusion of fair and equitable consideration of other viewpoints.
Draft Standard (DS)	A standard (volume, module, or section of a module or standard) that has been approved by the Expert Committee and presented for comment.
Due Process	The principle by which any person with a direct and material interest has a right to participate by a) expressing a position and its basis, b) having that position considered, and c) having the right to appeal the resulting decision.
Elected Member	A TNI member who applied for and is approved to participate on a committee and has full voting privileges.
Expert Committee	A committee whose duties include the development and maintenance of consensus standards.
Field Sampling Measurement Organization (FSMO)	Organizations engaged in environmental sampling and field measurement activities.
Laboratory	An organization that collects or analyzes samples in a fixed-base, mobile, or field-testing facility for chemical, and/or physical, and/or bacteriological properties or parameters.
National Environmental Laboratory Accreditation Program Executive Committee (NELAP EC)	A group within the National Environmental Laboratory Accreditation Program of TNI, with balanced representation whose purpose is to manage TNI's efforts in support of a national program for the accreditation of environmental laboratories.
National Environmental Field Activities Program (NEFAP)	A core TNI Program whose purpose is to establish and implement a program for the accreditation of field sampling and measurement organizations.
National Environmental Field Activities Program Executive Committee (NEFAP EC)	The committee responsible for the administration and maintenance of the TNI National Environmental Field Activities Program (NEFAP).
National Environmental Laboratory Accreditation Program (NELAP)	A core TNI program to establish and implement a program for the accreditation of environmental laboratories.
NELAP Accreditation Council (NELAP AC)	The body that consists of one individual from each recognized NELAP Accreditation Body, appointed by the Accreditation Body which has final authority for implementation of NELAP among participating states for the accreditation of environmental laboratories through development and approval of the policies and procedures that govern NELAP operations and is responsible for ensuring the successful implementation of the program.
Proficiency Testing Program Executive Committee (PTP EC)	The committee responsible for the administration and maintenance of the TNI Proficiency Testing program.
Program Administrator (PA)	TNI staff who provide administrative support to committees and serve at the direction of the Board of Directors and the Executive Director.
Stakeholder Group	Any group of individuals with a direct and material interest in a particular TNI activity and that participates by: a) expressing a position and its basis, b) having that position considered, and c) having the right to appeal. Default Stakeholder Groups are Accreditation Bodies, Laboratories/FSMOs, and Others.

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Standard Interpretation Request (SIR)	The submission of a request for an interpretation of how a standard applies to a particular situation, including the review of draft interpretations and adoption of a final approved interpretation.
Suitability	Criteria for justification of development of a new standard or modification of an existing standard or part thereof. Criteria include auditable; implementable; understandable; improvement over previous version; clearly written; enforceable; economically neutral or advantageous to stakeholders.
TNI Standard	A document that has been developed and established within the consensus principles of TNI, that meets the approval requirements of TNI procedures, and has been approved by the Expert Committee.
Voting Member	All Elected and Affiliate members

5.0 OPENNESS, LACK OF DOMINANCE, AND BALANCE

5.1 Openness

- 5.1.1 Participation in standards development activities must be open to all TNI members and to all members of the public who are directly and materially affected by TNI's standards. TNI membership must not be conditional upon membership in any organization nor unreasonably restricted on the basis of technical qualifications or other such requirements. Voting membership on the consensus body must not be conditional upon membership in any other organization nor unreasonably restricted on the basis of technical qualifications or other such requirements. Any member of the public may provide written input on any TNI standard. TNI will make a reasonable effort to reach out to non-TNI members who may have an interest in any standard that TNI develops. This may be done by publishing notices on the TNI website, emailing potentially interested parties, having webinars discussing standards or any other option to gather input from non-TNI members.
- 5.1.2 Any standards adoption organizations are invited to participate in the open consensus process. This will generally be accomplished through emails provided to interested parties.

5.2 Lack of Dominance

- 5.2.1 The standards development process must not be dominated by any single stakeholder group, individual, or organization.
- 5.2.2 If a party feels that a single stakeholder group, individual or organization dominated the standards development process, an appeal should be filed following established TNI procedures (see Section 9).

5.3 Balance

- 5.3.1 The standards development process must have a balance of interests. Participants from diverse stakeholder groups must be sought with the objective of achieving balance. There must be a minimum of three stakeholder groups for each Expert Committee.
- 5.3.2 The criteria for balance are that no single stakeholder group constitutes a majority of committee members on any Expert Committee. The default stakeholder groups are:
- ABs – accreditation bodies that operate accreditation programs,

- Laboratories – laboratories and other organizations (such as FSMOs) directly involved in providing sampling and measurements, and
- Others – consultants, proficiency test providers, state and federal agencies that do not run accreditation programs and all additional interested parties.

The stakeholder groups appropriate in the development of consensus for any given TNI standards activity are a function of the nature of the standards being developed. Expert Committees may determine that additional or different stakeholder groups are appropriate for the Expert Committee's scope of activity. Requests for changes in the stakeholder group designations for the given Expert Committee must be presented to the CSDP EC, and upon its recommendation, be presented to the TNI Board of Directors for its approval.

6.0 CONDUCT OF COMMITTEE BUSINESS

6.1 Meetings

Generally, there are two public meetings (conferences) per year (a summer meeting and a winter meeting) with webinars scheduled as needed. At these public events, the Expert Committees may present a draft standard or revisions to a standard for discussion and debate by the TNI and non-TNI members in attendance and receive input for further development of the standard. Any member of the public may register for, attend, and provide input during these meetings and webinars. Minutes from these meetings are published on the TNI website.

Expert Committee meetings, normally held virtually, are typically scheduled monthly at the same day and time (for example, the second Tuesday of each month at 1:00 PM ET). Expert Committee meetings are open to Voting and Associate Members, and to any member of the public who requests in writing or by email to the committee chair and Program Administrator to be included for a particular meeting of the committee. Minutes of all committee meetings are documented and presented for expert committee approval. After the committee approves minutes from these meetings, they are published on the TNI website and include a list of all attendees.

6.2 Notification of Meetings

Public meetings which may include Expert Committee meetings, are advertised in advance, and are routinely held as "summer" and "winter" meetings. Notices of these public meetings are the responsibility of the TNI Executive Director or his designee, as the conference publicity is considered adequate notice.

The Expert Committee's PA (or designee) notifies TNI's IT Administrator of notices of Expert Committee meetings and/or any necessary modifications of the schedule.

6.3 Decorum

All correspondence or comments, in whatever form, that are received by Expert Committees must be handled in a non-discriminatory manner. All such correspondence or comments must be addressed in an appropriate and timely manner by the Expert Committees and, when appropriate, responses are provided in writing to authors of the correspondence and/or comments. At no time should race, religion, politics or other potentially discriminatory factors be brought up during discussion of any form of correspondence or comments.

Expert Committee discussions and correspondence must also be completed with professionalism, decorum and in a non-discriminatory manner.

Should the Committee receive language inconsistent with these stipulations, the comment(s) is addressed to the commenter asking that these requirements be followed. Refusal to follow these

requirements will result in the submitted comment(s) being rejected.

7.0 COMMITTEE OPERATIONS

Committee operations must be in accordance with SOP 2-101 (Procedures for Expert Committee Operation) and SOP 1-102 (Voting Rules for TNI Committees).

8.0 STANDARDS DEVELOPMENT

8.1 Summary of the Process

Expert Committees develop and maintain standards during in-person and virtual meetings. The Committee Members serve in a leadership role in standards development. Committees must consider all comments and suggestions. The Expert Committees develop a TNI Standard by following the process described in this SOP. The principal steps in the process are the development of a Draft Standard and, as necessary, one or more sequential revisions of the Draft Standard.

If the standard is a modification of an existing TNI standard, the Expert Committee may choose to present a complete volume or module for consideration or may present only modified sections or clauses of a standard for consideration. The Committee Chair may delegate the standard-writing process to the Committee Members or to a workgroup(s).

All TNI Members (and other interested parties) are afforded the opportunity to contribute to the standard development process. Input from all stakeholders (including non-TNI members) is solicited, gathered, documented, and considered in the standards-writing process.

8.2 Notification – The First Step in the Development Process

The need to establish or modify a standard or part of a standard must be determined by the relevant Expert Committee. In the case of development of a new volume or new module of any TNI standard, or for an entirely new volume or module for a new standard, approval of the Board of Directors must be attained prior to proceeding.

A Notification of the Intent (NOI) to establish or modify a TNI standard must be developed by the appropriate Expert Committee utilizing the NOI form presented in Appendix 1. Use of this form ensures that requirements defined for suitability of a new or a modified part of the standard can be met.

This notification includes: (a) an explanation of the need for the standard; (b) how the standard is an improvement over the previous version where applicable; (c) identification of stakeholders (e.g. laboratories, Accreditation Bodies, FSMOs, engineering firms, PT Providers, PT Provider Accreditors, etc.) likely to be impacted by the standard; (d) any potential auditability, enforceability and/or implementation issues that may be encountered; and (e) potential economic impacts on any of the stakeholders.

8.2.1 Announcement of the NOI:

Once the NOI has been approved by the CSDP EC, it is posted to the website for 30 days of comment, using the following announcement:

Notice of Intent to Establish or Modify a TNI Standard

Date Posted: [mm/dd/yyyy]

The TNI [name] Committee intends to review and update [Volume # / Module # (Section Number as appropriate)] of the Environmental Laboratory Sector Standard.

Pursuant to SOP 2-100, notification of this proposed standards activity is being announced to provide the opportunity for participation by all directly and materially affected persons. Any comments asserting that a proposed standard duplicates or conflicts with an existing consensus standard developed by another recognized organization should be sent to [CSDP EC PA email address] within thirty days from the publication date of this announcement (i.e., no later than [mm/dd/yyyy]).

Link to Notice of Intent to Establish or Modify [Volume # / Module # (Section Number as appropriate)]:

[link to NOI.pdf]

Phrases presented in brackets, i.e., [CSDP EC PA email address], indicate that the item in the brackets must be substituted for the bracketed phrase for the purpose of the announcement. When announcements are made, a review of the due date should be done by the IT Administrator, considering any holidays (or other events that may impact the review) that occur near the due date. Announcements may be scheduled for a specific date to ensure that the due date included is accurate.

8.2.2 In addition to the posting of the NOI, the following groups/individuals, as applicable, are contacted about the posting:

- interested parties who signed up for TNI standards activity list serve,
- individuals on an email contact list maintained by the CSDP EC PA
- TNI expert committee chairs, the TNI Board of Directors and, as appropriate, the members of the NELAP Accreditation Council, NELAP EC, NEFAP EC or PTP EC.

8.2.3 This public announcement on the TNI website of the pending standards activity is provided to solicit input and provide the opportunity for participation by all directly and materially affected persons (both non-TNI and TNI members). The announcement may also include a date for a public meeting to receive input. The announcement initiates the beginning of a thirty-day period for input on the proposed modifications, or if a new standard, the subject of the standard. All suggestions/input received by the committee are considered in the development of the standard or revisions to the standard. As input is the intention of this notification, responses to input received at this stage of the process are not required (although a response may be made at the discretion of the Committee). All input/comments must be documented, however. The CSDP EC PA manages the publication and receipt of comments regarding the NOI.

Public notice of committee efforts to establish or modify a TNI Standard is also made to organizations representing the accredited community and to appropriate regulatory agencies. This public notice is done via press release, webinar, TNI newsletter article, or other forms of effective communication, as appropriate.

8.3 Summary and Draft Standard

After the close of the thirty-day period following the NOI, input, suggestions, and comments are sent to the Expert Committee and reviewed.

Prior to publication of the Draft Standard for comment, the Expert Committee may meet with the interested stakeholders and stakeholder groups by open meeting, webinar or any other form of effective communication to ensure that suggestions, input, and comments are understood.

The Expert Committee begins the process of preparing the Draft Standard. This process may involve full committees or workgroups focusing on all or part of the changes to the standard. The approach to be used in making these changes is entirely at the discretion of the Expert Committee.

8.3.1 Draft TNI Standards are named using the following convention:

DS-XX-V#MZ-YYYYMMDD

Where:

- XX is EL in the Environmental Laboratory sector or XX is FSMO in the Field Sampling and Measurement Organization sector,
- V means Volume,
- # is the volume number,
- M means module,
- Z is the Module number,
- YYYYMMDD is the date the Committee approved draft for comment.

Examples include the following:

- DS-EL-V1M1-20150718
- DS-FSMO-V1-20240726

8.3.2 If the standard is a revision of an existing TNI standard, the following records are reviewed during the standards development process, as applicable:

- Response to Comment Summary(ies) of all stages of the most recent previous standards development activity (see Appendix 3);
- all comments previously placed on hold that remain on hold; and
- all pertinent Standard Interpretation Request responses.

8.3.3 During Committee deliberations, each Expert Committee member may clarify, explain, and/or justify their position. Deliberations within the committee are conducted until the committee has determined that the DS is ready to be presented to all stakeholders and is compliant with SOP 2-103. The DS is entered into a content management system and made available to committee members.

8.3.4 All Voting Members of the Expert Committee are required to vote on the DS. The vote of the entire committee, however accomplished (whether in meeting participation or by e-mail ballot) must be recorded (including the date of each vote) in meeting minutes.

Any Draft Standard posted for comment becomes the Final Standard if no persuasive comments are received. Because the Standard can become final at this point, CSDP EC performs a review of the Standard looking for any potential conflicts and potential issues of implementability; and the Draft Standard must be compliant with SOP 2-103.

8.3.5 The voting members must cast votes as follows:

- Affirmative,
- Affirmative with comment, or
- Negative with comment.

Abstentions are not allowed when a vote is being called to advance a Draft Standard out of committee at any stage of revision. Any committee member who casts a negative vote on the DS must accompany the vote with written comments, justifying the vote. If possible, the voter should propose alternative language for the Standard

- 8.3.6 When the Expert Committee has a two-thirds affirmative vote on the DS, and the appropriate Executive Committee has been notified regarding how previous SIRs have been addressed, the Committee provides a summary of changes including justification for those changes (Appendix 2 contains the Summary of Changes and Justification form).

The DS and the summary of changes are posted for 90 days on the TNI website for stakeholder comment using the following announcement:

The TNI [name] Committee is providing for your review and comment the following documents:

A Draft of [name] Standard that has been modified consistent with the Committee's Notice of Intent to Modify (NOI) this Standard. [link to Draft Standard PDF]

A Summary of Changes with Justification for those changes. [link to Summary Document PDF]

The comment period is open for ninety days (i.e., until mm/dd/yyyy), in accordance with the Consensus Standards Development SOP 2-100 [link to SOP 2-100 PDF]. Please send your comments and proposed revised text to both [name] Committee Chair [email link to name of Chair] and [name of PA], the Program Administrator [email link to name of PA] for the Committee. All comments will be tracked by the PA, and commenters will be notified of the committee's response to the comment submitted. If there are no persuasive comments received, the Draft Standard will become the Final Standard.

- 8.3.7 The following groups/individuals, as applicable, are contacted about the posting:

- interested parties who signed up for TNI standards activity list serve,
- individuals on an email contact list maintained by the CSDP EC PA
- TNI expert committee chairs, the TNI Board of Directors and, as appropriate, the members of the NELAP Accreditation Council, NELAP EC, NEFAP EC or PTP EC.

- 8.3.8 The comment period for the DS is ninety days from the website posting. An Executive Committee or the NELAP Accreditation Council may petition CSDP EC for a thirty-day extension if an issue arises. All comments must be addressed to the Expert Committee chair and the Expert Committee PA and must be recorded by the Expert Committee as directed per 8.4. The Expert Committee attempts to capture verbal comments in minutes that are made during any open meeting, webinar, or in any other setting. If a commenter wants to ensure that a comment is addressed, or if the commenter wants a direct response about how the comment was handled, the comment must be submitted via email.

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- 8.3.8.1 The NELAP EC and NELAP AC follow their procedures for preparing comments and must provide comments on appropriate Draft Standards during the comment period.
- 8.3.8.2 The NEFAP EC and PTP EC follow their procedures for preparing comments and must provide comments on appropriate Draft Standards during the comment period.
- 8.3.8.3 The CSDP EC must provide comments on implementability to Expert Committees for all TNI Draft standards during the comment period.
- 8.3.8.4 Expert committee members may provide comments during the comment period.

8.4 Response to Comments

All written comments received during the DS comment period from any source are logged onto the Response to Comments form. If a committee member voted negative on the Draft Standard, the negative comment(s) submitted are logged into the Response to Comments form.

A comment may be withdrawn by request to the Expert Committee chair and/or the committee's PA.

- 8.4.1 All comments on the DS are logged onto the Response to Comment form and must be considered by the Expert Committee.

Following committee review and discussion, comments must be ruled persuasive, non-persuasive, or editorial. The Response to Comment form must be approved by a super majority vote of the Expert Committee.

Editorial changes are of two types: (1) those which introduce no change in technical content, but correct typographical errors, modify editorial style, change non-technical information, or reduce ambiguity, and (2) those which correct typographical errors in substance (essential information that could be misused or misinterpreted).

The Response to Comments form is used to record the committee's persuasive or non-persuasive ruling, any subsequent actions taken or to be taken by the committee, and any other details the committee deems pertinent. After completion and approval by the Expert Committee, the Response to Comments form is posted on the TNI website as well as being retained in TNI's permanent records. If persuasive comments are received, the Response to Comments form must be posted prior to or at the same time a revised DRAFT Standard is posted. The commenter's contact information is removed from the Response to Comments form prior to posting the document but is still available to committee members for consideration of comments.

Each time the Response to Comments form is used (e.g., DS and revisions of the DS), the final disposition of comments by the committee is posted on the TNI website and the appropriate groups/individuals identified in Section 8.3.7 are notified regarding the posting.

- 8.4.2 An Expert Committee may prioritize the comments received and may place a comment on hold until the next revision cycle of the standard. In determining whether to place a comment on hold, the Expert Committee may consider relevant factors, including, but not limited to:
 - the extent to which the comment proposes a change that is new and/or substantial;
 - the complexity of the issue(s) raised; and

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- whether sufficient debate and public review has taken place.

The commenter is informed, in writing, of the reason the comment is placed on hold. If a commenter does not respond to the committee notification within 30 days, the comment in question is not considered further.

Any comment placed on hold must be addressed during the next revision cycle of the standard and must be recorded and considered as a comment at that time. Comments placed on hold must be noted in the Response to Comments form.

- 8.4.3 The disposition of written comments is communicated in writing to each commenter. Communication includes the reason for the committee's decision regarding the comment.

8.4.3.1 Those who receive notification of the disposition of comments are not required to respond to the Committee.

8.4.3.2 The Committee presents the author(s) of non-persuasive comment(s) with the opportunity to expand, explain and/or justify their position within 30 days of receipt of the notification.

8.4.3.3 Following the commenter's presentation of their position to the committee, the comment is recirculated to the committee members to affirm or change their vote on the comment in question.

8.4.3.4 In the event that the comment remains as non-persuasive to the committee and unresolved to the commenter, an appeal may be filed consistent with the procedure in Section 9.

- 8.4.4 If any comments were ruled persuasive, the DS must be revised as described in section 8.5.

- 8.4.5 If the committee rules comments as non-persuasive, the commenter retains the right to appeal per section 9.0.

- 8.4.6 If the DS passes without any persuasive comments, or no comments, or appeals were received, the DS becomes final.

8.5 Draft Standard Revisions

- 8.5.1 If modifications to the DS are necessary due to persuasive comments, the Expert Committee develops a revised Draft Standard by following the process of review and approval found in Section 8.3. A new summary of changes form is prepared that only lists changes made to the revised Draft Standard.

- 8.5.2 Revisions of a Draft Standard are posted to the website for 60 days, using the following announcement:

The TNI [name] Committee is providing for your review and comment the following documents:

A revised Draft of [name] Standard that has been modified consistent with the Committee's Notice of Intent to Modify (NOI) this Standard. [link to Draft Standard PDF]

A Summary of Changes with Justification for those changes. [link to Summary Document PDF]

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The comment period is open for sixty days (i.e., until mm/dd/yyyy), in accordance with the Consensus Standards Development SOP 2-100 [link to SOP 2-100 PDF]. Please send your comments and proposed revised text to both [name] Committee Chair [email link to name of Chair] and [name of PA], the Program Administrator [email link to name of PA] for the Committee. All comments will be tracked by the PA, and commenters will be notified of the committee's response to the comment. If there are no persuasive comments received, the Draft Standard will become the Final Standard.

- 8.5.3 If additional persuasive comments are received during this phase of standard development, another revised DS is produced by the Expert Committee. The entire process is repeated until such time as no additional persuasive comments are received.
- 8.5.4 The committee's response to all comments is required as described in Section 8.4. Comments that have been previously ruled upon by the Expert Committee are not re-considered at this stage without the inclusion of new evidence or a new line of reasoning.
- 8.5.5 When the DS (at whatever revision) (1) has received an affirmative two-thirds vote of all Voting Expert Committee members, (2) no further persuasive comments were received, and (3) no objections were raised within 30 days of the posting of the Response to Comments document, the DS is considered final.
- 8.5.6 When the standard is complete, the standard is made available for distribution in final form. This is the version of the standard subject to consideration for adoption and implementation by any organization wishing to use it for accreditation purposes.

8.6 TNI Standard

- 8.6.1 When a Standard is final, the Expert Committee is required to develop and present a webinar on the complete standard, emphasizing the changes, to interested parties.
- 8.6.2 The TNI Standard is made available for purchase to all interested parties, including standards-adoption organizations.
- 8.6.3 The Expert Committee, with the approval of the TNI Board of Directors, may decide to abandon the processing of a proposed new or revised standard or portion thereof. Announcements of such discontinuance of a standards project are posted on the TNI website.
- 8.6.4 Approved standards are considered for revision or reaffirmation by the appropriate Expert Committee at least once every five years from their date of approval.
- 8.6.5 Standard Naming Convention

TNI Standards are identified with a unique file name using the following convention:

XX-V#MZ-YYYY

Where:

- XX is EL in the Environmental Laboratory sector or XX is FSMO in the Field Sampling and Measurement Organization sector,

- V means Volume,
- # is the volume number,
- M means module,
- Z is the Module number, and
- YYYY is the year of passage of the Volume or Module.

Examples include the following:

- EL-V1-2016
- EL-V1M3-2016
- EL-V2M2-2016
- FSMO-V2-2025

9.0 APPEALS

9.1 General

Persons who have directly and materially affected interests, and who have been or may be adversely affected by a procedural action or inaction of TNI, have the right to appeal. Commenters are notified of the disposition of their comments and their right to appeal. The appeal process is open to anyone who files a written appeal with the Executive Director of TNI within thirty days after the Response to Comment form is posted (see Section 8.4.1) on the TNI website. The burden of proof to show adverse effect is on the appellant.

- 9.1.1 The appeal must state the nature of the objection(s) including any adverse effects, the clause(s) of these procedures or the standard that is at issue, actions or inactions that are at issue, and the specific remedial action(s) that would satisfy the appellant's concerns. Previous efforts to resolve the objection(s) and the outcome of each are documented within the appeal.
- 9.1.2 Within seven days of receiving an appeal, the Executive Director notifies and provides a copy of the appeal to the Chair of the TNI Board of Directors and the Chair of the CSDP EC.
- 9.1.3 If an appeal is filed, the Standard does not become final until the appeal process is resolved.

9.2 Response

Within sixty days after receipt of the appeal, the Chair of the CSDP EC prepares a written response. The Chair of the CSDP EC may solicit other individuals with specific knowledge of the matter in question to assist with the response. The CSDP EC Chair forwards the response to the TNI Executive Director for review, comment, and/or approval. The approved response is submitted to the appellant by the TNI Executive Director. The response specifically addresses each allegation of fact in the appeal to the extent of the respondent's knowledge.

9.3 Hearing

If the appellant and TNI are unable to resolve the written complaint in a manner consistent with these procedures, the Executive Director schedules a telephone or online conference hearing with an appeals panel on a date agreeable to all participants, giving at least fifteen working days' notice.

9.4 Appeals Panel

An appeals panel is created that consists of three individuals who are knowledgeable of the issues

and familiar with the operation of consensus standards organizations, have not been directly involved in the matter in dispute, and who are not materially or directly affected by any decision made or to be made in the dispute. The TNI Executive Director, with input from the appellant, develops a list of five potential appointees for the appeals panel within fifteen days, and the appellant selects three of those names. This list of three names is submitted to the TNI Executive Committee, which appoints the members of the appeals panel. If the parties to the appeal cannot agree on an appeals panel within a reasonable amount of time, the matter is referred to the TNI Board of Directors, which then appoints members of the appeals panel.

9.5 Conduct of the Hearing

The appellant has the burden of demonstrating adverse effects, improper actions or inactions and the efficacy of any requested remedial action. TNI has the burden of demonstrating that the organization and the CSDP EC took all actions in compliance with these procedures and that the requested remedial action would be ineffective or detrimental. Each party may present evidence, and members of the appeals panel may address questions to individuals. *Robert's Rules of Order* apply to questions of parliamentary procedure for the hearing not covered herein. The appeals hearing proceedings are documented and maintained in TNI's Content Management System.

9.6 Decision

The appeals panel provides a determination to the TNI Board of Directors in writing within sixty days of the conclusion of the hearing, stating findings of fact and conclusions, based on a preponderance of the evidence presented to the appeals panel. The decision of the appeals panel is final, subject to agreement of the TNI Board of Directors (BoD). In the event that the BoD does not agree with the decision, it is returned to the Panel for further discussion. If any appeal is upheld, the affected module or section of the TNI Standard is withdrawn by the Expert Committee that developed that module or section for appropriate disposition and/or redevelopment in accordance with this SOP. If any appeal is denied, then the Standard is final.

10.0 PUBLICATIONS

Any TNI Standard is released for publication only through TNI.

11.0 RECORDS

Records are prepared and maintained to provide evidence of compliance with these procedures. Records include, but are not limited to, membership rolls; minutes of Expert Committee meetings; summaries of membership votes on standards; persuasive and non-persuasive comments, including comments from committee members; Expert Committee response to comments; draft standards and final approved standards.

12.0 STANDARD INTERPRETATION POLICY

Interpretation of any part of any standard is available as a service to the recipient of the standard or to any member of the public, provided a request is submitted on the "Request for Standard Interpretation" form that is available on the TNI website. Refer to SOP 3-105 for NELAP or SOP 5-106 for NEFAP.

13.0 REFERENCES

- SOP 1-102 Voting Rules for TNI Committees
- SOP 2-101 Procedures for Expert Committee Operations

- SOP 2-103 Format and Style Guide for Consensus Standards
- SOP 3-105 Standard Interpretation Process
- SOP 5-106 NEFAP Standard Interpretations
- OMB Circular A-119 for Voluntary Consensus Standards Bodies

14.0 SOP APPROVED CHANGES

Revision	Effective	Description of Change
0	3/15/2008	Original SOP approved
1.0	January 2010	TIA language added to 5.5.9
1.1	3/15/2010	Reformat to style guide, added Section 13
2.0	3/12/2015	Modification to SOP based upon Corrective Action Task Force
2.1	5/5/2015	Editorial change required by ANSI
2.2	9/19/2017	Editorial changes to Section 1.3.11 by adding the word "voluntary" and a clause about representation.
3.0	05/07/2020	Revisions to address the "Lessons Learned" document following completion and adoption of the 2016 TNI Environmental Laboratory Sector Standard and the 2019 ANSI Audit.
3.1	06/11/2020	Editorial changes made to Sections 1.1, 1.3, and 14.0; definitions added for Content Management System and Dominance
3.2	07/17/2020	Editorial changes made to Sections 1.4.2, 2.1.1, 3.3, 5.3.1, 5.4.2, and 5.4.4 per ANSI review; changed references to teleconference and face-to-face meetings to virtual meeting and in-person meeting, respectively.
3.3	08/14/2020	Added abstain to section 5.3.1 per request from ANSI. Added SOP 1-102 to Section 2.0
3.4	1/19/2021	Clarify opportunity for negative votes/comments or objections to present and amend their votes/comments consistent with <i>ANSI/ER Section 2.6</i>
4.0	10/09/2023	Revised to reflect approved format, changes in actual practice, and to present the SOP in the active voice'.
4.1	02/08/2023	Revised Affiliate definition; added formatting review of final Standard. Changed 'shall' to 'must' throughout document.
4.2	03/01/2023	Retained the first bullet in 8.2 and revised the second bullet. Revise 8.3.6 with no change in intent. Revised 8.3.6.2 for clarity. Revised 8.3.6.3 to remove unresolved. Conforming changes to 8.3.8. Revised 8.4.4 and created 8.4.5, and 8.4.6 to clarify the process. Revised 8.5.5 and 8.5.6 for clarity. Removed language from 8.5.7 relative to review by LASEC and NELAP AC.
4.3	04/14/2024	Clarified the role of the CSDP EC in 8.4.6
4.4	09/11/2025	Clarified in Section 2 that the CSDP EC is responsible for this activity. Added 4 SOPs to Related Documents. Clarified 6.1, 6.2, 8.2, 8.3, 8.4, and 8.5 to reflect actual practice. Other minor editorial changes and corrections with no change in intent.
4.4	9/11/2025	9/19/25: Edits to section 8.5.1 and addition of section 8.6.7 on file naming conventions to conform to SOP 2-103. Since these were minor conforming changes, the revision number and effective date was not changed.

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4.5	3/6/26	Templated language announcing the issuance of a Notice of Intent (NOI) or Draft Standards has been added to Sections 8.2, 8.3.5.1, and 8.5.2 References to ANSI requirements removed in sections 1.0, 5.1.1, 5.1.2, 8.2, 8.3, 8.3.5, 8.5.6, 8.6.3, 8.6.4, 8.6.5, 8.6.6; Clarified the list of individuals to be notified of standards activity in 8.2 and 8.3.7; Clarified 8.3.3 by adding language about committee deliberations and deleting 3 subsections that were a ANSI requirements; Sections 13-17 (Patent Policy, Antitrust Policy, Commercial Terms and Conditions, and Metric Policy, all ANSI requirements) removed in their entirety; References to ANSI Essential Requirements and ANSI Standards Action in the former Section 17 (now Section 13) removed; Revised the definition for the NEFAP EC; Other minor editorial corrections Other sections re-numbered as a result of these changes.
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Appendix 1. Notice of Intent Form
Notice of Intent to Establish or Modify a TNI Standard

Expert Committee:		Proposal Date:		CSDPEC Approval Date:	
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TNI Volume/Module	Section(s)

Potentially impacted stakeholders/stakeholder groups:

Nature of the standard to be established or modified.

If a new standard, provide a justification or need for the standard:

If a modification of an existing standard, how will the proposed changes be an improvement over the existing standard:

Any potential conflicts with the other standards and/or Modules of TNI Standards:

Potential economic impact:

Other potential suitability issues (enforceability, implementability, auditability):

Signature of proposal representative:

Date:

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Appendix 2. Justification Form

Standard Update - Summary of Changes and Justification

#	Original Text	Change	Justification
	<i>Include current reference and language. (If presented for public view, ISO language should only be referenced.)</i>	<i>Don't need to work on specific language - just summarize change needed.</i>	<i>Why does this need to be changed/updated?</i>

Note: This table can be used to prepare for a public meeting to seek stakeholder input.

Note: When the standard has been developed and is presented as a Draft Standard, a new version of this table is prepared noting the actual changes made to the current version of the Draft Standard. The "Suggested Change" column will include the actual language from the DS. The "Original Text" column will include the language from the previous (if any) standard. The "Justification" column states the reason for the change and provides any additional comments the expert committee thinks are pertinent.

Note: An additional Comment column may be added to this form to collect comments on each Change.

Appendix 3. Response to Comments Form

Title – Volume/Module being drafted

Disclaimer: The NELAC Institute (TNI) accepts no liability for the content of any comment on a standard. Any views or opinions on a standard are solely those of the commenter and do not necessarily reflect those of TNI.

Comment Number	Committee Décision ¹	Section	Comment	Committee Action	Date Addressed	Committee Comment	Submitter	Submitter Contact Info	Date Submitted	Date & Method of Submitter Notification
1	<i>P</i>	<i>1.2.3.4</i>								
2	<i>NP</i>	<i>1.0</i>								
3	<i>NP</i>	<i>4.3</i>								
4	<i>E</i>									

Committee decision – *Persuasive (P)* / *Non-Persuasive (NP)* / *Editorial (E)*

Tips for data entry:

Consider using a different worksheet for each set of comments, all in the same workbook, to distinguish public meetings and various stages of development of the standard/module. An Excel file with this template is available from the committee's Program Administrator, or you can easily create one from this template.

Comment Number – enter these manually in spreadsheet, because if you do previous-cell-plus-one, the numbers will not remain when you sort the spreadsheet/comments into sequential order so that you can work through the text of the document easily.

Section – enter the section number referred to in the comment. You will later use this to sort comments so that you can work through them in order, even though you have presumably entered them sequentially as they arrived.

Comment – copy the language submitted as comment into this cell. Expand the cell and “wrap text” as needed.

Committee Action – record what action the committee decided to take, in complete enough form that you can simply copy this line of the spreadsheet and send it to the submitter later, as notification of action taken.

Date Addressed – this should reference the date(s) of the meeting where the comment was discussed and thus recorded in the minutes.

Committee Comment – Justification for a decision on Persuasive or Non-Persuasive must be included here. Additional comments may be added as appropriate.

Submitter, Submitter Contact, and Date Submitted – these are in the right-most columns so that you can strip them out or conveniently hide them without disrupting formatting when displaying the comments for public discussion. It is acceptable to leave the identities in place while working in committee only, but in minutes, public sessions or webinars, names should not be routinely included unless the commenter was invited to address the committee about the comment and would thus be identified in the minutes anyway. If you strip out the names, be sure that you make a separate copy of the worksheet first, since you will need them later to notify the submitter of the action taken on their comment, and that will require reuniting name/info with the comments, later. If you hide the identities, consider “protecting” the worksheet before distributing it beyond the committee members.

Date and Method of Submitter Notification – for Draft Standards, you must notify the submitter about the disposition of their comments. This column provides an easy way to verify that was done.

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REMEMBER: Always save a duplicate copy of any file you will need again, in a different drive or attached to an email somewhere!