

SOP TITLE	NEFAP Standard Interpretations
SOP NO.	5-106
<b>REVISION NO.</b>	1.2
PROGRAM	NEFAP

# SOP Approval Dates

	Initial Approval	Last Revision	Last Review
Committee: NEFAP Executive	8/6/2012	3/20/24	
Program: NEFAP		3/20/24	
Policy Committee Review	9/12/2012	7/19/2024	
TNI Board of Directors	NA	NA (9/11/2024)	
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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.
- 1.2 Interpretations are provided only on TNI FSMO Standards specific language. Interpretation requests on ISO/IEC 17025 language and ISO/IEC 17011 language are not 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 direct inquiries to the Field Activities Expert Committee (FAC) and any other TNI committee who has 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 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. An agreement between these two individuals determines whether the inquiry is actually an SIR. If it is deemed to be an SIR, it is forwarded to the FAC (or appropriate committee) to respond to the request. 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 1-102, Voting Rules for TNI Committees

SOP 1-104, Control of TNI Documents

### 4.0 Definitions

Term	Definition
FSMO	Field Sampling and Measurement Organization.
Field Standard	The current approved TNI Field Sampling and Measurement Organization Sector Standard.

### 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). This request must 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 Field 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 NEFAP Program Administrator with his/her recommendation on whether the question is a SIR and if appropriate, which committee should respond to the question. SIRs are forwarded to the FAC (or appropriate committee). If there is agreement between the NEFAP EC Chair and the NEFAP Program Administrator, the SIR is processed. If there is not agreement there is email correspondence or a conference call between the NEFAP Chair and the NEFAP 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 Field Standard, the NEFAP 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 NEFAP Program Administrator.
  - 5.2.4 If it is determined that the question is the result of an accreditation dispute with an AB, the NEFAP 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 NEFAP Program Administrator.
  - 5.2.5 If it is determined that the question is a standards interpretation inquiry, the NEFAP Program Administrator forwards it to the FAC (or appropriate committee) for a response and emails a letter to the inquirer. The identification of the inquirer must not be included. 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.

- 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 NEFAP 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 NEFAP Program Administrator. The final response is reviewed by the committee for accuracy with the committee discussion or for editorial changes.
  - 5.2.6.1 When an SIR is discussed in a 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 The committee votes on the response, and if approved, it is forwarded to the NEFAP Program Administrator.
- 5.2.7 The NEFAP 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 1-102). 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 Field Standards.
- 5.3.3 The interpretation must be within the boundaries and scope of the Field Standard, that is, an interpretation is neither a new standard nor an addition to the current standard.
- 5.4 Finalization of the Response

Once the interpretation is finalized, the NEFAP 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 ABs, and accredited FSMOs. The interpretation is in effect until such a time as the Field 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 NEFAP Program Administrator maintains an Excel table to track all SIRs and their status.

### 6 References

SOP 1-102 - Voting Rules for TNI Committees

#### 7 SOP Approved Changes

Revision No.	Effective Date	Description of Change
0	8/6/12	New Document.
1	1/13/15	Expanded on purpose, how discussion should be recorded, and clarify what should be submitted.
1.1	3/20/24	Provide new voting SOP reference, correct placement of Reference and Related Documents, remove "shall", update definition of Standard to NEFAP Standard, and specify which Program Administrator.
1.2	07/19/24	Added that almost all SIRs are handled by the FAC.